



CATHOLIC EDUCATION
WESTERN AUSTRALIA

Modern Slavery Statement

2019–2020

Catholic Education Western Australia Limited

ABN 47 634 504 135

Acknowledgement of Country

Catholic Education Western Australia Limited (CEWA) acknowledges the Traditional Owners of the lands on which we live, learn and work. CEWA acknowledges the continued deep spiritual connection and relationship of Aboriginal people to country and commits to the ongoing journey of reconciliation.

Disclosure Note

This statement has been made on behalf of Catholic Education Western Australia Limited. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Catholic Education Western Australia Limited as a single reporting entity.

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About Us

Catholic Education Western Australia Limited (CEWA) is the second largest education provider in Western Australia, providing a faith-based education for 17% of the State's total school-age population, including 19% of all secondary students. In 2020, approximately 77,000 students were enrolled in 163 Catholic schools across Western Australia.

CEWA provides employment for more than 11,000 staff, making it the State's fourth largest private employer and a significant contributor to the WA economy.

CEWA, through the [Catholic Education Commission of Western Australia \(CECWA\) Strategic Directions 2019–2023](#), has a particular focus of ensuring the accessibility, affordability and sustainability of Catholic schools. CEWA is committed to making a Catholic education available to any family who seeks it for their child, and CEWA schools and offices strive to support all students, regardless of their individual circumstances, to receive quality education, care and support to enable them to make a positive contribution to society, both now and beyond their school years, in line with the values of Catholic Social Teaching.



Photo: St Anthony's School, Greenmount

Modern Slavery

'Modern slavery' is an umbrella term that describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights and are crimes under the *Criminal Code Act 1995 (Cth)*.

This Act defines modern slavery as encompassing slavery and slavery-like practices, including servitude, forced labour, the deceptive recruiting for labour or services, debt bondage, forced marriage, human trafficking, and the worst forms of child labour. Appendix 1 of CEWA's Modern Slavery Prevention Policy provides information on the types of modern slavery relevant to business.



Statement

The Most Reverend Gerard J Holohan DD,
Bishop of Bunbury and Chair, Catholic
Education Commission of Western Australia



We welcome the *Modern Slavery Act 2018* (Cth) and the increased awareness, requirement for due diligence and responsibility that this legislation brings to Australian organisations, including Catholic Education Western Australia Limited

(CEWA). We hope that this shared commitment will bring real and lasting improvement and change to labour supply and working conditions on a local, national and global scale.

We also welcome the opportunity to give witness to our Catholic faith, to live out our Gospel values, and contribute to a path of hope for the future, for the millions of people who are trapped in modern slavery.

It is important to recognise that modern slavery is a significant, complex and expanding human rights issue that affects tens of millions of lives. The 'crime against humanity'¹ that is modern slavery is inextricably interconnected with other human rights issues.

The decisions and choices we make, as individuals and as CEWA, significantly affect the livelihoods of people and communities, not just in Western Australia, but across the world – to the extent that responsible procurement is critical for the wellbeing and survival of humankind.

Forced labour is a serious violation of human rights that taints many of the goods we buy and the services we use. Our purchasing choices require ongoing vigilance and risk management. As part of the Catholic community, we must use our significant purchasing leverage to work collaboratively towards its eradication.

On behalf of the Catholic Education Commission of Western Australia, who have approved this statement, I commend it to you.

Bishop Gerard J Holohan
Chair

Catholic Education Commission of Western Australia

¹ Pope Francis speaking in Rome to RENATE (Religious in Europe Networking Against Trafficking and Exploitation), 7 Nov 2016

<https://www.youtube.com/watch?v=sXwOWTKzHY0>



Statement

Dr Debra Sayce,
Executive Director, Catholic Education
Western Australia Limited



Catholic Education Western Australia Limited (CEWA) is a Christ-centred and child-focused community of engaged learning environments, inspiring all to actively live the Gospel.

CEWA has a long standing and firm

commitment to giving witness to the principles of Catholic Social Teaching, especially the dignity of the human person. CEWA's broader mission is to make a significant and socially responsible commitment to the world, both through education of the next generation and through leading with our actions today. In reflecting on what actions are demanded by our Catholic values, we are increasingly aware that our responsibility extends to our procurement choices.

CEWA's [Strategic Directions 2019–2023](#) are underpinned by Catholic Social Teaching and other teachings of the Church. They outline priority areas for CEWA, which include creating and maintaining inclusive communities that welcome and support students with diverse learning and social needs. Our Strategic Directions embody the Church's preferential option for the poor and marginalised. We welcome the imperative that the modern slavery legislation provides to

ensure our operations, including procurement, prioritise decision making that ascribes value to considerations other than the financial cost to the purchaser. The legislation is necessary in focusing our decision making towards those participants in our global supply chains who are materially disadvantaged and so often voiceless.

In line with Church teachings, CEWA advocates for eradication of all forms of modern slavery. In a practical way, this articulates the shared commitment of all Catholics to uphold the respect for human rights, the dignity of work, the rights of workers and the advancement of the common good.

I am very pleased to present CEWA's first Modern Slavery Statement, which has been approved by the Catholic Education Commission of Western Australia and is endorsed by CEWA's Executive Team.

As a community, CEWA is committed to participating with other Catholic organisations in the Australian Catholic Antislavery Network (ACAN) collaboration and appreciates the expertise and guidance that has been and continues to be provided to CEWA by the members of the Antislavery Taskforce.

Dr Debra Sayce
CEWA Executive Director



2019–2020 Modern Slavery Risk Management Initiatives

Through 2019 and 2020, modern slavery risk management initiatives became a focus area aligned with the CECWA Strategic Directions 2019–2023. CEWA became a participant in the Archdiocese of Perth Modern Slavery Working Party with the focus to foster a collective approach in assessing modern slavery risks and to explore how these risks could be addressed.

This shared understanding and the risks it presents to CEWA's operations and supply chains has been enhanced throughout 2020 by consultation with experts. In particular, CEWA's action has been enhanced through participation in the Australian Catholic Antislavery Network (ACAN), a collaboration of more than 30 Catholic entities throughout all states and territories of Australia.

CEWA has facilitated state-wide learning to employees through informative and educative webinars and online forums provided by SD Strategies, a consultancy with significant expertise in integrating human rights and sustainability into decision making.

With this support, CEWA has commenced a focused journey to ensure decision making reflects a commitment to mitigate modern slavery risks, with the intent of making a difference for some of the most resource-poor and disadvantaged people working in goods and services supply chains.

Our Plans for 2021

For 2021, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- Strengthen the consideration of human rights in governance and decision making across relevant CEWA operations and practices
- continue to educate the CEWA community on modern slavery and CEWA's shared, system-wide commitment to the eradication of modern slavery from supply chains and operations
- improve procurement management processes and documentation to guard against slavery or slavery-like practices
- strengthen the ethical considerations in investment analysis and decision making

- implement improved oversight for facilities management services; and
- increase engagement with suppliers to communicate the requirements and effect of CEWA's commitment.

In alignment with ACAN's priorities, CEWA will:

- support Domus 8.7, ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service
- join Sedex, which will enable CEWA to progress supply chain mapping
- enhance supplier risk identification and analysis; and
- continue to provide e-learning courses and webinars across CEWA.



Our Plans Beyond 2021

This statement sets out the steps CEWA has actioned to the conclusion of December 2020.

CEWA has developed a modern slavery prevention implementation plan, which will proactively guide CEWA's strategic actions to undertake this work over the coming years. This document will be submitted to the CEWA Executive Team and the Audit and Risk Committee for endorsement and it will be under regular review and refinement, as appropriate.

The implementation plan outlines CEWA's ongoing commitment to continuous improvement and increased vigilance. Particular focus areas include:

- increasing understanding of CEWA's commitment and program of work
- regularly engaging with suppliers and contractors to communicate CEWA's commitment
- ensuring CEWA's human resources documentation reflects the same commitment to fair work practices that will be expected of contractors and suppliers
- developing and implementing supplier documentation that articulates responsible procurement and the expectation that suppliers and their supply chains operate in a manner consistent with CEWA values, objectives and relevant legislation; and
- providing clear access to a remedy pathway for victims of modern slavery and ensuring CEWA is operating in accordance with the intent of Domus 8.7.





Reporting Criterion 1: About Catholic Education Western Australia Limited

Our Organisational Structure

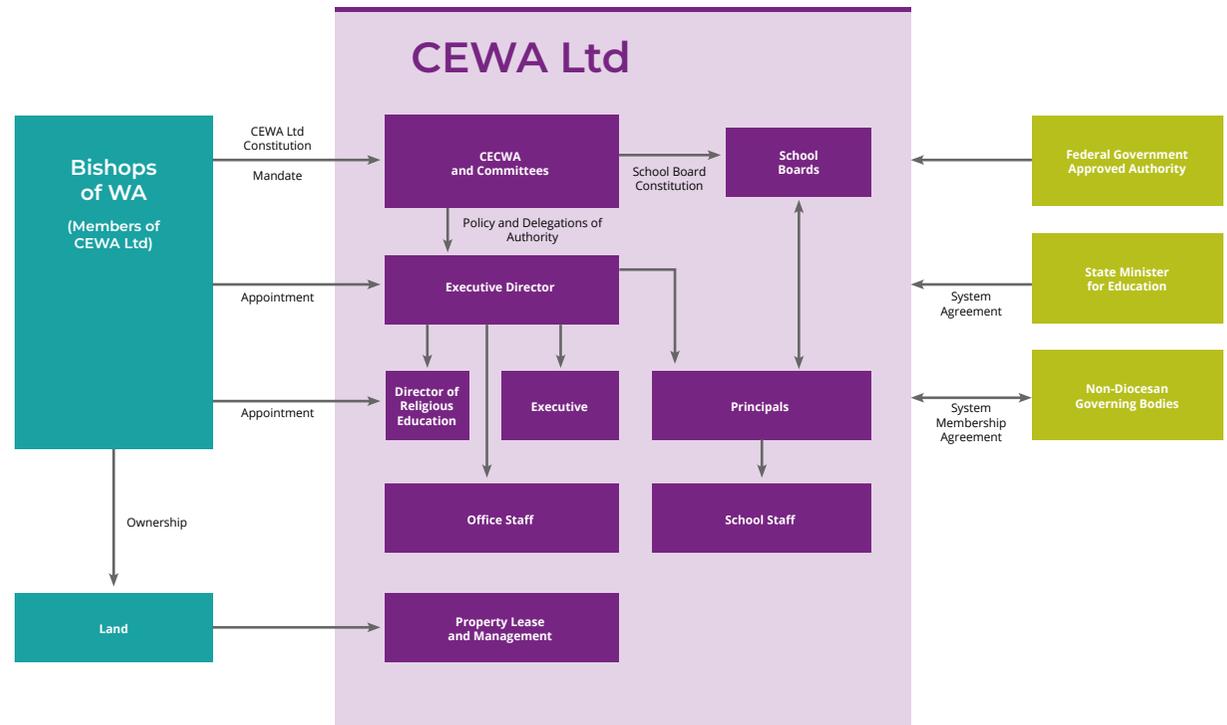
On 1 January 2020, the Bishops of Western Australia formed a new corporate governance structure as an incorporated body for Catholic schools in Western Australia. Catholic Education Western Australia Limited (CEWA) is the governing body for 149 diocesan Catholic schools and provides registration oversight for an additional 14 non-diocesan Catholic schools. The Members of CEWA Ltd are the diocesan Bishops of Western Australia, being the Archbishop of Perth, Bishop of Broome, Bishop of Bunbury and Bishop of Geraldton.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA Ltd is registered with the Australian Charities and Not-for-profits Commission (ACNC).

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA Ltd, directs CEWA to develop learning opportunities that fulfil the goals of Catholic schools, as outlined in the [Bishops' Mandate Letter](#). CECWA is supported through five committees, established to advance the strategic priorities of CEWA Ltd. These committees are:

- Aboriginal Community
- Audit and Risk
- Catholic Education Community
- Curriculum
- Finance

The new incorporated structure is illustrated below.





Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)

CEWA's latest published *Annual Report (2019)* is available [here](#).

Diocesan and non-diocesan schools

As mentioned above, in addition to the 149 diocesan schools, the CEWA system includes 14 schools that are governed by eight non-diocesan governing bodies. For the purposes of school registration in WA, the non-diocesan schools are included within the Catholic Education System, creating CEWA Ltd responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

CEWA Executive Team

Dr Debra Sayce is the Executive Director of Catholic Education Western Australia. In 2020, the Executive Director was supported by the following Directors within the CEWA Executive Team:

- Wayne Bull – Deputy Executive Director
- Mandy Connor – Director Teaching and Learning
- Dr Chris Cotter – Director Religious Education
- Dr Tony Curry – Director Leadership and Employee Services
- Gerry Doyle – Director Finance, Planning and School Resources; and
- Dr Edward Simons – Director Governance, Strategy and Digital Technology.

The CEWA Executive Team is based at CEWA's largest office in West Leederville and is supported by approximately 290 office staff working across the four Catholic dioceses in Western Australia.



Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)



Photo: Majella Catholic Primary School, Balga

Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of the Australian Securities and Investments Commission (ASIC), Australian Charities and Not-for-profits Commission (ACNC), the Bishops of Western Australia, the Federal Government, the State Government and CEWA's students, stakeholders and community.

The CEWA Code of Ethical Conduct sets out CEWA's expectations for all employees, with Dignity of the Human Person as a core focus area.

CEWA has 40 system-wide policies that meet regulatory expectations and have been approved by CECWA. Of particular note, CECWA approved the Modern Slavery Prevention Policy in November 2020 following a collaborative policy development process. The CECWA Modern Slavery Prevention Policy and associated program of work will be monitored by CECWA's Audit and Risk Committee and Finance Committee. Both committees have oversight of the initiatives that relate to CEWA's commitment to the eradication of modern slavery from all operations and supply chains, although other committees have input as necessary.

A risk management framework has been implemented across the CEWA system – at both enterprise level and individual school level. CECWA has overall responsibility for implementation and oversight of the risk management program and is assisted by the Audit and Risk Committee in this work. The breadth of risks addressed is wide and includes risks relating to modern slavery.

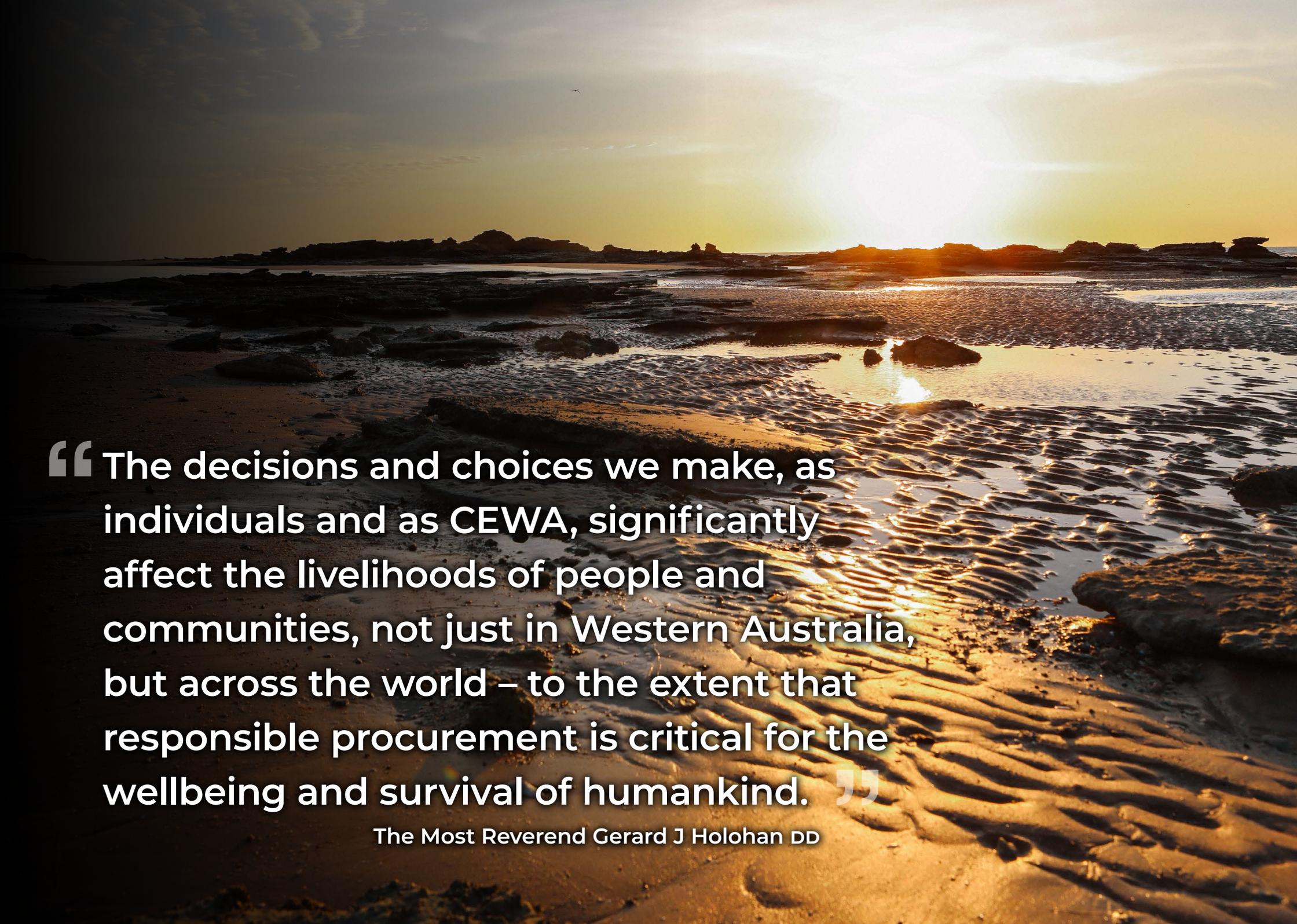
Throughout 2019 and 2020, CEWA undertook a significant policy review focusing on consolidating the complex policy environment for Catholic

schools in Western Australia. The new policy structure has been approved in principle by CECWA, for implementation on 1 January 2021. As a result of this, the Modern Slavery Prevention Policy will be renamed to *Executive Directive – Modern Slavery Prevention*. Other related policy focus areas transferring to the new structure are:

- CEWA's Whistleblower Protection Framework (CECWA Whistleblower Policy in 2020) provides a process for a potential report of modern slavery that would be fully investigated and appropriately actioned.
- The *Executive Directive – Work Health and Safety* will articulate a shared and proactive commitment to the health and wellbeing of one another and ensures everyone goes home safe and well.
- The *Executive Directive – Employment* will outline that bullying, harassment and discrimination are unacceptable and that all staff are to be treated with dignity and respect. This directive provides processes and documentation that ensure employees are paid fairly and in compliance with all applicable labour laws.

An Executive Directive – Procurement is currently under development and will aim to set out principles and practices for ethical acquisition of goods and services.

This is CEWA's first year of reporting under the *Modern Slavery Act 2018* (Cth). CEWA is committed to developing processes to reduce the risks of modern slavery in operations and supply chains, and to improving and enhancing those responses to work towards meaningful change for those most affected.

A sunset over a rocky beach. The sun is low on the horizon, casting a golden glow over the scene. The sky is filled with soft, wispy clouds. The water is calm, reflecting the sun's light. The sand in the foreground is rippled, and the rocks are scattered across the beach. The overall mood is peaceful and serene.

“ The decisions and choices we make, as individuals and as CEWA, significantly affect the livelihoods of people and communities, not just in Western Australia, but across the world – to the extent that responsible procurement is critical for the wellbeing and survival of humankind. ”

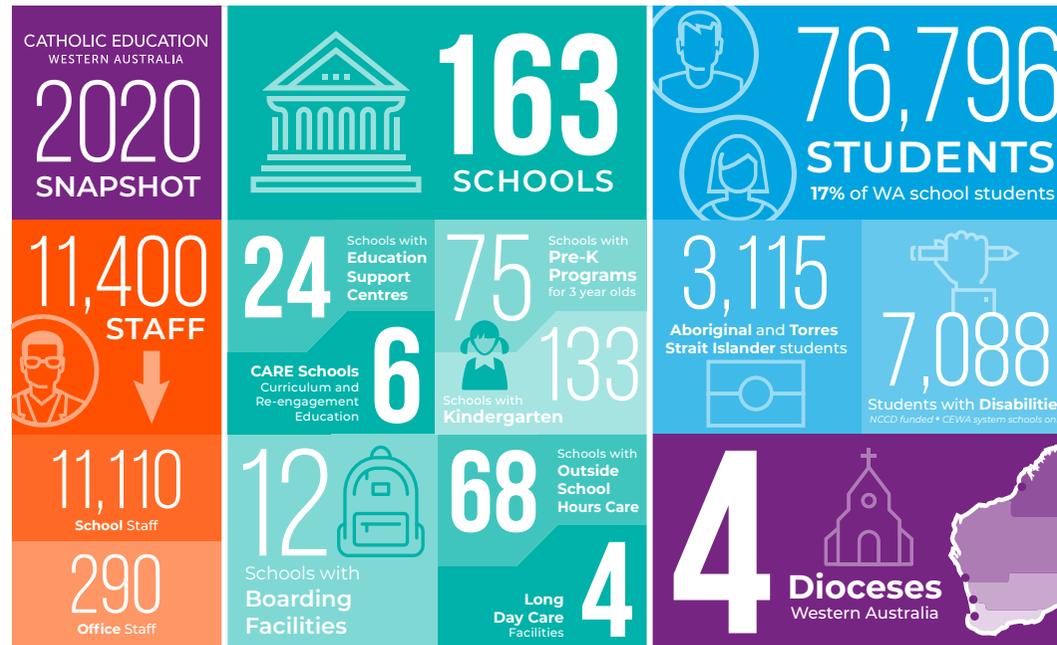
The Most Reverend Gerard J Holohan DD

Reporting Criterion 2: Operations and Supply Chains

Our Operations

CEWA is responsible for the provision of Catholic education throughout the state of Western Australia and is the second largest school system in the state after the Department of Education.

An overview of CEWA's reach in 2020 is provided in the figure below.



As well as playing a pivotal role in supporting the sustained learning and development of children and young people, Catholic schools provide vital pastoral care and wellbeing support.

CEWA also engages with contractors and subcontractors to service cleaning, waste management and some maintenance requirements and acknowledges that labour hire is a high-risk area. Accordingly, CEWA is careful to work with reputable recruitment agencies. It is anticipated that due diligence in this area will increase in the coming year with the introduction of appropriate supplier documentation, including a Supplier Code of Conduct that ensures contractors

adhere to fair work practices and pay at least the national minimum wage or applicable Award pay rate, as appropriate. The documentation is also expected to set out social, environmental and ethical expectations of suppliers, including the requirement that forced, involuntary or underage labour is expressly forbidden. Construction and capital development account for significant spend within CEWA due to new school construction, and the provision of new and upgraded facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas will also be subject to the same improved due diligence processes.



Reporting Criterion 2: Operations and Supply Chains (continued)

Our Supply Chains

Across CEWA, purchases are made at a system level and this report is focused on purchases that are driven by decisions made centrally. However, school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases.

Through further system alignment as a result of incorporation, including the planned appointment of a procurement manager, it is anticipated that future ethical purchasing decisions will be made by the system, with schools potentially operating through a preferred suppliers' program.

CEWA acknowledges that uniform purchasing, although not system managed, is known and acknowledged to be a potentially high-risk area, both with regards to cotton growing and garment manufacturing.

CEWA has identified, through a procurement review, that the CEWA office purchases a wide range of goods and services, including in the areas listed below:

- construction services and suppliers
- cleaning and security
- electronics
- furniture and stationery
- food and catering supplies
- travel and accommodation services; and
- books and printing.

In 2019 CEWA procured \$202,130,000 of goods and services from approximately 6,179 direct suppliers², predominantly Australian suppliers. These purchases include cleaning, catering, building contractor and security and waste service provision, all of which are known to be at increased risk of worker vulnerability, labour exploitation and modern slavery due to the low level of pay and the high prevalence of employment of migrant workers.

CEWA recognises that the supply chains of our Tier 1 suppliers, and therefore CEWA's own supply chains are interconnected, complex and diverse, and extend beyond Australia. CEWA supply chains are connected with the lives of many people worldwide – and it is acknowledged that slavery is a reality for many of them.

It has been identified that our extended supply chains present our highest risks for modern slavery.

CEWA is committed to working with highest risk, highest spend Tier 1 suppliers during 2021 and providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA anticipates extending that oversight to the extended supply chain.



In 2019 CEWA procured

\$202.13M

of goods and services

These goods and services were sourced from approximately

6,179

predominantly Australian suppliers

² Figures relate to 3rd party suppliers to diocesan schools and CEWA offices.

Photo: St Mary's College, Broome



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains

As of December 2020 CEWA supported

11,423

teaching and non-teaching jobs

\$1.64bn

GVA contribution in 2019; 17% of total
WA Education & Training sector

CEWA acknowledges that business and procurement activities could cause, contribute to or be directly linked to modern slavery practices in line with the United Nations Guiding Principles on Business and Human Rights and the associated reporting requirements of the *Modern Slavery Act 2018* (Cth). The risks of CEWA causing or contributing to modern slavery practices have been assessed as low, however it has been identified that CEWA's greatest modern slavery risk is through supply chains. CEWA seeks to prevent, mitigate and where possible remediate adverse human rights impacts that are directly linked to operations, products or services by business relationships, even if CEWA has not directly caused or contributed to those impacts. CEWA recognises that connections exist beyond daily operations and due diligence must necessarily extend to those activities.

Operational Risks

CEWA's COVID-19 response

CEWA is aware that the COVID-19 crisis is having a devastating health and economic impact globally. The economic and human rights effect on the most vulnerable and resource-poor in extended supply chains is of particular significance, and CEWA is concerned that workers, particularly in longer, more complex supply chains are likely to face increased vulnerabilities and exposure to modern slavery risks.

CEWA is aware of the importance to understand the risks of uniform suppliers, for example, as garment factories face the potential for increased health risks if a lack of PPE and overcrowded working conditions are not properly addressed.

The requirement to supply essential safety items, such as face masks and hand sanitiser very quickly and in vastly increased quantities has exposed a risk that availability and speed of supply was considered over and above the due diligence and checking of new suppliers.

From an operational perspective, CEWA focused on the health and wellbeing of staff and students and maintained educational continuity in line with Federal and State Government response strategies. Ensuring continuity of operations also meant that CEWA was able to maintain contractual obligations with suppliers and contractors, guarding against job losses that would have put workers at increased risk of being exploited. Of particular note is the speed at which CEWA staff necessarily worked to appoint cleaning companies that would be able to respond swiftly and according to government guidelines in the event that a case of COVID-19 was detected within a CEWA site. The tender that was issued specifically required tenderers to respond to questions that provided surety against modern slavery risks.

Improved oversight of CEWA's suppliers' exposure to modern slavery risks as a result of COVID-19 will be incorporated into a process of increased vigilance and supplier review and engagement that will be developed during 2021.

CEWA's people

As of December 2020, CEWA supported 11,423 teaching and non-teaching jobs, approximately 80% of which were female.³ It is estimated that the total Gross Value-Added contribution to the WA economy is approximately \$1.64 billion, which represents almost 17% of the WA Education and Training sector per year.

³ These figures include staff in diocesan schools and offices, including casual staff.

Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)



CEWA recognises the need for heightened due diligence across areas that are known to be at high risk of modern slavery, including cleaning contractors, and aims for employment documentation and contractor/subcontractor engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well documented and communicated policies and processes in place to ensure compliance with national and state employment law and legislation throughout the system. All employment related policies and processes are regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly. CEWA also conducts regular and ongoing training to continually upskill and build capacity in system leaders to ensure appropriate legislation and best employment practices are adhered to. If a case of modern slavery were suspected, it would be fully investigated and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any CEWA policies.

Research

Recognising that management of modern slavery risks calls for a collaborative, multi-stakeholder approach, transparency of disclosure and the integration of decision-making oversight into all operational aspects, CEWA considers that an ethical human rights approach to the approval of research applications is important.

The Executive Director is responsible for two forms of research that are facilitated across CEWA:

- research that occurs in CEWA schools or offices; and

- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

All research is quality controlled by the Australian Government document [National Statement on Ethical Conduct in Human Research 2007; \(2018 Update\)](#). Each researcher is required to place their research under the scrutiny of a registered Human Research Ethics Committee, which uses the National Statement to assure ethical approaches including the rights, safety, fair treatment and needs of all participants – children and adults – especially those from vulnerable populations, such as migrant families, whose families are engaged in high-risk work practices, such as third party labour hire or who work in high-risk product or service areas, such as cleaning or construction.

The CEWA research approval process provides a further layer of scrutiny, which, among other things, considers any issues associated with coercive practices related to modern slavery.

Similarly, any research partnerships negotiated with CEWA would take into consideration the good standing, past and existing ethical conduct of the proposed partner, including any connection to the coercive practices of modern slavery by that organisation and any entities known to be linked to them.

Investments

CEWA recognises that investment activities also provide a connection to companies and organisations that may have varying commitments to upholding human rights. The activities of these



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

organisations will also have repercussions on the lives and vulnerabilities of people engaged at various stages of their operations and supply chains; as such there is a real ethical, safety and human rights issue. CEWA recognises there is a direct stewardship responsibility that results from this potential risk that requires assessment and management of potential modern slavery risks in investment portfolios.

CEWA’s investment activities account for the management of \$172,360,000 worth of assets.⁴ CEWA is committed to an holistic approach to human rights due diligence across all operations, including CEWA’s investment activities. CEWA will work closely with investment advisors to ensure that investment advice and recommendations adequately consider the oversight and due diligence of potential investment opportunities, especially where these opportunities are in sectors known to be at increased risk of labour and human rights abuse. It is intended that proactive inquiry into the modern slavery readiness and the transparency and effectiveness of companies’ responses will form the basis of this work.

In line with CEWA’s investment policy, which summarises the organisation’s approach to investments, all investment managers are signatories of the United Nations Principles of Responsible Investment and share CEWA’s commitment to assessing environmental, social and governance (ESG) concerns (including human rights issues, such as modern slavery) in investment decisions. ESG considerations are integrated into investment decisions and CEWA proposes a review of those considerations in the coming year to ensure they remain fit for purpose.

Modern slavery gap analysis

A gap analysis was undertaken to understand the modern slavery risks facing CEWA and identify areas for improvement. The analysis was first undertaken during July 2019 and the exercise was repeated in December 2020. Several areas of improvement were identified. The comparative results are presented below in a heat map.

Category	Topic	Result 2019	Result 2020	Change
Management Systems	Governance	●	●	↑
	Commitment	●	●	-
	Business Systems	●	●	-
	Action	●	●	↑
	Monitor / Report	●	●	-
Risk Management	Risk Framework	●	●	-
	Operational Risk	●	●	-
	Identifying External Risks	●	●	↑
	Monitoring and Reporting Risk	●	●	-
Procurement and Supply Chain	Policy and Procedures	●	●	-
	Contract Management	●	●	-
	Screening and Traceability	●	●	↑
	Supplier Engagement	●	●	-
	Monitoring and Corrective Action	●	●	-
Human Resources and Recruitment	Awareness	●	●	-
	Policies and Systems	●	●	-
	Training	●	●	↑
	Labour Hire / Outsourcing	●	●	-
Customers and Stakeholders	Customer Attitude	●	●	-
	Information Provision	●	●	↑
	Feedback Mechanisms	●	●	↑
	Worker Voice	●	●	-

- Legend**
- Leading practice
 - Making progress
 - Starting out
 - At the starting line

CEWA investment activities account for the management of
\$172.36M
worth of assets.

⁴ As of 31 December 2020. Does not include cash and term deposits invested with the Catholic Development Fund.



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

Supply Chain Risks

During the second half of 2019 and throughout 2020, CEWA engaged external expertise to help identify potential risks in supply chains. In addition, CEWA has accessed publicly available research and media reports.

This research and analysis have led to the opportunity to consider procurement actions including the appointment of a procurement manager in 2021. The findings will also enable CEWA to engage effectively with suppliers in two ways:

- educating and providing information around modern slavery risks, and
- embedding appropriate oversight and documentation into the process to onboard new suppliers, increase due diligence of existing suppliers and pre-qualify companies tendering for work.

In considering supply chain risk, CEWA focused on the following areas:

- **Industry sector** – CEWA procures construction and facilities maintenance services, which are known to be high risk for both domestic instances of modern slavery and for the manufacturing of products used in the course of those operations.

- **Commodity/product** – Specific products and commodities are deemed high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials. CEWA recognises, for example, that electronic equipment contains metals and minerals that may be sourced from regions known to be at high risk of modern slavery practices.
- **Geographic location** – The risk based on geographic location is based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While CEWA predominantly engages Australian suppliers, it is recognised that goods and associated services may come from countries other than those of suppliers’ headquarters, CEWA recognises, for example, that electronic goods from Malaysia would be considered to be at high risk of modern slavery.
- **Workforce profile** – In undertaking the supplier analysis, CEWA considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).



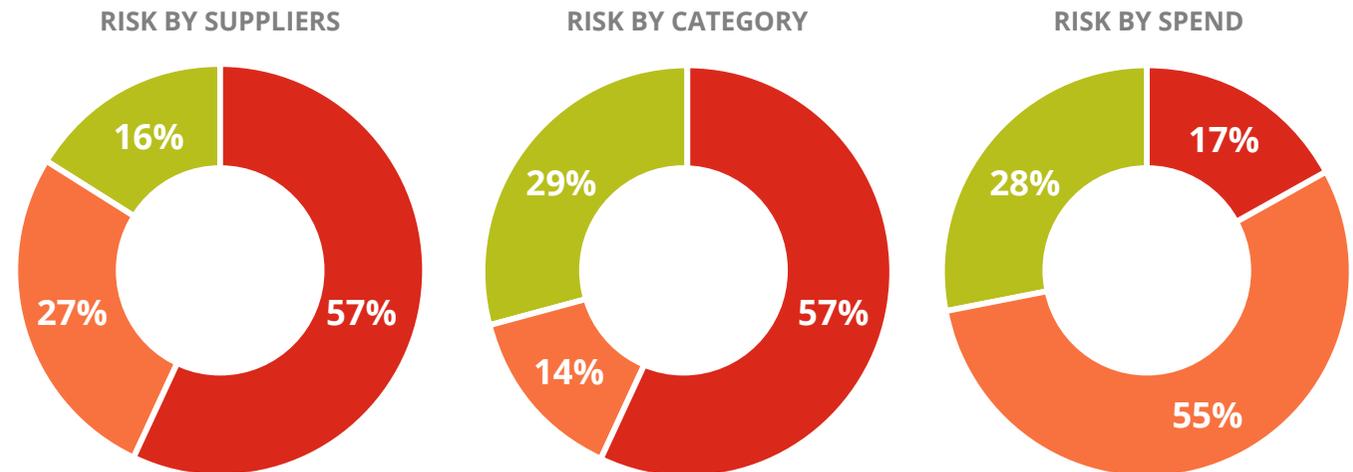


Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

Supplier risk identification and prioritisation

In July 2019, CEWA worked with a team of external experts to conduct a spend data analysis of the top 50 suppliers by spend as well as suppliers of key high-risk goods and services, regardless of the level of spend. Analysis of these data produced the results shown in the Supplier Risk Dashboard below.

● Low Risk
● Medium Risk
● High Risk



Actual risk has not been determined as CEWA has not yet conducted detailed investigation or analysis of the results of any investigation. The review highlighted the need to analyse supply chains especially for high-risk products and geographies, particularly for areas of highest spend. The new procurement manager will have oversight of the supply chain management.

This will be a focus of work to be undertaken in 2021.

CEWA's risks were assessed against the Risk Taxonomy document provided by external advisors.

From that assessment, CEWA recognised that the highest risks are:

- in the construction industry – both in labour hire and sourced materials used
- in outsourced, labour intensive and low skilled work, particularly facilities management including cleaning and security; and
- in supply chains, especially beyond tier 1 suppliers.



Reporting Criterion 4: Actions Taken to Assess and Address Risks

CEWA's focus for 2019 and 2020 was on strengthening CEWA's shared understanding of modern slavery and assessing the potential risks in CEWA's operations and supply chains.

Specific actions undertaken are depicted in the table below:

FOCUS AREA	ACTIONS	FOCUS AREA	ACTIONS
Building CEWA's understanding of MS risk	<ul style="list-style-type: none"> Attendance at the Eradicating Modern Slavery from Catholic Supply Chains conference in Sydney, July 2019. Active participation in ACAN. Production of a video to demonstrate CEWA's shared commitment, including involvement from several groups across the Archdiocese and dioceses, including all four WA Bishops. Webinars that addressed different aspects of modern slavery. Expert guest contributors presented on webinars 2–4. <ul style="list-style-type: none"> Webinar 1: Introduction to Modern Slavery Webinar 2: The Modern Slavery Act (with Alison Rahill, Anti-Slavery Taskforce, Archdiocese of Sydney) Webinar 3: Modern Slavery: Closer than you may realise (with Nicole D'Souza, Ethical Sourcing Manager at Konica Minolta; and Katy Welch, Senior Supervising Solicitor at The Humanitarian Group) Webinar 4: Forced Marriage (with Laura Vidal from Good Shepherd Australia New Zealand). Laura prepared a Tip Sheet for Responding to Forced Marriage in Australia, which was shared with participants and more widely through the dedicated CEWA-wide Modern Slavery Team. 	Incorporating Modern Slavery Prevention into the governance structure	<ul style="list-style-type: none"> Development and promulgation of a Modern Slavery Prevention Policy. Inclusion of modern slavery in CEWA's risk framework and register, and also in the CEWA school risk management framework. Development and promulgation of CEWA's Whistleblower Policy providing a process for modern slavery issues or risks to be raised confidentially and/or anonymously by those covered by the whistleblower legislation. CEWA Executive Team approved the CEWA offices registration as Fairtrade workplaces. Preliminary work to develop a suite of documentation, including a Supplier Code of Conduct, to facilitate a consistent approach to engaging with suppliers that will most effectively manage modern slavery risks in contracts and procurement.
			Engaging with our contractors and suppliers
		Committing to strengthen CEWA's response	<ul style="list-style-type: none"> Establishment of a modern slavery group on Microsoft Teams that invites participation from all CEWA schools and offices. Deployment of ACAN-developed e-learning MS101 training course on CEWA's learning platform, piloted by 11 staff. Social media posts during the week of UN World Day Against Trafficking in Persons, and also during Fairtrade fortnight. Article published in The Record – reported on activities within the Archdiocese on UN Day Against Trafficking in Persons.

Reporting Criterion 4: Actions Taken to Assess and Address Risks (continued)



Photo: Liwara Catholic Primary School, Greenwood

Modern Slavery Action Plan and Road Map

It is CEWA's commitment that the future action plan would be a collaboration across all Catholic schools and offices. The implementation plan will assign certain deliverables to different teams or groups within CEWA.

In order to progress this implementation plan effectively, CEWA intends to establish a working party, with appropriate expertise and Executive sponsorship to develop and progress CEWA's response to modern slavery. Additional oversight will be provided by the CEWA Executive Team and the CEWA Audit and Risk Committee. It is expected that CEWA's immediate next steps will be:

- continuing to work in collaboration with ACAN, engaging in the modern slavery risk management program. Participation in this program will support CEWA in:
 - respecting the priority to provide appropriate and timely remedy to people impacted by modern slavery
 - through Sedex membership, understanding our supply chains more fully to best engage, manage and onboard suppliers
- working to increase uptake of the offered e-learning courses and webinars to educate all staff on the shared commitment to modern slavery eradication from operations and supply chains
- improving procurement management processes and documentation to guard against slavery or slavery-like practices; and
- increasing engagement with suppliers to communicate the requirements of CEWA's modern slavery commitment.

Provision of Remediation Solution Through ACAN

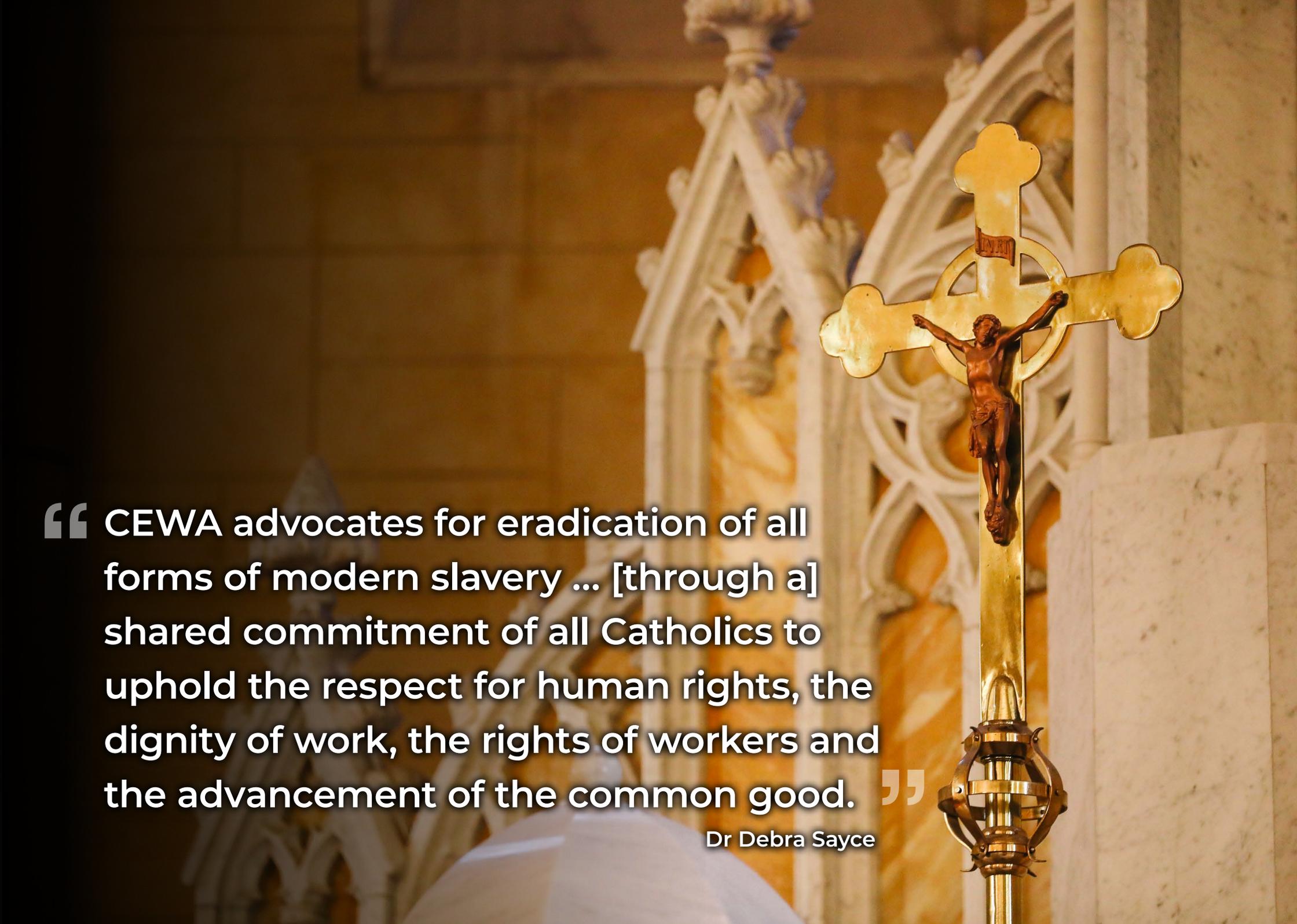
CEWA is committed to ensuring provision of appropriate and timely remedy to people impacted by modern slavery, in accordance with the [United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities](#) and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CEWA is found to have caused or contributed to modern slavery.

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, CEWA, is a founding partner of [Domus 8.7](#), an independent program to provide remedy to people impacted by modern slavery.

Where CEWA is directly linked to modern slavery by a business relationship, CEWA is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

When suspicions of modern slavery practices come to CEWA's attention through a whistleblower disclosure or another channel, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

CEWA has funded a 'Remedy Pathways' module in its modern slavery e-learning course that will be available to staff and other stakeholders in 2021.



“ CEWA advocates for eradication of all forms of modern slavery ... [through a] shared commitment of all Catholics to uphold the respect for human rights, the dignity of work, the rights of workers and the advancement of the common good. ”

Dr Debra Sayce



Reporting Criterion 5: Effectiveness Assessment

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic Social Teaching principles.

Specific means of monitoring and evaluating CEWA's modern slavery prevention efforts will need to be developed and this will be an area of focus for the working party. It is anticipated that this will entail increased engagement and surveying of stakeholders including employees and key suppliers.

Particular findings and learnings include:

- Modern slavery is a complex issue that is often hidden. As such, collaboration, communication, time and sustained engagement are key to reducing the risk and ultimately effecting lasting change.
- CEWA can either cause, contribute to or be directly linked with modern slavery practices.
- As an education community of over 11,000 staff, and almost 77,000 students, CEWA recognises that raising awareness of this important issue and providing appropriate opportunities for staff and stakeholders to increase knowledge on modern slavery is critical.
- Supply chains are CEWA's greatest risk meaning that the greatest risk of modern slavery is through direct linkage with modern slavery practices. Considerable work is required to understand CEWA's supply chains more fully; there is the potential for modern slavery in all aspects of operations and many small but significant steps CEWA can take to mitigate the risk

- Although there is increasing media and publicly available information on the existence of modern slavery, many people do not recognise the gravity of the situation, or that CEWA may play a part in it. CEWA acknowledges its responsibility to continue to educate, raise awareness and suggest actions that can be taken – and especially to provide leadership through meaningful action.

CEWA, through the governance structure, will monitor and improve processes and actions taken to address modern slavery risks on an ongoing basis. CEWA undertakes, and will continue to undertake, the following oversight and review of the effectiveness of the implementation plan:

- Regular reporting to CECWA, Audit and Risk Committee, Catholic Education Community Committee, Finance Committee and the CEWA Executive Team as appropriate
- Engaging with the CEWA community through staff meetings, announcements and information shared through the modern slavery Microsoft Team, and also via social media in connection to particular advocacy days
- Continuing to be vigilant to and process concerns or reports, including whistleblower disclosures, relating to modern slavery; and
- Advance procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2020 CEWA received no disclosures, reports or concerns relating to modern slavery.

Reporting Criterion 6: Process of Consultation with Entities Owned or Controlled

CEWA does not own or control any entities. 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 149 diocesan schools.

While CEWA does not control schools, the system operates within a network of 'connected autonomy'; every school and office is each a part of the CEWA system and a certain level of compliance through system-wide policies and directives is required. Within that compliance framework, schools are encouraged to explore opportunities and initiatives that reflect their individual charisms and priorities for their communities. This directly applies to CEWA's shared commitment to modern slavery eradication, with centrally led processes and requirements and school-initiated projects that reflect their situations, capabilities and interests.

The connected nature of the CEWA system has enabled the establishment of a CEWA-wide Microsoft Team dedicated to modern slavery prevention. All schools have been invited to nominate at least one person to join this Team, which provides shared opportunities for learning, sharing of ideas and support for implementing local initiatives within schools.



Photo: Christ the King Catholic School (Djarindjin Lombadina)



Reporting Criterion 7: Other

In addition to the reporting criteria, CEWA has considered in 2020 and is considering for 2021:

- opportunities to embed modern slavery into the curriculum in a seamless manner; and
- opportunities to create an online student showcase, which could highlight the work of CEWA students on the subject of modern slavery.

During 2020, CEWA has supported several organisations that work to address the root causes of slavery, including Caritas Australia and Catholic Mission. CEWA has also directly supported or connected with organisations both in Australia and abroad that work to support and build the capacity of vulnerable people, including:

- Good Shepherd Sisters Fatima Training Centre in Bangkok for vulnerable, disadvantaged girls and young women
- Australian Catholic Religious Against Trafficking in Humans, and
- The Humanitarian Group, Perth

CEWA intends to continue to collaborate and partner with organisations that advocate for human rights throughout 2021.

This Modern Slavery Statement 2020 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 9 April 2021, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed

Bishop Gerard J Holohan
Chair

Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited

Bishop Gerard J Holohan	Chair
Bishop Michael Morrissey	Commissioner
Dr Graeme Gower	Chair, Aboriginal Community Committee
Mr Wojciech Grzech	Chair, Audit and Risk Committee
Ms Mary Woodford	Chair, Catholic Education Community Committee
Professor Joan Squelch	Chair, Curriculum Committee
Professor Glenda Scully	Chair, Finance Committee
Dr Debra Sayce	Executive Director, CEWA
Dr Edward Simons	Company Secretary

CEWA Executive Team 2020

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Wayne Bull	Deputy Executive Director
Mandy Connor	Director Teaching and Learning
Dr Christopher Cotter	Director Religious Education
Dr Tony Curry	Director Leadership and Employee Services
Gerry Doyle	Director Finance, Planning and School Resources
Dr Edward Simons	Director Governance, Strategy and Digital Technology



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