



CATHOLIC EDUCATION
WESTERN AUSTRALIA

Modern Slavery Statement

2022

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.

Contents



ABOUT US	3
MODERN SLAVERY	3
STATEMENT FROM EVA SKIRA AM CHAIR, CATHOLIC EDUCATION COMMISSION OF WESTERN AUSTRALIA	4
STATEMENT FROM DR DEBRA SAYCE, EXECUTIVE DIRECTOR, CATHOLIC EDUCATION WESTERN AUSTRALIA LIMITED	5
SUMMARY OF ACHIEVEMENTS 2022	6
OUR PLANS FOR 2023	6
OUR PLANS BEYOND 2023	7
REPORTING CRITERION 1: ABOUT CATHOLIC EDUCATION WESTERN AUSTRALIA LIMITED	8
OUR ORGANISATIONAL STRUCTURE	8
OUR GOVERNANCE FRAMEWORK	10
REPORTING CRITERION 2: OPERATIONS AND SUPPLY CHAINS	12
OUR OPERATIONS	12
OUR SUPPLY CHAINS	13
REPORTING CRITERION 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAINS	14
OPERATIONAL RISKS	14
SUPPLY CHAIN RISKS	17
REPORTING CRITERION 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS	18
MODERN SLAVERY ACTION PLAN AND ROAD MAP	19
REPORTING CRITERION 5: EFFECTIVENESS ASSESSMENT	21
REPORTING CRITERION 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED	22
REPORTING CRITERION 7: OTHER	23



About Us

Catholic Education Western Australia Limited (CEWA) is the second largest education provider in Western Australia, providing a faith-based education for 16.7% of the State's total school-age population, including 17.1% of all secondary students. In 2022, over 74,000 students were enrolled in 158 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 10,500 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. Quality Catholic Education (QCE), embraced across Catholic schools and offices, ensures CEWA's commitment to practices that reflect Catholic social teaching. CEWA is committed to making Catholic education available to any family who seeks it for their child. A quality Catholic education, enables children to make a positive contribution to society in line with Catholic social teachings. CEWA schools and offices support all students, regardless of their individual circumstances.



Photo: St Luke's Catholic Primary School, Woodvale

Modern Slavery

Modern slavery 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)*. The 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 Executive Directive provides information on the types of modern slavery relevant to CEWA's business.



Statement

Eva Skira AM

*Chair, Catholic Education
Commission of Western Australia*



Catholic Education Western Australia Limited (CEWA) respects internationally recognised human rights principles and supports the overarching proposition that all businesses have a role to play in eliminating modern slavery.

Modern slavery is unacceptable within our operations and supply chain. We are committed to working in collaboration with our employees, suppliers, and all other relevant groups to tackle this challenge.

Globally, great strides have been made to ensure greater transparency in organisational protocols concerning the protection of human rights and ending modern slavery practices; a commitment that CEWA both supports and recognises as fundamental to our institution.

CEWA welcomed the implementation of the *Modern Slavery Act 2018* (Cth) and the increased requirements on organisations across Australia.

Following extensive consultation, we have been able to identify the mitigation practices required to limit risks that may exist and invite the opportunity to further mature our approach in this discipline.

We commit to doing our part to contribute to a path of hope for the millions of vulnerable people who are trapped in modern slavery. Our program

of work to help eradicate modern slavery by 2030 is reflective of faith and a commitment to live out our Gospel values.

CEWA continues to reflect on and examine practices across procurement, human resources, contractor management and risk management to ensure that we are focused on the wellbeing and social, political and economic equity of humankind.

I encourage everyone to consider what personal contribution they can make to eradicate modern slavery; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change.

It is my hope that CEWA's commitment to this shared goal of eradicating modern slavery will be realised through significant and continuous dedication to ensure the human rights of our students, staff, the wider community and the world are respected and upheld.

On behalf of the Catholic Education Commission of Western Australia I commend this statement and welcome your participation in this ongoing process.

Eva Skira AM

Chair

Catholic Education Commission of Western Australia

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Western Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 2 June 2022.

This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.



Statement

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



At the heart of Catholic Education Western Australia Limited's (CEWA) Christ-centred, child-focused vision, is a recognition of commitment to the dignity of all human persons in need, particularly those who face injustice.

Modern slavery is a complex issue that affects our country. The Global Slavery Index 2018 estimates that on any given day in 2016, there were 15,000 individuals living in conditions of modern slavery across Australia, a prevalence of 0.6 victims for every thousand people in the country.

Informed by [CECWA's Strategic Directions 2019–2023](#) and [Quality Catholic Education \(QCE\)](#) principles, we commit our support for positive change through both the education of our current and future leaders - by leading with example through our actions today.

As a significant education provider in Western Australia, with over 74,000 students, Catholic educators have a strong voice, which can be used to advocate for the marginalised and for equity for vulnerable persons and their human rights.

This is why CEWA, through our connection with the Catholic Church, welcomed partnership with corporations that share a common purpose. In 2021, CEWA initiated state-wide learning opportunities for staff, drawing on expertise to integrate sustainability into decision making, improving procurement practices and increasing supplier engagement to communicate our requirements.

In the past two years, CEWA has worked alongside groups including Caritas Australia and Catholic Mission to identify and eradicate the root cause of slavery. We have collaborated and supported Good Shepherd Sisters Fatima Training Centre in Bangkok and the Australian Catholic Religious Against Trafficking in Humans (ACRATH) among others.

This is a step in the right direction, and we will continue to work with organisations under the Australian Catholic Antislavery Network (ACAN) and Antislavery Taskforce to further progress in this space.

This Modern Slavery statement will help ensure our offices and schools continue to promote best practice and live out our Catholic values in support of vulnerable members of the community.

Dr Debra Sayce
Executive Director
Catholic Education Western Australia Limited





Summary of Achievements 2022

Throughout 2022, modern slavery prevention continued to be a focus across CEWA, aligned with both the CECWA Strategic Directions 2019–2023 and Quality Catholic Education. CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of about 40 Catholic entities throughout all states and territories of Australia.

The CEWA Modern Slavery Prevention Working Group, established in 2021 and comprised of office and school staff, remained in existence to support the implementation of modern slavery prevention across the System. Since its inception in 2021, the Working Group informed CEWA leaders on modern slavery related issues and facilitated CEWA's role in managing and mitigating modern slavery risks. The Working Group advised development, implementation, monitoring and review of CEWA's Modern Slavery Prevention Action Plan.

Our Plans for 2023

For 2023, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- Continue to embed the Executive Directive – Modern Slavery Prevention across the CEWA System (schools and offices);
- Strengthen the risk management framework to ensure that CECWA and the Audit and Risk Committee have awareness of the modern slavery risks with the potential to impact CEWA;
- Continue to strengthen procurement management approaches and documentation to guard against slavery or slavery-like practices;
- Promote the educational opportunities available to the CEWA community on modern slavery;
- Communicate CEWA's commitment to the eradication of modern slavery from supply chains and operations;
- Strengthen engagement with suppliers to communicate the expectations for practices relating to the prevention of modern slavery; and
- Continue to work within ACAN's priorities, including supporting Domus 8.7 - ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service.



Our Plans Beyond 2023

CEWA has established a Modern Slavery Prevention Program of Work 2021–2023, with specific deliverables across several focus areas. The Program of Work proactively guides CEWA's strategic actions and deliverables. The document will be revised and updated by the end of 2023.

CEWA's current Program of Work is built across the following focus areas to ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention:

FOCUS AREA	INTENT
Governance	To ensure CEWA's governance framework, practices and documentation clearly support CEWA's commitment to modern slavery prevention and underpin both the requirement in law for CEWA to respond, and the clear alignment of appropriate action with Catholic values.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of the risks of modern slavery.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.
Facilities Management	To increase CEWA's understanding and oversight of the risks of modern slavery in facilities management, and to work to mitigate those risks through responsible procurement.
Investment	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.
Research	To introduce considerations around modern slavery prevention into the approval process for research applications.
Engagement and Education	To continue to educate the CEWA community on modern slavery and how individually and collectively, work can be undertaken for eradication.
Schools Engagement	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.
Capital Development	To increase CEWA's understanding and oversight of the risks of modern slavery in building and construction, and to work to mitigate those risks through responsible procurement.
Human Resources	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.
Communications	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.
Student Safety and Wellbeing	To ensure staff are aware of and alert to the indicators of forced marriage, and what to do if they suspect a student is at risk of forced marriage.





Reporting Criterion 1: About Catholic Education Western Australia Limited

Our Organisational Structure

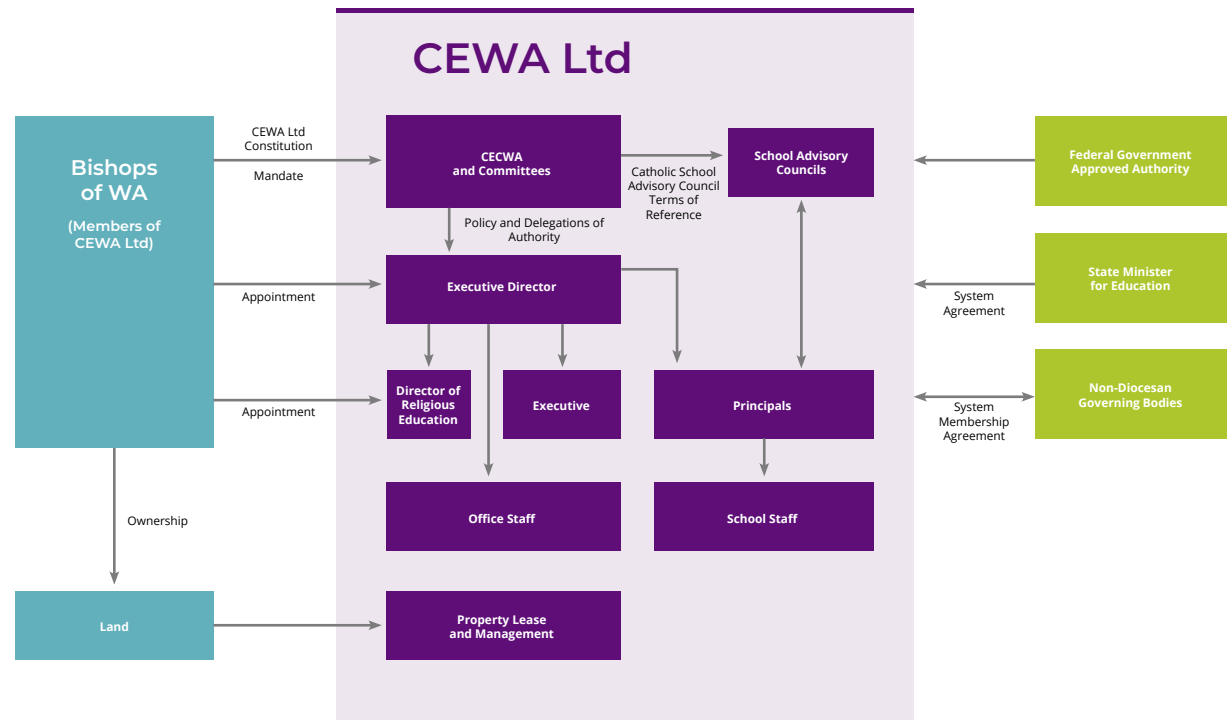
On 1 January 2020, the Bishops of Western Australia formed a new corporate governance structure as an incorporated body for Catholic schools in Western Australia. Catholic Education Western Australia Limited (CEWA) is currently the governing body for 148 CEWA schools and provides registration oversight for an additional 10 Catholic schools with their own governing bodies. The Members of CEWA are the diocesan Bishops of Western Australia.

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

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA, 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 and monitor activities. In 2022, these committees included:

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

CEWA's governance structure is illustrated below:





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

CEWA's 2022 Annual Report will be accessible on the public website at <https://www.cewa.edu.au>.

CEWA schools and Catholic schools with governing bodies

In addition to the 148 CEWA schools, the CEWA System includes 10 schools that are governed by six governing bodies other than CEWA. For the purposes of school registration in WA, the 10 schools with governing bodies other than CEWA are included within the Catholic Education System, creating CEWA's 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 CEWA. In 2022, 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 Tony Curry – Director Leadership and Employee Services;
- Rev Mark Powell – Director Religious Education; and
- Dr Glenda Scully – Director Finance, Infrastructure and Digital Technology.

The CEWA Executive Team is based in CEWA's West Leederville office and is supported by approximately 280 office staff working across the four Catholic dioceses in Western Australia.





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



Photo: Christ the King School, Beaconsfield

Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of ASIC, ACNC, the Bishops of Western Australia, the Federal Government, the State Government and CEWA's students, staff, stakeholders and community.

CEWA is governed by four overarching policies aligned with Quality Catholic Education – Catholic Identity, Education, Community and Stewardship. Supporting the four policies are a suite of Executive Directives (or procedures). CEWA's Executive Directives articulate CEWA's policy requirements and provide direct processes to be followed across the System.

CEWA has evolved its Modern Slavery Prevention Policy to become the *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA to actively and consciously counter any presence of modern slavery within operations, business relationships and extended supply chains. Importantly, the Executive Directive guides all CEWA staff to operate within the following principles:

1. Catholic Social Teaching calls for the dignity of work, the rights of workers and the advancement of the common good.
2. CEWA does not knowingly use or contribute to modern slavery practices in any form.
3. CEWA actively works to identify and eliminate modern slavery practices from operations, business partnerships and supply chains.
4. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or

financial) of CEWA community members or of people in its supply chain is unacceptable.

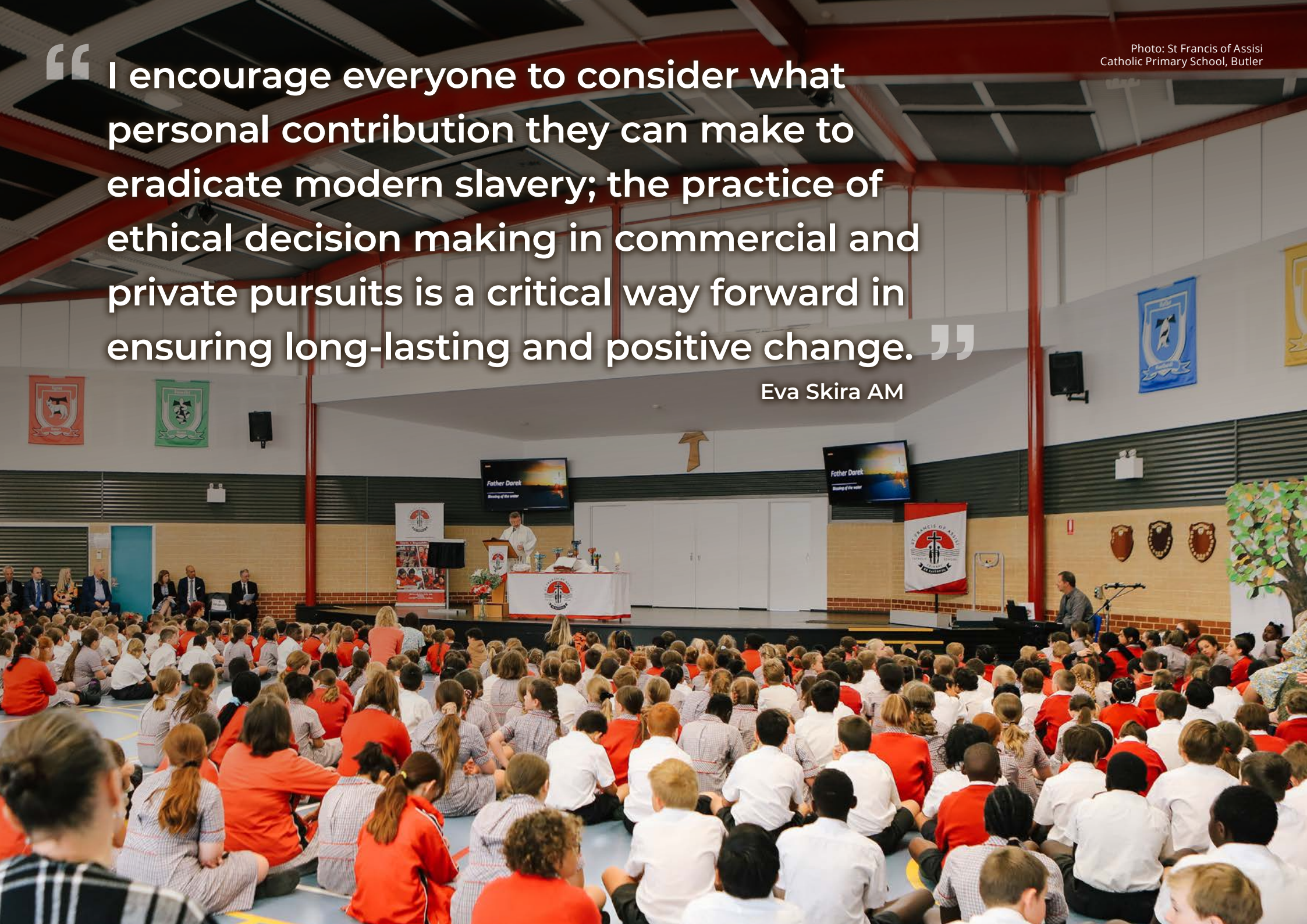
5. CEWA complies with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
6. CEWA's final purchasing decisions are not to be based on price alone. Ethical business processes are an essential part of CEWA's value for money and fit for purpose consideration which includes consideration of a living wage for workers and responsible worker recruitment.
7. CEWA incorporates ethical considerations alongside more traditional financial factors into investment analysis and decision making.
8. CEWA continues to support suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chain.

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

CECWA is updated on CEWA's progress to eradicate modern slavery through the Executive Director's report to CECWA as matters arise.

“ I encourage everyone to consider what personal contribution they can make to eradicate modern slavery; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change. ”

Eva Skira AM



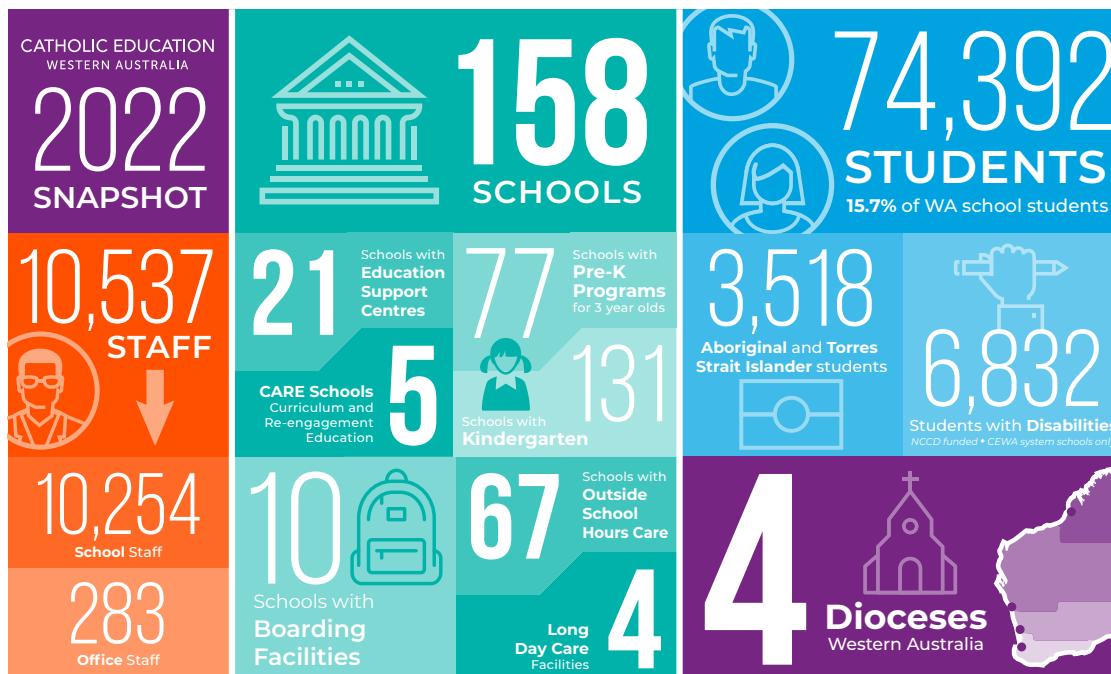


Reporting Criterion 2: Operations and Supply Chains

Our Operations

CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State.

An overview of CEWA's reach in 2022 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 faith formation, pastoral care and wellbeing support to all involved within the System.

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.

The development and advancement of CEWA's procurement strategy and approaches will increase

due diligence in contractor management. The documentation is anticipated 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, provision of new facilities and maintenance of existing facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas are also subject to improved due diligence processes within CEWA's *Building Quality Catholic Schools* document.



Reporting Criterion 2: Operations and Supply Chains (continued)

In 2022 CEWA procured

\$126M

of goods and services

These goods and services were
sourced from approximately

13,400

predominantly Australian suppliers

Our Supply Chains

Across CEWA, purchases are made at a system-level and this report is focused on purchases that are driven by administration-made decisions. However, Catholic school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases. Through further maturity of system processes because of incorporation, including the appointment of a Contracts and Procurement Manager and the creation of the Procurement Team, 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 managed individually by Catholic schools, 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 the areas listed below:

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

In 2022, CEWA procured \$126 million of goods and services from approximately 13,400 direct suppliers*, predominantly Australian suppliers. These purchases included 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 CEWA's extended supply chains present the highest risks for modern slavery.

As communicated in 2021, CEWA is committed to work with the highest risk, highest spend Tier 1 suppliers by providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA will extend that oversight to the extended CEWA supply chain.



* Figures relate to third-party suppliers to CEWA schools and offices.

Photo: St Francis' School, Maddington



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

As of December 2022 CEWA supported

10,537

teaching and non-teaching jobs

\$2.37bn

GVA contribution in 2021; 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 acknowledges and understands that the COVID-19 pandemic has had devastating 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 personal protective equipment is available 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 students and staff and maintained educational continuity in full compliance 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. Continuing the work from previous years, CEWA staff 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 reported within a CEWA site. The tender that was issued specifically required tenderers to respond to questions that provided surety against modern slavery risks.

CEWA's people

As of December 2022, CEWA supported 10,537 teaching and non-teaching jobs, approximately 80% of which were female employees*. In 2021, it is estimated that the total Gross Value-Added contribution to the WA economy was approximately \$2.37 billion, representing almost 17% of the WA Education and Training sector per year.

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

* These figures include staff in CEWA schools and offices, including casual staff.



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



engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well documented and communicated policies, Executive Directives and processes in place to ensure compliance with national and state employment law and legislation throughout the System. The *Executive Directive - Employment* is 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 was 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 the 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. This is especially important for 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.

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 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.



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



CEWA is committed to a 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 approach, which summarises the organisation’s approach to investments, CEWA’s 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 remains vigilant of these matters to ensure that they are fit for purpose. CEWA’s investment managers provided regular reports to CECWA that include their commitment to responsible investing.

Modern slavery gap analysis

A gap analysis was undertaken to understand the modern slavery risks facing CEWA and identify areas for improvement. CEWA acknowledges that performance in 2022 was consistent with gains made in 2021. Further uplift will be achieved in 2023 with implementation of re-established priorities and investment in enhanced reporting mechanisms, which will work toward addressing identified improvement areas.

The comparative results are presented below in a heat map.

Category	Topic	Result 2019	Result 2020	Result 2021	Result 2022	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



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

Supply Chain Risks

In 2020, CEWA appointed a Contracts and Procurement Manager with duties that include increasing CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to work and mitigate these risks through responsible procurement. CEWA is continuing the process of engaging effectively with suppliers in two ways:

- educating and providing information around modern slavery risks; and
- embedding appropriate oversight and documentation into onboarding of new suppliers, increasing due diligence of existing suppliers, and pre-qualifying companies tendering for work.

CEWA is continuing the process to analyse supply chains, especially for high-risk products and geographies, particularly for areas of highest spend.

From a previous, external assessment of CEWA's spend, 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 established a Working Group in 2021 to strengthen a shared understanding, across the System, of modern slavery and assessing the potential risks in CEWA's operations in supply chains.

Specific actions undertaken since 2021 are depicted in the table below:

FOCUS AREA	INTENT	ACTIONS
Governance	To ensure CEWA's governance framework, practices and documentation clearly support CEWA's commitment to modern slavery prevention and underpin both the requirement in law for CEWA to respond, and the clear alignment of appropriate action with Catholic values.	<ul style="list-style-type: none"> Revision of Modern Slavery Prevention Executive Directive. Committed to joining ACAN from July 2021 to June 2023. Hosted webinars to raise awareness regarding modern slavery. Included modern slavery risks within CEWA's risk management framework. Included modern slavery risks with the CEWA school risk management framework. Completed gap analysis on operations.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of the risks of modern slavery.	<ul style="list-style-type: none"> Commencement of the drafting of an Executive Directive for procurement and associated procedures, including the implementation of a CEWA Procurement Management System. Identification of the Top 50 High Risk Suppliers using ACAN's Risk Taxonomy Identification of the Top 20 IT suppliers Invitations sent to all suppliers to join the Sedex Platform. Development of purchase order terms including relevant modern slavery prevention clauses. Development of tender templates that include relevant modern slavery prevention requirements. Development of contract terms and conditions that include appropriate modern slavery prevention clauses and obligations. Communication to suppliers on CEWA's modern slavery prevention commitment. Development of supplier documentation that sets out ethical expectations of suppliers. Development of documentation to enable oversight of suppliers' commitments to modern slavery eradication.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.	<ul style="list-style-type: none"> Inclusion of modern slavery prevention clauses in standard supplier contracts.
Facilities Management	To increase CEWA's understanding and oversight of the risks of modern slavery in facilities management, and to work to mitigate those risks through responsible procurement.	<ul style="list-style-type: none"> Establishment of Fairtrade staffrooms at all CEWA offices. Engagement with cleaners, security and waste management providers to raise awareness of fair work practices.
Investment	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.	<ul style="list-style-type: none"> CEWA's Investment Policy specifies that CEWA will seek to avoid direct investment in those companies with a red flag as assessed by Morgan Stanley Capital International (MSCI) for Modern Slavery / Labour Rights Controversy.
Research	To introduce considerations around modern slavery prevention into the approval process for research applications.	<ul style="list-style-type: none"> Conducted a due diligence examination of research organisations including reputation, non-commercial focus, any third-party involvement, and funding sources. Assess the methodology for research proposals including data and information protocols.

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

FOCUS AREA	INTENT	ACTIONS
Engagement and Education	To continue to educate the CEWA community on modern slavery and how individually and collectively, work can be undertaken for eradication.	<ul style="list-style-type: none"> Development of eLearning Module into CEWA's System. Consideration of the eLearning Module by the CEWA Executive Team and approval for system roll-out. Completion of eLearning Module by all Working Group members.
Schools Engagement	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.	<ul style="list-style-type: none"> Aim of Membership of the Modern Slavery Working Group being representative of 70% of all CEWA schools and offices. Investigate the development of a Fairtrade website for use across the system.
Capital Development	To increase CEWA's understanding and oversight of the risks of modern slavery in building and construction, and to work to mitigate those risks through responsible procurement.	<ul style="list-style-type: none"> Identification of the top 50 construction suppliers. Invitations sent to all suppliers to join the Sedex Platform.
Human Resources	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.	<ul style="list-style-type: none"> Initial discussions regarding updating the <i>Executive Directive – Employment</i> to articulate a commitment against slavery and slavery-like practices.
Communications	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.	<ul style="list-style-type: none"> Promotion of the Feast Day of St Bakhita (8 February). Promotion of the UN Day Against Trafficking in Persons (30 July) throughout the System. Promotion of Fairtrade Fortnight (6–19 August) across the System.
Student Safety and Wellbeing	To ensure staff are aware of and alert to the indicators of forced marriage, and what to do if they suspect a student is at risk of forced marriage.	<ul style="list-style-type: none"> Lesson prepared for use as part of the delivery of the Keeping Safe Child Protection Curriculum in secondary schools. Incorporation of forced marriage information into the Keeping Safe Child Protection Curriculum teacher training.

Modern Slavery Action Plan and Road Map

CEWA's current approach to modern slavery prevention will continue into future years.

A future action plan will be developed in 2023, as a collaboration across Catholic schools and offices. The implementation plan, as in 2021, will assign deliverables to teams or groups within CEWA.

The Working Group will continue in 2023 with the following objectives:

- Provide input and advice to the CEWA community on issues related to modern slavery;
- Lead the further development and implementation of CEWA's Modern Slavery Prevention Action Plan;
- Assist CEWA to determine priority actions to be

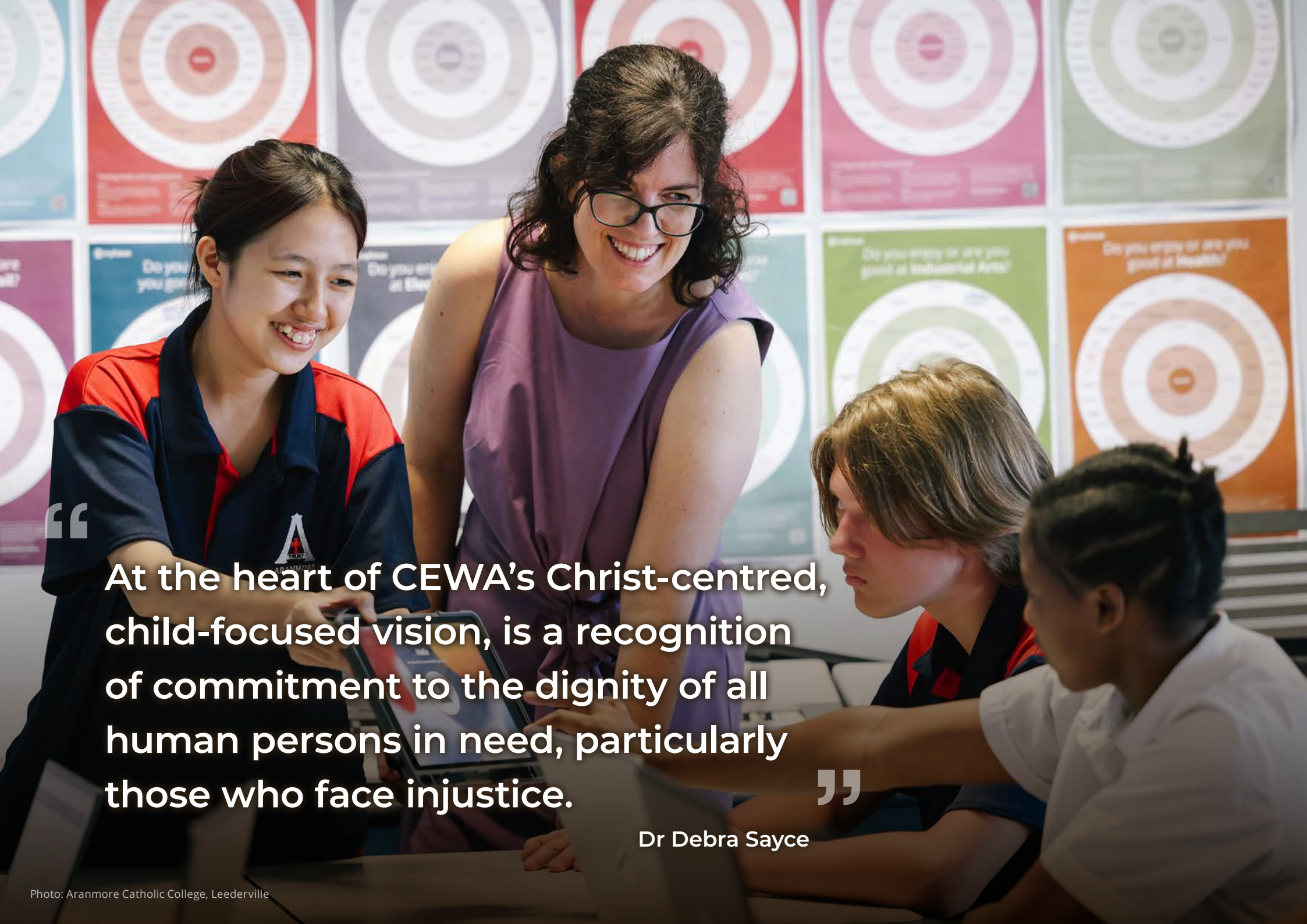
undertaken and establish annual goals and targets;

- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CEWA meets the requirements of the *Modern Slavery Act 2018 (Cth)*.

In addition to the existing work streams, CEWA will also work across the following areas for action:

- Leadership: to ensure leaders understand the requirement for CEWA to address modern slavery risks;
- Remedy: to adopt Domus 8.7 remedy pathway for victims of modern slavery abuse;

- Partnerships: to ensure a collaborative and coordinated approach throughout Western Australia and to support relevant projects that further CEWA's understanding and support of works with the same intent; and
- Procurement: implement a new Procurement System which will include the use of Purchase Orders with Modern Slavery Prevention clauses, better visibility of suppliers and spend, and categorisation of suppliers to improve the identification of high-risk activities. The system will also facilitate a wider use of quotes, tenders and contracts for procurement activities which include Modern Slavery Prevention clauses and the CEWA Code of Conduct.



“

At the heart of CEWA's Christ-centred, child-focused vision, is a recognition of commitment to the dignity of all human persons in need, particularly those who face injustice.

”

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 were developed by the Working Group and reported accordingly to CEWA's Executive. However, it is acknowledged that continued focus is required. 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. CEWA remains committed to collaboration, communication, time and sustained engagement being vital to reducing the risk and ultimately effecting lasting change.
- CEWA recognises that raising awareness of this important issue and providing appropriate opportunities for staff and stakeholders to increase knowledge on modern slavery issues is critical and in full alignment with CEWA's vision and mission.
- Increased focus is required on the procurement practices as CEWA matures as a company limited by guarantee.
- 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 through the CEWA Executive Team to CECWA, as appropriate;
- Engaging with the CEWA community through staff meetings, announcements and information shared through the modern slavery prevention Microsoft Team, and via social media in connection to particular advocacy days;
- Continuing to be vigilant in processing 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 2022 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 148 CEWA schools.

While CEWA does not control schools, the System operates within a network of 'connected autonomy' through Quality Catholic Education (QCE); every school and office are part of the CEWA System and 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 opportunities for learning, sharing of ideas and support for implementing local initiatives within schools.





Reporting Criterion 7: Other



CEWA has supported several organisations that work to address the root causes of slavery, including Caritas Australia and Catholic Mission. To date, CEWA has supported and 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 2023.

This Modern Slavery Statement 2022 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 2 June 2023, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed

Eva Skira AM
Chair

Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited 2022

Eva Skira	Chair (appointed as Commissioner 27 January 2022)
Bishop Gerard Holohan	Chair (concluded 3 June 2022)
Jonathon Woolfrey	Deputy Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Margaret Collins	Commissioner (concluded 31 December 2022)
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Michelle Shafizadeh	Commissioner
Peter Yensch	Commissioner

CEWA Executive Team 2022

Dr Debra Sayce	Executive Director
Wayne Bull	Deputy Executive Director
Mandy Connor	Director Teaching and Learning
Rev Mark Powell	Director Religious Education
Dr Tony Curry	Director People, Capability and Wellbeing
Dr Glenda Scully	Director Finance, Infrastructure and Digital Technology



**CATHOLIC
EDUCATION**
WESTERN AUSTRALIA



(08) 9380 1800
www.cewa.edu.au