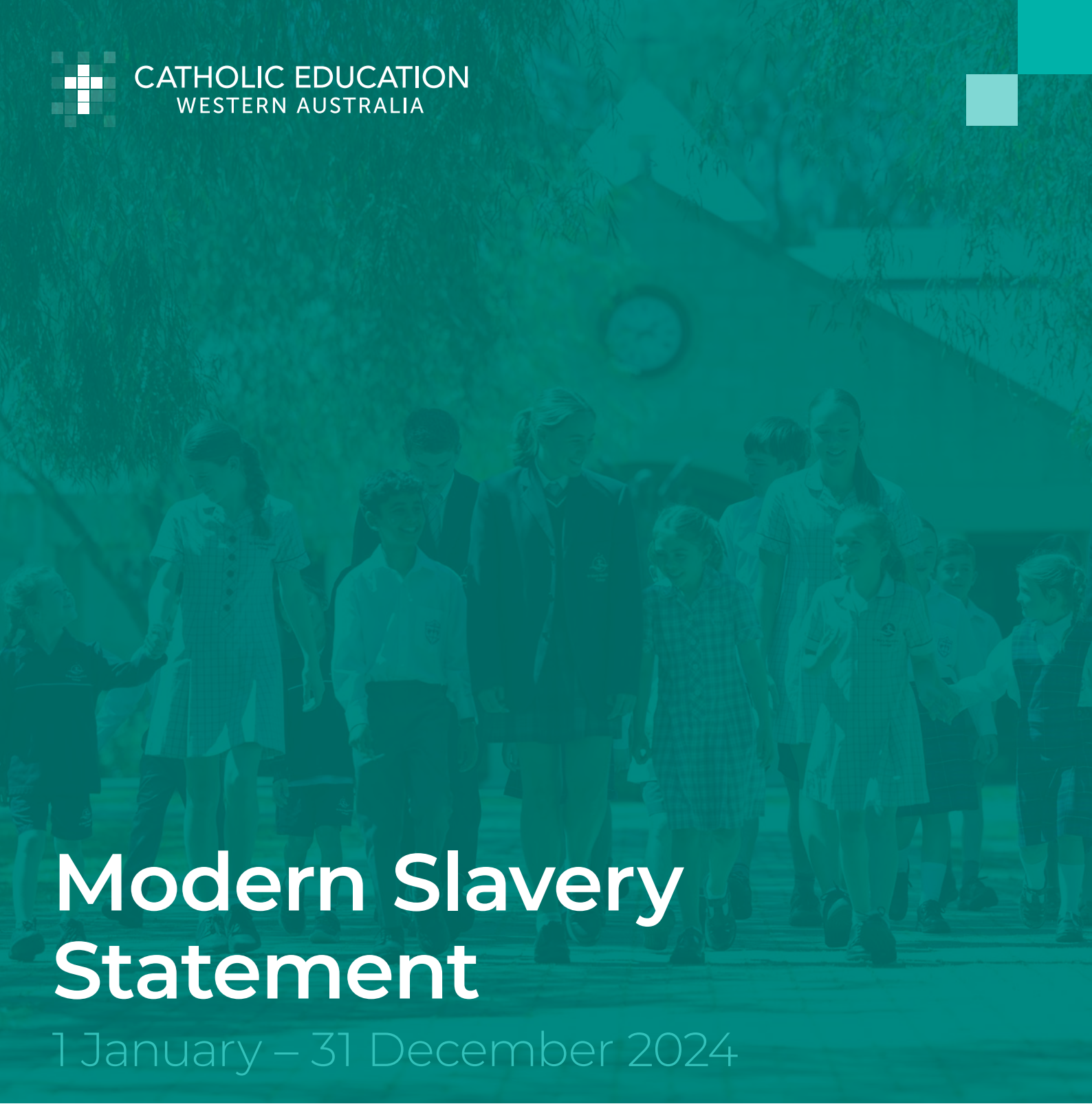




CATHOLIC EDUCATION
WESTERN AUSTRALIA



Modern Slavery Statement

1 January – 31 December 2024



Catholic Education Western Australia Limited



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.

Cover photo: St Mary MacKillop College
(Busselton), Our Lady of the Cape Primary
School (Dunsborough) and St Thomas More
Catholic Primary School (Margaret River)
Left/right: St Patrick's Primary School (Fremantle)

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Leadership Message

Approval and Signature

Eva Skira AM

*Chair, Catholic Education
Commission of Western
Australia*



As Chair of the Catholic Education Commission of Western Australia, I am pleased to present this updated Modern Slavery Statement. At Catholic Education Western Australia Ltd we are deeply committed to operating with the highest standards of integrity, transparency, and accountability. Modern slavery, which encompasses practices such as human trafficking, forced labour, and exploitation, is a grave violation of human rights, and we recognise the significant responsibility we bear in ensuring that our operations, supply chains, and business relationships do not contribute to such practices.

This statement outlines the steps we have taken, and continue to take, as a system to prevent and address modern slavery. It reflects our ongoing efforts to ensure that every action we take is aligned with our Catholic values of respect, dignity, and fairness. We believe in creating a positive, ethical environment for all those with whom we interact, whether they are our employees, suppliers, or customers.

CEWA has developed robust policies and systems designed to identify, prevent, and respond to any risks related to modern slavery. We continue to commit ourselves to ensuring our governance, procurement, investment and other practices are cognisant of the shame of modern slavery.

I encourage everyone to consider what personal contribution they can make to prevent 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.

I would like to extend my gratitude to our employees, partners, and stakeholders for their commitment to this important cause. Particularly to those leaders and employees who have been directly involved in the preparation of this updated statement. Together we will continue working towards a future where modern slavery has no place in any aspect of our operations.

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 May 2025. This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.



Leadership Message

Approval and Signature

Wayne Bull

*Executive Director,
Catholic Education
Western Australia Limited*



I am privileged to be able to present Catholic Education WA's updated Modern Slavery Statement.

As a community grounded in the teachings of Christ and guided by the principles of justice, dignity, and solidarity, we recognise the profound moral imperative to confront and prevent the evils of modern slavery in all its forms. CEWA's Modern Slavery Statement is a further step in our ongoing commitment to protecting the most vulnerable members of society and ensuring that their human dignity is upheld in every aspect of our work and beyond.

This new statement builds upon the work our community of Catholic schools and offices have undertaken to deepen our understanding of modern slavery, and to identify and prevent its root causes. In the last twelve months there has been particular focus on preparing for the rollout of CEWA's new procurement system, Zycus. Once implemented this system will allow for identification of high-risk categories and better equip CEWA to develop strategies to mitigate supplier risks.

The Church has long taught that every human person is made in the image and likeness of God, deserving of respect, freedom, and the opportunity to flourish. Modern slavery, whether through forced labour, human trafficking, or any form of exploitation, violates this sacred truth. It strips individuals of their God-given dignity and perpetuates a cycle of suffering that we, as followers of Christ, are called to dismantle.

In reflecting on this issue, we draw inspiration from the words of Pope Francis, who has consistently spoken out against the scourge of modern slavery, urging us to build a culture of encounter, solidarity, and mercy. In his message for the World Day of Peace, he reminded us, *"No one can be saved alone. We must learn to live as one family."*

It is within this spirit that we commit to ensuring that our practices are free from the stain of exploitation and that we stand in solidarity with those whose voices have been silenced. Since launching the first Modern Slavery report in 2021, CEWA has worked with groups such as Caritas Australia and Catholic Mission to grow our collective understanding of Modern Slavery and to identify and eliminate its root causes.

As we take another step together on our journey of understanding and tackling the scourge of modern slavery, I encourage you all to promote best practice and live out Catholic values in support of vulnerable members of our society.

Wayne Bull

*Executive Director
Catholic Education Western Australia Limited*

Criterion 1

About Catholic Education Western Australia Limited (CEWA)

Established by the Catholic Bishops of the State of Western Australia, CEWA's purpose is to provide a Catholic education for all families who seek it for their children. Through its Catholic schools, CEWA provides all students with Christ-centred, child-focused learning environment, to empower young people to actively live the Gospel and to become responsible citizens who contribute to the development of Australian society.

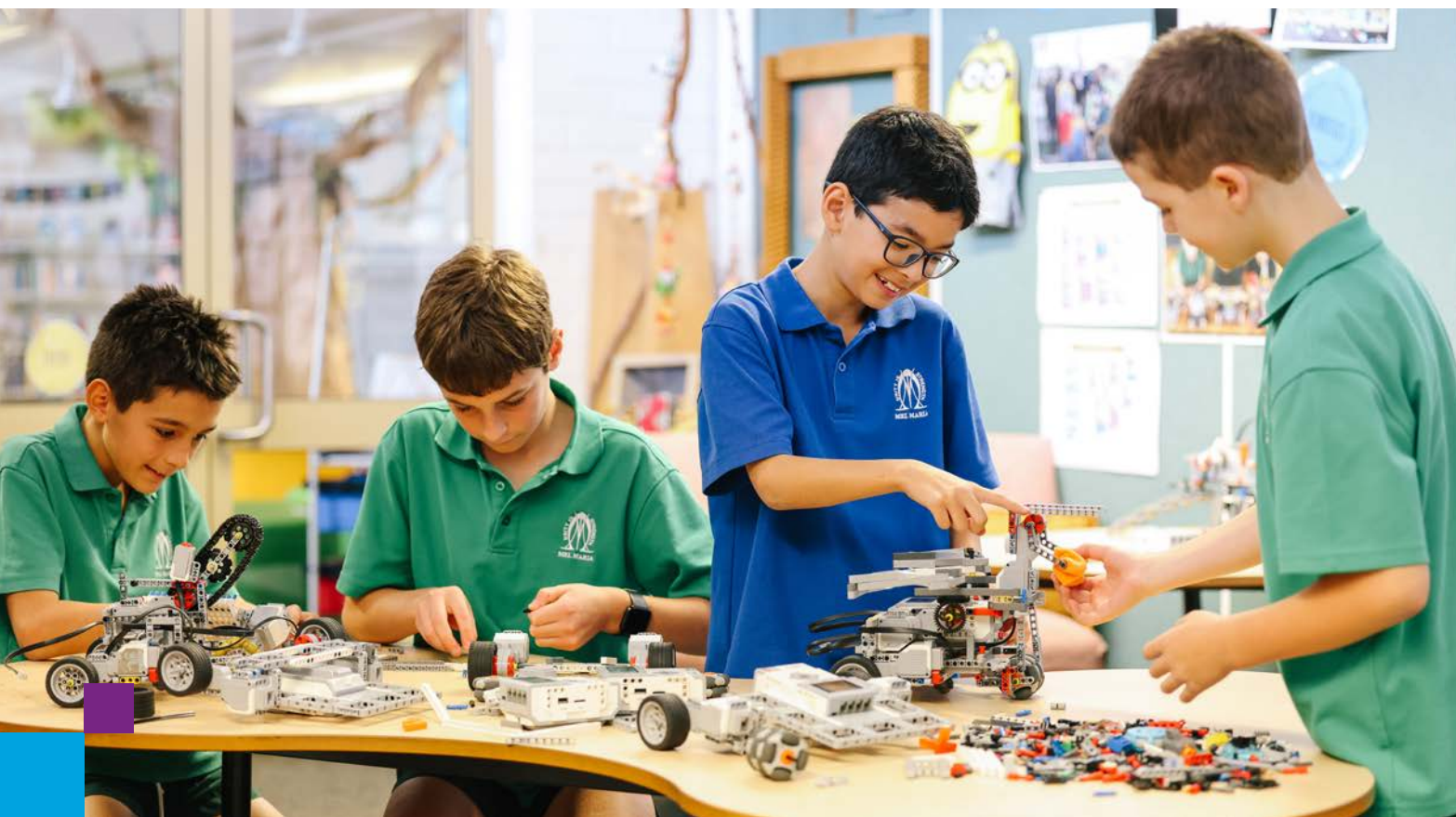
CEWA is the second largest education provider in Western Australia, providing a faith-based education for 16.6% of the State's total school-age population, including 19% of all secondary students. In 2024, almost 82,000 students were enrolled in 162 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 12,000 staff, making it a significant contributor to the Western Australian economy.

In 2024, the Catholic Education Commission of Western Australia (CECWA) launched the [Strategic Initiatives 2030](#), which focus on providing effective faith formation (Formation for Mission), ensuring all CEWA does is of the highest quality (Excellence for Success), elevating our Catholic Story (Witness for Impact), and providing more students with a Catholic education (Growth for Access).

Quality Catholic Education (QCE), embraced across Catholic schools and offices, ensures CEWA's commitment to practices that reflect Catholic Social Teaching. Receiving a quality Catholic education, care, and support enables young people to make a positive contribution to society in line with Catholic Social Teaching. CEWA schools and offices support all students, regardless of their individual circumstances, especially the marginalised and disadvantaged, guided by our mission of bringing the Good News of Jesus Christ to all.

Photo: Mel Maria Catholic Primary School (Attadale / Myaree)



Criterion 2

Our Structure, Operations and Supply Chains

Our Organisational Structure

In 2024, CEWA was the governing body for 149 CEWA schools and provided registration oversight for an additional nine Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

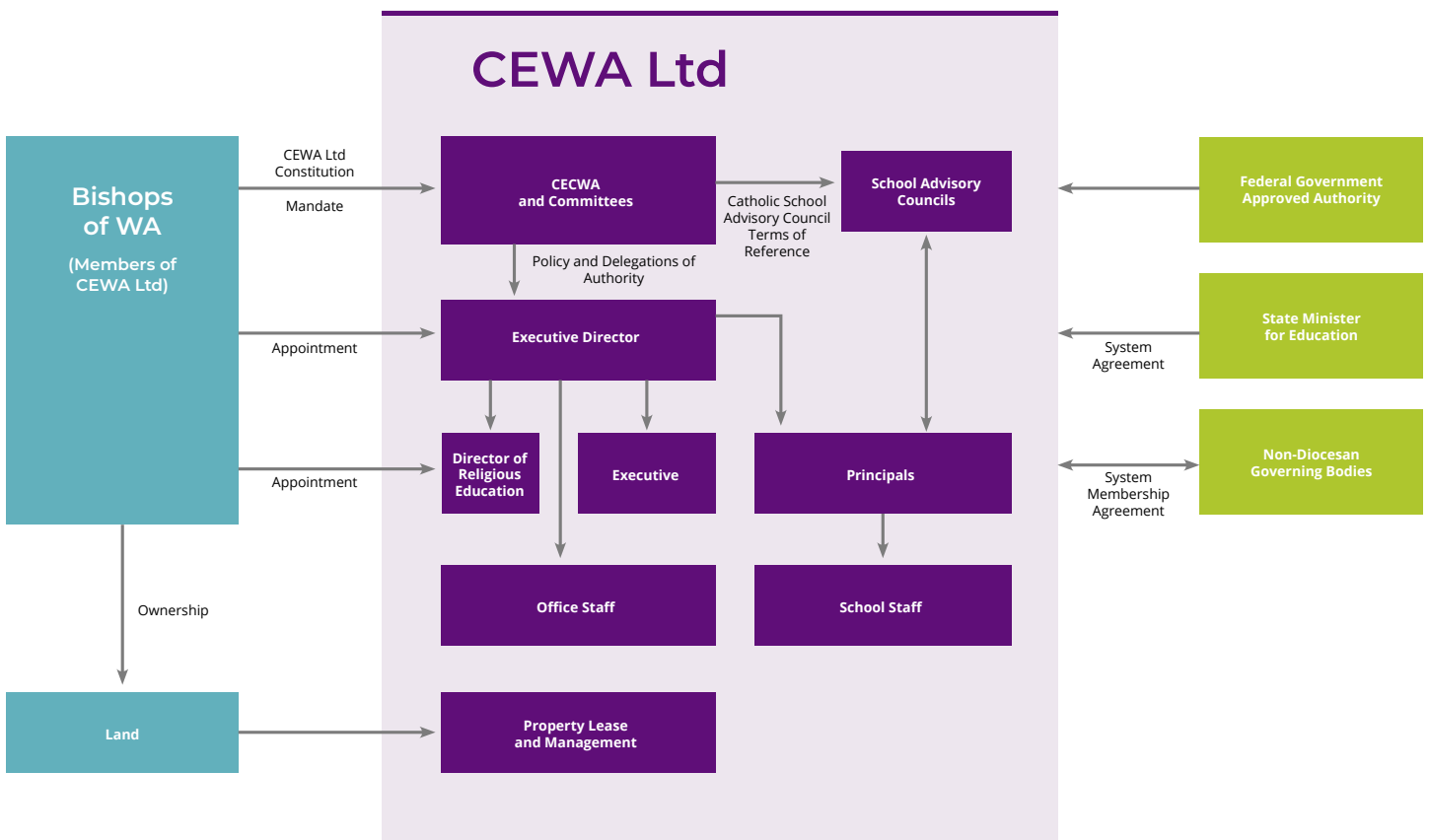
CEWA's annual consolidated revenue in 2024 was \$1,366,479,563.

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 communities that fulfil the goals of Catholic schools as outlined in the Bishops' Mandate. CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2024, these committees included:

- Aboriginal Community Committee;
- Audit and Risk Committee;
- Finance Committee;
- Formation and Workforce Committee; and
- School Improvement Committee.

CEWA's governance structure is illustrated below:



Criterion 2: Our Structure, Operations and Supply Chain (continued)

CEWA schools and Catholic schools with governing bodies

In addition to the 149 CEWA schools, the CEWA System includes nine schools that are governed by five governing bodies other than CEWA. For the purposes of school registration in Western Australia, the nine 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

The Executive Director of CEWA in 2024 was Wayne Bull. The Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Annette Morey
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director Leadership and Wellbeing	Dr Tony Curry
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office (Perth) and is supported by approximately 380 office staff working across the four Catholic dioceses in Western Australia: the Archdiocese of Perth, the Diocese of Bunbury, the Diocese of Broome, and the Diocese of Geraldton.



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), ACNC, the Bishops of Western Australia, the Federal and State Governments, 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. CEWA's Executive Directives articulate CEWA's policy requirements and provide directions to be followed across the System.



Criterion 2: Our Structure, Operations and Supply Chain (continued)

CEWA has an *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA 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 system at both enterprise and individual school and office 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 address, monitor and review modern slavery risks through the Executive Director's report to CECWA as matters arise.



Criterion 2: Our Structure, Operations and Supply Chain (continued)



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. As well as playing a pivotal role in supporting a developmentally appropriate and engaging teaching and learning program for children and young people, Catholic schools provide vital faith formation, pastoral care, and wellbeing support to all involved within the System.

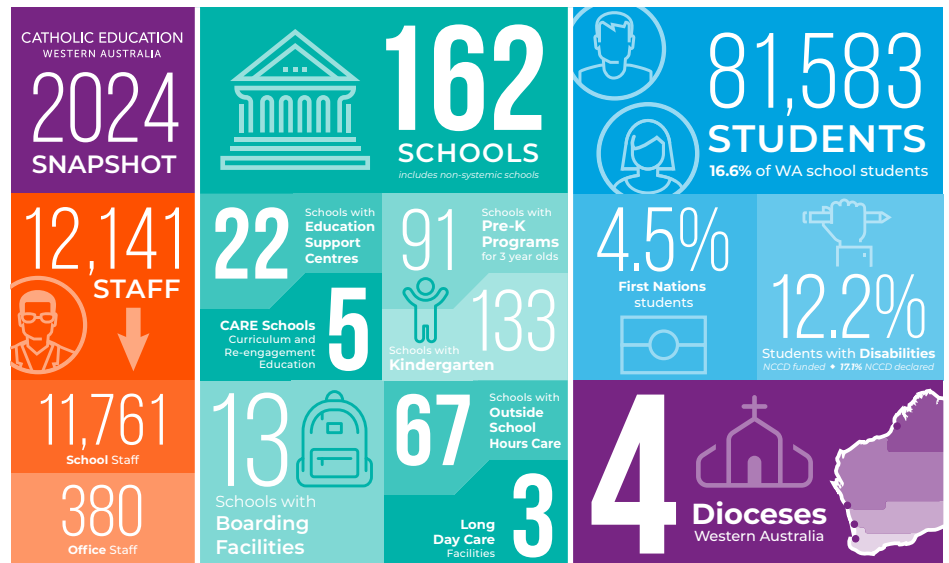


CEWA's wide range of operations include:

- the development of Catechist resources to prepare children not attending Catholic schools to receive the sacraments at the appropriate ages through the Parish Religious Education Program (PREP);
- providing resources, formation training and information to support the work of parish Catechists and Sacrament Coordinators;
- providing outside of hours school care, long day care and vacation care;
- providing flexible and supportive education through our five Curriculum and Re-engagement in Education (CARE) schools to enable young people at risk to continue their education journey in a safe, supportive environment;
- providing access to boarding and residential accommodation to students from families in regional areas so they can access a quality Catholic secondary education;
- providing traineeships, cadetships, and scholarships to facilitate career pathways in the education sector for Aboriginal and Torres Strait Islander peoples;
- providing educators and support staff – through the Kimberley Calling program – with the experience of learning, living, and serving in the Catholic school communities of the Kimberley, emphasising the abundance of rich personal, professional, cultural, and environmental experiences, and unique opportunities and challenges of working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout Catholic Education Western Australia, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

Criterion 2: Our Structure, Operations and Supply Chain (continued)

An overview of CEWA's reach in 2024 is provided in the figure below.



CEWA schools and offices engage contractors and subcontractors to provide cleaning services, waste management, and conduct routine maintenance tasks.

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 under-age 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.

Our Supply Chains

Across CEWA, purchases are made at system-level and this report is focused on purchases that are driven by management-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, it is anticipated that future ethical purchasing decisions will be made by the system, with schools operating through a preferred suppliers' program.





Criterion 3

Modern Slavery Risks

In 2024 CEWA procured

\$289m

of goods and services

These goods and services were
sourced from approximately

26,900

predominantly Australian suppliers

In 2024, CEWA procured \$289,706,259 of goods and services from approximately 26,900 direct suppliers* (predominantly Australian). Services procured included building, cleaning, facilities management, security services and waste management services, 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 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.

CEWA acknowledges that uniform purchasing is a potentially high-risk area, both with regards to cotton growing and garment manufacturing. Uniform purchasing continues to be managed individually by Catholic schools. However, the development of the procurement system incorporated an overhaul of the supplier onboarding and categorising, to allow for identification of high-risk categories, including uniform suppliers. This will enable CEWA to continue to develop strategies to mitigate supplier risks.

CEWA has identified, through a procurement review, that the CEWA offices purchase 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.

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.

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

Criterion 3: Modern Slavery Risks (continued)

As of December 2024 CEWA supported

11,508

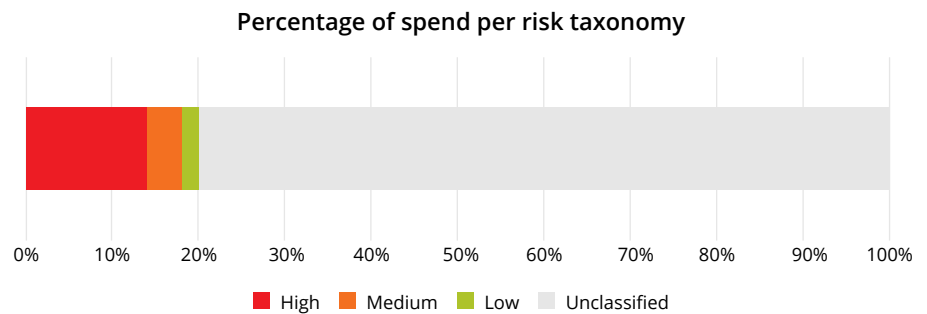
teaching and non-teaching jobs

\$2.37bn

GVA contribution in 2021; 17% of total
WA Education & Training sector

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.

The table below illustrates the percentage of spend per risk taxonomy for 2024, with 14% of spend identified as high risk, representing \$40,922,323 across 862 suppliers. In addition, 4% of spend has been identified as medium risk, and 2% of spend as low risk.



Operational Risks

CEWA's people

As at December 2024, CEWA Ltd supported 11,508 teaching and non-teaching jobs, 80% of which were female*. In 2021, it was estimated that CEWA's 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 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 in Schools* is regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly.

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, CEWA takes an ethical human rights approach to the approval of research applications that provides transparency of disclosure and the integration of decision-making oversight into all operational aspects.

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

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



Criterion 3: Modern Slavery Risks (continued)

CEWA had investments of
\$161.2m
during the reporting period.

- 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. 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.

Investment Risks

CEWA had approximately \$162.1 million in investments during the reporting period. 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.

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.



Criterion 3: Modern Slavery Risks (continued)

The investment manager for the CEWA Long Service Leave Fund (LSL), JBWere, are bound by the Investment Policy Statement (IPS), outlining the key criteria for CEWA's responsible investing activities. This specifically states that the investment managers 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. This is defined as a company that is involved in controversies related to labour-management relations, employee health and safety, collective bargaining and unions, discrimination and workforce diversity and management of supply chain employee relations standards.

As detailed in the LSL Fund's December Quarter 2024 Investment Report, from the total 52 Australian and International equity holdings invested in, 58% of these have not been involved in any major recent controversies regarding modern slavery/labour rights; 27% have been involved in recent moderate level controversies; and 15% have been involved in one or more recent severe structural controversies that are ongoing. There are no investments in companies that have been involved in very severe, red flag controversies.

Supply Chain Risks

In 2023, CEWA appointed a provider (Zycus Cognitive Procurement) to implement a procurement system that will increase CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to enable the organisation to work toward the mitigation and eradication of these risks through responsible procurement. CEWA will continue the process of engaging effectively with suppliers in two ways:

- identifying suppliers in high-risk categories to promote education and information around modern slavery risks through the support of ACAN; and
- embedding appropriate oversight and documentation into the onboarding of both new and existing suppliers and assessing the risk of modern slavery during formal market assessment activities.

The onboarding of suppliers through CEWA's procurement system will commence in March 2025 including an increased compliance with Modern Slavery and supplier categorisation. This will be followed by the full implementation of the procurement system commencing from June 2025, which will bring improved conformance, reporting and data capabilities.

CEWA continues the process to analyse supply chains, especially for high-risk products and geographies, particularly in high-risk and high-spend categories.

CEWA's highest risks areas continue to be identified:

- 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 extended supply chains, especially beyond Tier 1 suppliers.



Criterion 4

Actions Taken to Assess and Address Modern Slavery Risks

Actions taken in 2024

Throughout 2024, CEWA continued its commitment to modern slavery prevention, aligned with both the CECWA Strategic Initiatives 2030 and Quality Catholic Education (QCE). CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of 50 Catholic entities throughout all states and territories of Australia.

CEWA's governance practices ensured ongoing commitment to modern slavery prevention, through the revision of the Modern Slavery Prevention Executive Directive. The wider implementation of the CEWA strategic risk framework, redeveloped in 2023, ensured inclusion of modern slavery risks within the system-wide risk framework.

Throughout 2024, CEWA worked on developing its first CEWA Laudato Si' Sustainability Strategy, called to action by Pope Francis' Encyclical Laudato Si' and the Fifth Plenary Council Decree 8. The CEWA Laudato Si' Sustainability Strategy will be supported by a 2025 Action Plan, based on the framework provided by the Vatican Dicastery for Promoting Integral Human Development via the Laudato Si' Action Platform. Input from schools, offices, and First Nations and Church agencies will build the Strategy and Action Plan. The 2025 Action Plan will include CEWA's commitment to modern slavery prevention as one of the actions under Laudato Si' Goal 2: Cry of the Poor.

Based on ACAN's analysis, CEWA's maturity assessment score increased with 4% from 2023 to 2024, mainly due to increased supplier engagement, as part of the continuation of the phased implementation of the Zycus procurement system. The introduction of this centralised procurement system will ultimately reduce supplier risk across the organisation, at CEWA schools and offices. Among other benefits of a centralised procurement system, Zycus will introduce a central database of supplier data, instead of the current practice of individual schools managing their own supplier database. This central database will allow for categorisation of suppliers, as well as identification of high-risk categories, which will enable a system-response to mitigate any modern slavery risks. Contracts will be centrally reviewed before execution, to allow for amendment or deletion of any unacceptable terms and conditions that might pose a modern slavery risk. In addition, as part of Zycus, CEWA will introduce purchase orders across the entire system, which will lead to improved payment times to suppliers and, ultimately, their employees.

Implementation of the procurement system commenced in August 2023. Supplier onboarding, to enable the categorisation of suppliers and assessment against key risk criteria that include Modern Slavery, commences in March 2025, with CEWA offices scheduled to go live with the full functionality from July 2025, followed by a phased rollout to all CEWA schools over the course of 2025 and 2026.



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

Our Plans for 2025

For 2025, 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);
- ensure CEWA continues to operate within its Risk Appetite Statement, eliminating opportunities for modern slavery practices in its supply chain and operations;
- continue to strengthen procurement practices by completing the implementation of CEWA's procurement system to assist in the assessment and mitigation of modern slavery risks throughout the supply chain;
- go live with full functionality of the Zycus procurement system at CEWA offices;
- start the phased rollout to all CEWA schools;
- continue to strengthen engagement with suppliers to communicate the expectations relating to the prevention of modern slavery at the onboarding process;
- categorisation of suppliers, as well as identification of high-risk categories, which will enable a system-response;
- enact the 2025 Action Plan supporting the CEWA Laudato Si' Sustainability Strategy;
- review and update community and staff engagement initiatives;
- continue the use of Fairtrade staffrooms at all CEWA offices; and
- continue to participate in the ACAN Modern Slavery Risk Management Program.

Photo: Holy Cross College (Ellenbrook),
St Helena's Catholic Primary School
(Ellenbrook) and Emmaus Catholic
Primary School (Dayton)



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

Our Plans Beyond 2025

To ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention, CEWA maintains the following focus areas:

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. Reinforce CEWA's commitment to modern slavery prevention as one of the actions under Laudato Si' Goal 2: Cry of the Poor, in the CEWA Laudato Si' Action Plan.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of its supply chain risks through the phased rollout of the procurement system to CEWA schools.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery including purchase order terms.
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.
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.

Photo: Mel Maria Catholic Primary School
(Attadale / Myaree)



Criterion 5

Assessing Effectiveness

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

CEWA, through its governance structure, will continue to 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;
- reviewing community and staff engagement initiatives;
- continuing to be vigilant to and process concerns or reports, including whistleblower disclosures, relating to modern slavery; and
- advancing procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2024, CEWA received no disclosures, reports or concerns relating to modern slavery.

The table below summarises CEWA's activities relating to staff and supplier engagement in 2024, compared to 2023.

2024	Activity	2023 CEWA	2023 CEWA
Internal / Staff	Hours spent on modern slavery activities	10	20
	Individual staff completed e-learning	0	14
	E-learning modules completed	0	11
External / Supplier Engagement	Total number of suppliers	22,687	26,942
	Number of suppliers with visible contact information and ABN	261	261
	Number of suppliers across high-risk categories	4,878	2,396
	Number of ACAN Supplier Surveys completed (cumulative)	484	630
	Supplier attending capacity building webinars (cumulative)	111	50
	Invited to join Sedex (cumulative) <i>Number of suppliers invited to join Sedex</i>	96	160
	Joined Sedex (cumulative) <i>Number of suppliers that joined Sedex</i>	23	93
	Sedex SAQ completed (cumulative) <i>Number of Sites with Sedex SAQ completed</i>	12	79
	Social audits <i>(Number of audits completed)</i>	6	12
	Corrective actions <i>(Number of non-conformances)</i>	3	53
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	8	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0



Criterion 6

CEWA does not own or control any entities.

Consultation with Owned or Controlled Entities

Criterion 7

No other relevant information.

Any Other Relevant Information

Photo: St Mary's College (Broome)



This Modern Slavery Statement 2024 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 May 2025, 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 2024

Eva Skira AM	CECWA Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner
Michelle Shafizadeh	Commissioner
Jonathon Woolfrey	CECWA Deputy Chair
Peter Yensch	Commissioner

CEWA Executive Team 2024

Wayne Bull	Executive Director
Annette Morey	Deputy Executive Director
Paul Andrew	Director People and Culture
Mandy Connor	Director Teaching and Learning
Dr Tony Curry	Director Leadership and Wellbeing
Rev Mark Powell	Director Religious Education
Dr Glennda Scully	Director Finance, Infrastructure and Digital Technology



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