Victorian Catholic Education Authority

June 2024

Victorian Catholic Education Authority Limited

Modern Slavery Statement
1 January – 31 December 2023

In the spirit of reconciliation, the VCEA acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land and pays respect to their Elders past and present.

Victorian Catholic Education Authority Limited (VCEA)
ABN: 92 119 459 853
Casselden Place, 2 Lonsdale St Melbourne, VIC 3000
https://vcea.catholic.edu.au/
Email: secretary@vcea.catholic.edu.au

Victorian Catholic Education Authority

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This Modern Slavery Statement (**Statement**) has been made on behalf of Victorian Catholic Education Authority Limited (**VCEA**) ABN 92 119 459 853 (formally known as Catholic Education Commission of Victoria Limited (CECV) prior to 13 December 2023). The Statement has been prepared pursuant to sections 6 and 13 of the Modern Slavery Act 2018 (Cth) (the **Act**) and covers VCEA as a single reporting entity.

This Statement sets out the progress that VCEA has made towards identifying, assessing and addressing modern slavery risks during the 2023 reporting period and acknowledges the organisational transformation that took place within VCEA during this period. This is VCEA's first statement in its renewed form.

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Victorian Catholic Education Authority Limited as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 17 June 2024.

This Modern Slavery Statement is signed by the Chair as the responsible member of Victorian Catholic Education Authority Limited as defined by the Act.

James Merlino
Chair
17 June 2024

Criteria 1: About the Victorian Catholic Education Authority Limited

VCEA is the peak body for Catholic School education in Victoria. Established as the Catholic Education Commission of Victoria (CECV) in 1973 by the Archbishop of Melbourne and the Bishops of Ballarat, Sale and Sandhurst dioceses, it was incorporated in 2006.

In 2021 the Bishops of Victoria commissioned an independent review into the role, governance and operations of CECV leading to a renewal process to enhance the governance structure and operating model.

As part of that process, in 2023, its name was changed to the Victorian Catholic Education Authority (VCEA) Limited.

VCEA works in close collaboration with the Catholic School proprietors across Victoria. These comprise:

- Melbourne Archdiocese of Catholic Schools (MACS) is responsible for the governance and operation of 295 schools in the Archdiocese of Melbourne.
- Diocese of Ballarat Catholic Education Limited (DOBCEL) is responsible for the governance and operation of 64 schools in the Diocese of Ballarat.
- Diocese of Sale Catholic Education Ltd (DOSCEL) is responsible for the governance and operation of 43 schools in the Diocese of Sale.
- Catholic Education Sandhurst (CES) is responsible for the governance and operation of 58 schools in the Diocese of Sandhurst.
- In addition to the diocesan school proprietors, there are Catholic Religious Institute and Ministerial Public Juridic Person Schools Proprietors who are responsible for the governance and operation of 48 schools across Victoria. These proprietors are members of Catholic Religious Institute and Ministerial Public Juridic Person Victorian Schools Limited (CRMV)

Mission

The Company exists to advance the mission of Catholic School education in the State of Victoria, in the service of students, families and the broader community.

Through the delivery of its stated Objects, the Company will advance a Catholic vision of education where every student's life is understood as gift. Each student in a Catholic School throughout Victoria will be afforded every opportunity to come to the fullness of life. The Company will strive for excellence in education through the delivery of responsive and quality educational practices.

Central to the Company's mission is the advancement of every child throughout their educational journey to allow them to mature in every dimension of their lives through the formation of their intellectual, spiritual, physical, and social capacities. Through the equitable sharing of resources among Catholic educational providers, the Company's mission is to enable students to flourish, to grow in awareness of their unique gifts and to confidently embrace their future with hope, in faith, and through love. The Company:

a) seeks to integrate this work of educating with the explicit proclamation of the Gospel of Jesus Christ in fostering communities of learning and teaching, which recognise and nurture the dignity of each person, created in the image of God.
b) strives to ensure that Catholic schooling in Victoria is distinguished by its intellectual, practical, and moral excellence, and fosters a formation of the whole person that is deeply and enduringly humanising.

c) upholds the rights of parents, as the first teachers of their children, to access Catholic schooling which provides a religious and moral formation that is aligned with their conscience and religious faith.
d) promotes the common good in its structures, policies and actions by advocating for appropriate access to, and funding of Catholic schooling in Victoria, and ensuring the just distribution of education resources.
e) recognises the ecclesial identity of each Catholic school, and the bond of communion with its diocese, parish or religious institute that underpins its foundation, and seeks to nurture them by promoting dialogue and cooperation among all Catholic School education providers, Catholic entities, and with the general community.

Governance structure

The renewed governance structure for VCEA came into effect on 5 December 2023 at the Annual General Meeting (AGM) of Members through the adoption of the recommendations contained in the Bishop members *Response and Directives*, which included a new Constitution and the appointment of a skills-based board.

Company members

- Most Rev Peter A Comensoli DD Archbishop of Melbourne
- Most Rev Paul Bird CCsR MA DD Bishop of Ballarat
- Most Rev Gregory Bennet MS STL Bishop of Sale
- Most Rev Shane Mackinlay DD Bishop of Sandhurst
- Sr Eileen Ann Daffy rsm *(appointed from 19 December 2023)*

Board

- James Merlino, Chair
- Patricia Cowling, Director *(appointed from 1 March 2024)*
- Lynn Glover, Director
- Chris O'Grady KC (*appointed from 15 May 2024*)
- Marcelle Mogg, Director *(appointed from 1 March 2024)*
- Damian Murphy, Director

Board Committees

- VCEA Consultation Committee
- People and Employment Relations Committee
- Review Body and Compliance Committee
- Catholic Mission Committee *(not yet established)*
- Finance, Risk and Audit Committee
- Nominations Committee
- Education and Performance Excellence Committee *(not yet established)*

Executive Leadership

- Professor Elizabeth Labone, Chief Executive Officer (*appointed from 20 May 2024*)
- Bruce Phillips, Chief Strategy Officer (*from 29 August 2023*) and Acting Chief Executive Officer (*from 22 January 2024 to 16 May 2024*)
- Jim Miles, Former Chief Executive Officer (*resigned as CEO 19 January 2024*)
- Tracey Bannan, Chief Operations Officer (*appointed from 11 September 2023*)
- Stefanie Veal, Chief Education and Integrity Officer (*appointed from 25 September 2023 to 7 June 2024*)
- Geoff Bell, Acting Chief Education and Integrity Officer (*from 10 June 2024*)

Services and Functions

VCEA provides a number of services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria, working in close collaboration with proprietors. The services and functions are set out in VCEA's Constitution and relate to:

- Government funding of Catholic schools
- School registration and compliance
- Enterprise bargaining
- Long service leave
- Representation and advocacy
- Catholic identity
- Research
- State-wide performance of Catholic schools
- Data collection
- State-wide accreditation

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Criteria 2: Operations, supply chains and organisational structure

Information on the operations of VCEA can be found in the Financial Report included in the VCEA 2023 Annual Report. This document can be found on the VCEA website.

The Annual Report outlines the operations of VCEA throughout 2023 and provides an overview of the reorganisation of the governance structures, functions and operations that occurred during 2023 at the direction of the VCEA Members, the Catholic Bishops of Victoria. The Annual Report will also be available on the Australian Charities and Not-for-profits Commission (ACNC) website.

It is noted that out of VCEA's $3.4 billion 2023 expenditure, 99.6% relates to direct distributions of government grants to systemic schools in Victoria and distributions to incorporated diocesan education entities.

VCEA's operational expenditure, excluding depreciation and amortisation of $134,179, was $15.3 million, representing only 0.45% of VCEA's total operational expenses.

Risk Management

VCEA has adopted a strategic, consistent, and structured enterprise-wide approach to risk management to achieve an appropriate balance between realising opportunities and minimising unexpected outcomes.
VCEA recognises that risk arises in all aspects of its operations and at all stages within the life cycle of those operations. This is true of modern slavery risks.

Risk management is an integral part of sound management practice and an essential element of good corporate governance and responsible stewardship. It reinforces accountabilities, enhances decision-making and improves outcomes.

The VCEA Board understands the importance of risk management as a facet of good governance and has implemented an approach to its management of risk that aligns with *ISO 31000:2018 Risk management – Guidelines.* At VCEA risk management refers to the set of principles and policies, framework, culture, processes and coordinated activities used to direct and control the organisation regarding risks that arise in its pursuit of its objectives.
The VCEA Board is accountable for overseeing and monitoring the assessment and management of risk.
In 2023 the Board was supported in its risk management role by the Audit and Risk Committee (ARC), which was responsible for the review and endorsement of the Risk Management Framework, Risk Appetite Statement and Risk Management Policy, for approval by the Board.
The ARC met four times during 2023. At each meeting it considered the enterprise risk register. The register outlines those risks that management identifies as requiring ongoing review due to the level of exposure faced or where the risk is outside of VCEA's risk appetite, which is set annually by the Board. VCEA's exposure to modern slavery was considered in 2023 but did not trigger an exposure that required reporting to the ARC i.e. the exposure was deemed to be below VCEA tolerance.

Organisational Structure and Workforce Profile

For the majority of 2023, VCEA operations were delivered via a Service Level Agreement (**SLA**) with Melbourne Archdiocese Catholic Schools Ltd (**MACS**) while VCEA worked to directly appoint staff. Amongst other business units, procurement, risk management and IT services were included in the 2023 SLA with MACS.

VCEA was progressively staffed throughout 2023, with staff recruited via open external channels including Seek and executive recruitment agencies or transferring directly from MACS. VCEA also contracted agency staff in 2023 to support day-to-day operations. Contractors were also engaged in the provision of IT services and where this occurred, staff were primarily located at MACS.

As at 31 December 2023, there were 53 people working at VCEA as set out below:

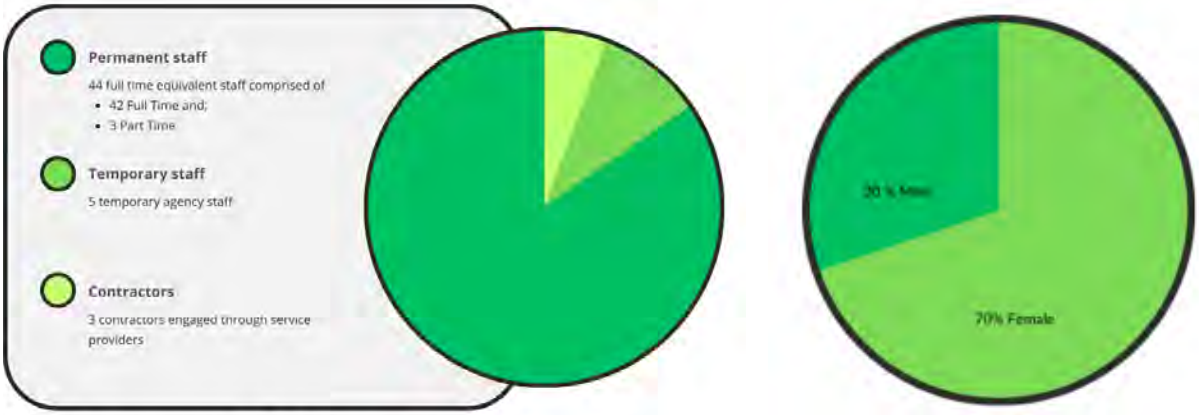

Figure 1.1 - Workforce profile as at 31 December 2023

When fully staffed, VCEA will employ approximately 75 staff. The portfolios and management structure are shown below.

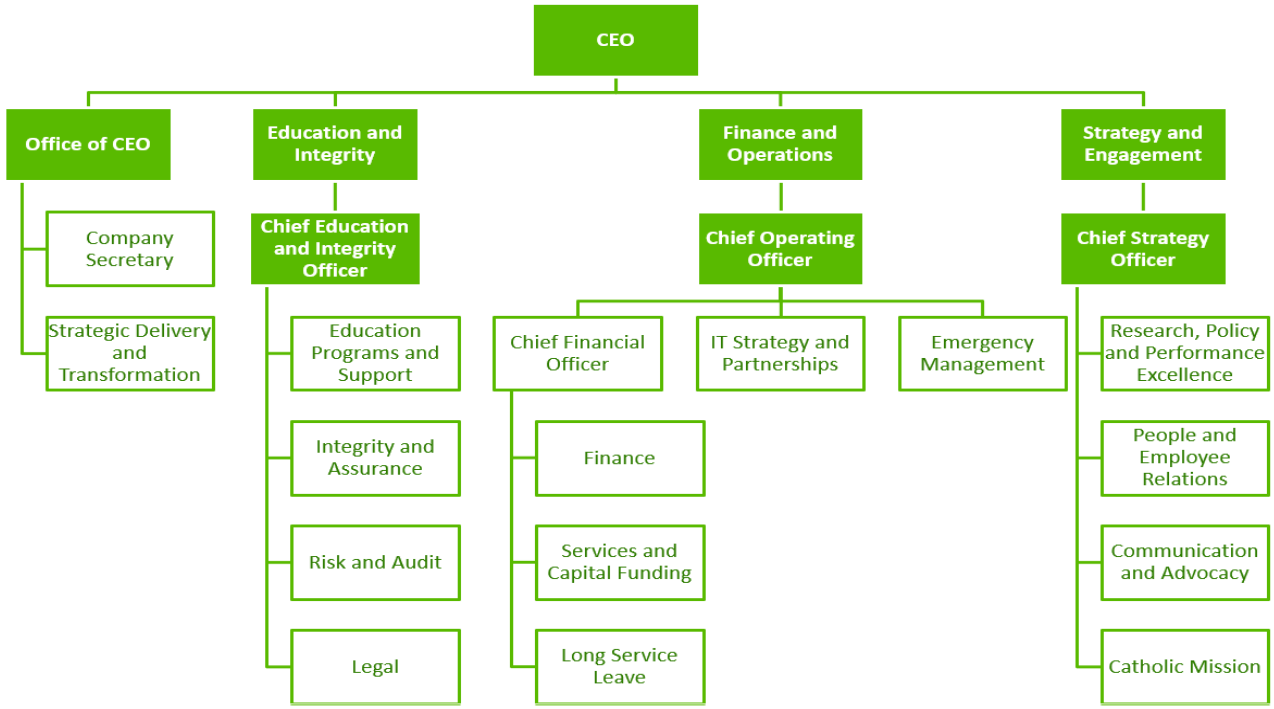

Figure 1.2 Organisational Structure

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Criteria 3: Modern Slavery risks

Risks in Operations and Supply Chains

VCEA monitors the risks of modern slavery practices in operations and supply chains and the potential to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain.

- **Cause:** Refers to situations where an organisation's actions or decisions might directly create conditions that could lead to human rights violations, including modern slavery.

- **Contribute to:** Indicates scenarios where an organisation's activities indirectly contribute to human rights violations or modern slavery, even if they are not directly causing them. It might involve benefiting from practices that are linked to violations.

- **Directly linked:** Instances where modern slavery is directly connected to an organisation's operations or supply chain through the activities of another entity that they have a business relationship with.

VCEA's suppliers are predominantly located in Australia and are predominantly service related. As such, VCEA has rated its exposure to modern slavery risk as low. We recognise, however, that our suppliers' supply chains may extend outside of Australia. VCEA's modern slavery risk assessment practices are not yet sufficiently mature to extend beyond Tier 1 of our operations and supply chain. Tier 1 in a supply chain refers to the first level of suppliers directly linked to an entity and typically consists of primary suppliers that provide goods and services directly to the organisation.

Our relationship with the Australian Catholic Ant-Slavery Network (ACAN) assists us in gaining insight into our operational activity partners and suppliers. With ACAN's support we continue to operate an ongoing monitoring system of our suppliers. Whilst VCEA has determined that the risk of encountering modern slavery practices in our operations is low, the highest area of exposure has been identified as ICT hardware (laptops, computers and mobile phones) within the VCEA supply chain. These goods may be manufactured using conflict and/or forced labour in the early stages (Tier 2 and beyond) of their supply chains.

> *According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the Global Slavery Index and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.*
> *https://www.walkfree.org/global-slavery-index/*

VCEA supplier data has been reviewed against the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labour Organisation (**ILO**) definitions of modern slavery.

- Of the 192 VCEA suppliers engaged in 2023, 49 suppliers have completed the ACAN supplier survey
- 7 suppliers have joined Sedex (Supplier Ethical Data Exchange) platform
- VCEA continued with risk identification activities throughout 2023 for all new suppliers

In 2023, VCEA procured a range of goods and services to support its operations. Suppliers represent a combination of services provided to schools, funded by government grants, and VCEA operational suppliers. Modern slavery risks associated with VCEA for 2023 have been identified across 13 spend categories using the ACAN Category Risk Taxonomy. These range from high-risk IT Hardware through to low-risk Professional Consultancy. These 13 categories represent an increase in the spend categories from nine in 2022. This reflects the changes to VCEA's structure outlined under Category 1 and 2.

The graph below shows an analysis of supplier expenditure with 50% considered low risk, 15% medium risk, and 29% high risk, based on spend.

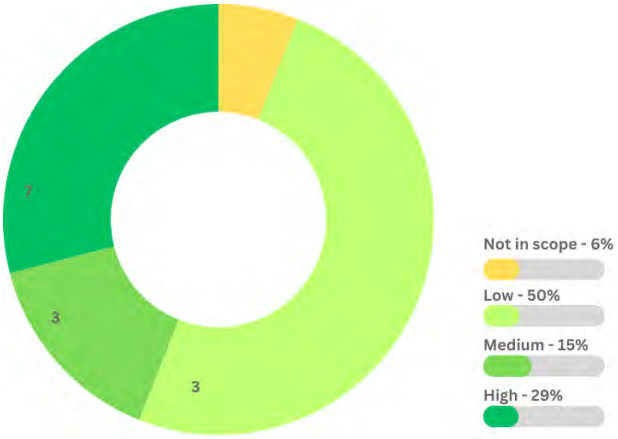

Figure 2.1 Risk by category and spend

In 2023, VCEA's main categories of expenditure were in the following areas. The most significant change from 2022 was in Professional Consultancy (low risk) which increased.

- Professional Services
- IT Hardware
- IT Software and network services
- License Fees

A total of 29 suppliers were within the high-risk category (ACAN Category Risk Taxonomy), of which 13 provide VCEA with ICT Hardware. This represents an increase in the number of suppliers in the high-risk category, over 2022.

The top 20 suppliers by spend, equated to approximately 80% of total expenditure to external suppliers. Our largest procurement categories included Professional Services and ICT Hardware. The graph below shows an analysis of the top 20 suppliers' expenditure by percentage.

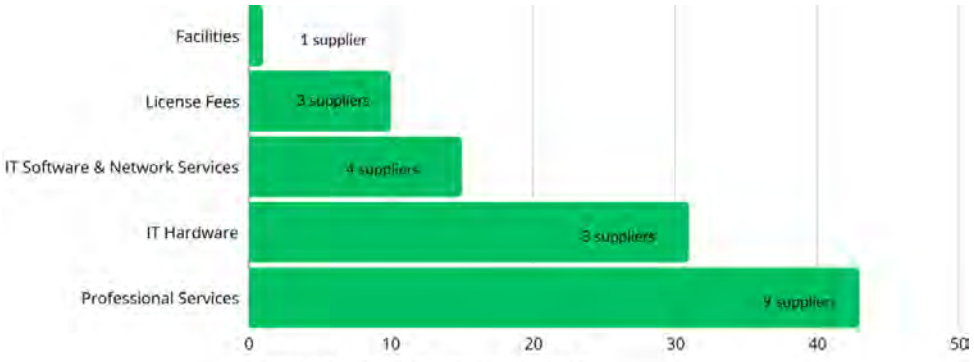

Figure 2.2 - Top 20 suppliers by spend

IT Hardware Procurement

VCEA recognises the higher risk of modern slavery exposure within the IT hardware supply chain and takes a responsible sourcing approach. When sourcing IT hardware, well known larger companies are preferred who are aware of and meeting their own modern slavery obligations in their supply chains.

Where a supplier is identified as high or medium risk (using the ACAN Taxonomy) during a tender process, a due diligence process is implemented by MACS through its SLA with VCEA. This process is informal and is undergoing continued improvement. The due diligence process seeks to account for if and how modern slavery risks are being managed by suppliers, which includes any/all of the following actions:

- requesting details on the suppliers' approach to addressing modern slavery within their operations or supply chain including the provision of relevant policies; and
- imposing modern slavery clauses in standard contract templates, including binding suppliers to the ACAN Code of Conduct.

Vendors do not proceed through the tender process if they are unable to provide this information or do not accept the modern slavery clauses and the ACAN Code of Conduct in standard contract templates.

Employment Risk

In 2023, VCEA established a directly employed workforce. VCEA also accessed labour hire and professional consultancy support to deliver on key aspects of the renewal.

The People and Culture team at VCEA oversees compliance with labour, employment and immigration laws through various policies and procedures. VCEA is committed to ensuring appropriate controls including policies, procedures and guidelines are in place to protect against modern slavery across the organisation's internal employment operations and to ensure the safety and wellbeing of employees. VCEA continues to develop and renew people policies to ensure that the suite of policies addresses applicable employment laws and that internal procedures are efficient and effective.

VCEA uses two major instruments of employment, the Catholic Education Multi-Enterprise Agreement 2022 (**CEMEA 2022**) and individually negotiated employment contracts. Approximately 18% of staff were covered by the CEMEA 2022 in 2023.

Competency based position descriptions, along with related policies and procedures support VCEA in the recruitment, selection and appointment of employees. It is a condition within VCEA appointment processes that employees provide a valid and current Working with Children Check (**WWCC**), criminal record check and evidence of working rights prior to commencement.

The People and Culture team also work closely with external labour hire agencies to vet consultants and short-term temporary staff to ensure all have valid working rights.

The following VCEA Board approved policies outline VCEA's expectations and were available during 2023.

Policy	Purpose
Board Charter including a Director Code of Conduct	To ensure high standards of behaviour are observed by the Directors in the context of their role.
Whistleblower Policy	To govern and promote ethical behaviour at VCEA and to encourage and manage appropriate and responsible whistleblowing.
Anti – Slavery Policy	To prevent and mitigate modern slavery risk within VCEA operations and supply chains, the policy seeks to ensure that modern slavery does not occur within VCEA operations, its business relationships and extended supply chains.

Policy	Purpose
Bullying Discrimination and Harassment Policy	To ensure that VCEA is a safe workplace, where the rights of all employees are respected and where all legal requirements, as outlined in relevant legislation, are adhered to.
Privacy Policy	To ensure VCEA protects and handles personal and sensitive information lawfully.
People and Culture policies	A range of policies and procedures to support the safety and wellbeing of employees including; • Working from home guideline • Employee Lifecycle Policy • Performance Planning and Review Policy • Injury Management and Rehabilitation Policy • Work Health, Safety and Wellbeing Policy
Employee Assistance Program ('EAP')	To promote a healthy and safe workplace culture through the provision of guidance and resources to help employees achieve a healthy work-life balance, manage stress, and navigate life transitions.
Risk Management Policy & Framework	The policy describes accountability for risk management, reporting protocols, and the approach for the identification, assessment and mitigation of risk. It references VCEA's Risk Management Framework which provides details on VCEA's risk appetite and processes for managing risk.

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Criteria 4: Actions taken to assess and address Modern Slavery risks

ACAN participating entities are united in the belief that action against modern slavery is a fundamental Catholic social teaching. As such, with the support of ACAN and MACS procurement (provided under the existing SLA), VCEA achieved the following actions to address modern slavery risks in its operations.

- Embedded modern slavery risk controls in its procurement processes by incorporating contractual clauses which bind suppliers and service providers to addressing modern slavery risks into template contract documents, along with binding suppliers and service providers to the ACAN Supplier Code of Conduct. These template contracts incorporating modern slavery clauses and the ACAN Supplier Code of Conduct are issued in requests for tenders and other pre-contractual processes.
- Reported on the risks associated with operations, like modern slavery, through the enterprise risk register. The register is tabled quarterly at meetings of the Audit and Risk Committee and is focused on those risk rated high or extreme and/or those activities operating outside of risk appetite.
- Implemented a Modern Slavery Policy using the ACAN Risk Taxonomy.
- Continued to include modern slavery risks in due diligence procurement processes and to undertake risk assessments of suppliers and service providers.
- Through ACAN, invited suppliers to reflect on their own Modern slavery awareness and to complete the ACAN Supplier Survey.
- Through ACAN, invited suppliers to join Sedex (Supplier Ethical Data Exchange) platform.
- Continued participation in the Modern Slavery Risk Management Program (Program) with the Australian Catholic Anti-Slavery Network (ACAN).

Supplier Engagement with Sedex

In 2023, 31 high risk / high volume VCEA suppliers were invited for on-boarding to the Sedex platform by ACAN. Sedex is a data exchange platform designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts.

Once invited to join the platform as a supplier of VCEA, the suppliers are encouraged to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score). Seven suppliers took up this invitation to join Sedex. VCEA will continue to work with ACAN to encourage suppliers to join Sedex to:

- Manage the risk of modern slavery with existing suppliers
- Screen new suppliers as part of tenders and supplier on-boarding processes
- Gain visibility further upstream in the supply chains.

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Criteria 5: Effectiveness of steps undertaken

Maturity Assessment

As a reporting entity CECV completed three gap analyses between 2019-2022 using the ACAN tool to review the four stable operational categories of Management Systems, Procurement and Supply Chain, Risk Management and Customers and Stakeholders. The fifth category Human Resources and Recruitment was not applicable to CECV as CECV did not employ staff directly at that time.

The shift to a Maturity Assessment from a Gap Analysis marks a strategic evolution in the ACAN approach to Modern Slavery risk taken by VCEA. It represents a reset point for continuous improvement that is timely given the operational renewal of VCEA and continuous improvement approach.

VCEA has now completed its first maturity assessment with an overall maturity score of 33%. Given the significant transformation in the operations of VCEA throughout 2023 including renewed governance, direct employment of staff, and the development of VCEA policies and procedures, a first-year reporting target of over 15% has been achieved.

Pillar	Maturity Score 2023
Business process and governance Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities	34%
Operations Focuses on internal practices and how effectively we manage risks within our day-to-day activities.	33%
Supply chain Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.	40%
Worker engagement Addresses how we manage worker engagement and the standards upheld to prevent exploitation.	33%
Entity's programs and activities Looks at the broader initiatives and engagements we undertake to combat modern slavery.	16%
Grievance mechanisms and remediation Evaluates the channels available for reporting concerns and the processes for addressing them.	43%

Sub Pillar	Maturity Score 2023
Governance Sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.	38%
Risk Assessment Identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.	57%
Risk Management Evaluates how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.	19%
Effectiveness of Actions Measures the impact of anti-slavery efforts and is what holds us accountable.	20%

VCEA will continue to strengthen its approach to modern slavery risk in 2024 through targeted actions in the context of the new governance and organisational structure and operating processes.

VCEA's modern slavery risk management program is incorporated into VCEA's procurement processes in accordance with VCEA's modern slavery controls, such as adding mandatory key contractual clauses to VCEA's template contracts. However, VCEA can more consistently embed the risk management program in supplier and employment practices across the organisation.

Areas of focus in 2024 will include modern slavery-related programs, activities and an assessment of our modern slavery risk management practices to monitor the effectiveness of actions. Where possible, metrics will provide a quantitative basis for evaluating actions and providing a clear, objective measure of whether and to what extent VCEA's goals are being achieved.

It is noted that VCEA's engagement with the ACAN program and participation in Domus 8.7 Remediation Services increases both our Risk Assessment and Grievance Mechanisms and Remediation scores. This will need to be considered in developing the renewed action plan.

Looking ahead

VCEA commits to the redevelopment of a multi-year modern slavery action plan with reviews at regular and appropriate intervals to ensure the actions remain relevant and effective and contribute to the modern slavery risk management approach. In 2024 VCEA commits to undertake the following steps:

Systems and processes	• Review and renew the Anti Slavery Policy • Develop a Staff Code of Conduct, Complaints and Grievances Policy, Equal Opportunity Policy and Procurement Policy • Appoint a Modern Slavery Liaison Officer (MSLO) and Whistleblower Protection Officer (WPO) and incorporate the roles into role mandates • Establish a cross disciplinary Modern Slavery Working Group (MSWG) with representation from key areas of the organisation including Risk, Legal, Finance and People and Culture teams. • Define roles and responsibilities of the MSWG in a Terms of Reference
Risk management	• MSWG to undertake a gap analysis and review of existing processes and actions that support risk mitigation and reporting • Prepare a renewed Modern Slavery Action Plan aligned to VCEA's governance structure, policies, processes and approach to effectively managing enterprise risk

	• Assess the effectiveness of VCEA's control structures that address modern slavery risk • Monitor progress and effectiveness of actions (existing and new, based on the assessment above) • Review and renew the Risk Management Policy to ensure a consistent process for the identification, assessment, treatment, monitoring, and reporting of risk across all VCEA operations • Establish consistent risk reporting to the newly formed Finance Risk and Audit Committee • Develop and embed procurement related delegations
Procurement and supply chain	• Continue to assess risk within VCEA operations and supply chains • Include modern slavery requirements in standard VCEA market engagement documents e.g. requests for proposals • Embed modern slavery risk due diligence within the procurement process • Invite new high risk category suppliers of VCEA to complete the ACAN supplier survey
Engage, educate & respond	• Introduce modern slavery training modules for management, staff and the VCEA Board (Modern Slavery 101 and Modern Slavery Business Relevance) • Establish a remedy pathway to address and respond to modern slavery practices identified in operations or supply chain • Enhance engagement and participation in the ACAN Modern Slavery Risk Management Program by the MSWG

VCEA is committed to continuous improvement in partnering with our stakeholders to proactively work to reduce modern slavery.

Remediation

When suspicions of modern slavery practices come to VCEA's attention through whistle blowers or other channels, VCEA will contact relevant law enforcement agencies if a person is in immediate danger or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

In 2024, training will be offered to VCEA staff to support them in recognising the causes of modern slavery, and the mechanisms available to address poor labour practices, unsafe working conditions and other indicators of modern slavery.

Criteria 6: Consultation with owned or controlled entities

VCEA has no controlled entities that require internal consultation.

In preparing the 2023 Modern Slavery Statement, the following functions have been consulted and/or have contributed material to ensure the statement accurately reflects the practice and policies applied. Consultation has also occurred with MACS concerning the provision of services to VCEA in 2023.

Team or function	Input subjects
Finance	Operations and supplier spend
Procurement (MACS)	Supply chains, goods and services procured, and processes for supplier diligence, on-boarding and management
Risk	Risk management approach with respect to modern slavery
People and Culture	Working conditions of employees and contractors, the implementation of training programs to educate on modern slavery risk and other steps to build a culture that places priority on modern slavery and other human rights abuse risks.
Legal	Contractual and legal obligations and legislative requirements
Communication and Advocacy	A description of the current operating context and renewed governance systems

Criteria 7: Any other relevant information

No further information at this time.

Modern Slavery Statement

2023

vcea.catholic.edu.au