



CATHOLIC EDUCATION  
WESTERN AUSTRALIA

# Modern Slavery Statement

2023

## 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 CEWA. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers CEWA as a single reporting entity.

CEWA Office:  
50 Ruislip Street  
West Leederville WA 6007

[www.cewa.edu.au](http://www.cewa.edu.au)



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# Approval and Signature

## Eva Skira AM

*Chair, Catholic Education  
Commission of Western  
Australia*



The passing of the *Modern Slavery Act 2018* and the establishment of the *National Action Plan to Combat Modern Slavery 2020–2025 (National Action Plan)* are examples of positive steps taken by the Australian Government to counter the prevalence of modern slavery in Australia.

CEWA believes fervently that human rights are inherent and inalienable for all persons regardless of race, gender, nationality, ethnicity, language, religion, or otherwise. While modern slavery continues to be deeply embedded in global communities today, it is a practice that CEWA distinctly rejects. Modern slavery disrupts supply chains, undercuts responsible local businesses and has devastating physical, mental, and emotional consequences for its victims.

As CEWA reflects upon and examines practices across our organisation, we remain committed to ensuring the social, political, and economic equity of humankind. Modern slavery, in any form, is unacceptable across our operations or supply chains. CEWA is committed to working in collaboration with our employees, suppliers, and all other relevant groups to tackle this challenge.

Aligned with the CECWA Strategic Directions 2019–2023 and Quality Catholic Education, CEWA continues to make strides in ensuring that we take positive steps including the promotion of educational opportunities and strengthening procurement management approaches to do our part in making an impactful difference.

I encourage everyone to consider what personal contribution they can make to address modern slavery risks; 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 modern slavery will be realised through our significant and continuous dedication, ensuring that 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 welcome your participation in this ongoing process.

A handwritten signature in black ink, appearing to read 'E. Skira', followed by a long horizontal flourish.

**Eva Skira AM**

*Chair*

*Catholic Education Commission of Western Australia*

*This Modern Slavery Statement was approved by the principal governing body of CEWA as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 3 May 2024. This Modern Slavery Statement is signed by a responsible member of CEWA as defined by the Act.*

# Approval and Signature

## Wayne Bull

*Executive Director,  
Catholic Education  
Western Australia Limited*



As a significant employer in Western Australia with more than 11,500 employees and as one of the largest education providers, with over 80,000 students enrolled in Catholic education, it is imperative that we continue to use our platform to amplify the human rights of the marginalised and vulnerable people impacted by modern slavery. A complex issue, modern slavery, sadly impacts more than 40,000 people in Australia and despite internationally lauded legislation, is a growing concern in our country.

To counter modern slavery practices, CEWA's focus has been to build collaborative partnerships with groups that align with our vision. By maintaining our membership with Australian Catholic Antislavery Network (ACAN) and over 50 Catholic entities throughout Australia, CEWA is confident that impactful outcomes are being achieved by collectively demanding positive change from national and international supply chains.

CEWA's system-wide Executive Directive – Modern Slavery Prevention is one of the many implemented measures that aims to ensure that the dignity of work, and the rights of workers are upheld, that ethical business processes are applied, and modern slavery risks are addressed, ensuring that CEWA's commercial affiliations remain consistent with legislative and moral expectation.

On 8 February 2019, Pope Francis spoke at the 10th World Day of Prayer and Awareness against Human Trafficking, stating that we must *"mobilise all our resources in combating trafficking and restoring full dignity to those who have been its victims. If we close our eyes and ears, if we do nothing, we will be guilty of complicity."* In slavery-proofing all procurement practices and supply lines of the Vatican, Pope Francis reminds us that whether through consumption of commercial goods produced through slavery, or the making of financial profits through the practice, modern slavery ought to be contended. Pope Francis has modelled the way forward; fortitude in demanding better for those impacted by modern slavery, and reminding all that the cost of goods should never be prioritised over the human rights of individuals, particularly those most vulnerable to modern slavery practices.

Yet, there is still much work to be done in this space. CEWA continues to develop our program of work in areas including governance, procurement and supplier management, legal documentation, facilities management, investment, research, engagement, and education, and more. We are committed to exceeding all obligations in respect to modern slavery prevention and the assurance of a future where all persons are empowered to embrace the irrevocable value of their human dignity.

A handwritten signature in black ink, appearing to read 'Wayne Bull', written in a cursive style.

**Wayne Bull**

*Executive Director  
Catholic Education Western Australia Limited*

# Reporting 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 a Christ-centred, child-focused learning environment for students, so that they can become active 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 15.6% of the State's total school-age population, including 17.2% of all secondary students. In 2023, over 80,000 students were enrolled in 163 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 11,500 staff, making it the State's fourth largest private employer and a significant contributor to the Western Australian 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. Receiving a quality Catholic education, care and support enables children 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: St Joseph's School (Boulder)



# Reporting Criterion 2

## Our Structure, Operations and Supply Chains

### Our Organisational Structure

In 2023, CEWA was the governing body for 149 CEWA schools and provided registration oversight for an additional 10 Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

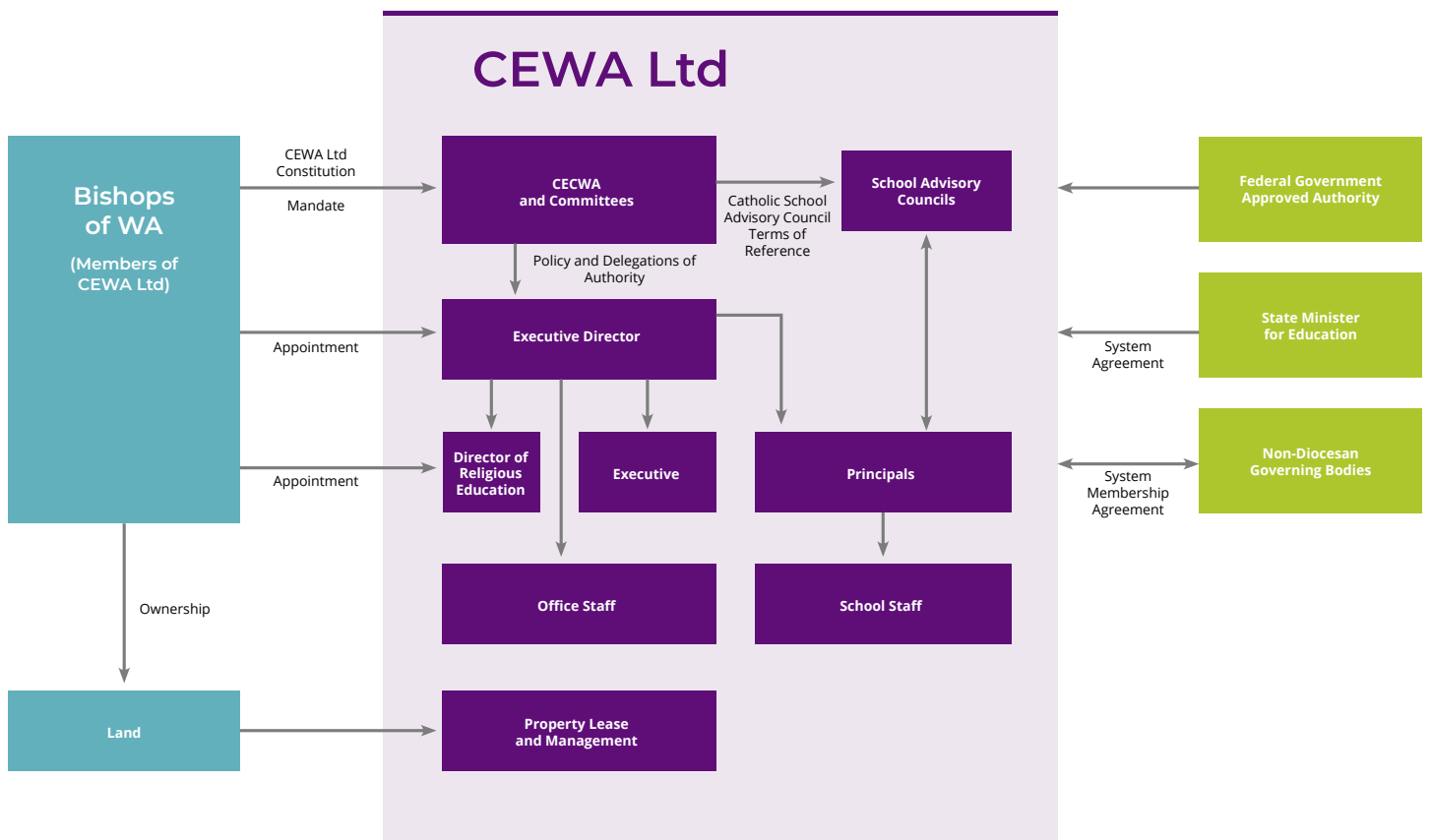
CEWA's annual consolidated revenue in 2023 was: \$1,358,034,942.

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. CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2023, 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:



## Reporting 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 10 schools that are governed by six governing bodies other than CEWA. For the purposes of school registration in Western Australia, 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 was the Executive Director of CEWA until 31 December 2023. In 2023, the Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Wayne Bull
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director Leadership and Wellbeing	Dr Tony Curry
Director People and Culture	Paul Andrew <i>(commenced 11 September 2023)</i>
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office and is supported by approximately 332 office staff working across the four Catholic dioceses in Western Australia.



## 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.

## Reporting 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.



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



## Our Operations

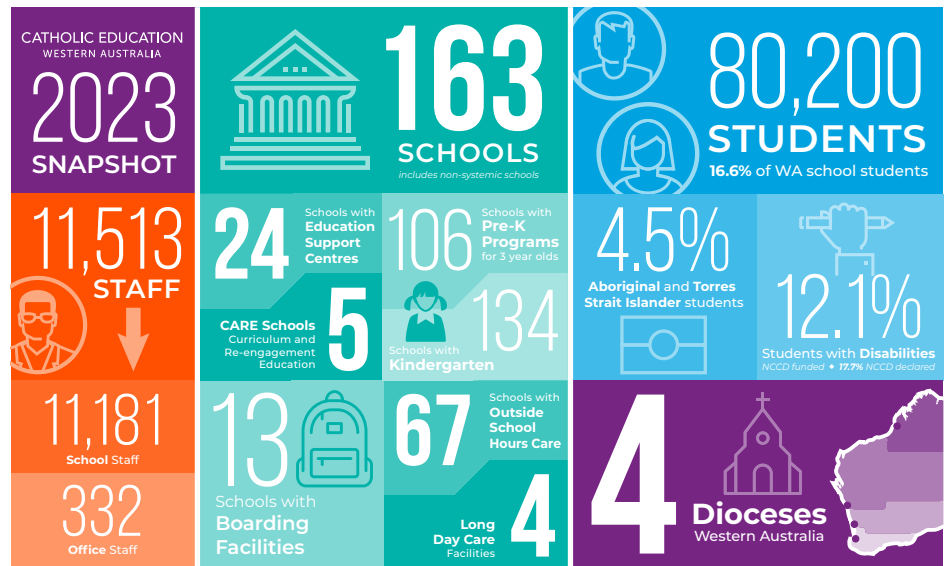
CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State. As well as playing a pivotal role in supporting a developmentally appropriate and engaging teaching and learning program 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 people;
- 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 that working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout CEWA, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

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

An overview of CEWA's reach in 2023 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, environment 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.

## 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 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 supplier program.

# Reporting Criterion 3

## Modern Slavery Risks

In 2023 CEWA procured

**\$1.25b**

of goods and services

These goods and services were  
sourced from approximately

**13,400**

predominantly Australian suppliers

In 2023, CEWA procured \$1,251,145,590 of goods and services from employees and approximately 13,400 direct suppliers\* (predominantly Australian). Services procured 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 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. Throughout 2023, uniform purchasing continued 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 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.

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.

## Reporting Criterion 3: Modern Slavery Risks (continued)

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.



As of December 2023 CEWA supported

# 11,500

teaching and non-teaching jobs

# \$2.37bn

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

## Operational Risks

### CEWA's people

As of December 2023, CEWA supported 11,500 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.

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, 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:

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

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

Photo: Aranmore Catholic Primary School (Leederville)

### Reporting Criterion 3: Modern Slavery Risks (continued)

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 \$161 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 CEWA that include their commitment to responsible investing.

CEWA had investments of  
**\$161m**  
during the reporting period.

### Reporting 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 2023 Investment Report, from the total 52 Australian and International equity holdings invested in, 66% of these have not been involved in any major recent controversies regarding modern slavery/labour rights; 21% have been involved in recent moderate level controversies; and 13% 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.

CEWA is continuing 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 supply chains, especially beyond Tier 1 suppliers.

# Reporting Criterion 4

## Actions Taken to Assess and Address Modern Slavery Risks

### Actions taken in 2023

Throughout 2023, CEWA continued its commitment to modern slavery prevention, aligned with both the CECWA Strategic Directions 2019-2023 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 Executive Directive – Modern Slavery Prevention and the revision of the training modules. The re-development of the CEWA strategic risk framework, undertaken in 2023, ensured inclusion of modern slavery risks within the system-wide risk framework.

In June 2023, CEWA partnered with Zycus Cognitive Procurement to transform CEWA's procurement practices at CEWA schools and offices. This included an overhaul of the supplier onboarding process to enable the categorisation of suppliers and assessment against key risk criteria that include modern slavery.

The selection of Zycus represented a significant milestone in the establishment of best-practice procurement at CEWA and highlights the commitment to reducing supplier risk across the organisation.

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, with CEWA offices scheduled to go live in August 2024 followed by a phased rollout to all CEWA schools in the course of 2025.



### Our Plans for 2024

For 2024, 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 operates within its Risk Appetite Statement, eliminating opportunities for modern slavery practices in its supply chain and operations

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

- 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;
- strengthen engagement with suppliers to communicate the expectations relating to the prevention of modern slavery;
- promote the educational opportunities available to the CEWA community on modern slavery, through promoting the online modules on modern slavery prevention offered via ClanEd;
- 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.

## Our Plans Beyond 2024

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. Called to action by Pope Francis' Encyclical <i>Laudato Si'</i> , CEWA will develop a <i>Laudato Si'</i> Action Plan that will include CEWA's commitment to modern slavery prevention as one of the actions under Goal 2: Cry of the Poor.
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.
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 encourage participation in online modules on modern slavery prevention, offered via ClanEd, 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 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
- Advance procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2023, 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 2023.

2023	Activity	CEWA
Internal / Staff	Hours spent on modern slavery activities	10
	Individual staff completed e-learning	0
	E-learning modules completed	0
External / Supplier Engagement	Total number of suppliers	22,687
	Number of suppliers with visible contact information and ABN	261
	Number of suppliers across high-risk categories	4,878
	Number of ACAN Supplier Surveys completed	484
	Supplier attending capacity building webinars	111
	Invited to join Sedex	96
	Joined Sedex	23
	Sedex SAQ completed	12
	Social audits	6
	Corrective actions	3
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

# Reporting Criterion 6

CEWA does not own or control any entities.

Consultation  
with Owned or  
Controlled Entities

# Reporting Criterion 7

No other relevant information.

Any Other  
Relevant  
Information

Photo: St Mary's Primary School (Kalgoorlie)



This Modern Slavery Statement 2023 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 3 May 2024, 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 2023

Eva Skira	CECWA Chair
Jonathon Woolfrey	CECWA Deputy Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner ( <i>commenced 1 November 2023</i> )
Michelle Shafizadeh	Commissioner
Peter Yensch	Commissioner

#### CEWA Executive Team 2023

Dr Debra Sayce	Executive Director ( <i>until 31 December 2023</i> )
Wayne Bull	Deputy Executive Director
Paul Andrew	Director People and Culture ( <i>commenced 11 September 2023</i> )
Mandy Connor	Director Teaching and Learning
Dr Tony Curry	Director Leadership and Wellbeing
Rev Mark Powell	Director Religious Education
Dr Glenda Scully	Director Finance, Infrastructure and Digital Technology

