



MODERN SLAVERY POLICY

1 Purpose

The purpose of this policy is to articulate the position of the Dominican Education Australia (DEA) Board of Trustees in relation to compliance to the Modern Slavery Act 2018 (Cth), namely to:

- confirm the intent of DEA to have in place, within the operations and supply chains of each entity within the DEA group, appropriate procedures designed to prevent and address modern slavery risks.
- require that each of the entities within the DEA group implement a program of work to demonstrate compliance with the Modern Slavery Act 2018 (Cth) and any other applicable modern slavery laws and regulations.

2 Scope

This Policy applies to all persons involved in the operations of each entity within the DEA group, including the Board of Trustees of the PJP, Ministry Board Members, paid staff of the PJP and the Ministries, volunteers, seasonal workers, agency staff, business partners, suppliers of goods and services, contractors and sub-contractors and their employees, apprentices and out workers.

2.1 Statutory Obligations

The Modern Slavery Act 2018 (Cth) applies to any entity, or any group of entities under the control (as defined under Australian Accounting Standards) of another entity, which has or have an annual consolidated revenue of more than \$100 million.

Because Dominican Education Australia Ltd, a Public Juridic Person (“PJP”) established under the Canon Law of the Roman Catholic Church and incorporated under the Corporations Act 2001 (Cth)

- 1) is the sole member of each of six separately incorporated education entities (“Ministries”) and
 - 2) is responsible for the appointment and removal of the Directors for each of those six Ministries,
- this legislation applies to the PJP and those six Ministries as a consolidated group (“the DEA group”).

3 Policy

The Dominican Education Australia Board of Trustees is committed to the following:

3.1 The DEA group not knowingly using or contributing to modern slavery in any form.

- 3.1.1 The DEA group will actively work to identify and eliminate modern slavery from our operations, business partnerships and supply chain.
- 3.1.2 Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in its operations or supply chain is unacceptable.
- 3.1.3 The DEA group will comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- 3.1.4 The final purchasing decisions of each entity within the DEA group will not be based on price alone. Ethical business processes are an essential part of our value for money and ‘fit for purpose’ considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.
- 3.1.5 Each entity within the DEA group will continue to support our 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 chains.



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3.2 Actions to prevent and manage modern slavery risk

- 3.2.1 Each entity within the DEA group will institute a modern slavery risk management program (“the program”) which will be underpinned by ethical business practices and be maintained in consideration of all our stakeholders (including people who are at-risk of and/or experience modern slavery practices). Key elements of our programs are summarized in Appendix 1.
- 3.2.2 To put this policy into practice the following actions in Sections 3.3 to 3.6 will be required of each entity’s workers, business partners and suppliers.

3.3 Management, staff and contractors of entities in the DEA group

- 3.3.1 The Trustees of the PJP have overall responsibility for ensuring this policy and its implementation complies with relevant Guiding Principles (outlined in Appendix 2), and legal and ethical obligations.
- 3.3.2 The Board and senior leadership teams of each entity within the DEA group have responsibility for managing modern slavery risk within their entity.
- 3.3.3 All levels of management within each entity are responsible for ensuring the entity’s workers are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
- 3.3.4 Anyone working for any entity in the DEA group or on its behalf is expected to:
- Acknowledge that business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery are strictly forbidden;
 - Ensure that the identification, prevention, management and mitigation of modern slavery risk is known and accepted to be a core responsibility of all workers;
 - Acknowledge that any actual or suspected activity that could breach this policy will be reported immediately.
- 3.3.5 Relevant external stakeholders will be engaged to support this policy (for example suppliers, contractors, or other business partners).
- 3.3.6 Anti-slavery clauses will be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- 3.3.7 Supplier reviews (including self-assessment questionnaires) will be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks. This includes any new company that wants to do business with any entity in the DEA group.

3.4 Suppliers and business partners

- 3.4.1 Each entity within the DEA group will actively engage with suppliers to promote this policy and assist in developing their capabilities to identify and manage modern slavery risks.
- 3.4.2 Each entity within the DEA group expects suppliers to share our goals and values in relation to ending modern slavery.
- 3.4.3 Suppliers are expected to support each entity’s efforts to assess the levels of risk within their operations and supply chain, and to gauge their commitment and capability to manage modern slavery risks.
- 3.4.4 Suppliers will demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

3.5 Reporting Modern Slavery

- 3.5.1 Internal reporting of actual or suspected modern slavery risks by all staff within the DEA group is expected.
- Staff will immediately report any suspected violations of the policy or other illegal or unethical conduct.
 - Information is confidential and there shall be no retribution or retaliation for reports made in good faith.



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- 3.5.2 Suppliers are also required to report immediately, any
- suspected or actual modern slavery impacts to people
 - indicators or “red flags” indicating potential modern slavery activity, without fear of retribution, retaliation or loss of business with us.
- 3.5.3 Each entity within the DEA group commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.
- 3.5.4 If a supplier or any other person outside the DEA group provides information to any staff member about suspected or actual modern slavery impacts to people, indicators or red flags within our organisation or supply chain, the information must be immediately passed by the staff member to their line manager for escalation.

3.6 Compliance with this policy

- 3.6.1 In line with the Modern Slavery Act (2018), any employee, Director or Trustee within the DEA group who knowingly and wilfully breaches this policy may face disciplinary action. This could, in the most severe circumstances, include dismissal for misconduct or gross misconduct.
- 3.6.2 Each entity within the DEA group retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they knowingly and wilfully breach this policy.

4 Definitions

DEA group

Dominican Education Australia, a public juridic person incorporated under the Corporations Act 2001 and each of its separately incorporated Ministries.

Modern slavery

Situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery violates universally recognised human rights, is a serious crime against a person or persons and poses a critical risk to the operations of DEA.

The Modern Slavery Act 2018 (Cth)

Defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour (including exposure to dangerous work) and deceptive recruiting for labour or services (see Appendix 3).

5 Responsibility for implementation, monitoring, and continual improvement

As articulated in the policy, responsibilities for implementation, monitoring and review of the policy is vested at the level appropriate to the following roles:

DEA Board & Office	DEA Ministry
DEA Board of Trustees	Ministry Board
DEA Finance & Risk Committee	Principal
Chief Executive Officer	Business Manager



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6 Supporting procedures or policy support documents

The following documents are to be read in conjunction with, and are additional to, any other relevant Dominican Education Australia, Ministry, or local/national Catholic Education policy, procedure or support document.

- **Appendices to this policy:**
 1. Modern Slavery Risk Management Program – Key Elements
 2. Guiding Principles behind Modern Slavery Action
 3. Types of Modern Slavery
- [DEA Modern Slavery Statements](#)

7 References

- Modern Slavery Act 2018 (Cth) <https://www.legislation.gov.au/C2018A00153/latest/text>
- Australian Catholic Anti-Slavery Network (ACAN): <https://www.acan.org.au/>

8 Revision Record

This policy is reviewed at least every two years. DEA shall provide information and/or training on any changes made as a result.

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Appendix 1

Modern Slavery Risk Management Program – Key Elements¹

1. A **policy** which outlines a commitment to prevent and manage modern slavery within the entity's operations, business partnerships and supply chains
2. **Communication** of this policy and related program initiatives to staff, business partners and supply chain
3. **Consultation** with people with lived experience of exploitation and modern slavery, wherever possible, conducted according to ethical engagement principles
4. **Assessment of modern slavery risks** within the entity's operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks
5. Integration of **anti-slavery requirements** into relevant tenders and contract terms and conditions
6. Adoption of **due diligence measures** for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk
7. **Raising awareness, engaging and educating staff** and other key stakeholders so they take practical steps to prevent and manage risk
8. Implementation of an **escalation protocol** and **remedy pathway** to ensure human rights impacts caused by the entity's activities, contributed to by the entity or that are linked to the entity are effectively addressed
9. **Monitoring and reporting** measures so the entity can identify ways to continuously improve
10. **Collaboration** with other organisations, wherever possible, to increase the entity's impact in the prevention of modern slavery

Appendix 2:

Guiding Principles behind Modern Slavery Action²

1. **Respect for Human Dignity** – the DEA group recognises and respects the inherent dignity of the human person, as created in the image and likeness of God.
2. **Social Justice and Solidarity** – the DEA group advocates for a society where all individuals are treated fairly, and where the vulnerable and marginalised are protected and supported. The DEA group has a responsibility to ensure the rights of others and must not fulfill its own rights at the expense of others.
3. **Ethical Leadership and Governance** – The decision-making of each entity within the DEA group upholds the dignity and rights of every person, fostering social justice, and ensuring the welfare of all members of society.
4. **Education for Empowerment and Development** – the DEA group has an important role to play in creating a just and compassionate society through educating its stakeholders.

¹ <https://www.acan.org.au/resources-acan-docs> (accessed 2024)

² Developed from <https://www.acan.org.au/resources-acan-docs> (accessed 2024)



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Appendix 3:

Types of Modern Slavery³

Debt bondage (or bonded labour)

Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined. Unfair deductions from pay (for accommodation, transport, food, uniforms/equipment) or illegal/arbitrary fines and penalties may contribute to debt bondage. In some cases a debt is accrued in order to get the job through recruitment or placement fees. Over time, the debt becomes excessive and unreasonable making it difficult to ever pay off.

Deceptive recruiting for labour or services

Deceptive recruiting occurs when a person is misled or lied to about the job and conditions they are recruited for, and instead leads to them into being exploited through modern slavery.

Types of deceptive conduct used by recruiters include promises of high rates of pay, reasonable work hours, training and inclusions of accommodation, food, transport and other expenses.

Forced Labour

Describes situations where the victim is either not free to stop working or not free to leave their place of work because of physical and/or psychological coercion. Coercive tactics may include threatened or actual harm, arrest, deportation, violence or other detrimental actions against the victim, other workers or family members and confiscation of passports and identity documents

Human Trafficking

The legal definition of human trafficking in Australia is:

...the recruitment, transportation, transfer, harbouring or receipt of a person through means such as threat or use of force, coercion, deception, or abuse of power or vulnerability; for the purpose of exploiting that person ...

Human trafficking is a serious crime with the trafficked people being exploited through modern slavery, forced labour, servitude, debt bondage, organ removal or other forms of exploitation

Servitude

The condition of a person who provides labour or services and who, because of the use of coercion, threat or deception, would not consider himself or herself to be: (a) free to cease providing labour or services, or (b) free to leave the place where the person provides labour or services, and who (c) is significantly deprived of his or her personal freedom

Forced Marriage

A forced marriage is when a person gets married without freely and fully consenting, because they have been coerced, threatened or deceived, or because they are incapable of understanding the nature and effect of a marriage ceremony, for reasons including age or mental capacity.

Worst Forms of Child Labour

The worst forms of child labour includes where children are:

- exploited through slavery, forced labour or similar practices;
- engaged in hazardous work which may harm their health, safety or morals;
- used to produce or traffic drugs

³ <https://www.acan.org.au/resources-acan-docs> (accessed 2024)



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Slavery or slavery like offences

Slavery is defined in the Australian Criminal Code Act 1995 (Section 270) as where the 'powers attaching to the right of ownership are exercised': people are dehumanised to the point where they are literally owned by others.

Slavery is the exploitation and control of others through coercion, such as:

- Restricting where people live, work, move or communicate with others
- Using threats or actual violence against the person or their family
- Forcing them to work, withholding food or water, pay and other forms of abuse