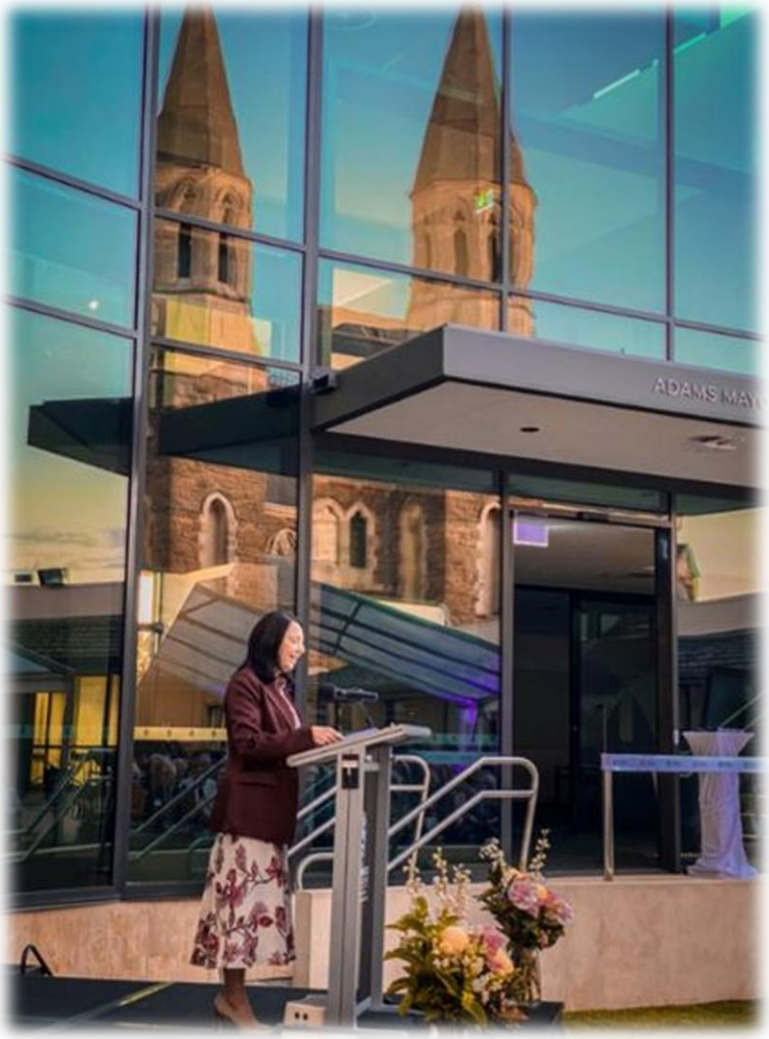
2024 Modern Slavery Statement

1 January – 31 December 2024



Disclosure Note

This statement has been made on behalf of Dominican Education Australia Ltd ABN 54 610 124 322. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Dominican Education Australia as a single reporting entity.

Educational Ministry	**ABN**
Santa Sabina College Ltd	88 003 415 450
St Mary's College Ltd	87 423 943 103
St Dominic's Priory College Ltd	25 085 110 379
Cabra Dominican College Ltd	55 403 574 164
St Lucy's School Ltd	60 085 372 863
Siena College Ltd	85 756 114 223

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Introduction

Dominican Education Australia (DEA) is a Ministerial Public Juridic Person (PJP) which was established in 2015 by three congregations of Dominican Sisters - the Congregation of the Dominican Sisters of North Adelaide, the Holy Cross Congregation of Dominican Sisters, Adelaide and the Congregation of the Dominican Sisters of Eastern Australia and the Solomon Islands.

As a PJP, DEA oversees the canonical governance of six Education Ministries in the Dominican tradition. The Board of Trustees of DEA has responsibility in civil and canon law for these Ministries.

This is our second Modern Slavery Statement.

DEA recognises that the term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. We understand that slavery can take many forms, such as human trafficking, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

We also recognise that modern slavery is only used to describe serious exploitation and it does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery.

DEA is committed to ensuring that effective policies and procedures are in place to minimise the risk of modern slavery occurring within our Ministries' business operations and supply chain. We respect the human rights of our students and their families, our staff, our suppliers and the communities in which our Ministries operate. Our collective intention is to identify and manage risks related to human rights across our network and through our supply chain management.

In addition, DEA is a member of the Australian Catholic Anti-Slavery Network (ACAN) which brings together Catholic entities to share resources and coordinate action to manage modern slavery risk across their respective industry sectors.

DEA takes pride in our Catholic ethos and the Dominican heritage imbued in all our Ministries. The ethical and compliant approach that each Ministry takes to providing education to its students is clearly articulated in their Codes of Conduct. In this way, we work to build a more sustainable future – not only for our students, but also for the communities in which we operate.

This statement is published by DEA and is consistent with the reporting obligations under the Modern Slavery Act 2018 (the Act). The statement is prepared by DEA on behalf of itself and its entities.

This statement sets out how we are working within our Ministries to identify, mitigate and manage risk of modern slavery in those Ministries and their supply chains. This statement has been prepared for the financial year ended 31 December 2024.

Tony O'Byrne – Chairperson

Paul Reid – Treasurer

This Modern Slavery Statement was approved by the principal governing body of Dominican Education Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 19 June 2025.

This modern slavery statement is signed on behalf of Dominican Education Australia by two responsible members as defined by the Act.

Reporting Criterion 1: About Dominican Education Australia

Dominican Education Australia, is a Public Juridic Person established under the Canon Law of the Roman Catholic Church and is also a company limited by guarantee under the Corporations Act 2001. It has responsibility for the stewardship of six separately incorporated education Ministries. DEA and each of its Ministries is a charity registered with the Australian Charities and Not-for-profits Commission. In 2024, the aggregated operational turnover of DEA and its six Ministries amounted to $154 million.

	Dominican Education Australia Limited	Is a Public Juridic Person and parent entity of six education Ministries in New South Wales, Victoria and South Australia
	St Lucy's School Limited	Provides K-12 education for children with disabilities specialising in a wide range of disabilities: mild to severe intellectual disability, autism and sensory impairments.
	Santa Sabina College Limited	Provides education for girls K-12 and boys K-4. It operates an Early Childhood Centre for children from the age of six weeks to six years.
	Siena College Limited	Provides young women with secondary school education, fostering intelligent and responsible use of their personal gifts.
	St Dominic's Priory College Ltd	Provides Reception to Year 12 education. Students are motivated to achieve personal excellence whilst maintaining a collaborative approach to their learning.
	St Mary's College Ltd	Provides Reception to Year 12 education, empowering young women through the key areas of Learning, Relationships and Innovation**.**
	Cabra Dominican College Ltd	Provides a co-educational experience for students in Years 7–12, fostering a culture of forward-thinking, in a place where tradition meets innovation.

Our Mission

Every person is important in the community of DEA. Our Ministries strive to be inclusive, caring and welcoming. DEA's mission is to nurture its Ministries as places of excellence in teaching and learning in the Catholic tradition. Dominican schools have always been characterised by a strong commitment to outreach and social justice. They encourage critical thinking and develop self-confidence.

Our Vision

The vision of DEA is to continue and further enliven the works of DEA and takes its vision from the inspiration of Jesus Christ and the spirit of St Dominic de Guzman, the founder of the Order of Preachers. It assumes the responsibility to further the education Ministries of its three founding Dominican Congregations and continues to build on the founding grace and traditions of each of these Congregations.

The Dominican Ideals

The Dominican ideals are a commitment to Truth explored in Dialogue, a vibrant Preaching of the Gospel, a critical appreciation of culture and cultures, and a love of the Beautiful. Our goal in each of our Education Ministries is to foster these values, together with a spirit of prayer and contemplation, respect for the dignity and uniqueness of each individual, and the pursuit of excellence.

Our goal is for DEA education Ministries to be communities defined and characterised by:

- an emphasis on fostering those Ministries' right relations with God, others and creation
- a strong Catholic identity and practice of Christian values
- a search for truth
- a philosophy of education that understands the role of the teacher as an enabler of students' learning
- a commitment to critical reflection and action in responding to issues of injustice
- a commitment to marginalised and vulnerable students
- stewardship that seeks to ensure that spiritual and material resources are used for the common good.

Priorities

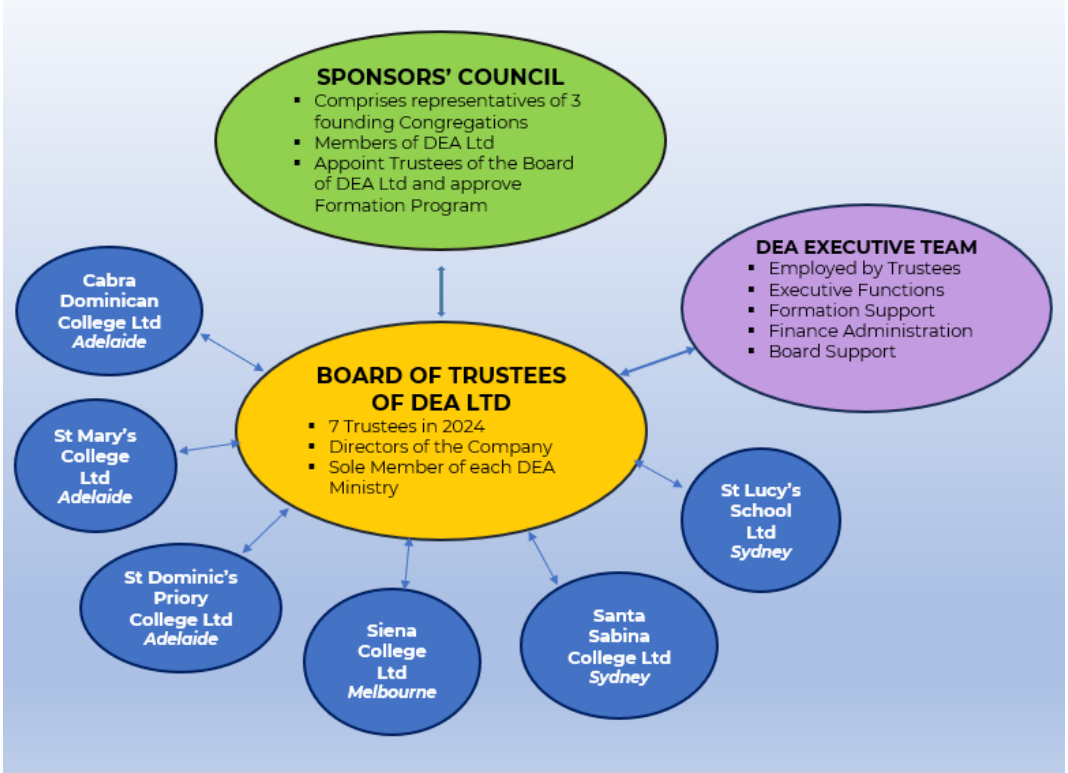
This is our second Modern Slavery Statement. DEA has progressed from 2023 where there was implementation of a modern slavery risk management program at one of our Ministries, Siena College Limited. Based on the lessons learned and experience from working with Siena College in 2023, DEA has extended the program in 2024 to four of its Ministries, with a view to full implementation with all six Ministries in 2025.
2024 saw a more tailored approach in its development of a modern slavery risk management program, that aims to maximise opportunities for mitigating and minimising risks of modern slavery in DEA Ministries.

Reporting Criterion 2: Operations and Supply Chain

Our Organisational Structure

DEA was established in 2015 by decree of the Holy See of the Roman Catholic Church.
DEA continues the mission of Jesus Christ and assumed responsibility for the stewardship of the six incorporated education Ministries in Australia formerly under the responsibility of the Dominican Sisters of Eastern Australia and Solomon Islands, the Holy Cross Congregation of Dominican Sisters of Adelaide and the Dominican Sisters of North Adelaide.

DIAGRAM SHOWING ORGANISATIONAL STRUCTURE OF DEA



The Sponsors Council is comprised of three members, being one representative from each of the three founding Congregations. One of their powers is to appoint Trustees to the Board of DEA.

Dominican Education Australia Ltd was established for the purpose of owning and nurturing the education Ministries of DEA in the Commonwealth of Australia. The Trustees of DEA, appointed by the Sponsors, fulfil a governance role and work in a way that recognises the individual rights and responsibilities of the incorporated bodies (Education Ministry Boards) and affirms the importance and subsidiarity of each Ministry.

The seven Trustees that comprised the Board of DEA in 2024, have responsibility for both canonical and civil governance matters. To assist with this oversight, the DEA Board maintains the following Subcommittees:

- Finance & Risk
- Safeguarding
- Mission and Formation

DEA Trustees appoint the Directors of the Board of each incorporated Education Ministry; appoint the Chair of the Board of Directors; and approve the appointment of the Principal of the School/College.

In accordance with their respective Constitutions, each incorporated DEA Education Ministry has a Board which oversees the management of the business of that Ministry. Each person appointed to the Board becomes a Director of the incorporated Ministry. The Directors are accountable to DEA Ltd as sole Member, represented by the DEA Trustees.

DEA has an office at Hunters Hill in Sydney, NSW and an office in Glen Osmond, Adelaide, South Australia.

DEA and each of its Ministries is a charity registered with the Australian Charities and Not-for-profits Commission.

Operations

The following provides a snapshot of the operations of DEA Ministries in 2024:

- Six Ministries operated Catholic schools in South Australia (3), Victoria (1) and New South Wales (2)
- 4813 students were educated in Dominican Education Australia Ministries

Workforce Profile

The following staffing numbers have been aggregated across DEA and its six Ministries:

- Approx 716 FTE staff worked in teaching and non-teaching positions;
- A further 485 staff were employed on a casual basis as emergency teachers, sports coaches, music tutors and in a variety of other roles
- In some of the Ministries, maintenance, groundskeeping, catering, IT and cleaning are variously outsourced to contractor services – these staff are not directly employed by those Ministries. This category includes an estimated 67 organisations

DEA Modern Slavery Working Group (MSWG) in 2024

The DEA MSWG was comprised of:

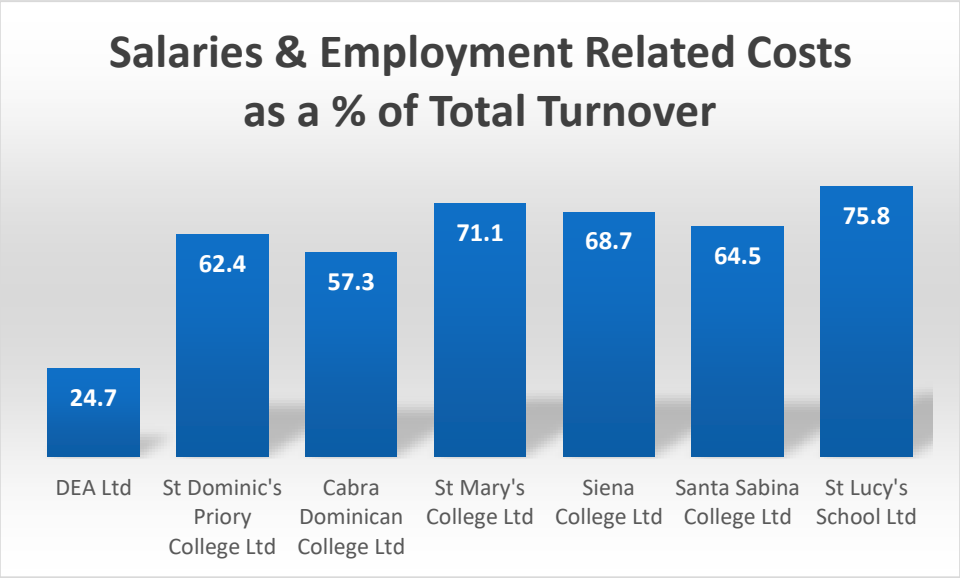
- the DEA CEO
- a DEA Finance & Risk Committee Member
- the Business Manager from each Ministry
- other representative stakeholders from each Ministry
- ACAN representatives

The MSWG is accountable to the Finance and Risk Subcommittee through the CEO, who chairs the MSWG and provides a progress report to the Trustees every 2 months.

10 meetings took place in 2024.

Supply Chains, Goods and Services

Each of DEA's six Ministries is an educational institution. Accordingly, the majority expenditure is on teaching staff and learning and support staff, represented in the graphic below:



Most staff are employed directly by the Ministries, and wages are paid in accordance with the relevant Enterprise Agreements or legislated awards.

The aggregated total procurement spend for DEA and its six Ministries: $44,616,677

The following categories support our Ministries' operational requirements:

Banking	Information Technology	Support services
Business support services	Marketing	Telecommunications
Facilities	Professional services	Travel

Reporting Criterion 3: Modern Slavery Risks

DEA uses the ACAN Category Risk Taxonomy, a classification standard that identifies inherent or potential modern slavery risks associated with major spend categories.

The ACAN Category Risk Taxonomy is based on sources such as:

- the Global Slavery Index
- the International Labor Organisation (ILO), including definitions of modern slavery
- the Bureau of International Labor Affairs (ILAB), U.S Department of Labor
- the Global Child Forum and UNICEF

Four key factors are also used to determine the level of risk:

- ***Geography***: the country or location where a good is made
- ***Industry***: the sector in which the making of the good or service occurred
- ***Commodity:*** the raw materials or components that comprise the goods or products
- ***Workforce vulnerability***: such as temporary migrants, women or children known to be employed in specific industry sectors

Classification

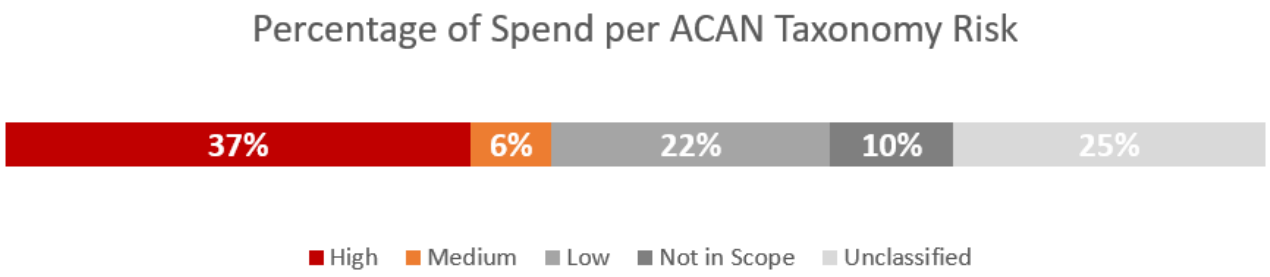
High Risk	Medium Risk	Low Risk
• Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Uniforms and PPE • Waste management services	• Advertising & Marketing • ICT Software and network services • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider	• Professional services • Financial expenses • Government and agency fees • License / membership fees

Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

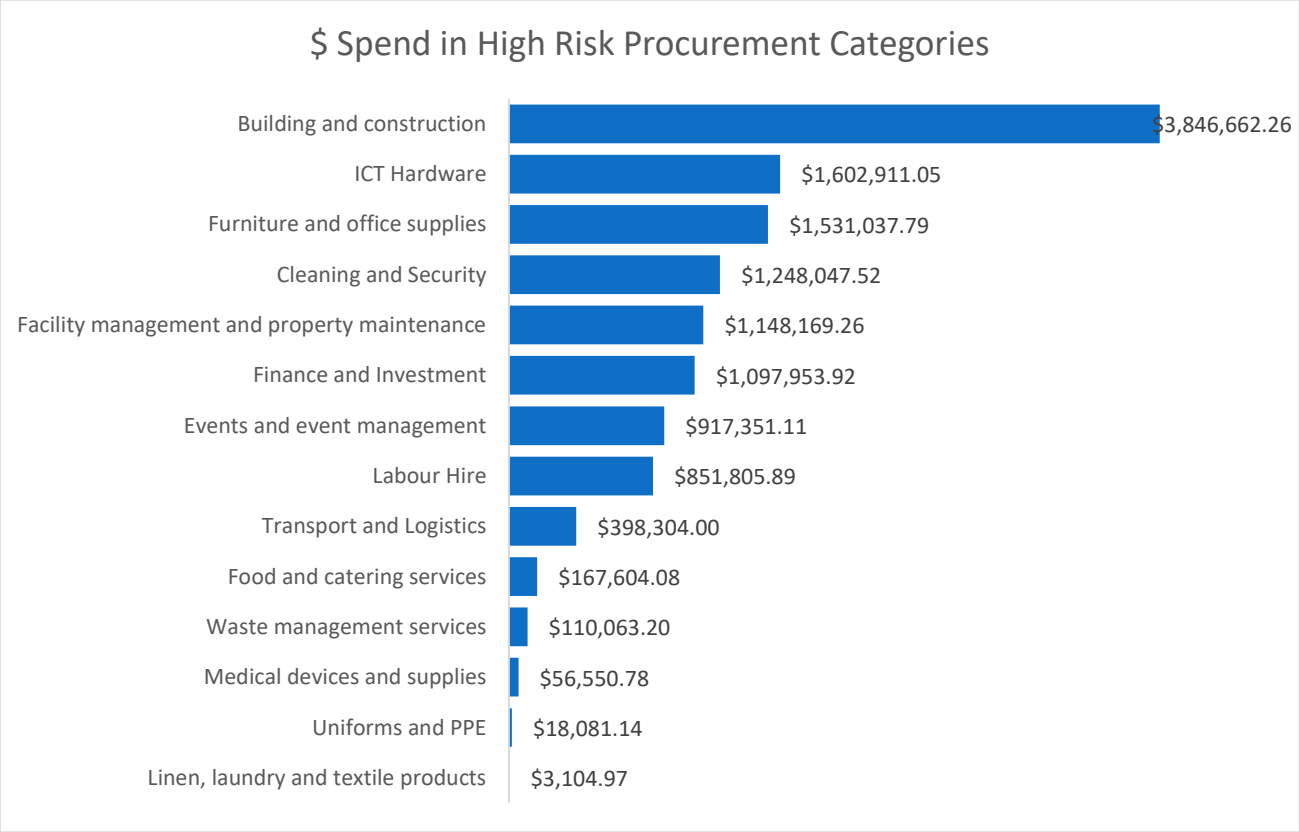
- Pastoral
- Payroll (excluding labour-hire and sub-contracting)

The key risks for DEA, as a group, are in the acquisition of products and services that are sourced, either wholly or in part, outside of Australia, particularly as they might relate to the construction, furnishing and maintenance of our Ministries' education.

Based on ACAN's analysis of $35,182,000 of spend data provided by four of our Ministries, the following percentage of spend and risk bar illustrates DEA's main areas of priority for action. The highest spend percentage for DEA Ministries is with suppliers considered more likely to be high risk according to ACAN's risk taxonomy. This does not mean that all or a majority of the suppliers themselves are inherently High Risk. We also recognise the risks involved with school uniforms that are not procured by the school and the need for action with these suppliers.



A further analysis of DEA and its Ministries, has identified the following procurement categories which are designated as High Risk under the ACAN Taxonomy. This spend is with 724 suppliers.



DEA continues to compile data regarding specific supplier procurement practices at each of our Ministries to determine the level of inherent risk.

Reporting Criterion 4: Steps taken to address Modern Slavery Risk

DEA continues to work with ACAN to increase its collective response to address modern slavery in supply chains. The following represents the collective progress made in 2024 by DEA and its Ministries:

- DEA development and approval of Modern Slavery Policy to distribute to Ministries for Ministry Board ratification in 2025
- Inclusion of Modern Slavery clauses in new major contracts at all Ministries
    - Including major construction projects at 2 sites
- Introduction of Modern Slavery compliance checks for new vendors as part of onboarding procedures
- Restrictions placed on high-risk suppliers
- Updating of procurement policy to include Modern Slavery
- Presentations to staff on Modern Slavery
- Completion of ACAN training modules, mainly key executive leadership roles within Ministries

Grievance Mechanism and Remediation Pathways

DEA is committed to providing appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

In addition to our Modern Slavery Policy, DEA has a Safeguarding Policy, Code of Conduct and Complaints Process that are publicly available and apply to staff, volunteers and contractors.

Through Domus 8.7, DEA has access to the Domus 8.7 Remediation Service. Domus 8.7 provides an independent grievance channel, modern slavery assessment, case management, coordination and referrals for people impacted by modern slavery to enable effective remedy.

In the unlikely event that DEA is directly linked to modern slavery by a business relationship, we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

When indicators of modern slavery practices come to our attention through any of our channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

During the 2024 reporting period, DEA did not receive any complaints, disclosures or concerns relating to modern slavery.

Modern Slavery Action Plan and Road Map: DEA & its Six Entities

DEA is continuing to develop supplier analysis based on procurement over a calendar year across all schools.

The CEO of DEA is working in collaboration with the Ministry Business Managers to:

- gather the supplier data for analysis by ACAN, and
- ascertain the actions to be taken by each Ministry in 2025

DEA and its Ministries will prioritise the following tasks:

FOCUS	Priorities
Strategy & Compliance	Define DEA Modern Slavery Framework [align with ACAN risk management program] Approve a Modern Slavery Policy that includes expectations in relation to sourcing of goods and services. Complete ACAN Entity Profile Survey to obtain a maturity capability assessment for 2025.
Risks	Ministries work with ACAN to understand and address modern slavery risks to people in their operations and supply chain using quality resources, risk ratings, agreed metrics and scorecards. Create a category in each Ministry's Risk Register for Modern Slavery and define their risk appetite.
Supplier Due Diligence	Modern slavery pre-qualification requirements included into all 2025 contracts and requests for tender, including future building tenders. - Supplier Survey [entry point engagement = 20 questions, 5 mins to complete] - Webinar attendance/training completion - Sedex membership and Self-Assessment Questionnaire (SAQ), as requested Implement a standard contract clause for significant purchases in selected procurement categories.
	Complete the ACAN Supplier Data spreadsheet with supplier data that will inform supplier risk prioritisation and engagement strategy. Commence supplier engagement in collaboration with ACAN. ACAN to monitor and report on supplier engagement and escalate non-responses or other issues to DEA and Ministries, as required.
Staff	Use internal communications channels to engage our staff. Staff to complete ACAN's Staff Awareness Survey to provide a baseline for knowledge, attitudes and beliefs. This can inform future actions. Members of the leadership team, and Board Chair, undertake the assigned ACAN modern slavery e-learning modules (four modules are included in the course).
Students & Families	Consider opportunities to include the topic of anti-Modern Slavery in the school curriculum. e.g. in the Religious Education Curriculum, Humanities and other curriculum areas. Provide avenues for students to actively engage in anti-slavery action-learning - 8 February Feast Day of St Josephine Bakhita - 8 March International Women's Day - 1 May Feast Day of St Joseph the Worker and International Workers Day - 30 July UN World Day Against Trafficking in Persons - 11 October International Day of the Girl Child - 2 December UN World Day for the Abolition of Slavery - School events – ACAN team member in each Ministry's geographic location Communicate our anti-slavery commitment to stakeholders - Website / Social media / Newsletters

Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

In March 2024, Board Chairs and Principals received a further briefing in relation to the Modern Slavery Act, DEA's commitment to anti-slavery practices and support through the ACAN Modern Slavery Risk Management Program.

Four of DEA's six Ministries engaged with this program.

Additionally, DEA has adopted ACAN Baseline Data metrics to capture the outcomes of our actions, demonstrate continuous improvement and guide future actions.

2024	ACTIVITY	2023 Dominican Education Australia	2024 Dominican Education Australia
INTERNAL / STAFF	Hours spent on modern slavery activities	16	48
	Individual staff completed e-learning	10	10
	E-learning modules completed	10	10
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1817	3553
	Number of suppliers with visible contact information and ABN	1817	2549
	Number of suppliers across high-risk categories	33	724
	Number of ACAN Supplier Surveys completed	131	497
	Supplier staff attending capacity building webinars	0	28
	Invited to join Sedex	59	71
	Joined Sedex	11	67
	Sedex SAQ completed	1	38
	Social audits	0	10
	Corrective actions	0	52
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	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

The ACAN Modern Slavery Maturity Assessment provides a score card of DEA's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey generated by ACAN and can be used to set future direction, establish a multi-year action plan.

The maturity score is designed to provide a comprehensive view of DEA's efforts across key areas of operation, presented as pillars:

1. **Business Process and Governance**: Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.

2. **Operations**: Focuses on internal practices and how effectively we manage risks within our day-to-day activities.

3. **Supply Chain**: Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.

4. **Worker Engagement**: Addresses how we manage worker engagement, and the standards upheld to prevent exploitation.

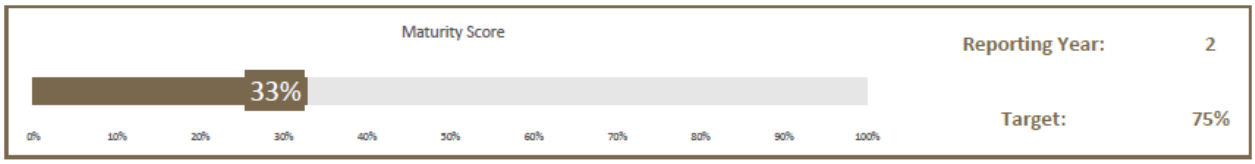
5. **Program and Activities**: Considers the broader initiatives and engagements we undertake to address modern slavery.

6. **Grievance Mechanisms and Remediation**: Evaluates the channels available for reporting concerns and the processes for addressing them

The scoring scale ranges from: 0 to 100

The result for DEA shows an improvement from a score of 30 in 2023 to a score of **33 in 2024**:

Dominican Education Australia - Overview



Dominican Education Australia - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024
1. Business Process and Governance	36%	30%	10%	0%	19%
2. Operations	43%	15%	34%	23%	29%
3. Supply Chain	51%	80%	27%	20%	45%
4. Worker Engagement	36%	48%	25%	27%	34%
5. Entity's program and activities	50%	10%	50%	25%	34%
6. Grievance Mechanisms and Remediation	58%	30%	49%	15%	38%
Average	46%	36%	32%	18%	33%

Reporting Criterion 6: Internal Consultation

Priorities

In 2025, all DEA Ministries will commit to undertaking this important work.

The DEA Modern Slavery Policy was developed in 2024. This will be adopted by all DEA Ministries in 2025.

Together with ACAN, DEA will focus on compliance and onboarding of uniform, cleaning and construction suppliers in the 2025 calendar year.

DEA and its Ministries will also commit to the following actions across all of its Ministries:

- Continue with Modern Slavery e-learning modules of key stakeholders including senior executives and key Board Directors from DEA Ministries
    - Completion of ACAN online training modules
- Updating Procurement Policy to include MS Act Compliance for all new contracts
- Include Modern Slavery clause in contracts for major projects and tenders
- Inclusion of remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with DEA to ensure victim-centered remediation processes are implemented in accordance with DEA's Modern Slavery Policy.
- With assistance from ACAN, Ministries to engage with non-compliant suppliers
- Ministries to complete ACAN's Staff Awareness Survey
- Conduct student and school community events that incorporate modern slavery awareness raising

Reporting Criterion 7: Other Information

No other relevant information