

# MODERN SLAVERY STATEMENT

# ACKNOWLEDGEMENT OF COUNTRY, HEALING AND INCLUSION

We acknowledge and pay respect to the original and ongoing custodians of the land upon which we live, work, learn and teach  
We commit to actively working alongside First Nations people for healing, reconciliation and justice.

The Catholic education faith community is inclusive and acknowledges that we are all made in the image and likeness of God and we are created in love. People of all faiths, genders, sexualities, abilities and cultures are therefore respected equally in the Sandhurst Catholic community.

We acknowledge the pain and suffering of all who have been hurt in body, mind and spirit by those who have betrayed the trust placed in them.

May we all stand tall, stand firm, grounded in truth, together as one.

## CHILD SAFETY

Catholic Education Sandhurst Limited (CES Ltd) is committed to the safety, participation and empowerment of all children.

## CONTENTS

Acknowledgement of Country, Healing and Inclusion statement .....	1
Child Safety statement.....	1
Disclosure Note .....	2
Entity Details.....	2
Declaration.....	3
Vision .....	4
Mission.....	4
About Us .....	4
CES Ltd Modern Slavery achievements in 2021 .....	5
Our plans for 2022 and beyond .....	5
From the Bishop of Sandhurst.....	6
From the Executive Director of Catholic Education.....	7
<b>REPORTING CRITERION 1</b>	
Catholic Education Sandhurst Limited (CES Ltd) - Governance Framework.....	8
Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C).....	9
Educational and Office Services.....	10
Key Objective of CES Ltd .....	10
The CES Ltd Head Office Structure .....	12
<b>REPORTING CRITERION 2</b>	
Operations and Supply Chains.....	13
Delegations Framework .....	13
The Guiding Principles of Procurement at CES Ltd .....	16

# DISCLOSURE NOTE

This statement has been made on behalf of Catholic Education Sandhurst Limited (CES Ltd) ABN 94 493 967 364. This statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers CES Ltd as a single reporting entity.

# ENTITY DETAILS

Catholic Education Sandhurst Limited (CES Ltd)  
ABN 94 493 967 364.  
120 Hargreaves Street Bendigo Vic 3550  
PO Box 477, Bendigo Vic 3550  
P: 03 5443 2377  
E: [enquiries@ceosand.catholic.edu.au](mailto:enquiries@ceosand.catholic.edu.au)  
W: [www.ceosand.catholic.edu.au](http://www.ceosand.catholic.edu.au)

## REPORTING CRITERION 3

Operational Risks .....	17
Our COVID-19 Response .....	17
Our People .....	18
Modern Slavery Gap Analysis .....	19
Supply Chain Risks .....	21

## REPORTING CRITERION 4

Actions taken to assess and address risks .....	24
Modern Slavery Action Plan and Road Map.....	26
5 Step Action Plan and Road Map .....	26
Provision of Remediation Solution through ACAN .....	27

## REPORTING CRITERION 5

Effective Assessment.....	28
---------------------------	----

## REPORTING CRITERION 6

Consultation with Entities Owned or Controlled.....	29
---	----

## REPORTING CRITERION 7

CES Ltd Current and Future Initiatives .....	30
Social Justice Reference Group.....	30
The SJRG believes .....	30
Next Steps for 2022.....	32
Modern Slavery Action Working Party.....	32
Objectives of the Modern Slavery Action Working Party.....	33
Appendix - List of schools with ABNs .....	34

# DECLARATION

## MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

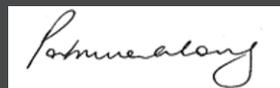
### Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body of Catholic Education Sandhurst Limited Board (CES Ltd Board)*.

as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("*the Act*") on 26 April 2022.

### Signature of Responsible Member

This modern slavery statement was approved by a *responsible member of Catholic Education Sandhurst Limited Board (CES Ltd Board)* as defined by the Act<sup>2</sup>.



**Patricia Cowling**

*Chair - Catholic Education Sandhurst Limited Board (CES Ltd Board)*

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

#### Mandatory criteria Page number/s

- |  |         |
|--|---------|
| a) Identify the reporting entity.  | Page 8  |
| b) Describe the reporting entity's structure, operations and supply chains.  | Page 13 |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.  | Page 17 |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.   | Page 24 |
| e) Describe how the reporting entity assesses the effectiveness of these actions.  | Page 28 |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).* | Page 28 |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**  | Page 30 |

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

## VISION

The vision for Catholic Education Sandhurst Limited (CES Ltd) is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within the Diocese. At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

## We believe:

-  that the values of the Gospel are central to who we are, what we do, and how we act.
-  that we have a vital role in the mission of the Catholic Church to imagine and seek new horizons while respecting our Tradition.
-  that a strong sense of community is dependent on the quality of our collegial relationships.
-  that each person's potential is fostered through the dedicated ministry of Catholic education.
-  in leadership encompassing vision, innovation and empowerment.

## MISSION

The ongoing mission of Catholic education remains the mission of the Church - "to spread the Kingdom of Christ over all the earth". Under the precepts of Canon Law (806 1), the Bishop watches over Catholic schools in the Diocese and provides general regulations for them. The Sandhurst Catholic school today responds to its mission by ensuring education is provided according to Catholic Teachings and beliefs and by offering a particular cultural experience that is grounded in "... a Christian view of the world, of life, of culture and of history". This translates into a Christ-centred ethos and worldview that permeates all aspects of school life including relationships, structures, liturgies, celebrations and routines, as well as the formal curriculum.

Catechism of the Catholic Church, n.863 Congregation for Catholic Education. (1997),  
The Catholic School on the Threshold of the Third Millenium, n.14

## ABOUT US

The vision for education in Sandhurst is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within Catholic Education Sandhurst Limited (CES Ltd). At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

The identity of the Sandhurst Catholic Schools reflects the principles of Catholic social teaching, grounded in the person of Jesus and interpreted and enacted for the "common good" in response to the "signs of the times". These principles require that the dignity and potential of each person be fully respected within a climate that is conducive to peace, security and development. This must find expression in the relationships, structures, curricula, planning, processes and care in the everyday life of the school.

## CES Ltd Modern Slavery achievements in 2021

Catholic Education Sandhurst Limited (CES Ltd) transitioned to a new Governance structure in 2021 and is currently establishing procedures and oversight of all our Catholic schools. Under the new company structure the roles of both Risk and Compliance and Procurement and Contracts has been designated to new roles within the organisation which will be very effective to centrally focus on our procurement function and risk management in Modern Slavery.

To begin the CES Ltd Modern Slavery eradication journey, several initiatives began in 2021, to build a framework for the future of CES Ltd.

- Joined the Australian Catholic Anti-slavery Network (ACAN) and commenced participation in the ACAN modern slavery risk management program.
- Social Justice Reference group working with ACRATH and CARITAS to educate our students and school communities.
- Modern Slavery Policy was developed and Board approved at the end of 2021 (and launched on 8th of February 2022).
- Developed Guiding Principles of Procurement to raise awareness for ethical, sustainable and socially conscious procurement practices.
- Implemented Modern Slavery clauses into standard contracts.

## Our plans for 2022 and beyond

To strengthen our mitigation practices going forward the following initiatives are in development for 2022:

- Modern Slavery awareness training to all staff at CES Ltd
- A due diligence program for key suppliers
- A modern slavery communications program, education, advice and guidance to 52 Catholic Schools, through the Modern Slavery Action Working Party
- A contact system for escalation protocol and remedy pathways
- Utilising the SEDEX (ACAN program) platform to identify and assess the risk of engaging various suppliers who may have a red flag for modern slavery practices in their operations.
- Continue our partnership with ACAN with guidance and support through their webinars and compliance program

CES Ltd aspirational goal is to identify and eliminate all risks associated with modern slavery from our operations, business partnerships and supply chain.



# FROM THE BISHOP

## Most Reverend Shane Mackinlay DD



The Christian tradition affirms the inalienable dignity of each person: created in the image of God, with unique gifts and talents, connected with the whole of creation, enriched by relationships of friendship and love lived out in a shared common life, capable of astonishing creativity, insight and achievement, and invited into communion with the Triune God revealed by Jesus. This core Christian vision of the human person is fundamental to the mission of Catholic Education Sandhurst Ltd.

While the most immediate consequence of this principle is in the way that students are placed at the centre of Catholic education, it also directs the relationship that Catholic schools have to parents, staff and the broader community. One of the insights we have learned from the COVID pandemic is the truly global reach of our human interdependence, with the potential for outbreaks of disease in remote parts of the world to have a dramatic impact on our local community.

This interdependence is also relevant to the various forms of modern slavery, which have many opportunities for connection to the operations and supply chain of our schools, often in ways that are not immediately apparent. Practices such as human trafficking, child labour, and exploitation of workers for minimal or no wages are terrible abuses of human dignity and are contrary to the fundamental respect that Christians seek to promote for each person. Catholic Education Sandhurst Ltd is committed to doing all in its power to assist in eliminating these practices.

The new corporate structure for Catholic education in the Sandhurst Diocese was established in January 2021, and so this is the first Modern Slavery Statement of Catholic Education Sandhurst Ltd. I am very pleased to see that in the first year of its operations, the Company has already taken significant steps to identify and address ways in which it might be at risk of supporting modern slavery.

I am confident that the Company has put in place structures, partnerships and policies that will help all involved in Catholic education in the Sandhurst Diocese to grow in awareness of modern slavery, and to act in ways that promote the dignity, freedom and wellbeing of each person.

**Most Reverend Shane Mackinlay**  
*Bishop of Sandhurst*

FROM THE  
EXECUTIVE DIRECTOR  
Mr Paul Desmond



Slavery has always been a stain on the history of humanity. It is so important that we, who have so much, do all we can to help those who do not experience wealth and freedom.

Slavery treats human beings like belongings. In the eyes of God who created every one of us, each person is special, each has rights, each should be treated respectfully.

At Catholic Education Sandhurst Ltd, we believe it is important to protect every person's rights. We have a duty to do whatever we can to protect the rights of other people, no matter where on this planet those people exist. Human life must always be treated with the greatest respect.

In the first year of operation under a new governance structure, we have laid the foundations of ethical and sustainable standards for our business practices as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain. At the heart of this vision is our commitment to the ongoing duty of care that we have for the dignity, safety, wellbeing, and inclusion of all people.

Our focus for 2021 and 2022 has been to develop a risk framework and tools to identify and manage risks of modern slavery in our operations and supply chain. To walk with us on this journey, we have partnered with organisations such as the Australian Catholic Anti-Slavery Network (ACAN), Caritas Australia and the Australian Catholic Religious Against Trafficking in Humans (ACRATH) who are leading the way and providing valuable support to organisations such as ours.

We are committed to continuous education and awareness of Modern Slavery as well as increasing visibility of the risks not only throughout our supply chains but also the impact of Modern Slavery on the day to day lives of our whole school community. In 2022 we have established the CES Ltd Modern Slavery Action Working Group comprised of members from across the organisation that will drive the education and change required for a positive future.

We are a people of hope, and we are encouraged by the progress that has been made in our first reporting year. We know too that much more needs to be done. We are cognisant that tackling Modern Slavery will require ongoing focus in collaboration with industry, the community and I appeal to our young people, the students of Sandhurst schools- do whatever you can to carry this message out to others, stand united in the belief that you can make a difference, you can improve the opportunities for people everywhere.

**Mr Paul Desmond**

*Executive Director of Catholic Education Sandhurst Limited (CES Ltd)*

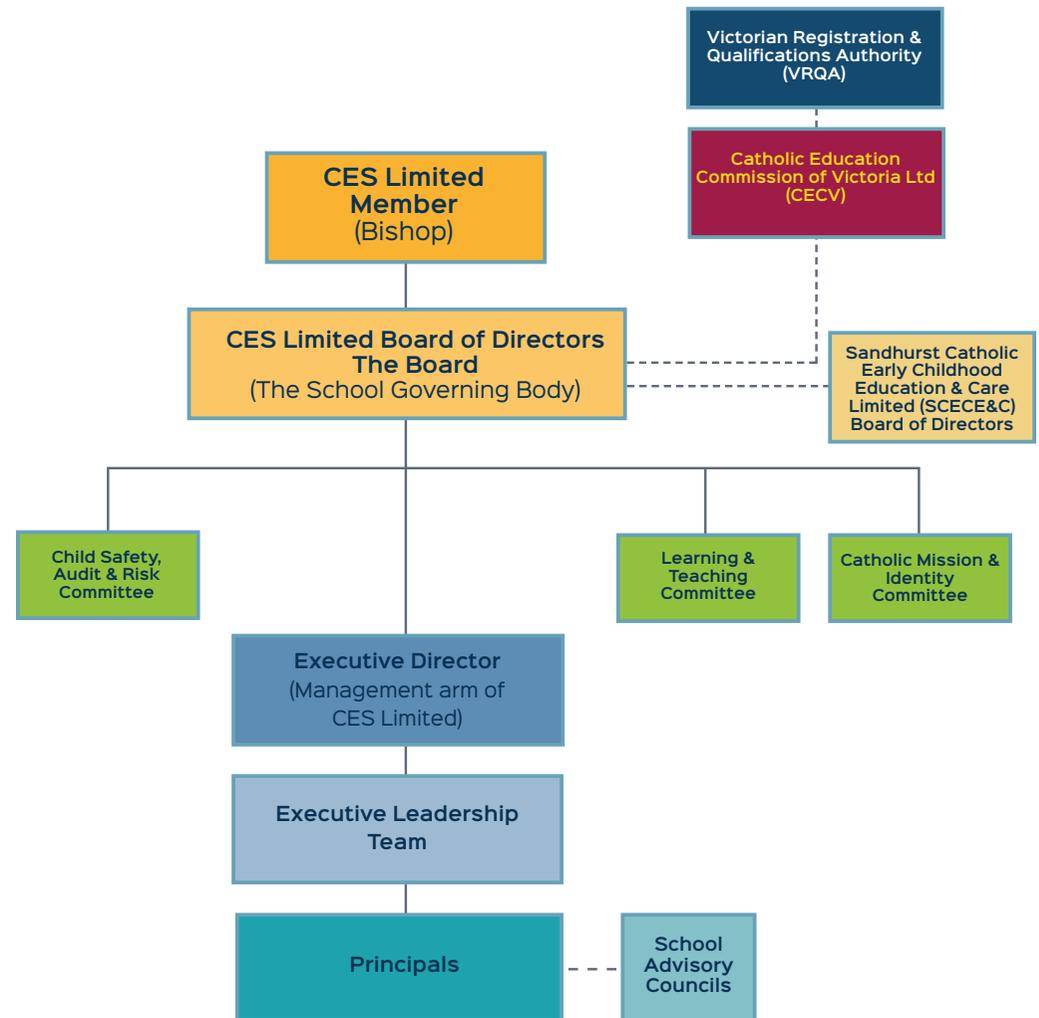
# REPORTING CRITERION 1

## Catholic Education Sandhurst Limited (CES Ltd) - Governance Framework

In 2021 the Bishop (Bishop Shane Mackinlay) established the Company, Catholic Education Sandhurst Limited (CES Ltd), to assume the ownership and operation of fifty-two Catholic schools previously operated in an unincorporated form, and to be responsible for the operation of any further schools that will be established by the Company referred to as (Sandhurst Catholic Schools). In addition to two Early Childhood centres operating as a subsidiary entity Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C).

The CES Ltd Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CES Ltd spans primary schools, secondary schools, and schools in specialist settings. It is the responsibility of the CES Ltd Board to ensure that each school that is operated by the Company is fully compliant with all legal obligations and standards required of registered schools in Victoria.

The Board is responsible for setting strategic direction and policies to achieve the above. It contributes legal, financial and other professional expertise to the governance of the Company and is supported by an expert Board committee membership. The Board works to promote stability, confidence, mutual respect and support in the relationships between all who exercise leadership and management. The Board must ensure that Sandhurst Catholic schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).



# REPORTING CRITERION 1



It is the role of the Board to make explicit the importance of system improvement, facilitate the achievement of high-quality personal learning outcomes for all students and the provision of educational environments in which all will continue to flourish. In so doing the Board ensures that all legal obligations and compliance responsibilities arising from being a Company are met, particularly the:

- key aspects of the Board's legal obligations under the Corporations Act (i.e. Board of Director responsibilities)
- governance standards imposed by Division 45 of the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (ACNC Act)
- minimum standards for school registration under Schedule 4 of the ETR Regulations, including all matters relating to Governance; Enrolment; Curriculum and Student Learning; Student welfare; Staff employment and School infrastructure
- Ministerial Order 870 – Child Safe Standards - Managing the risk of child abuse in schools, the Board, as the school governing authority, is responsible for ensuring Sandhurst Catholic Schools embed a culture of child safety and operate in compliance of child safety requirements. These include, but are not limited to, ensuring the Company has suitable policies, which are enforced, and provide for child safety and strategies to reduce the risk of child abuse. All such policies are approved and mandated by the Board.

The Executive Director has delegated responsibility to report to the Board on implementation of the policies.

- reviewing and ensuring the reliability and effectiveness of CES Ltd's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy • finance and audit management
- capital development.

For the purposes of school regulation, the Board is structured in a way to enable:

- effective development of strategic direction of Sandhurst Catholic schools
- effective management of the finances of the Sandhurst Catholics schools; and
- fulfil its legal obligations in respect of each Sandhurst Catholic school.

## **Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C)**

Sandhurst Catholic Early Childhood Education and Care Ltd (SCECE&C) was instituted by Bishop Shane Mackinlay to assume the ownership and operation of two existing Catholic early childhood education and care centres in the Sandhurst Diocese. From January 1, 2021, SCECE&C was an approved Provider with the Australian Children's Education and Care Quality Authority (ACECQA) for the early learning centres at St Mel's Kindergarten Shepparton and Assisi

# REPORTING CRITERION 1

Kindergarten Strathfieldsaye. SCECE&C is a company limited-by-guarantee and registered with the Australian Charities-and-not-for-profit Commission.

As a wholly owned subsidiary of CES Ltd, SCECE&C is governed by a Board of Directors, and led by the Executive Director of CES Ltd with a delegation to the Assistant to the Executive Director, Early Childhood Education and Care. SCECE&C works in close collaboration and partnership with local Catholic and Government schools, parish communities and diocesan agencies, to help ensure a continuity of growth and development for each child and their family.

## Educational and Office Services

### Key Objective of CES Ltd

*“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a love of learning, a sense of curiosity, and respect for themselves and for others, including the poor and marginalised.”*

Bishop Shane Mackinlay: CES Ltd Initial Directions 2020

The history of Catholic schools within the Diocese of Sandhurst spans 168 years, with the first school opened on the Bendigo Goldfields in 1853 and forty years since the Catholic Education Office began. Over the decades, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region.

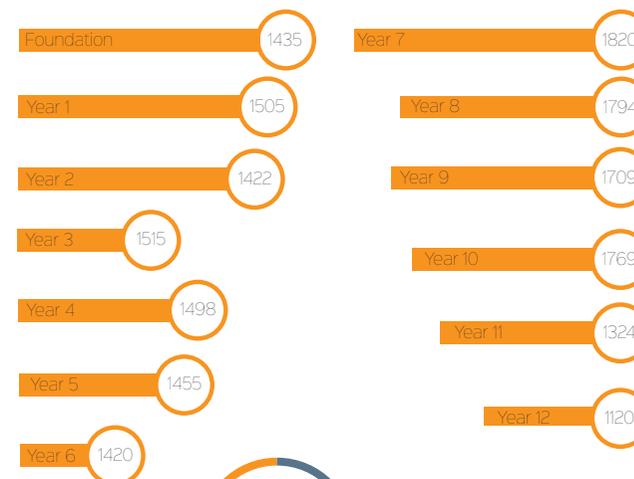
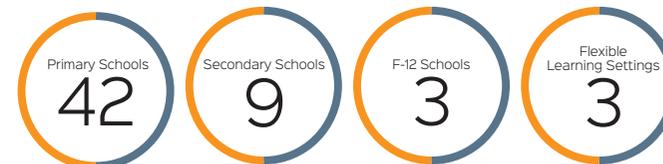
Sandhurst Catholic schools are part of a long tradition of Catholic education in Australia. Countless thousands of young people have benefited from the experiences they had and the skills they acquired in Catholic learning environments.

Today Catholic Education Sandhurst Limited oversees and is responsible for the operation of fifty-two Catholic schools (including Primary, Secondary and Specialist Settings). It will also be responsible for the operation of future schools that will be established by the Company referred to as (Sandhurst Catholic schools).

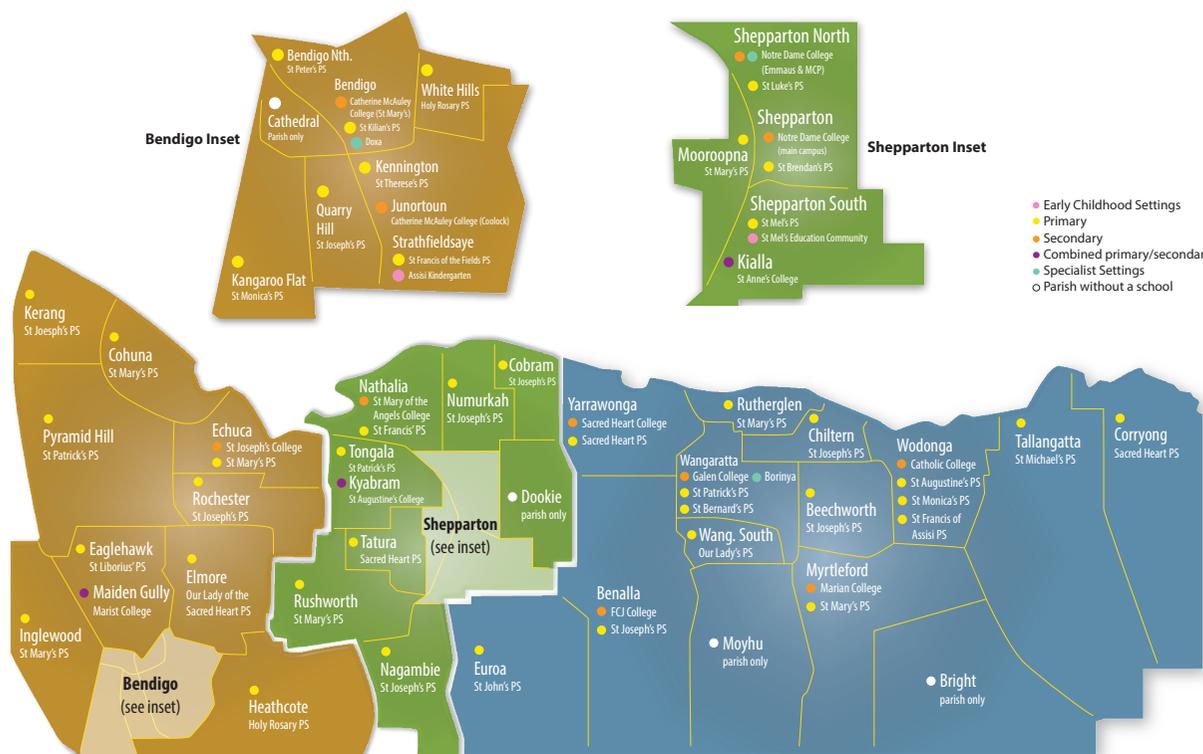
# REPORTING CRITERION 1



## Student Population



## CES Ltd Staff Population



**WESTERN DEANERY**  
Principal Consultants:  
Ashley Marsh (Primary) and Leonie Irwin (Secondary)

**GOULBURN VALLEY DEANERY**  
Principal Consultants:  
Janet Claassen (Primary) and Leonie Irwin (Secondary)

**NORTH EASTERN DEANERY**  
Principal Consultants:  
Kim Butler (Primary) and Leonie Irwin (Secondary)

Legend:  
■ Western Deanery  
■ Goulburn Valley Deanery  
■ North Eastern Deanery

- Early Childhood Settings
- Primary
- Secondary
- Combined primary/secondary
- Specialist Settings
- Parish without a school

# REPORTING CRITERION 1

## The CES Ltd Head Office Structure

The CES Ltd Head Office, operates as the business and management arm of CES Ltd. CES Ltd Office employs 94 staff members located in three regional locations, Bendigo (Head Office), Tatura and Wangaratta to lead and support CES Ltd schools in all areas of operation.

The Executive Director of CES Ltd, supported by the CES Ltd Executive Leadership Team is responsible for the oversight of all areas of management of CES Ltd schools and will ensure full compliance by all schools with all CECV and legislative requirements.

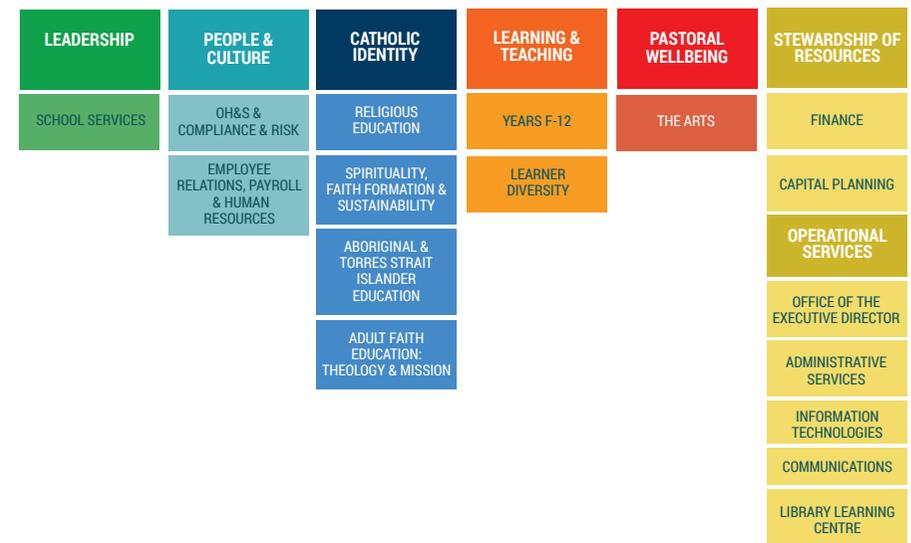
The Catholic Education Office is strongly committed to working with each school and parish community and the broader Catholic education community of Victoria in a spirit of co-responsibility. We commit to shaping the culture, enhancing the performance and building the capacity in schools and the Catholic Education Office.



## CATHOLIC EDUCATION OFFICE SANDHURST STAFF STRUCTURES, ROLES & PROCESSES

**EXECUTIVE DIRECTOR**  
CATHOLIC EDUCATION SANDHURST

**EXECUTIVE LEADERSHIP**





## Operations and Supply Chains

In 2021 CES Ltd had a total turnover of approximately \$220 million. As an educational institution our largest expenditure is the salaries of teachers and support staff whose salaries and employment related costs represent 48% of the company's annual expenditure.

In terms of non-salary related costs, during the reporting period. Across all 52 CES Ltd schools and 3 support offices, CES engaged with in excess of 3,000 Service Providers and Goods Suppliers.

Schools are supported through the CES offices providing support services to schools which include:

- Leadership
- Catholic Identity (including Religious Education, Faith Formation and Aboriginal and Torres Strait Islander Education support and resources)
- People and Culture (HR Services)
- Learning and Teaching Support
- Pastoral Wellbeing
- Finance Support
- Property and Capital Works
- Risk and Governance
- Marketing and Communication

## Delegations Framework

Schools operate under a Financial Delegation oversight and approval framework approved by the CES Ltd Board which provides authority to engage suppliers dependent on the value of the engagement.

The purpose of the Delegations Framework is to establish a framework for delegating powers, duties or functions of CES Ltd Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

# REPORTING CRITERION 2

## LEVELS OF DELEGATION

### Level 1

Executive Director

### Sub-delegations from the Executive Director

### Level 2

Deputy Director: Catholic Mission and Identity

Deputy Director: Learning and Teaching

Assistant to the Executive Director: Finance and Resources

Assistant to the Executive Director: People and Culture

Assistant to the Executive Director: Pastoral Wellbeing

Assistant to the Executive Director: Leadership Development

Assistant to the Executive Director: Planning, Resources and Governance

### Level 3

Principals

### Level 4

Deputy Principals

Business Managers

Leadership Teams

### Level 5

An employee at the school who has written authority by the Principal.

Please note:

Certain functions will require that Board approval and Member approval be sought. These are noted in the Schedules, where applicable.

## Function – School Contracts

Description	Delegation Reference	Limitations/Conditions	Delegated Level
School Contracts	SCON 1.0	Primary Schools – Contracts up to \$50,000 per annum	Level 3
	SCON 1.1	Primary Schools – Contracts of \$50,000 and above per annum	Level 2
	SCON 1.2	Secondary Schools – Contracts up to \$100,000 per annum	Level 3
	SCON 1.3	Secondary Schools – Contracts of \$100,000 and above per annum	Level 2
	SCON 1.4	School Camps Contracts and Booking Agreements/All schools	Level 3
	Includes – Before and After School Care, School Cleaning and Maintenance, Uniform Supplies, Canteen Operator/Supplier, Employment Agency, Service Providers (Independent Contractor), Bus Contracts, Camp Contracts, ICT providers, All Other		
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Work Experience	SCON 3.0	All schools	Level 3
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Capital Expenditure – Furniture, Plant and Equipment	FIN 12.0	Primary Schools (up to but less than \$50,000 and within approved budget)	Level 3
	FIN 12.1	Primary Schools (up to but less than \$50,000) and NOT within approved budget	Level 2
	FIN 12.2	Primary Schools \$50,000 and greater	Level 2
	FIN 12.3	Secondary Schools	Level 3
Expenditure – ICT Equipment	FIN 13.0	Primary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.1	Primary Schools – ICT Equipment NOT within approved budget	Level 2
	FIN 13.2	Secondary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.3	Secondary Schools – ICT Equipment NOT within approved budget	Level 2
Capital Expenditure Projects – Land, Building and Improvements	FIN 14.0	All land purchases To be approved by CES Ltd Board	N/A
	FIN 14.1	All Schools less than \$100,000 within approved budget	Level 3
	FIN 14.2	All Schools \$100,000 or greater To be approved by CES Ltd Board	N/A

# REPORTING CRITERION 2



The current practices involving the schools and offices using 3 different accounting systems and autonomy over supplier selection has caused a high-risk issue with data integrity and insight. Due to inconsistent and repetitive data across various accounting systems the consolidation of the information is difficult to gain meaningful analysis of the Supply Chain. In 2022 CES Ltd Procurement Department will begin strategic planning to:

- establish a financial data consolidation process in conjunction with the Finance team's rollout of the ICON program to all schools (due to conclude in 2023)
- analysis of Service Providers and develop a data consolidation process
- and using the consolidated data to create a "Preferred Service Provider" list for the schools and offices.

The Service Providers and Suppliers on this preferred list will be vetted by the Procurement team in accordance with the CES Ltd Procurement Guiding Principles and recontracted with the new Service Agreement that outlines a Modern Slavery Compliance clause.

*CES Ltd seeks to work in partnership with Service Providers to meet and exceed the minimum expectations to drive success for our relationships and continuously strives to improve the ethical and sustainable standards of our business practices.*

*We believe in leadership encompassing vision, innovation, and empowerment.*

# REPORTING CRITERION 2

## The Guiding Principles of Procurement at CES Ltd are:

**Responsibility** – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain.

**Integrity** - CES Ltd and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CES Ltd policies. Service Providers will be treated fairly, respectfully and free from bias.

**Clarity** – We will drive transparency and accountability to support open, success-driven and respectful partnerships with our Service Providers. We strive for success with our partnerships because when our Service Providers succeed, CES Ltd and our school communities will thrive!

**Community** – CES Ltd greatly values our local communities and is committed to supporting and fostering prosperity with local businesses. CES Ltd actively seeks the engagement of goods, services and staff sourced from within the Sandhurst Diocese and the wider Victorian area.

**Balance** - CES Ltd determines “the Best Value” for goods and services to balance cost, service, quality, reliability, innovation, ethics, sustainability and value alignment.



*“Every person ought to have the awareness that purchasing is always a moral - and not simply an economic - act”*

Pope Francis (2014)

# REPORTING CRITERION 3



## Operational Risks

CES Ltd has undertaken a number of steps to identify Modern Slavery risk in its operations.

CES Ltd acknowledges that business procurement activities could cause, contribute to or be directly linked to modern slavery practices. In response to the Modern Slavery Act (2018) and the obligations to report, CES Ltd have established a relationship with the Australian Catholic Anti-Slavery Network (ACAN) to assist CES Ltd to identify and assess risks in our organisation, to reduce any chance of modern slavery practices in our supply chains. Identifying and addressing modern slavery risks and reporting on the risks and actions taken is highly complex and will not be fixed quickly or easily. ACAN provides a support forum for Catholic executives tasked with the new obligations about supply chain transparency to work in collaboration and cooperation with each other.

CES Ltd Board and CES Ltd Leadership have adopted a Risk Management Framework, that defines CES Ltd's risk operating model, appetite, responsibilities, methodology this Framework supports the approach to manage modern slavery risks through good governance and accountability. The *ISO 3100:2018 Risk Management - Guideline* consists of a set of Principles, Framework and Processes that will aim to improve the decision making about risks in our organisation.

## Our COVID-19 response

CES Ltd recognise that impact of COVID 19 may increase the vulnerability of workers in our supply chains to modern slavery in certain jurisdictions. With the ever-changing environment of the pandemic on social and economic standards and the unknown ramifications, CES Ltd will commit to continually assess our risks as per our Risk Management Framework and mitigate solutions to reduce the likelihood of the risk in our supply chains.

Throughout the 2 years of the pandemic, CES Ltd have been able to keep all 52 schools operating, some small closures resulting in positive cases, but regardless of the number of students attending, continuation of education was ensured. Essential workers and vulnerable students continued their education on site at school, which was imperative for the safety of the families and the country. Introduction of online learning was essential, with staff and families working together to work safely in their home environments. Staff wellbeing was always at the forefront of all decisions relating to work arrangements and ensuring staff were able to take sick days and leave when required and encouraged for their safety.

# REPORTING CRITERION 3

Safeguarding of staff, students and the school community throughout the pandemic has been the key focus for CES Ltd. Purchasing of PPE, sanitiser and cleaning supplies and the engagement of cleaning services increased during the pandemic and with it increased the risk of Modern Slavery in the supply chain due to product being sourced by our supply chain from high-risk areas overseas. Whilst further action is required, CES Ltd was formed in January 2021, twelve (12) months into the pandemic, and in the first twelve (12) months of operating has implemented a number of operating changes including the creation of a Risk and Governance and Procurement and Contracts roles to work with suppliers and develop an ethical procurement strategy and assess and monitor the risk moving forward.

## **Our People**

The staff employed at CES Ltd come from a diverse background, nationalities and experiences. Our schools and offices are across a vast stretch of land, including small communities, remote locations, rural areas and country cities. The range of age of our staff include newly graduated to those preparing for retirement and have committed a service to the Catholic Education.

CES Ltd complies with labour, employment and immigration laws through a variety of HR suite of policies and procedures, including employment contracts, Code of Conduct, Staff Bullying, Harassment and Discrimination Policy, Complaints Management Framework, Whistleblower Policy, Managing Performance Concerns Policy and Staff Grievance Policy. All employment related policies and procedures are regularly reviewed and updated by the Compliance, Policy and Reference Group to ensure any changes in law and legislative are reflected accordingly.

The Modern Slavery Policy identifies the escalation process for all staff at CES Ltd and if a case of modern slavery was suspected, it would be fully investigated and any appropriate disciplinary action would be taken.

If a staff member has a query around their conditions of employment, where relevant they can contact their Principal or Team Leader. Staff also have access to the Complaints Management Framework which clearly provides guidance and support in complaints procedures and escalation process.

# REPORTING CRITERION 3



## Modern Slavery gap analysis

CES Ltd undertook the 'Bridge the Gap' analysis, which is an online tool developed by ACAN, to assist organisations to understand gaps, assess maturity and modern slavery risk.

The following categories are the key focus in the organisations gap analysis:

1. Management Systems
2. Human Resource and Recruitment
3. Procurement and Supply Chain
4. Risk Management
5. Customers and Stakeholders

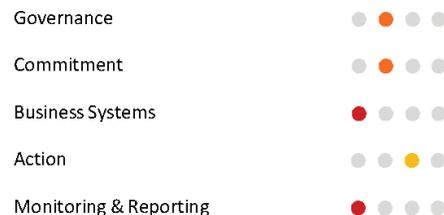
The results below are based on the initial analysis conducted in October 2021 which identified the following strengths and weaknesses:

### Legend

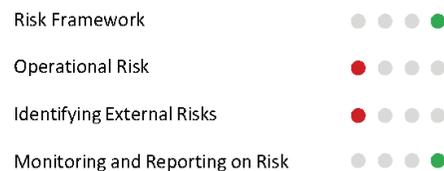
- Leading practice (GREEN)
- Making progress (YELLOW)
- Starting out (ORANGE)
- At the starting point (RED)

### Heat Map

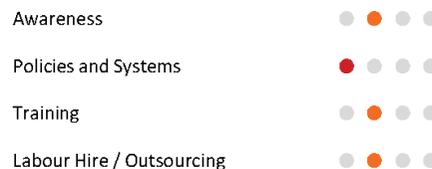
#### Management Systems



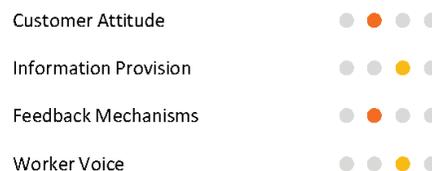
#### Risk Management



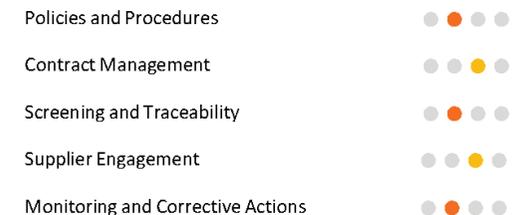
#### Human Resources and Recruitment



#### Customers and Stakeholders



#### Procurement and Supply Chain



# REPORTING CRITERION 3

*Suggested actions based on the Bridge the Gap analysis of priority areas to refine our risk management to modern slavery:*

Category	Actions
<b>Management Systems</b>	
<b>Business Systems</b>	Review existing business systems against the requirements of modern slavery legislation
<b>Monitoring and Reporting</b>	Integrate modern slavery risk findings into monthly management reports
<b>Risk Management</b>	
<b>Operational Risk</b>	Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks
<b>Identifying External Risks</b>	Map modern slavery risk and vulnerabilities along extended supply chain
<b>Human Resources and Recruitment</b>	
<b>Policies and Procedures</b>	Encourage lowering tolerance approach to modern slavery among all staff and contractors
<b>Training</b>	Create instructional materials, from all stakeholder perspectives
<b>Customer and Stakeholders</b>	
<b>Customer Attitude</b>	Develop awareness raising programs for customers and stakeholders
<b>Feedback Mechanism</b>	Establish system and processes to evaluate and take immediate action on feedback received
<b>Procurement and Supply Chain</b>	
<b>Screening and Traceability</b>	Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow
<b>Monitoring and Corrective Actions</b>	Establish a supplier monitoring program



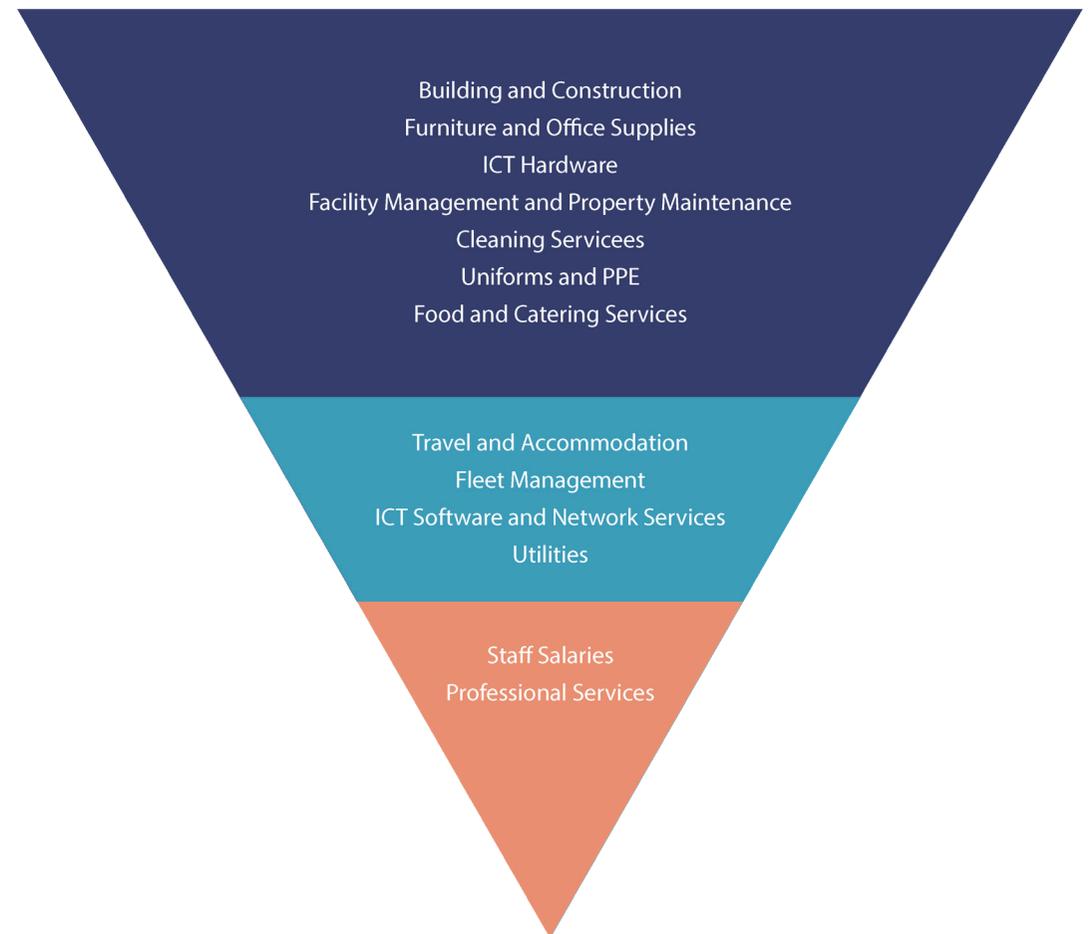
## Supply Chain Risks

Supply Chain Risks Due to the data consolidation issues caused by multiple accounting systems and inconsistent data entry across these platforms and volume of goods and service providers, the risk analysis has been conducted using the data obtained only from the 35 schools using the ICON accounting system. The assumption being that the 35 schools using the ICON platform is a large enough data sample to provide an accurate assessment of the Modern Slavery risk in the supply chain. However, it should be noted that the 35 schools in the data sample are all primary schools.

Using this data we have identified the top 100 suppliers by spend as well as suppliers of key high risk goods and services. The highest risks areas identified for educational institutions are:

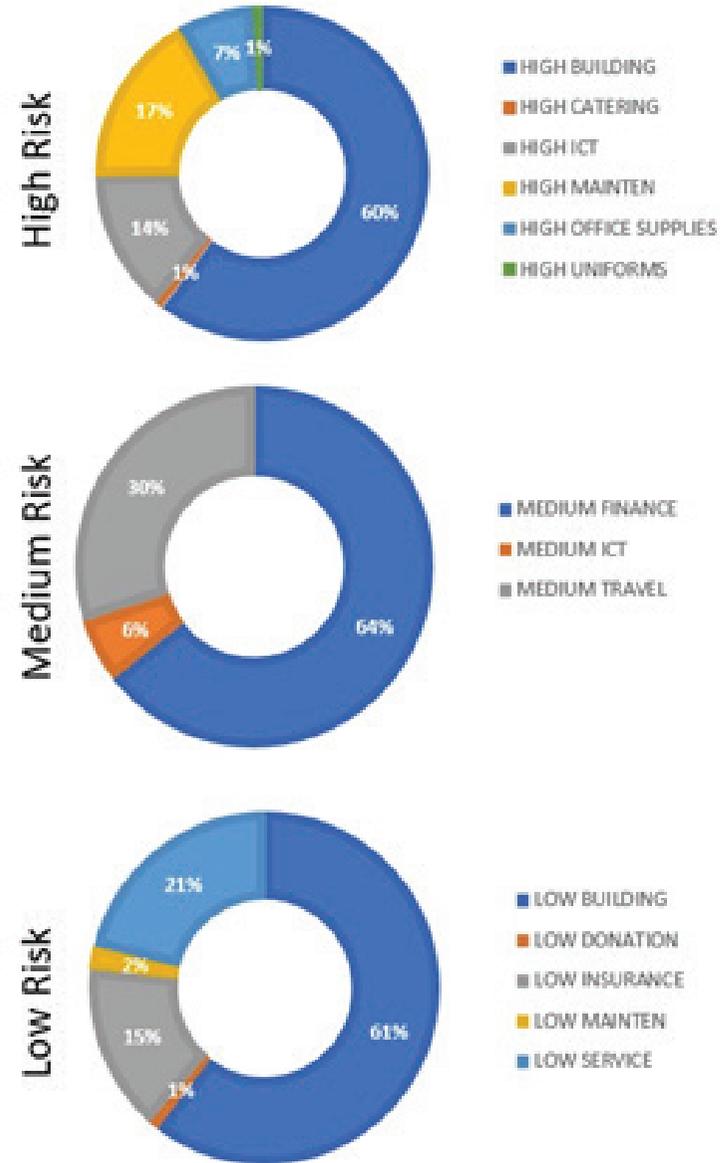
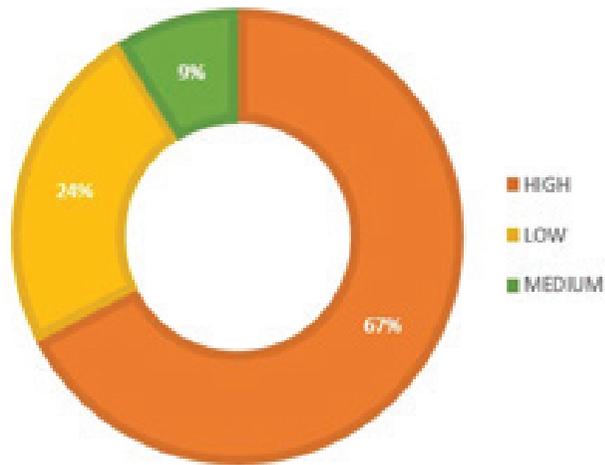
- Building and Construction
- ICT Hardware
- Cleaning services and equipment
- Uniforms and PPE
- Furniture and Office Supplies
- Catering.

### Key Expenditure Categories



# REPORTING CRITERION 3

CES LTD SUPPLY CHAIN RISK TO MODERN SLAVERY



# REPORTING CRITERION 3



**When procuring goods and services the table below identifies 4 key risk factors which can indicate an increase of modern slavery in supply chains:**

Sector	Example of Goods or Service with Potential Risk	Example of Labour Rights Risk
<b>Industry Sector</b>	CES Ltd procures construction and facilities maintenance services, which are known to be high risk for both domestic instances of modern slavery and for the manufacturing of products used in the course of those operations.	Forced labour in the production of building and construction materials
<b>Commodity or Product</b>	Specific products and commodities are deemed high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.	CES Ltd recognises, for example, that electronic equipment contains metals and minerals that may be sourced from regions known to be at high risk of modern slavery practices.
<b>Geographic Location</b>	The risk based on geographic location is based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. CES Ltd predominantly engages Australian suppliers, it is recognised that goods and associated services may come from countries other than those of suppliers' headquarters.	For example, that electronic goods from Malaysia would be considered to be at high risk of modern slavery.
<b>Workforce Profile</b>	In undertaking the supplier analysis, CES Ltd considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as 3D' work (dirty, dull or dangerous).	Cleaning services, may use vulnerable or migrant labour which the work is deemed as '3D' work (dirty, dull, or dangerous) Exploitation of such employment conditions, below award wages or docking of wages.

CES Ltd has identified the following risk factors and will implement a process to engage with high spend suppliers and invite them to join Sedex. In doing so, suppliers will complete a comprehensive self-assessment questionnaire (SAQ) and SCS will have access to results of the SAQ and any corresponding red flag factors that may contribute to modern slavery practices. Currently CES Ltd has a decentralised data system and collation of this data is under development, clear understanding of risks in our operations will be developed further throughout 2022 and onwards.

There is further risk associated with the uncontrolled expenditure in Staff Reimbursements, while there is an approval process in place for these expenses, there is no overall visibility for these costs and is a considered a High Risk procurement activity. Review of this process may be required in future by CES Ltd.

# REPORTING CRITERION 4



## Actions taken to assess and address risks

CES Ltd has completed a number of actions to address modern slavery and risks it imposes.

The following actions have taken place:

- **Joined the Australian Anti-Slavery Catholic Network (ACAN)**
- **The appointment of two Modern Slavery Liaison Officers (MSLO)**, who lead the operational activities to identify and mitigate modern slavery risks within the organisation. The MSLOs work closely with the Executive Leadership Team to collaboratively work together for the organisation approach to modern slavery. The MSLOs participate in the ACAN monthly webinars and engage with ACAN expertise on a needs basis to assist in actions to address risk of modern slavery and keep informed of new initiatives and the risk management program activities.
- **Developed the CES Ltd Modern Slavery Policy** - CES Ltd has developed a Modern Slavery Policy endorsed by the Board to clearly establish our commitment to mitigate modern slavery risks within our business operations and supply chains. This Policy provides a robust framework to ensure compliance with the reporting requirements of the Act, whilst also providing guidance for staff not to knowingly use or contribute to modern slavery practices.
- The development of **contractual clauses** for standard contracts. CES Ltd will access ACAN guidance for comprehensive clauses for high-risk contracts.
- **Completed a Modern Slavery risk assessment Operations and Supply Chain.**
- **Completed modern slavery awareness training through ACAN** - The two MSLOs have completed modern slavery training-learning modules and are developing a training session for all of the organisation. E-learning modules cover:
  - » ACAN- Modern Slavery 101
  - » ACAN- Business Relevance
  - » ACAN- Implementing a Modern Slavery Risk Management Program.
- Engage with internal stakeholders of the organisation to seek their input in addressing the risk of modern slavery, by creating **Modern Slavery Action Working Party (MSAWP)**.
- Recognising the Feast Day of St Bakhita on the 8th February concerning the plight of the victims of modern slavery.
- CES Ltd **Social Justice Reference Group** initiatives / website.

# REPORTING CRITERION 4



- Attendance of a supplier engagement workshop organised by ACAN. The purpose of the workshop was to train participants on how to run supplier workshops for high-risk expenditure categories
- Completion of the 2021 BtG analysis, identifying areas in which progress has been made as well as areas requiring further attention in 2022 and beyond. These will be addressed in accordance with the Action Plans for 2021, 2022 and later years.
- Commenced **supplier engagement** – CES Ltd has commenced its supplier engagement strategy by introducing **modern slavery clauses in the terms of Service Agreements** and Tendering activities.
  - » In 2021 ACAN joined **Sedex, one of the world's leading ethical trade membership organisations**, working with businesses to improve working conditions in global supply chains. Via this connection, CES Ltd Procurement now has access to an online platform, tools and services to help schools operate responsibly and sustainably, protect workers and source ethically.
  - » Tendering templates have been updated to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CES Ltd.
  - » As well as developing the above-mentioned **Guiding Principles of Procurement** aimed to establish CES Ltd's values and commitment to responsible procurement. This communication strategy is the first of many steps related to building supplier awareness.
  - » In 2022 the CES Ltd Modern Slavery Action Working Party will develop a School and Office awareness plan and a **Supplier Code of Conduct** and updated **Supplier Induction Procedures** will be developed and distributed in 2022, current practice is for Service Providers to adhere to CES Ltd policies and codes, the Procurement Team is working on a tailored document specifically for Service Providers.
  - » In 2021 ACAN joined the **Cleaning Accountability Framework**. CAF is a multi-stakeholder organisation that exists to end exploitation in property services and improve labour standards through education and advocacy. CAF stakeholders work together in a spirit of cooperation to drive responsible standards for the procurement, management, and delivery of cleaning services. This occurs through CAF Certification, a worker-centric due diligence mechanism that assesses, addresses and mitigates the risk of labour exploitation by engaging workers and other supply chain stakeholders. In 2022-23 CES Ltd will have access to these resources in order to develop a review of cleaning providers and products to ensure workers are protected and supplies are sourced ethically and responsibly.
  - » CES Ltd will invite high spend suppliers to join Sedex and undertake the SAQ.

# REPORTING CRITERION 4



## Modern Slavery Action Plan and Road Map

CES Ltd is committed to follow the 5 Step action plan as provided by ACAN to guide and support our processes and objectives to reduce the risk of modern slavery in our operations.

Progress has been made in this reporting period from the Road Map, and some actions have been achieved, but there are still areas of improvement and opportunities to build and educate all our staff and stakeholders.

## 5 Step Action Plan and Road Map

Areas in bold text, indicate action has been taken or under development.

### STEP 1: Commitment

- Engage top management and set direction**
- Adopt the Modern Slavery Policy**
- Establish a Modern Slavery Action Working Party**
- Define roles and responsibilities**

### STEP 2: Business State of Play

- Understand what you are doing well and where your gaps are to manage modern slavery risks**
- Prepare and implement a modern slavery action plan or strategy to address your gaps
- Monitor progress and ensure continual improvement

### STEP 3: Supplier Risk

- Prioritise suppliers based on potential risk and spend
- Seek responses from suppliers on their modern slavery actions in EOI or tender processes
- Clearly outline expectations to suppliers

### STEP 4: Engage, Educate and Respond

- Engage and train management, employees and contractors
- Engage and educate highest priority suppliers
- Establish remedy pathway to respond when slavery practices identified in operations or supply chain

### STEP 5: Modern Slavery Statement

- Prepare draft Modern Slavery Statement and submit to leadership for signature**
- Collaborate with ACAN participants to develop Modern Slavery Compendium and upload to Commonwealth Modern Slavery Statement Register
- Publish Modern Slavery Statement on entity website



## **Provision of Remediation Solution through ACAN**

CES Ltd is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CES Ltd is utilising the Domus 8.7 program from ACAN - an independent program to provide remedy to people impacted by modern slavery.

CES Ltd has not had the opportunity to review the remediation program, but will enhance future directions through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with ACAN, Domus 8.7, CES Ltd can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CES Ltd is directly linked to modern slavery by a business relationship, CES Ltd is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with CES Ltd to ensure victim centred remediation processes are implemented to the satisfaction of CES Ltd.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact the Modern Slavery Liaison Officers (MSLO) in the first instance. Then the MSLO will contact the relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

# REPORTING CRITERION 5



## **Effective Assessment**

CES Ltd Board will oversee the ongoing development of the planning and program to manage risks within our organisation of modern slavery. The ACAN Action Plan and Road Map provides a great base to build on our planning and our commitment from all staff and stakeholders. The “Bridge the Gap” analysis was completed, and the assessment has provided clear actions and key components that require development. Our target for 2022, is to make improvements over the majority of the indicators provided from the ‘Bridge the Gap’ assessment tool.

As this is our first year in submitting a Modern Slavery Statement, there are no results or effective process to report or to compare to at this stage.

# REPORTING CRITERION 6

## **Consultation with Entities Owned or Controlled**

This statement is provided as a single reporting entity, pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and incorporates the activities and operations of the 52 Sandhurst diocesan schools and also includes subsidiary entity SCECE&C Ltd’s two early learning centres.

For the preparation of this statement we have consulted with different departments of CES Ltd such as Procurement, Risk and Compliance, Marketing and Finance teams, when preparing this statement as well as ACAN and other members of the ACAN network.

This consultation with ACAN and our other departments has informed our approach to ensure it is appropriate and effectively tailored to reflect our organisational context and will be an ongoing consultation process for future initiatives, activities and statements.

# REPORTING CRITERION 6



CES Ltd is committed to modern slavery eradication and in 2022 will establish the Modern Slavery Action Working Party (MSAWP) made up of representatives from across operations and education including:

- Social Justice Team / Catholic Identity
- Capital Planning
- Operations and Facility Management
- Procurement and Contracts
- Risk and Governance
- People and Culture
- Communications
- School Liaisons and Representatives

The purpose of the MSAWP is to facilitate CES Ltd's response to modern slavery legislative requirements utilizing the support and resources developed by our Modern Slavery Support Partners including: the Australian Catholic Anti-slavery Network (ACAN), ACRATH, VicTas Anti-Slavery Taskforce and other relevant sources.

The MSAWP will inform and advise CES Ltd's Executive Leadership Team and Board on modern slavery related issues and CES Ltd's role in managing and mitigating modern slavery risks. The Working Group will particularly advise on the development, implementation, monitoring and review of CES Ltd's Modern Slavery Action Plan which includes developing an education plan for our schools to promote awareness and educate students of the risks of modern slavery.



## **CES Ltd Current and Future Initiatives**

### **Social Justice Reference Group**

Prior to the incorporation of CES Ltd, The Social Justice Reference Group (SJRG) has existed in the organisation for many years and has evolved over time. The SJRG is mandated to ensure our schools respond to the mission of Jesus encapsulated by John 10:10 by ensuring regular social justice activities are conducted at diocesan and local levels. These activities are clearly grounded in a well-developed understanding of the principles of Catholic Social Teaching, particularly showing respect and compassion for the dignity of all humankind.

The purpose of the SJRG is:

1. To demonstrate that through our Catholic Identity social justice is core to Learning and Teaching, Wellbeing, Leadership and Stewardship of Resources.
2. To educate and empower all members of our Sandhurst school communities to uphold and respond to the principles of Catholic Social Teaching.
3. To provide a space for social justice initiatives to be generated and discerned for proposed common applications in schools throughout the diocese.
4. To collect and map key social justice initiatives throughout the diocese to ensure a common voice and clear message.

### **The SJRG believes ...**

That opportunities to experience inequity and injustice lead to awareness which has the potential to transform and lead to justice action. The SJRG has been actively involved with the school communities in awareness raising, action for solidarity, advocacy and action for change as the principles which inform and guide an interdependent approach to social justice initiatives and programs.

# REPORTING CRITERION 7



## The SJRG includes representation across the school community

- Primary and Secondary Teachers
- CES Ltd Catholic Identity Team
- Diocesan Caritas/Justice Coordinator
- CES Ltd Indigenous Education Officer
- Secondary Students

## The SJRG Action Plan for 2022 includes

- Conduct Justice Matters Camp
- Raise awareness and provide educational resources for Refugee Week
- Conduct Diocesan Winter Sleepout
- Develop and distribute a School Social Justice Planning template for both Primary and Secondary schools
- Develop, launch and monitor CES Ltd Laudato Si' Action Plan

# REPORTING CRITERION 7



## Next Steps for 2022

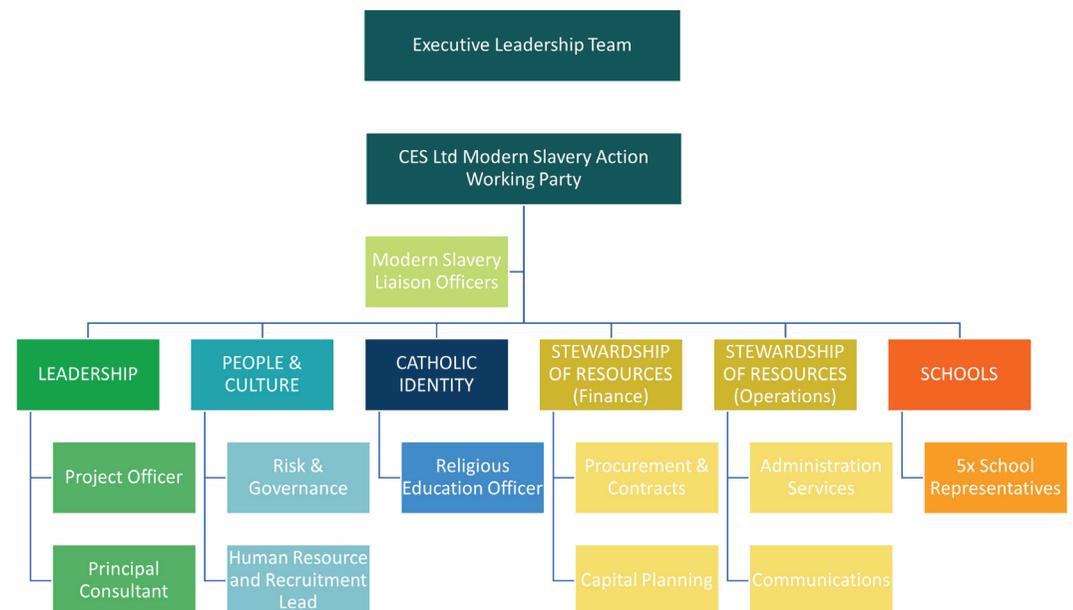
- The MSLO and SJRG launched the Modern Slavery Policy to CES Ltd on the Feast Day of St Josephine Bakhita (8th of February) - the policy has been publically published on the CES Ltd website (<https://www.ceosand.catholic.edu.au/about-us/policies>)
- Develop and Implement a Modern Slavery Escalation and Remediation Process,
- Strategic Procurement Action Plan for:
  - » Managing data consolidation and analysis issues,
  - » Accurately identifying supply chain risk and establishing a monitoring strategy
  - » Supplier Engagement to raise awareness of Modern Slavery Risk and education
  - » Develop and implement specific Service Provider Code of Conduct and update to Supplier Induction procedures.

## Modern Slavery Action Working Party

A Modern Slavery Action Working Party (MSAWP) has been established and will meet once a term to monitor the progress of the Modern Slavery Action Plan.

The MSAWP will inform and report to CES Ltd's Executive Leadership Team and Board on all issues related to modern slavery and CES Ltd's role in managing and mitigating modern slavery risks.

The MSAWP is comprised of representatives from all across the entity in order to provide maximum input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery.





## **Objectives of the Modern Slavery Action Working Party**

The objectives of the Modern Slavery Action Working Group are to:

- Provide input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery.
- Actively support the development and implementation of CES Ltd's Modern Slavery Action Plan.
- Assist CES Ltd to determine priority actions to be undertaken and to establish annual goals and targets.
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness.
- Ensure CES Ltd meets the requirements of the Modern Slavery Act 2018 (Cth).



## List of schools with ABNs

E Number	Name	Town	Office	Deanery	ABN
E3999	Catholic Education Office Sandhurst	Bendigo	Head Office	Western Deanery	94493967364

E Number	School Name	Town	Primary / Secondary	Goulburn Valley Deanery	ABN
E3035	St Mary's	Rushworth	Primary	Goulburn Valley Cluster	54294883020
E3054	St Augustine's F-12 College	Kyabram	F-12	Central Murray Cluster	27464784130
E3051	St Francis'	Nathalia	Primary	Central Murray Cluster	54412713465
E3015	St Joseph's	Numurkah	Primary	Central Murray Cluster	97392135646
E3029	St Joseph's	Cobram	Primary	Central Murray Cluster	18744901330
E3041	St Patrick's	Tongala	Primary	Central Murray Cluster	26830037899
E3042	St Mary of the Angels College	Nathalia	Secondary	Central Murray Cluster	24118139345
E3061	St Anne's College	Kialla	F-12	Goulburn Valley Cluster	24880421954
E3007	Sacred Heart	Tatura	Primary	Goulburn Valley Cluster	45985652934
E3003	St Brendan's	Shepparton	Primary	Goulburn Valley Cluster	47792950935
E3005	St Joseph's	Benalla	Primary	Goulburn Valley Cluster	77557417261
E3030	St Joseph's	Nagambie	Primary	Goulburn Valley Cluster	47043727335
E3055	St Luke's	Shepparton North	Primary	Goulburn Valley Cluster	28727486838
E3034	St Mary's	Mooroopna	Primary	Goulburn Valley Cluster	74357745481
E3038	St Mel's	Shepparton South	Primary	Goulburn Valley Cluster	85558516062
N/A	St Mel's	Shepparton	Kindergarten	Goulburn Valley Cluster	98643978205
E3013	Notre Dame College	Shepparton	Secondary	Goulburn Valley Cluster	50248908314



## List of schools with ABNs

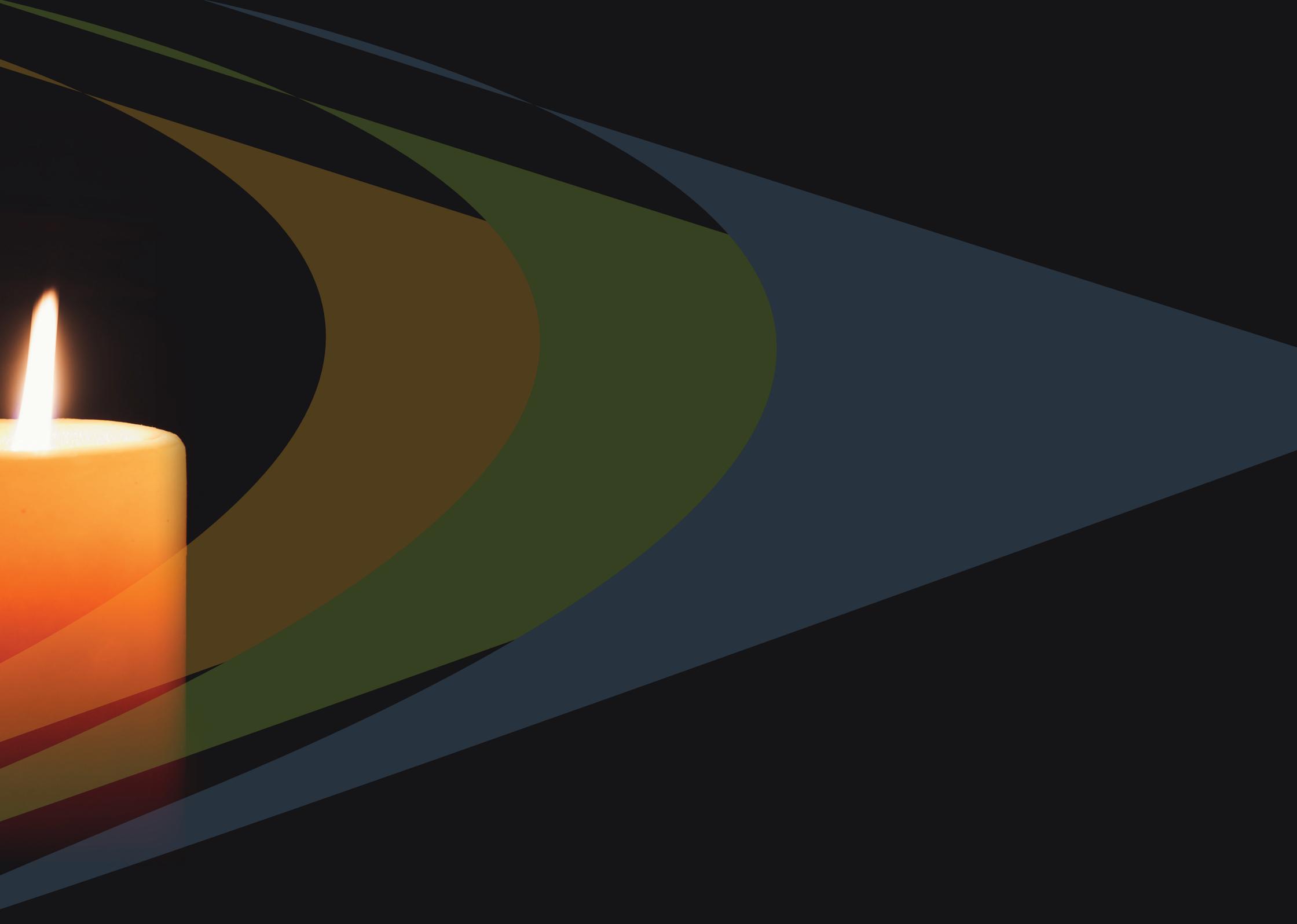
E Number	School Name	Town	Primary / Secondary	North Eastern Deanery	ABN
E3058	Borinya Wangaratta Community Partnership	Wangaratta	Flexible Learning Setting	Ovens Cluster	48234647790
E3040	Our Lady's School	Wangaratta	Primary	Ovens Cluster	20376223461
E3012	Sacred Heart	Yarrowonga	Primary	Ovens Cluster	31105341490
E3043	St Bernard's	Wangaratta	Primary	Ovens Cluster	45622757419
E3028	St John's	Euroa	Primary	Ovens Cluster	95487582538
E3022	St Joseph's	Beechworth	Primary	Ovens Cluster	39457814349
E3031	St Mary's	Myrtleford	Primary	Ovens Cluster	82074132527
E3001	St Patrick's	Wangaratta	Primary	Ovens Cluster	14591826647
E3049	Galen Catholic College	Wangaratta	Secondary	Ovens Cluster	65163726691
E3045	Marian College	Myrtleford	Secondary	Ovens Cluster	41878533208
E3014	Sacred Heart College	Yarrowonga	Secondary	Ovens Cluster	39641905468
E3044	Sacred Heart	Corryong	Primary	Upper Murray Cluster	52056437203
E3024	St Augustine's	Wodonga	Primary	Upper Murray Cluster	34865040990
E3056	St Francis of Assisi	Baranduda	Primary	Upper Murray Cluster	26559101675
E3008	St Joseph's	Chiltern	Primary	Upper Murray Cluster	15998336276
E3009	St Mary's	Rutherglen	Primary	Upper Murray Cluster	90053304261
E3039	St Michael's	Tallangatta	Primary	Upper Murray Cluster	82622718301
E3046	St Monica's	Wodonga West	Primary	Upper Murray Cluster	77239304724
E3050	Catholic College Wodonga	Wodonga	Secondary	Upper Murray Cluster	31244284084

# APPENDIX

## List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	Western Deanery	ABN
E3057	Doxa School	Bendigo	Flexible Learning Setting	Goldfields Cluster	76421028851
E3027	Holy Rosary	White Hills	Primary	Goldfields Cluster	89199183200
E3053	St Francis of the Fields	Strathfieldsaye	Primary	Goldfields Cluster	15768597240
N/A	Assisi	Strathfieldsaye	Kindergarten	Goldfields Cluster	98643978205
E3025	St Joseph's	Quarry Hill	Primary	Goldfields Cluster	28371056933
E3023	St Kilian's	Bendigo	Primary	Goldfields Cluster	93721943550
E3006	St Liborius'	Eaglehawk	Primary	Goldfields Cluster	39031591026
E3004	St Monica's	Kangaroo Flat	Primary	Goldfields Cluster	30477548549
E3047	St Peter's	Bendigo North	Primary	Goldfields Cluster	87736760135
E3037	St Therese's	Kennington	Primary	Goldfields Cluster	55460716403
E3032	Holy Rosary	Heathcote	Primary	Northern Plains Cluster	78836957753
E3020	Our Lady of the Sacred Heart	Elmore	Primary	Northern Plains Cluster	48491407034
E3018	St Joseph's	Rochester	Primary	Northern Plains Cluster	84603693288
E3026	St Joseph's	Kerang	Primary	Northern Plains Cluster	32650192040
E3010	St Mary's	Inglewood	Primary	Northern Plains Cluster	11237942413
E3016	St Mary's	Echuca	Primary	Northern Plains Cluster	77914476179
E3033	St Mary's	Cohuna	Primary	Northern Plains Cluster	70245681952
E3036	St Patrick's	Pyramid Hill	Primary	Northern Plains Cluster	76745874254







Catholic Education Sandhurst Ltd

