



Policy Statement

Diocese of Ballarat Education Limited (DOBCEL) is committed to ensuring that modern slavery is prevented within its operations, business relationships or extended supply chains and to ensuring compliance with the *Modern Slavery Act 2018 (Cth)*. This policy is intended to prevent and mitigate the risk of modern slavery within DOBCEL operations and supply chains.

Context

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Action against modern slavery is fundamental to Catholic social teaching. DOBCEL is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its organisational operations or schools.

DOBCEL expects its service providers, suppliers, and contractors to share a commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or supply chains.

Scope

The policy applies to all DOBCEL Board Directors, Committee members, staff, volunteers, consultants, labour-hire staff, contractors and sub-contractors and their staff.

Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These core principles underpin this policy.

- Slavery is a major issue for Australian businesses within Australia and in extended supply chains
- DOBCEL will not knowingly use or contribute to modern slavery practices in any form
- DOBCEL will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain
- Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in DOBCEL operations or supply chains is unacceptable
- DOBCEL shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association
- DOBCEL procurement decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers
- DOBCEL will support suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

Legislative Context

[Modern Slavery Act 2018](#)

Definitions

TERM	DEFINITION
Modern Slavery	<p>Modern slavery is the use of coercion, threats or deception to exploit individuals and deprive them of their freedom.</p> <p>The Modern Slavery Act defines modern slavery to include:</p> <ul style="list-style-type: none"> • trafficking in persons • slavery • servitude • forced labour • debt bondage • deceptive recruitment • forced marriage, and • the worst forms of child labour: situations where children are subjected to slavery or similar practices or engaged in hazardous work. <p>The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights, are crimes and pose a serious business risk to DOBCEL operations and reputation.</p>

Roles and Responsibilities

ACTIVITY	RESPONSIBILITY	STEPS
Prevention and management of modern slavery risk	Whole of Organisation	The Procurement and Purchasing Policy and Procedures ensure the safety of children and students for facilities and services provided by third parties. Child safe procurement applies regardless of the value of the product or service.
	Board	Has overall responsibility for ensuring this policy and its implementation complies with Catholic social teaching, legislated requirements and ethical obligations.
	Directorate	Have responsibility for managing modern slavery risk within DOBCEL offices and schools.
	All levels of management	Have responsibility for ensuring that staff are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
	Staff	Have responsibility for Internal reporting of actual or potential modern slavery risks.
	Modern Slavery Liaison Officer (MSLO)	Is responsible for providing advice and direction to the Board, Directorate and Leadership teams, and schools. Will manage ongoing risk management actions required of staff, suppliers and business partners.
Monitoring and reporting	Modern Slavery Liaison Officer (MSLO)	Is responsible for collecting information relevant to include in the annual modern slavery statements and preparing content for the modern slavery statement Provision of general advice and support to DOBCEL staff on all matters relating to modern slavery. DOBCEL and its subsidiaries retain the right to terminate relationships with individuals, suppliers, contractors and business partners working in, on behalf of or engaged by DOBCEL or its subsidiaries if they breach this policy.

Supporting Documents

Internal

Policy Development and Review Policy and Procedures
Procurement and Purchasing Policy and Procedures
Risk Management Policy
Risk Management Framework

Resources

[Australian Catholic Anti-Slavery Network](#)
[Anti-Slavery Australia](#)
[Australian Catholic Bishops Conference: Submission 16](#)

DOBCEL Principles of Governance

All DOBCEL policies are founded on and reflect the Principles of Governance stated in the Document:
[DOBCEL Principles of Governance](#)

Responsible Directorate member	Deputy Director Catholic Education
Document Owner	Modern Slavery Liaison Officer
Assigned Board Committee	Catholic Faith Community and Culture
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