



## **Modern Slavery Statement**

In compliance with the Modern Slavery Act  
2018 (Cth) (Act)

January 1 2022 – December 31 2022

### **CATHOLIC SCHOOLS BROKEN BAY**

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## 1. Introduction

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Catholic Schools Diocese of Broken Bay (CSBB) is committed to doing everything in its control to contribute to the eradication of modern slavery in Australia and globally. In doing this, CSBB is committed to acting with integrity, honesty, transparency and fairness.

Modern slavery describes situations where victims are exploited and their freedom undermined, by the use of coercion, threats or deception. Practices that constitute modern slavery include:

- Slavery;
- Servitude;
- Forced labour;
- Debt bondage;
- Forced marriage;
- Deceptive recruiting for labour or services;
- Human trafficking; and
- the worst forms of child labour.

In 2015, Pope Francis referred to slavery as “an open wound on contemporary society”. Pope Francis pledged to work with other global religious leaders to empower their communities to stand against modern slavery in all its forms. Australia pledged to eradicate modern slavery and human trafficking by 2030 by adopting the Pope Francis inspired *UN Sustainable Development Goal (SDG) 8.7*. Today, he continues to raise his voice against modern slavery and human trafficking, promoting an “economy of care”.

As a system of Catholic schools immersed in the Gospel of Jesus, CSBB is committed to the values of compassion, tolerance, forgiveness and reconciliation. CSBB opposes modern slavery in all its forms.

CSBB acknowledges its role and responsibility in safeguarding the human rights of all people through ethical business practices and that it must do its part to prevent, identify and report unacceptable labour practices in its supply chains as they are identified. CSBB recognises the importance of protecting the human rights of all people in its communities and those that may be impacted by its activities.

Continued detailed assessments of CSBB’s procurement practices and a deeper understanding of the organisation’s supply chains will provide an opportunity for improvement year on year. CSBB plan to continually build stronger policies, processes and practices throughout the organisation to ensure its supply chains are not contributing to modern slavery.

This statement addresses the modern slavery reporting criteria in accordance with the Modern Slavery Act 2018 (Cth) ('the Act') for the financial year 1 January 2022 to 31 December 2022.

## 2. Reporting entity

The reporting entity submitting this statement is Catholic Schools Diocese of Broken Bay (ABN: 19 542 675 092) ('CSBB').

The registered office for the reporting entity is at Caroline Chisholm Centre, Building 2, 423 Pennant Hills Rd, Pennant Hills NSW.

## 3. Structure, operations and supply chain

### Structure

The reporting entity has 45 wholly owned and controlled subsidiary entities. These are set out below.

Entity	Location	ABN
Mercy Catholic College	Chatswood	31 439 493 889
St Paul's Catholic College	Manly	31 990 612 609
Corpus Christi Catholic Primary School	St Ives	93 731 206 639
Holy Family Catholic Primary School	Lindfield	89 548 339 579
Maria Regina Catholic Primary School	Avalon	83 509 495 501
Mater Maria Catholic College	Warriewood	63 423 792 086
Sacred Heart Catholic Primary School	Pymble	51 490 837 374
Our Lady Help of Christian Catholic Primary School	Epping	21 428 536 511
Our Lady of Dolours Catholic Primary School	Chatswood	53 932 362 427
Our Lady of Good Counsel Catholic Primary School	Forestville	30 842 913 699
Our Lady of Perpetual Succour Catholic Primary School	West Pymble	53 987 617 495
Our Lady of the Rosary Catholic Primary School	The Entrance	26 056 443 965
Our Lady of the Rosary Catholic Primary School	Waitara	18 348 120 766
Prouille Catholic Primary School	Wahroonga	22 412 327 740
Sacred Heart Catholic Primary School	Mona Vale	49 988 711 561
St Agatha's Catholic Primary School	Pennant Hills	94 348 201 843
St Bernard's Catholic Primary School	Berowra	14 481 048 838
St Cecilia's Catholic Primary School	Balgowlah	23 521 712 887
St Cecilia's Catholic Primary School	Wyong	64 190 020 653

St Philip Neri Catholic Primary School	Northbridge	29 988 792 638
St Gerard's Catholic Primary School	Carlingford	22 011 765 184
St John's Catholic Primary School	Narraweena	23 629 383 434
St John the Baptist Catholic Primary School	Freshwater	66 770 014 768
St John the Baptist Catholic Primary School	Woy Woy	49 586 632 836
St Joseph's Catholic College	East Gosford	93 041 953 582
St Joseph's Catholic Primary School	Narrabeen	71 921 607 268
St Kevin's Catholic Primary School	Dee Why	56 665 728 002
St Kieran's Catholic Primary School	Manly Vale	60 129 423 973
St Leo's Catholic College	Wahroonga	30 147 067 836
St Mary's Catholic Primary School	Manly	14 161 213 405
St Patrick's Catholic Primary School	Asquith	66 789 035 993
St Patrick's Catholic Primary School	East Gosford	70 308 733 443
St Thomas' Catholic Primary School	Willoughby	32 613 802 773
St Rose Catholic Primary School	Collaroy	22 626 746 064
St Mary's Catholic Primary School	Toukley	61 558 206 679
Our Lady Star of the Sea Catholic Primary School	Terrigal	21 557 574 781
St Martin's Catholic Primary School	Davidson	67 181 592 433
Our Lady of the Rosary Catholic Primary School	Wyoming	40 073 033 827
St John Fisher Catholic Primary School	Tumbi Umbi	68 466 829 768
St Brendan's Catholic Primary School	Lake Munmorah	11 504 332 761
Holy Cross Catholic Primary School	Kincumber	43 227 223 632
St Peter's Catholic College	Tuggerah Lakes	39 784 133 202
Mackillop Catholic College	Warnervale	69 094 564 017
St Brigid's Catholic College	Lake Munmorah	32 136 813 910
Catholic Schools Broken Bay (Headquarters)	Pennant Hills	19 542 675 092

### **Operations**

CSBB is a not-for-profit system of schools that delivers Catholic education to approximately 17,000 students enrolled in its schools, with 47 locations and approximately 2,100 employees in total. CSBB's school system comprises 44 schools (36 primary schools, 7 high schools, and 1 K-12 school).

The system of CSBB schools is located across 3 geographical areas: Sydney North Shore, Sydney Northern Beaches and NSW Central Coast. CSBB is headquartered in Pennant Hills, Sydney, Australia.

The two main sources of income which fund CSBB's operations are government grants and school fees.

In 2020 CSBB began an organisational transformation led by the Director of Schools, which introduced a workstream approach for the delivery of school system support services, consisting of:

1. Student Achievement;
2. Evangelisation and Catechesis;
3. Capability and Enablement;
4. Governance, Legal and Risk;
5. Digital Enablement;
6. Facilities and Procurement; and
7. Financial Viability.

### ***Supply chain***

CSBB's supply chains include contracting with and purchasing from suppliers of both products and services in a number of categories including:

- Construction and related services and products such as building companies engaged to carry out capital works at schools;
- Facilities repairs and maintenance and related services and products;
- Facilities management services and products such as on-site security services;
- Business and education services and products such as stationery and promotional products;
- Technology such as audio-visual equipment or classroom learning related technology;
- Online services such as canteen services food ordering platforms;
- Sale of school uniforms;
- Overseas excursions, and pilgrimages and immersion programs for students and staff.

These products and services may relate directly to the provision of education (for example, stationery and teaching products) or indirectly support the provision of education (eg. roof repair services engaged at a school site).

CSBB also engages a labour force of teaching and support staff (both employed and contracted) primarily based in Australia, with a small amount of services in schools provided by overseas nuns.

The suppliers engaged by CSBB are predominantly based in Australia, however some are internationally based and in addition some will in turn have their own suppliers in their own supply chains who are internationally based (ie. 'indirect suppliers' to CSBB).

As part of its Modern Slavery Statement, CSBB reports on its actions to assess and address modern slavery risks associated with its operations, including its Procurement Framework. CSBB also explains how it is assessing and addressing modern slavery risks in its supply chains.

The **CSBB Procurement Framework** identifies responsible business conduct in procurement and purchasing and is supported by policies that ensure due diligence. CSBB decision making is delegated to the responsible persons through the CSBB Financial Delegations Policy. The protection of the human rights of people within its extended supply chains is a priority for CSBB, and its processes ensure ethical procurement of all CSBB requirements.

#### 4. **Risks of modern slavery practices in operations and supply chains of the reporting entity and owned and/or controlled entities**

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CSBB has assessed the risks of modern slavery practices in its reporting entity and owned and/or controlled entities through segmenting risks into:

**1. *Risks that CSBB may cause modern slavery practices (ie. risk that CSBB operations may directly result in modern slavery practices)***

CSBB considers these risks to comprise those directly related to the employment of its employees, and the small scale of provision of services to its schools by overseas nuns (not directly employed by CSBB).

All CSBB full or part time employees are employed by the reporting entity, with the engagement of temporary contracted employees occurring in both the reporting entity and subordinate entities.

**2. *Risks that CSBB may contribute to modern slavery practices (ie. risk that CSBB's operations and/or actions in its supply chains may contribute to modern slavery, including acts of omissions that may facilitate or incentivise modern slavery)***

There are two key areas where this CSBB may be subject to these kinds of risks:

- Construction projects required under timelines which might risk construction contractors using means to achieve these timelines involving components of modern slavery which are unobservable to CSBB through contractual or other documentation and/or physical observation on site; and
- technology or other goods produced overseas.

**3. *Risks that CSBB may be directly linked to modern slavery practices (ie. risk that CSBB operations may be connected to modern slavery through the activities of another entity it has a business relationship with).***

This risk will be broad in scope (sitting across all supplier categories) and will focus on entities with which CSBB has a contracted and/or ongoing and/or large spend.

CSBB's initial assessment of the risk of modern slavery in its supply chains was undertaken with *SD Strategies* in 2019 and the results produced assisted with the identification of key areas of focus. The areas measured by the "Bridge the Gap" risk assessment were: management systems, risk management, human resources and recruitment, customers and stakeholders and lastly, procurement and supply chain. The outcome presented a starting point for further risk reviews that will comprehensively identify where modern slavery and the intersecting risks to the rights of humans lies in CSBB's supply chains.

A similar risk assessment in respect of CSBB's supply chains is intended to be undertaken later in 2023.

## 5. **Actions taken by the reporting entity and owned and controlled entities to assess and address risks, including due diligence and remediation processes**

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CSBB's reporting entity (and associated headquarters) takes the majority of responsibility for taking actions to assess and address risks relating to modern slavery. The reporting entity's obligations to the CSBB schools also take responsibility for taking actions in this area. However, they do so under the guidance of CSBB and with the instruction that suppliers from which they regularly purchase and/or from whom they contract the supply of products or services are subject to proper due diligence and remediation.

Actions taken are categorised below in line with the segmentation of risks identified.

### **1. *Risks that CSBB may cause modern slavery practices (ie. risk that CSBB operations may directly result in modern slavery practices)***

*Identify and assess:* CSBB has assessed the risk of modern slavery in its operations to be very low due to our robust employment practices which serve to safeguard the employee and in turn, safeguard against modern slavery.

*Integrate findings and track performance:* CSBB has in place systems, policies and procedures to safeguard its direct employees and their rights. CSBB regulates working conditions and employment in line with Fair Work Act 2009 and negotiated enterprise agreements. All of CSBB's direct employees are located within Australia, and CSBB has a strong employment and onboarding process, whereby the employee is respected and remunerated commensurate with the minimum award rate if they are not covered by a contract.

*Communicate:* CSBB is committed to promoting justice and fairness in relationships and



service and promote proper working conditions characterised by justice and fairness. CSBB is committed to continually revising its Modern Slavery Statement as new risks and/or trends in this area emerge requiring a CSBB response.

**2. Risks that CSBB may contribute to modern slavery practices (ie. risk that CSBB's operations and/or actions in its supply chains may contribute to modern slavery, including acts of omissions that may facilitate or incentivise modern slavery)**

*Identify and assess:* In all construction projects, CSBB ensures that a full and detailed construction program is put together by facilities construction and repairs and maintenance suppliers, with this program subject to thorough due diligence using Subject Matter Experts (SMEs) to ensure that the assumptions embedded in the program do not indicate unreasonable or undeliverable timeframes for sub-tasks in the context of standard industry practice. Equally, a thorough due diligence exercise in relation to quoted costs is used to uncover labour rate assumptions and any indication of hourly rates which are below industry standard and that required by legislation which may indicate the risk that slavery is embedded within supply chains

In the case of technology produced overseas, CSBB adopts its vendor due diligence (see point 3 below) in identifying and assessing risk associated with its vendors in this space, and where deemed appropriate based on risk assessed, ceasing dealings with vendors perceived to carry high risk of modern slavery.

In addition to CSBB's vendor due diligence, CSBB has Market Testing Guidelines which ensure that all new purchases and agreements entered into are appropriately market tested in correlation with the size and inherent risk of the purchase or agreement. The purchaser is required to provide proper justification for a chosen provider for a purchase or agreement, including consideration of non-price factors such as quality, risk and alignment with CSBB values. This process highlights any vendor who is pricing significantly below the market (and in turn perceived to pose a modern slavery practices risk).

*Integrate findings and track performance:* SMEs are engaged across multiple capital works and R&M projects to ensure relevant benchmarks for timeframes and costs. Equally, where relevant and appropriate, a database of these benchmarks is maintained.

*Communicate:* CSBB is committed to continually revising its Modern Slavery Statement as new risks and/or trends in these areas emerge requiring a CSBB response.

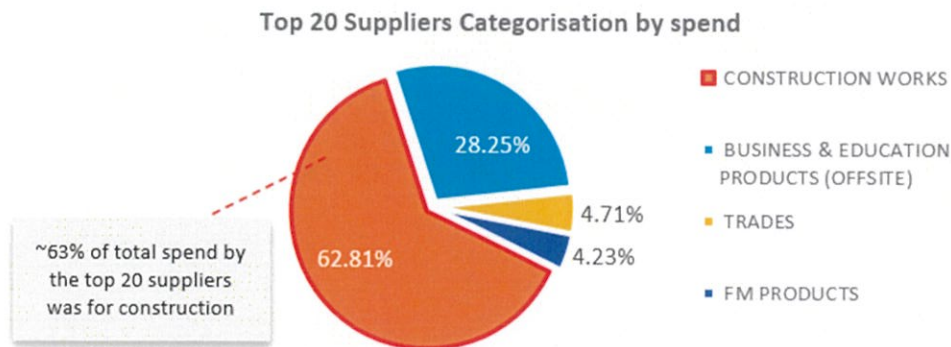
**3. Risks that CSBB may be directly linked to modern slavery practices (ie. risk that CSBB operations may be connected to modern slavery through the activities of another entity it has a business relationship with)**

*Identify and assess:* CSBB has taken the key steps below in an initial assessment

of its supply chain risk:

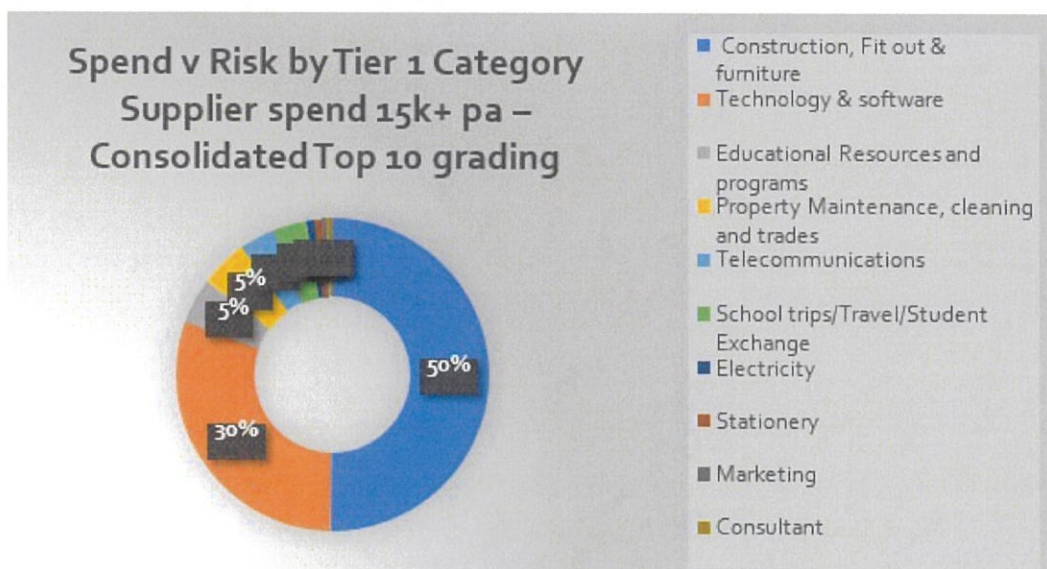
- 1 Quantify spend: for the 2022 year total spend with suppliers was approximately \$55 million (CSBB's other spend comprises staff costs).
- 2 Categorise spend: the top 20 suppliers for CSBB Corporate (with total spend representing ~\$33m of a total ~\$55m of supplier spend) were categorised by CSBB. This analysis is set out graphically below and highlights a heavy weighting in dollar spend towards construction, trades and facilities management products (approximately 43% of total supplier spend when combining construction works, trades and FM products).

2022 spend supplier category profiling – CSBB Corporate – by spend



This 2022 analysis is supplemented by analysis which was undertaken in 2020 which looks at suppliers with CSBB spend over \$15k in that year. The highest spend suppliers were categorised and an analysis of the top 10 supplier categories undertaken. This identified the construction, fit out and furniture consolidated category as accounting for 50% of the Top 10 category spend.

2020 spend supplier category profiling



- 3 Understand the risk: Initial risk analysis to identify the level of risk of each product or service in CSBB's supply chains has been completed. This process is to be undertaken for all suppliers at intervals throughout the contract lifecycle. A risk and value matrix on which CSBB spend categories were plotted was developed in 2022 for the purpose of a refreshed assessment of primary sourcing strategy by spend category.
- 4 Delve deeper into high risk categories: This will be undertaken as an ongoing activity. The focus is on the suppliers in the categories that have been identified as a significant risk.

CSBB's **vendor due diligence** includes the assessment of a vendor's ability to supply the goods or services in a manner that ensures they comply with all legislated requirements, including the Modern Slavery Act 2018. This vendor due diligence is captured in a Supplier Compliance Questionnaire which is attached as Appendix A to this statement, and represents the necessary step required ahead of placing a supplier on CSBB's list of Compliant Suppliers.

In addition to use of the Supplier Compliance Questionnaire, CSBB have added a criteria in **tender due diligence** (via tender documentation) that specifically seeks the extent of the tenderer's knowledge of the Modern Slavery Act 2018 and whether they are reporting mandatorily, voluntarily or not at all, and their willingness to work with CSBB to address any modern slavery risks in its supply chains.

In addition to CSBB's tender requirements, all relevant Diocesan suite of legal precedents in respect of contracts expected to be of material value will incorporate relevant provisions and a Modern Slavery Act clause in response to CSBB's commitment to anti-slavery and the *Modern Slavery Act*. Furthermore, should CSBB enter into a supplier or contractor's precedent agreement in respect of a contract of material value the following clauses will be requested to be inserted:

*[Clause X] Anti-Slavery*

*(a) In this clause [X]:*

- (i) Modern Slavery has the same meaning as in the Modern Slavery Act 2018 (Cth); and*
- (ii) Modern Slavery Laws means the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), any other applicable legislation and regulations relating to Modern Slavery, and any code of practice or compliance code relating to Modern Slavery applicable to this Agreement.*

*(b) The Supplier must take all reasonable steps to ensure there is no Modern Slavery in its operations and supply chain, or that of its subcontractors and suppliers, including:*

- (i) establishing and implementing appropriate systems and processes (including relevant employee training systems and supply chain due diligence procedures) to ensure any risks or occurrences of Modern Slavery in its supply chains or any part of its business are identified, assessed and addressed;*
- (ii) notifying Catholic Schools Broken Bay as soon as reasonably practicable after it becomes aware of, or has a reasonable basis for suspecting, instances of Modern Slavery in its supply chains or any part of its business; and*
- (iii) taking all reasonable steps to ensure that any instances of Modern Slavery in its supply chains or any part of its business cease and victim remediation occurs to the reasonable satisfaction of Catholic Schools Broken Bay.*

*(c) The supplier must provide all reasonable assistance (including the provision of information and access to document) that Catholic Schools Broken Bay reasonably requires to ensure supplier's compliance with clause [X] and to enable the Catholic Schools Broken Bay to comply with its obligations under Modern Slavery Laws.*

*Integrate findings and track performance:* CSBB have implemented a process to regularly monitor a number of high-risk supplier categories, through:

- 1 Public information monitoring** – monitoring information publicly available which refers to modern slavery practices as exposed somewhere in CSBB's supplier base;
- 2 Panel providers** – Ongoing checking of pricing rate cards offered to CSBB by CSBB's key suppliers in areas such as facilities construction and repairs and maintenance. CSBB's largest area of supplier spend is in the area of construction, fittings and furniture. This area is a publicly known modern slavery high risk category and is therefore an area of concern for CSBB;
- 3 Registration of onsite contractors and providers** – Any contractor or provider that is required to enter a CSBB school site is required to have proper insurances and Child Protection registrations – by undertaking these checks and monitoring CSBB is reinforcing use of reputable and registered suppliers and contractors;
- 4 Market testing** – By undertaking an assessment of reasonable market value in alignment with CSBB's Market Testing Guidelines, CSBB is ensuring that for all

purchases and contracts there is size and risk correlated monitoring to ensure no evidence of underpricing of goods or services which may align with a modern slavery practices risk.

CSBB is working towards finalising the implementation of the 'Purchase to Pay' module in its new **Enterprise Management System (EMS)**. As part of this implementation, existing Supplier Compliance Questionnaire capability and compliance related information is being populated in this system, with functionality being developed for the EMS to flag when compliance information is not available and/or out of date (ie. not currently valid). This exercise will assist in tracking any situations where commitments, statements and/or declarations in relation to modern slavery have not been sought by CSBB and/or provided by a CSBB supplier.

CSBB takes action to consider not dealing with or ceasing existing dealings with a supplier where its responses to the Supplier Compliance Questionnaire in the area of modern slavery raise concerns.

*Communicate:* CSBB is committed to continually revising its Modern Slavery Statement as new risks and/or trends in these areas emerge requiring a CSBB response.

### **Summary**

CSBB has policies, procedures and guidance in place to ensure our organisation complies with relevant legislation including section 83c of the Education Act 1990 (which requires all schools to operate on a "not-for-profit" basis in order to be eligible for funding from the NSW Government), and that ensures that CSBB operates to a certain standard that guides the responsible stewardship of resources, that are ethical, efficient, effective, and value for money.

CSBB having a centralised response to modern slavery will mitigate the risks of slavery in its supply chains, no matter what the procurement. In addition to the work on embedding modern slavery due diligence into CSBB's tender and supplier compliance processes, contract documents address human rights issues and in particular, an agreement between CSBB and the supplier to work together to combat modern slavery. CSBB believes that suppliers that have the security of a contract in place are less likely to employ illegal slavery practices.

Over the course of 2020 through to the end of 2022 CSBB has:

1. Completed a high-level assessment of its operational supply chain risk
2. Created a process for completing suppliers' due diligence and compliance assessment
3. Created a Supplier Compliance Questionnaire and rating system
4. Circulated the Supplier Compliance Questionnaire out to suppliers with potential for ceasing supplier engagement where supplier responses cause concern

5. Assessed categorised spend to identify key risk areas
6. Commenced the process of creating awareness both within and outside the organisation
7. Commenced work on technologies to assist with procurement processes
8. Embedded modern slavery due diligence into tenders
9. Identified key risk areas/gaps in purchasing for its school system
10. Completed the migration of existing supplier compliance information into its new Enterprise Management System (EMS)
11. Finalised a rolling list of Compliant Suppliers
12. Engaged an external consultant (EY) to revisit supplier categorisation, sourcing strategy by category, compliance requirements by category and the supplier on-boarding process.

## **6. How the reporting entity assesses the effectiveness of these actions**

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### ***Process to regularly review***

The components of the Supplier Compliance Questionnaire which include criteria that directly or indirectly addresses the supplier's business model, staff, training, modern slavery awareness and financial stability is CSBB's first step to modern slavery supply chain due diligence. All current suppliers and future suppliers will be put through this process in order to be on CSBB's list of Compliant Suppliers. This will be reviewed at intervals to ensure this questionnaire covers the vital first level of assessment for all suppliers. The effectiveness of this exercise can be measured by how many of our suppliers CSBB has completed this rigorous process with.

The migration of this information to the EMS will make this review an even more effective and efficient process.

### ***Regularly checking risk management process***

A Procurement Working Party was established in 2021, with its recurring agenda items incorporating:

- Continual refinement of the information requested by the Supplier Compliance Questionnaire;
- Continual refinement of the supplier onboarding process;
- Continual refinement of the CSBB Procurement Framework and its related policies and procedures (including tender process documentation templates); and
- The management of suppliers and contracts in the EMS.

### ***Regular engagement and feedback***

The CSBB Procurement function will aim to regularly engage with internal stakeholders (including school-based staff) in respect of modern slavery, with brief education

programs/materials where deemed relevant and necessary.

The CSBB Procurement function will also aim to seek feedback on the view the schools have on the way suppliers are being managed for CSBB supplier compliance considerations such as modern slavery.

### ***Key Performance Indicators (KPIs)***

Whilst CSBB does not currently include a clause or KPI relating to modern slavery in all its standard agreements with suppliers, it ensures that all new suppliers declare their commitment to operation in accordance with the Modern Slavery Act (through vendor or tender due diligence).

CSBB's primary KPI in the area of modern slavery is intended to be the contracting of and repetitive engagement with only those suppliers which have met the requirements of CSBB's vendor and/or tender due diligence.

### ***Partnering***

At relevant milestones, CSBB will partner with an external advisor deemed appropriate in order to share its progress and the way this progress is being documented for independent review and feedback.

Later in 2023 CSBB intends to engage an external consultant(s) to undertake a similar risk assessment in respect of CSBB's supply chains as undertaken in 2019.

## **7. Process of consultation with owned or controlled entities**

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The CSBB Procurement Framework which was drafted in 2020 and finalised in 2021 makes reference to the need for CSBB to operate in accordance with the Modern Slavery Act 2018.

This Procurement Framework was developed through consultation with other Catholic Schools Offices and internal stakeholders (including CSBB school representatives).

The Procurement Reference Group comprised CSBB School Principals from all CSBB geographic areas in addition to representatives from some of the CSBB support services workstreams who worked to develop the CSBB Procurement Framework. The status quo of procurement in the organisation was assessed and the future direction and alignment with the organisation's values and policy informed the decisions made by the group.

As the CSBB Procurement function matures, it will be developing a program in line with the modern slavery legislative requirements that will monitor, analyse and manage modern slavery risks into the future. This will be embedded through the Procurement

Working Party.

## **8. Principal Governing Body Endorsement**

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This Statement describes the actions of Catholic Schools Broken Bay in response to the Modern Slavery (Cth) Act 2018.

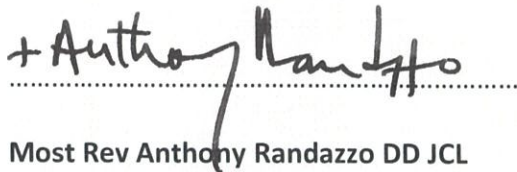
This statement highlights the steps Catholic Schools Broken Bay have taken to date and the work we are completing to eradicate modern slavery from our supply chains. This statement covers the financial year 1 January 2022 to 31 December 2022.

This statement is endorsed by the Trustees of the Roman Catholic Church for the Diocese of Broken Bay. The signed endorsement follows on page 15.

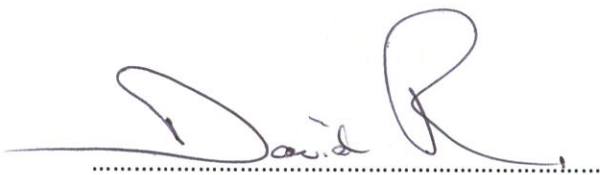


This statement is approved and endorsed by the Responsible Persons of Catholic Schools Broken Bay (CSBB):

Signed at Pennant Hills on this <sup>14</sup>..... day of June



**Most Rev Anthony Randazzo DD JCL**  
Bishop of Broken Bay  
Responsible Person  
Trustee of the Roman Catholic Church for the Diocese of Broken Bay



**Very Rev Dr David Ranson**  
Vicar General  
Responsible Person  
Trustee of the Roman Catholic Church for the Diocese of Broken Bay



**Mr Danny Casey**  
Director of Schools – Diocese of Broken Bay  
Responsible Person

## 9. Appendix A: Supplier Compliance Questionnaire

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### Supplier Compliance Questionnaire

This form must be completed and approved before an applicant can commence works for or supply goods or services to Catholic Schools Broken Bay (CSBB) at any of its schools or other sites.

All applicants are to complete questions 1 - 16

**\*Required**

1. Applicants (Company) Name \*

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2. Applicant contact name \*

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3. Applicant address \*

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4. Applicant contact email \*

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5. Applicant contact phone \*

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6. Applicant website

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7. ABN # (NOTE CSBB reserves the right to verify ABNs provided) \*

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## RELATED PARTIES AND CONFLICT OF INTEREST

### RELATED ENTITIES

The Not-for-Profit guidelines for Non-Government Schools, aligned with Section 83c of the Education Act 1990 define a related entity as a person or a legal entity that is related to a proprietor of school either as a result of office, membership, management, control or influence of personal/familiar relationship and includes but is not limited to:

- a) a person or close member of that person's family is a related entity if that person:
  - i. has control or joint control over the proprietor or school;
  - ii. has significant influence over the proprietor or school;
  - iii. is a member of the key management personnel of the proprietor or school.
- b) an entity is a related entity to a proprietor or school if any of the following conditions apply:
  - i. the entity and the proprietor or school are members of the same group;
  - ii. the entity is an associate or joint venture of the proprietor or school;
  - iii. the entity and the proprietor or school are joint ventures of the same third party;
  - iv. the entity is a joint venture of a third entity and the proprietor or school is an associate of the third entity;
  - v. the entity is controlled or jointly controlled by a person identified in (a);
  - vi. a person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or parent of the entity);
  - vii. the entity, or any other member of a group of which it is part, provides key management personnel services to the proprietor or school or to the parent of the proprietor or school;
- c) an employee of the proprietor, school or an entity identified in (b).

### CONFLICTS OF INTEREST

A Conflict of Interest can be created for a CSBB employee (with respect to an interested supplier) where:

- a) their personal interests or the interests of a relative or close associate conflict with their responsibility to act in the best interests of, or in accordance with the statutory obligations to, the NSW Catholic Schools system; or
- b) the person has decision-making authority or exercises such authority over NSW Catholic Schools system or parts thereof and the Related Party.

A conflict of interest may be actual, potential or perceived and conflicts of interest are not limited to financial gain.

Personal interests include direct interests as well as those of family and friends.

A checklist that may assist determine if a conflict of interest exists or may be perceived to exist:

- Would a CSBB employee or anyone associated with them (family, friend or relative) benefit from or be detrimentally affected by the engagement by CSBB of my organisation?
- Could there be benefits for a CSBB employee or their associates in the future, arising from the relationship between my organisation and CSBB, that could cast doubt on their objectivity?
- Does a CSBB employee have a current or previous personal, professional or financial relationship or association of any significance with my organisation?
- Would a CSBB employee's reputation or that of a relative, friend or associate stand to be enhanced or damaged because of the proposed relationship with my organisation?
- Has a CSBB employee made any promises or commitments to someone who stands to gain or lose from the proposed relationship with my organisation?
- Has a CSBB employee received a benefit or hospitality from someone who stands to gain or lose from the proposed relationship with my organisation?
- Is a CSBB employee a member of an association, club or professional organisation or do they have particular ties and affiliations with organisations or individuals who stand to gain or lose by

relationship with my organisation?

- Could a relationship between CSBB and my organisation have an influence on any future employment opportunities for a CSBB employee outside their current official duties?
- Does the proposed relationship between CSBB and my organisation conflict with a CSBB employee's responsibility to act in the best interests of, or in accordance with the statutory obligations to, the NSW Catholic Schools system?
- Does the proposed relationship between CSBB and my organisation provide a benefit to another institution over which a CSBB employee has either control or influence?
- Could there be any other benefits or factors that could cast doubts on the objectivity of a CSBB employee in the proposed relationship between CSBB and my organisation?

8. \* Based on the guidance above, are you or any of your employees and/or subcontractors a related entity of CSBB, or is there the existence of any actual or perceived conflict of interest? Any relationship that creates an actual or perceived conflict of interest, and other actual or potentially perceived conflicts of interest, must be disclosed.

Mark only one oval.

Yes

No

8A. If you answered YES above please provide a full explanation.

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9. Have all employees of the company undergone a Working with Children Check? \*

Yes

No

If not and this is assessed as a service where a WWCC is required, would you be willing to meet this requirement at your company's own expense? (Please note if your category is assessed as requiring a WWCC, you will not be permitted to commence any service, or supply any goods, until such time as WWCC's are in place).

Yes

No

10. Please click on the link below for Schedule 1: Contractor Declaration and Safe School Expectations Undertakings

[Declaration for Volunteers/Contractors Catholic Schools Broken Bay](#)

11. \* If your service is assessed as not requiring a WWCC, would you be willing to complete the declaration linked above at Schedule 1 to this form, before being allowed on a School site?

Mark only one oval.

Yes

No

12. Please click on the link below for SCHEDULE 2: Contractor Declaration for Volunteers and Contractors [Contractor / Volunteer Collection Notice](#)

13. \* Would the supplier be willing to sign the Declaration link above at Schedule 2 to this form before being allowed on a School site?

Mark only one oval.

Yes

No

14. \* Is your company aware of the requirements of the Modern Slavery Act 2018?

Mark only one oval.

Yes

No

15. \* Does your company have a Modern Slavery Statement (either mandatory or voluntary)?

Mark only one oval.

Yes

No

16. \* If no, how does your company ensure Modern Slavery does not exist in your supply chain?

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IMPORTANT - ALL APPLICANTS PLEASE NOTE

1. Submission of this application is for consideration only and does not guarantee that the application will be accepted.
2. If you are successful, you will be advised with 30 days of this application.
3. If your application is not accepted, it may be kept on file for future reference.
4. ALL invoices to the Catholic Schools Broken Bay MUST be supplied as a readable PDF file, and have the following details:

Addressed to: The Catholic Schools Broken Bay Diocese of Broken Bay; and emailed to [CSBBfinance@dbb.catholic.edu.au](mailto:CSBBfinance@dbb.catholic.edu.au)

- \*Purchase order number, where required; otherwise the name of the authorised CSBB contact if no PO# was supplied
- \*The words "Tax Invoice"
- \*The Tax invoice number
- \*Date Tax invoice was raised
- \*Terms of payment
- \*Full description of the services provided
- \*A breakup of cost per item + GST
- \*The schools name
- \*Your mailing address
- \*Your ABN
- \*The name of a contact at your company for any queries
- \*A phone number for enquiries
- \*An email address for Remittance advices
- \*Your company's bank account details for payments

The exception to the above is construction work, where a payment schedule will be agreed between the parties prior to work being undertaken, and payment claims submitted throughout the course of the work being undertaken at the agreed intervals, however the basic information provided above will still be required.

Standard payment terms are 30 days from date of invoice. Ability to be paid according to alternate terms must undergo a separate approvals process.

17. \* Does the applicant agree to complying with the guidance above, including providing bank account details on each and every invoice provided to CSBB before it is able to be paid?

*Mark only one oval.*

Yes

No