



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**

COMPENDIUM OF
**MODERN SLAVERY
STATEMENTS**

2023



ACAN COMPENDIUM
EXECUTIVE SUMMARY

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“Together we can encourage the growth of an economy of care, opposing with all our might every form of exploitation and human trafficking.”

MESSAGE OF HIS HOLINESS POPE FRANCIS
FOR THE EIGHTH INTERNATIONAL DAY OF PRAYER AND
AWARENESS AGAINST HUMAN TRAFFICKING 2022



Facilitated by the
Catholic Archdiocese
of Sydney

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1 About ACAN

1.1 Catholic Entities Participating in ACAN

VIC/TAS

St. Vincent's Hospital
Melbourne
St Vincent's Private Hospitals

Cabrini Health

Cabrini Property
Cabrini Outreach

Mercy Health

Mercy Hospitals Victoria
Mercy Hospitals NSW
Mercy Palliative Care
Mercy Aged and
Community Care
Mercy Health Property
Southern Cross Care Vic
Mercy Health Service Albury

Catholic Archdiocese of Melbourne

Melbourne Archdiocese
Catholic Schools
Melbourne Catholic
Development Fund

Villa Maria Catholic Homes

Diocese of Sale Catholic Education Ltd

Catholic Education Sandhurst

Diocese of Ballarat Catholic Education

Catholic Archdiocese of Hobart

Catholic Education Tasmania
CatholicCare Tasmania
Catholic Development
Fund Tasmania
Centacare Evolve Housing
St Joseph Affordable
Homes Inc

The Blueline Laundry Inc

Edmund Rice Education Australia

EREA Victorian Schools

Mercy Education

Victorian Catholic Education Authority (VCEA)

MacKillop Family Services

Catholic Church Insurance

Calvary Health Care Tasmania
St John of God
Outreach Services

NSW/ACT

Catholic Health Australia

National Catholic Education Commission

St. Vincent's Health Australia

St Vincent's Healthcare
EREA NSW Colleges

Australian Catholic University

Calvary

Calvary Health Care Newcastle
Calvary Retirement
Communities
Calvary Private Health
Care Canberra
Calvary Health Care Riverina
Calvary Health Care Sydney
Calvary Home Care Services

Catholic Healthcare Ltd

Southern Cross Care NSW & ACT

St. Vincent's Hospital Sydney

Catholic Archdiocese of Sydney

Sydney Catholic Schools

CatholicCare Sydney

Catholic Development Fund

Catholic Diocese of Maitland-Newcastle

CatholicCare Social
Services Hunter-Manning
Diocese of Maitland-
Newcastle Catholic Schools
Catholic Development Fund

Catholic Schools Parramatta Diocese Limited

Diocese of Lismore Catholic Schools

Catholic Education Diocese of Bathurst

Catholic Education Diocese of Wollongong

Catholic Education Canberra Goulburn

Catholic Education Diocese of Wagga Wagga

Catholic Education Network (CENet)

St Vincent de Paul Society (NSW)

St Vincent de Paul Housing

Marist Schools Australia

Dominican Education Australia

Catholic Cemeteries and Crematoria

Catholic Schools NSW

Catholic Employment
Relations Ltd

St John of God Health Care

St John of God Hawkesbury
Health Campus

QLD

St Vincent's Care Services
St Vincent's Care
Services Boondall
St Vincent's Care
Services Carseldine
EREA Flexible Schools
EREA Colleges

Catholic Archdiocese of Brisbane

Brisbane Catholic
Education Centacare
Archdiocesan
Development Fund

Mater Health

Mater Education
Mater Research

Catholic Diocese of Rockhampton

Catholic Education Diocese
of Rockhampton
CentacareCQ
Stella Maris Apostleship
of The Sea
Diocesan Development Fund

Southern Cross Care QLD

Mercy Community Services SEQ

St Vincent de Paul Society Qld

St Vincent De Paul
Society Qld Housing

Ozcare

WA

Catholic Archdiocese of Perth

Southern Cross Care WA

St John of God Midland
Health Campus
St John of God Berwick
Health Campus

Catholic Education Western Australia

MercyCare WA

Mercy Community Services

Mercy Human Services

University of Notre Dame Australia

SA/NT

Calvary Health Care Adelaide

Catholic Archdiocese of Adelaide

Centacare Catholic
Family Services
Catholic Education
South Australia
Catholic Church
Endowment Society

Catholic Education Northern Territory





1.2 Endorsements

Archbishop Peter Costelloe, President – Australian Catholic Bishops Conference

“The Australian Catholic Bishops Conference endorses the 2023 Compendium of Modern Slavery Statements from Catholic entities across Australia. The 2023 Compendium of Modern Slavery Statements serves as a vital resource that tangibly expresses our collective moral and civic commitment to the Modern Slavery Act (2018). The 2023 Compendium of Modern Slavery Statements reiterates the commitment of each Catholic entity to proactively respecting and upholding the infinite dignity of every human being, a principle that compels each of us to stand resolutely against all forms of modern slavery and human exploitation. We openly embrace the call to upholding the dignity of every person as we recommit ourselves to being bearers of God’s love and justice in the world through the communities we serve across our nation.”

Martin Teulan, Executive Director – Association of Ministerial Public Juridic Persons

“(AMPJP) brings together the MPJPs who sponsor some of Australia’s major Catholic health, aged and community care, and educational organisations. MPJP ministries wish to ensure they are not directly or indirectly contributing to modern slavery. AMPJP commends the Australian Catholic Anti-slavery Network (ACAN) as a vital partner in informing and supporting MPJP Canonical Stewards and the ministries they sponsor in their missional role of addressing modern slavery.”

Jacinta Collins, Executive Director – National Catholic Education Commission

“Catholic schools serve as both centres of faith and learning, fostering in our students a respect for the human dignity of all people. Education is a powerful tool in promoting social justice and equity, and this Compendium demonstrates our shared commitment and strong engagement in our schools and dioceses towards these important principles.”

Jason Kara, Chief Executive Officer – Catholic Health Australia

“As a Catholic health and aged care peak body, we are deeply committed to the sanctity of every human life and the dignity of every individual. This Compendium highlights our collective efforts across the nation to ensure that our health care operations and supply chains are sustainable. We continue to lead with faith and compassion, striving to set a benchmark for integrity and responsibility in all aspects of health and aged care.”

Monique Earsman, Executive Director – Catholic Social Services Australia

“Catholic Social Services Australia is committed to building a fair and inclusive society in Australia, one that upholds the dignity and equality of everyone, including those involved in our operations and supply chains. This Compendium highlights the ongoing efforts of our members to recognise and empower the vulnerable people who enable our work on the ground.”





1.3 Introduction

Modern Slavery Act 2018

Australian Modern Slavery Act 2018 (Cth) (the Act) requires businesses and not-for-profits to take effective measures to assess, address and mitigate the risk of modern slavery to workers in supply chains and operations.

The Act requires annual reporting of activities and actions taken during the reporting period which Catholic entities align to the calendar year. The annual Modern Slavery Statement (Statement) must address the following seven mandatory reporting criteria:

- i. Organisational structure and governance
- ii. Operations and supply chains
- iii. Modern slavery risks in operations and supply chains
- iv. Action taken to assess and address risks, including due diligence and remediation processes
- v. Measuring effectiveness of action taken and demonstrating continuous improvement
- vi. Describe the process of consultation with entities owned or controlled
- vii. Any other information

A senior representative of the highest governing body of the reporting entity (in the case of Catholic entities, the Chair of the Board or Bishop) must sign the Statement and include the date of approval.



ACAN Risk Management Program

In response to the Act, Catholic entities participate in the Australian Catholic Anti-slavery Network (ACAN) Modern Slavery Risk Management Program (ACAN Program).

Over 50 Catholic entities renewed their commitment to participate in the ACAN Program for 2023 – 2026. The ACAN Program creates the opportunity to increase leverage with suppliers, generate efficiencies, and embed sustainable business management practices within Catholic entities.

ACAN Program Managers support each Catholic entity to implement 72 tools and resources, which include tailored content, training, action planning and awareness-raising in their respective organisations. ACAN Program Managers also develop and support supplier engagement.

Catholic Modern Slavery Statements

ACAN Program Managers review each Statement for compliance, providing systematic and comprehensive feedback against a checklist of 55 criteria and make recommendations for areas of improvement.

Each Catholic entity completes an annual entity profile survey. The 2023 survey contained 134 questions that assess the maturity of each entity's modern slavery risk management program.

The results of the survey are also aggregated to produce an overview of activities undertaken across the network. That overview is incorporated into this Executive Summary.

This annual collection of self-reported data culminates in the publication of the ACAN Compendium of Catholic Modern Slavery Statements. This 2023 Compendium consists of 44 individual Statements submitted to the Australian Government Online Register on 27th June 2024 and published on the ACAN website.



2 Operations and Supply Chains

Catholic entities include hospitals and aged care, schools and universities, dioceses, social and community services, finance and investment entities from across metropolitan and regional Australia. As a result, the supply chains of Catholic entities vary widely in scale and complexity.



214,139*

Staff employed across 264 entities



41,266

Volunteers



623,851

Students educated in 1,482 Schools



106,302

Social Care Clients



13,414

Beds across 67 Hospitals



45,533

University students across 11 Campuses

*Increase from reporting year 2022 linked to additional Catholic entities joining ACAN

\$29.5B

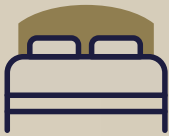
ANNUAL
REVENUE

\$8.5B

ANNUAL
PROCUREMENT
SPEND

166,215

TOTAL NUMBER
OF SUPPLIERS



7,121

Community
Service Beds



19,643

Aged Care Beds across
231 Facilities



3 Modern Slavery Risks

3.1 Risk Assessment

Of the \$8.5 billion aggregated procurement expenditure by Catholic entities in 2023, \$4.5 billion was spent with 45,534 suppliers across 13 high risk categories.

These risk categories are defined by the ACAN Category Risk Taxonomy, a classification standard that identifies inherent or potential modern slavery risks associated with major spend categories, based on sources such as the Global Slavery Index and the International Labor Organisation (ILO) definitions of modern slavery.

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

- Geography: the region of goods production or service provision
- Industry: the sector in which the making of the good or service occurred
- Commodity: the raw materials or components that comprise the goods or products
- Workforce vulnerability: factors such as migration status, age and gender can be associated with increased risk
- Domus 8.7 Intelligence

The categories align with the United Nations Standard Products and Services Code (UNSPSC), facilitating integration and equivalency to a multitude of procurement systems and models available in the network.



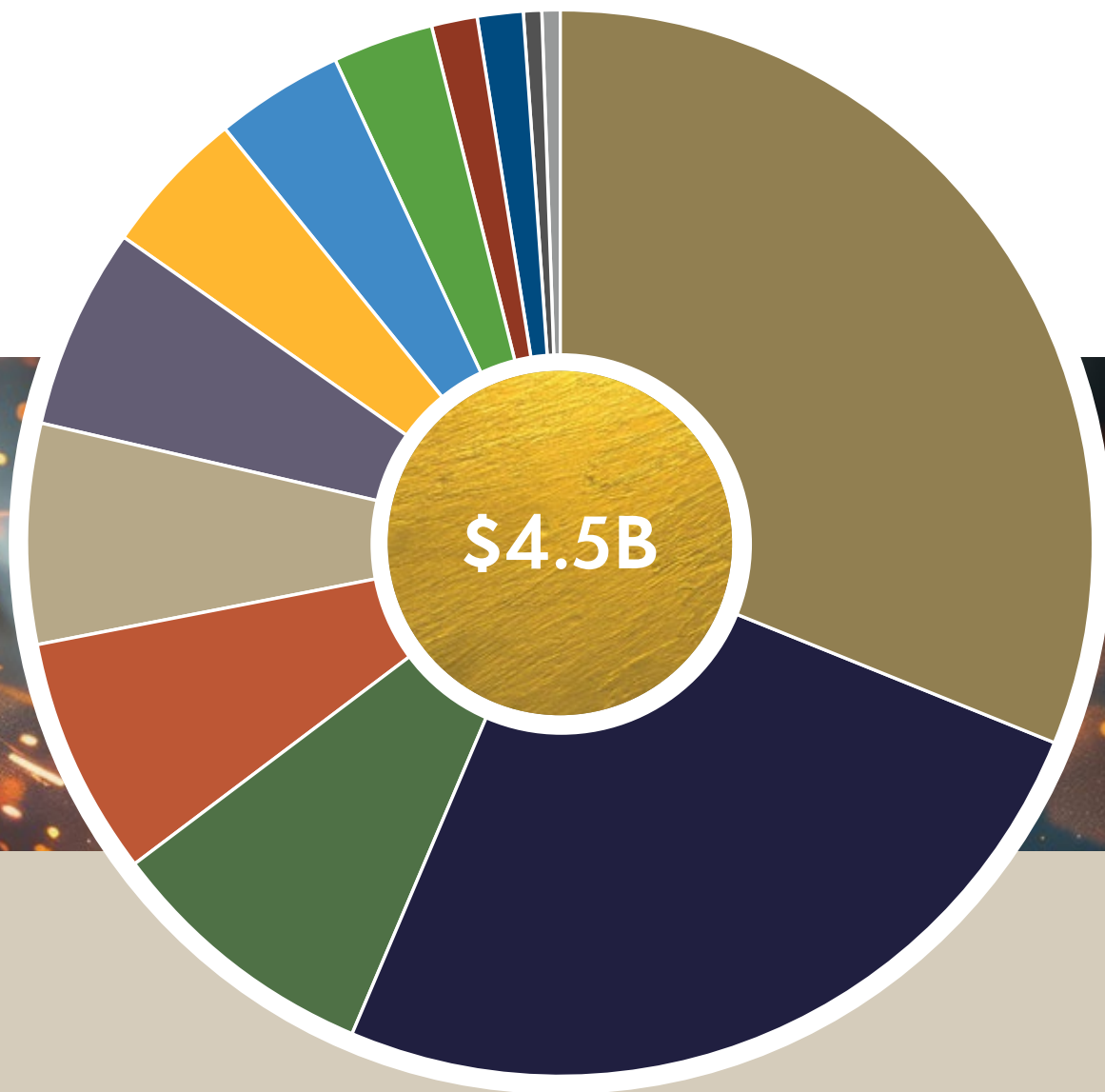


3.2 Risk Categories

Total Spend in High Risk Categories



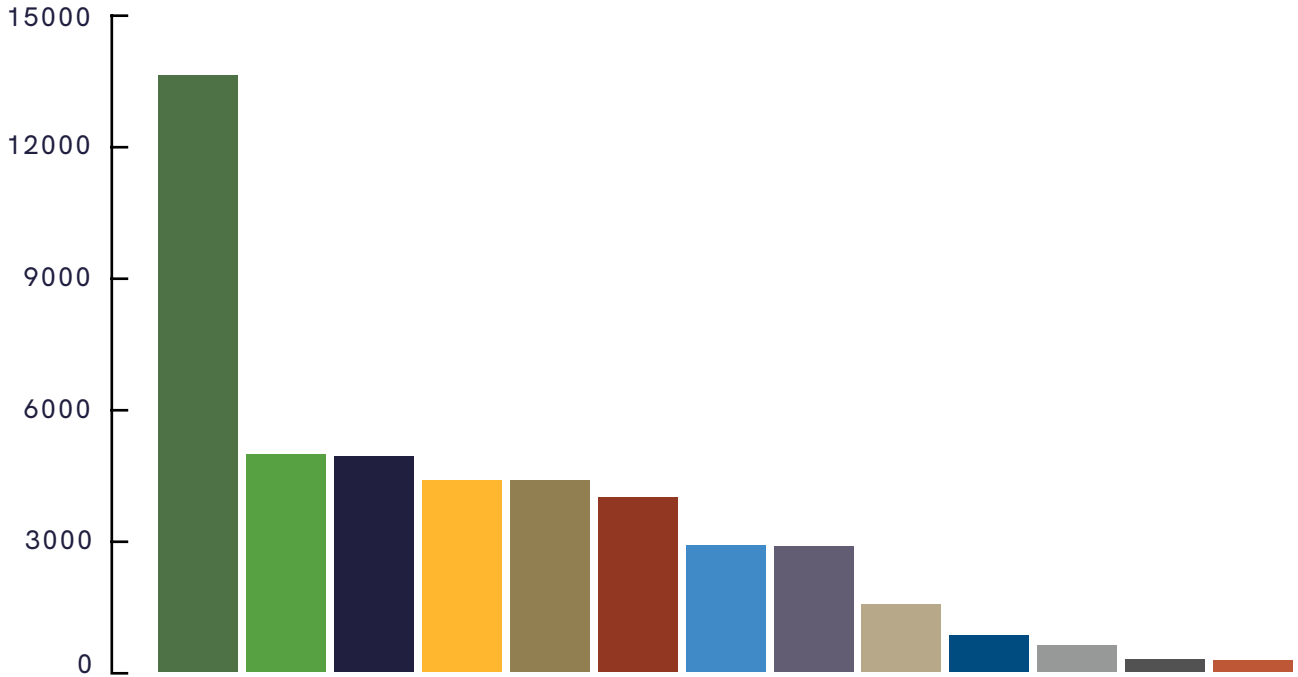
BUILDING AND CONSTRUCTION	\$1,389,256,907.00
MEDICAL DEVICES AND SUPPLIES	\$1,134,239,313.00
FACILITY MANAGEMENT & PROPERTY MAINTENANCE	\$363,924,280.00
FINANCE, INVESTMENT, AND PORTFOLIO POSITIONS	\$321,103,373.00
LABOUR HIRE	\$305,672,287.00
ICT HARDWARE	\$267,189,602.00
FOOD AND CATERING SERVICES	\$205,744,558.00
CLEANING AND SECURITY SERVICES	\$170,177,607.00
FURNITURE AND OFFICE SUPPLIES	\$134,896,262.00
EVENTS AND EVENT MANAGEMENT	\$67,474,810.00
WASTE MANAGEMENT SERVICES	\$55,219,565.00
LINEN, LAUNDRY AND TEXTILE PRODUCTS	\$31,175,218.00
UNIFORMS AND PPE	\$19,073,222.00



- Building and Construction **31.1%**
- Medical Devices and Supplies **25.4%**
- Facility Management and Property Maintenance **8.2%**
- Finance, Investment, and Portfolio Positions **7.2%**
- Labour Hire **6.8%**
- ICT Hardware **6.0%**
- Food and Catering Services **4.6%**
- Cleaning and Security Services **3.8%**
- Furniture and Office Supplies **3.0%**
- Events and Event Management **1.5%**
- Waste Management Services **1.2%**
- Linen, Laundry and Textile Products **0.7%**
- Uniforms and PPE **0.4%**

3.2 Risk Categories

Number of Suppliers in the High Risk Categories



- **13604** Facility Management & Property Maintenance
- **4967** Furniture and Office Supplies
- **4912** Medical Devices and Supplies
- **4375*** Food and Catering Services
- **4369*** Building and Construction
- **3992** Events and Event Management
- **2890** Cleaning and Security Services
- **2867** ICT Hardware
- **1548*** Labour Hire
- **841*** Waste Management Services
- **614** Uniforms and PPE
- **284** Linen, Laundry and Textile Products
- **271** Finance, Investment, and Portfolio Positions

*In 2023, higher participation of reporting in decentralised procurement systems accounted for a higher overall spend figure and more an increased number of suppliers in building and construction, food and catering services, labour hire and waste management services.

3.3 Risk Profile



\$8.5B

COMBINED ANNUAL PROCUREMENT SPEND

With over half of total spend considered to be high risk for modern slavery.

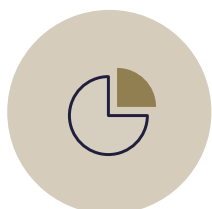


High Risk

THE FOUR LARGEST POTENTIALLY HIGH RISK SPEND CATEGORIES ARE:

- ✗ Building and Construction
- ✗ Medical Devices and Supplies
- ✗ Facility management & property maintenance
- ✗ Finance, Investment and Portfolio Positions

Over 72% of total spend is in categories with inherent high risk of modern slavery



45,534

TOTAL NUMBER OF SUPPLIERS IN HIGH RISK SPEND CATEGORIES ACCOUNT FOR \$4.5B EXPENDITURE

The total number of ACAN suppliers increased by 6% between 2022 and 2023. In 2023 a higher participation of reporting in decentralised procurement systems accounted for a higher number of suppliers in building and construction, food and catering services, labour hire and waste management services.

The spend data indicates that 75% of suppliers have a procurement spend of less than \$50,000 with 8% of all suppliers shared by 2 or more ACAN members. The overall spend across Catholic entities informs the supplier engagement strategy.



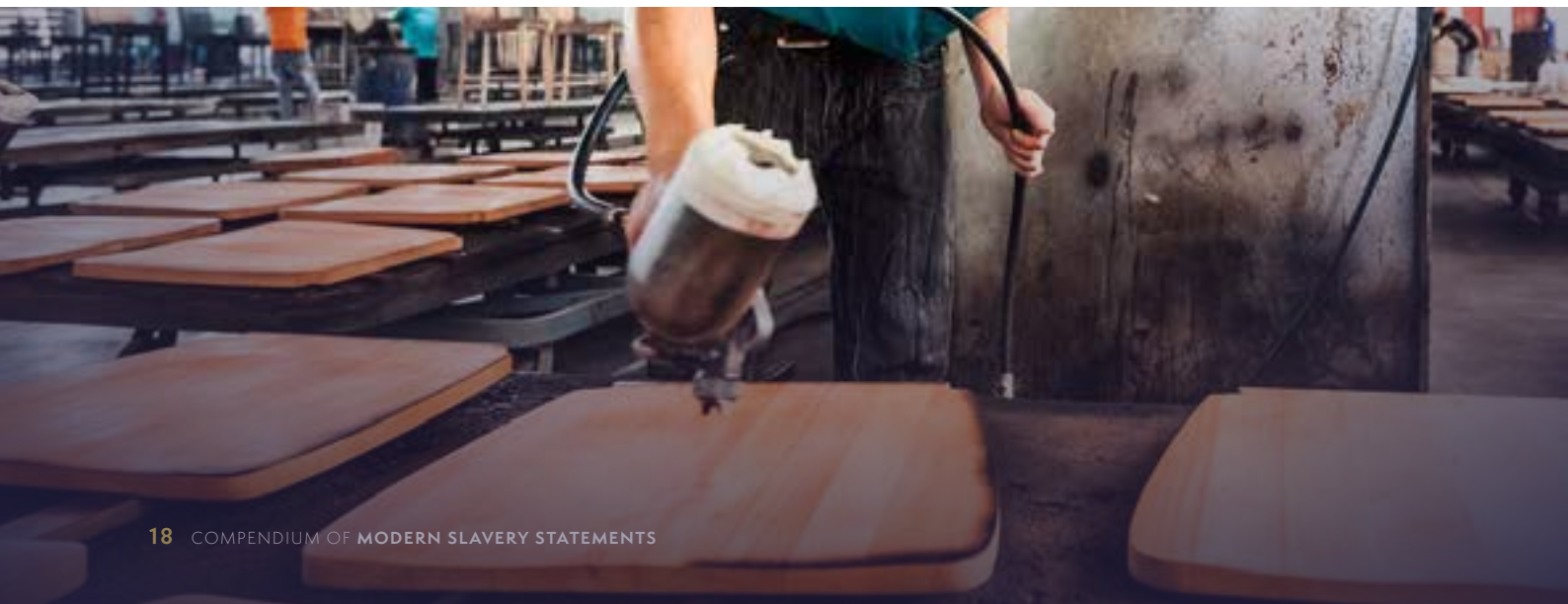
4 Actions Taken to Address Risk

4.1 Supplier Engagement

The ACAN Program provides supplier engagement support and data, enabling a systematic and comprehensive supply chain risk assessment. This assessment was updated in 2023 with the inclusion of supplier education and audits, and continues to evolve as the program matures.

SUPPLIER ENGAGEMENT PROCESS:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy
2. ACAN Supplier Survey to identify Tier 1 suppliers for Sedex Onboarding and supplier profile in relation to revenue, number of employees, countries they source from and types of contractual arrangement with workforce
3. Supplier education on modern slavery and risk management in key areas: cleaning, building and construction, procurement of labour, labour hire and services, sourcing goods from overseas, grievance and remediation
4. Onboarding suppliers to the Sedex platform provides ACAN with a business address, contact details and goods or services provided
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement
6. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of company alignment with local laws and international best practices concerning worker wellbeing standards
7. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to ACAN participating entities



ACAN RISK TAXONOMY

45,534 Suppliers in high-risk categories

ACAN SUPPLIER SURVEY

2,181 Supplier surveys completed

SUPPLIER EDUCATION

1228 Suppliers attended webinars and forums

SEDEX ONBOARDING

1,403 Suppliers invited and 909 joined Sedex

SEDEX SAQ

245 SAQs completed

AUDITS

50 SMETA Audits visible in Sedex

ACAN PREQUALIFIED SUPPLIER DIRECTORY

147 Suppliers

The self-declarations (ACAN Supplier Survey and the Sedex Self Assessment questionnaire) used in ACAN's engagement process are for the purpose of identifying:

- suppliers willing to join ACAN's modern slavery supplier program
- key modern slavery contacts in the supplier's business
- business structure
- engagement supports for desktop reviews, audit and due diligence.

As a combined data set, the SAQs identify gaps in knowledge, understanding and controls in supply chains and guide additional tools and resources available for Catholic entities and their suppliers.





4.2 ACAN Supplier Pre-Qualification Categories

The ACAN Pre-qualified Supplier Directory is a searchable list of preferred suppliers that meet expectations of the ACAN Modern Slavery Risk Management Program. This list launched in 2023, together with a decision tree, training material and capacity building for small suppliers.

Over time, the Pre-qualified Supplier Directory will become an important tool for sourcing ethical products and services across Catholic entities. Maintaining a strong emphasis on supplier engagement will remain a key focus for the ACAN Program in 2024.

WHAT CAN SUPPLIERS DO?

1. Designate a staff role for modern slavery engagement and send contact details to info@acan.org.au
2. Enrol key staff in ACAN e-learning and complete training modules
3. Complete an ACAN Supplier Survey
4. Watch an ACAN supplier webinar to understand Catholic entity obligations to comply with the Modern Slavery Act 2018 and expectations of Catholic entities
5. Register for a live ACAN Webinar
6. Download and present the ACAN supplier PowerPoint presentation to management and staff
7. Join SEDEX as a Supplier Member. Connect to all Catholic entities and complete a Self-Assessment Questionnaire (SAQ)
8. Complete a short survey and consent form to be listed in the ACAN Pre-qualified Supplier Directory

Visit www.acan.org.au/suppliers or scan the QR Code.







5 Measuring Effectiveness

5.1 Baseline Data

The ACAN baseline data table is an important measure of effectiveness of ACAN Program activities. Aggregated supplier engagement data provides a useful measure to track progress and illustrate levels of engagement with suppliers and actions taken.

	ACTIVITY	2021	2022	2023
INTERNAL/ STAFF	Entities participating in ACAN	47	50	50
	Hours spent on modern slavery activities	14500	23,955	25,681
	Individual staff completed e-learning	**	6809	5430
	E-learning modules completed	3597	7106	9938
EXTERNAL SUPPLIER ENGAGEMENT	Total number of suppliers	164531	156,433	166,215
	Number of suppliers across high-risk categories	24929	46,369	45,534
	Number of ACAN Supplier Surveys	260	1235	2,181
	Supplier attending capacity building webinars	260	430	1228
	Invited to join Sedex	1262	1535	1403
	Joined Sedex	247	364	909
	Sedex SAQ completed	44	97	245
	Social audits	0	9	50
	Corrective actions	0	220	194
	ACAN Newsletter Total Opens	2582	15,282	24,433
	ACAN Newsletter Total Engagement	791	4,309	8,008
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	11	0	0
	Referrals for advice and assistance	3	5	5
	Individuals identified or referred for modern slavery assessment	0	0	1
	Individuals with modern slavery cases remediated	1	0	0

** Not monitored during reporting year

Cumulative Metrics (2020 to 2023)

INTERNAL STAFF



EXTERNAL SUPPLIER ENGAGEMENT



* 555 SAQs visible to ACAN, this is higher than the sum of questionnaires in ACAN Baseline Data as it includes additional information on SAQs completed prior to 2023 that became visible in 2023.

DOMUS 8.7 EXTERNAL REFERRALS





6 Index of Modern Slavery Statements

ENTITY NAME	ABN
1 Victorian Catholic Education Commission	92119459853
2 Diocese of Sale Catholic Education Limited	91621266993
3 Catholic Education Office Diocese of Sandhurst	94493967364
4 Diocese of Ballarat Catholic Education Ltd	68629894686
5 The Roman Catholic Trusts Corporation for the Diocese of Melbourne	52768159282
6 Villa Maria Catholic Homes Ltd	32004364103
7 Roman Catholic Church Trust Corporation of The Archdiocese of Hobart	24097986470
8 Trustees for Catholic Education Office Archdiocese of Canberra & Goulburn	47824127996
9 Catholic Archdiocese of Sydney	72823907843
10 Catholic Schools Parramatta Diocese Limited	66661001798
11 Trustees for the Wollongong Diocese Catholic School System	67786923621
12 Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle	62089182027
13 Catholic Education in the Diocese of Wagga Wagga	36345537994
14 Catholic Education Diocese of Bathurst	73470086952
15 Diocese of Lismore Catholic Schools Ltd	93638070836
16 Catholic Schools NSW Ltd	46619593369
17 The Corp of the Trustees of the Roman Catholic Archdiocese of Brisbane	25328758007
18 The Roman Catholic Trust Corporation for the Diocese of Rockhampton	50979741889
19 Catholic Education Northern Territory	22616685167
20 Catholic Archdiocese of Adelaide	29608297012
21 Catholic Education Western Australia Ltd	47634504135

	ENTITY NAME	ABN
22	Australian Catholic University Ltd	15050192660
23	The University of Notre Dame Australia	69330643210
24	St. Vincent's Health Australia Ltd	75073503536
25	St John of God Health Care Inc	21930207958
26	Mater Misericordiae Ltd	83096708922
27	Mercy Health Australia Ltd	89614115856
28	MercyCare Ltd	31098197490
29	Mercy Community Services SEQ Ltd	51166477318
30	Little Company of Mary Health Care Ltd	11079815697
31	Catholic Healthcare Ltd	69064946318
32	Trustees of Edmund Rice Education Australia	96372268340
33	Mercy Education Ltd	69154531870
34	Dominican Education Australia	54610124322
35	Marist Schools Australia	76654014794
36	MacKillop Family Services Ltd	79078299288
37	Cabrini Australia Ltd	42624828306
38	Southern Cross Care (NSW & ACT) Ltd	76131082374
39	Southern Cross Care (QLD) Ltd	65104033471
40	St Vincent de Paul Society NSW	91161127340
41	St Vincent de Paul Society QLD	14211506904
42	Ozcare	58072422925
43	Catholic Metropolitan Cemeteries Trust	85744325709
44	Catholic Church Insurance Ltd	76000005210



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**



Facilitated by the Catholic
Archdiocese of Sydney

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Published in June 2024



Victorian
Catholic
Education
Authority

June 2024

Victorian Catholic Education Authority Limited

Modern Slavery Statement
1 January – 31 December 2023



In the spirit of reconciliation, the VCEA acknowledges Aboriginal and Torres Strait Islander people as the traditional custodians of the land and pays respect to their Elders, past, present and emerging.

Victorian Catholic Education Authority Limited (VCEA)

ABN: 92 119 459 853

Casselden Place, 2 Lonsdale St Melbourne, VIC 3000

<https://vcea.catholic.edu.au/>

Email: secretary@vcea.catholic.edu.au

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This Modern Slavery Statement (**Statement**) has been made on behalf of Victorian Catholic Education Authority Limited (**VCEA**) ABN 92 119 459 853 (formally known as Catholic Education Commission of Victoria Limited (CECV) prior to 13 December 2023). The Statement has been prepared pursuant to sections 6 and 13 of the Modern Slavery Act 2018 (Cth) (the **Act**) and covers VCEA as a single reporting entity.

This Statement sets out the progress that VCEA has made towards identifying, assessing and addressing modern slavery risks during the 2023 reporting period and acknowledges the organisational transformation that took place within VCEA during this period. This is VCEA's first statement in its renewed form.

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Victorian Catholic Education Authority Limited as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 17 June 2024.

This Modern Slavery Statement is signed by the Chair as the responsible member of Victorian Catholic Education Authority Limited as defined by the Act.



James Merlino
Chair
17 June 2024



Criteria 1: About the Victorian Catholic Education Authority Limited

VCEA is the peak body for Catholic School education in Victoria. Established as the Catholic Education Commission of Victoria (CECV) in 1973 by the Archbishop of Melbourne and the Bishops of Ballarat, Sale and Sandhurst dioceses, it was incorporated in 2006.

In 2021 the Bishops of Victoria commissioned an independent review into the role, governance and operations of CECV leading to a renewal process to enhance the governance structure and operating model.

As part of that process, in 2023, its name was changed to the Victorian Catholic Education Authority (VCEA) Limited.

VCEA works in close collaboration with the Catholic School proprietors across Victoria. These comprise:

- [Melbourne Archdiocese of Catholic Schools \(MACS\)](#) is responsible for the governance and operation of 295 schools in the Archdiocese of Melbourne.
- [Diocese of Ballarat Catholic Education Limited \(DOBCEL\)](#) is responsible for the governance and operation of 64 schools in the Diocese of Ballarat.
- [Diocese of Sale Catholic Education Ltd \(DOSCEL\)](#) is responsible for the governance and operation of 43 schools in the Diocese of Sale.
- [Catholic Education Sandhurst \(CES\)](#) is responsible for the governance and operation of 58 schools in the Diocese of Sandhurst.
- In addition to the diocesan school proprietors, there are Catholic Religious Institute and Ministerial Public Juridic Person Schools Proprietors who are responsible for the governance and operation of 48 schools across Victoria. These proprietors are members of [Catholic Religious Institute and Ministerial Public Juridic Person Victorian Schools Limited \(CRMV\)](#)

Mission

The Company exists to advance the mission of Catholic School education in the State of Victoria, in the service of students, families and the broader community.

Through the delivery of its stated Objects, the Company will advance a Catholic vision of education where every student's life is understood as gift. Each student in a Catholic School throughout Victoria will be afforded every opportunity to come to the fullness of life. The Company will strive for excellence in education through the delivery of responsive and quality educational practices.

Central to the Company's mission is the advancement of every child throughout their educational journey to allow them to mature in every dimension of their lives through the formation of their intellectual, spiritual, physical, and social capacities. Through the equitable sharing of resources among Catholic educational providers, the Company's mission is to enable students to flourish, to grow in awareness of their unique gifts and to confidently embrace their future with hope, in faith, and through love. The Company:

- a) seeks to integrate this work of educating with the explicit proclamation of the Gospel of Jesus Christ in fostering communities of learning and teaching, which recognise and nurture the dignity of each person, created in the image of God.
- b) strives to ensure that Catholic schooling in Victoria is distinguished by its intellectual, practical, and moral excellence, and fosters a formation of the whole person that is deeply and enduringly humanising.

- c) upholds the rights of parents, as the first teachers of their children, to access Catholic schooling which provides a religious and moral formation that is aligned with their conscience and religious faith.
- d) promotes the common good in its structures, policies and actions by advocating for appropriate access to, and funding of Catholic schooling in Victoria, and ensuring the just distribution of education resources.
- e) recognises the ecclesial identity of each Catholic school, and the bond of communion with its diocese, parish or religious institute that underpins its foundation, and seeks to nurture them by promoting dialogue and cooperation among all Catholic School education providers, Catholic entities, and with the general community.

Governance structure

The renewed governance structure for VCEA came into effect on 5 December 2023 at the Annual General Meeting (AGM) of Members through the adoption of the recommendations contained in the Bishop members *Response and Directives*, which included a new Constitution and the appointment of a skills-based board.

Company members

- Most Rev Peter A Comensoli DD Archbishop of Melbourne
- Most Rev Paul Bird CCsR MA DD Bishop of Ballarat
- Most Rev Gregory Bennet MS STL Bishop of Sale
- Most Rev Shane Mackinlay DD Bishop of Sandhurst
- Sr Eileen Ann Daffy rsm (*appointed from 19 December 2023*)

Board

- James Merlino, Chair
- Patricia Cowling, Director (*appointed from 1 March 2024*)
- Lynn Glover, Director
- Chris O’Grady KC (*appointed from 15 May 2024*)
- Marcelle Mogg, Director (*appointed from 1 March 2024*)
- Damian Murphy, Director

Board Committees

- VCEA Consultation Committee
- People and Employment Relations Committee
- Review Body and Compliance Committee
- Catholic Mission Committee (*not yet established*)
- Finance, Risk and Audit Committee
- Nominations Committee
- Education and Performance Excellence Committee (*not yet established*)

Executive Leadership

- Professor Elizabeth Labone, Chief Executive Officer (*appointed from 20 May 2024*)
- Bruce Phillips, Chief Strategy Officer (*from 29 August 2023*) and Acting Chief Executive Officer (*from 22 January 2024 to 16 May 2024*)
- Jim Miles, Former Chief Executive Officer (*resigned as CEO 19 January 2024*)
- Tracey Bannan, Chief Operations Officer (*appointed from 11 September 2023*)
- Stefanie Veal, Chief Education and Integrity Officer (*appointed from 25 September 2023 to 7 June 2024*)
- Geoff Bell, Acting Chief Education and Integrity Officer (*from 10 June 2024*)

Services and Functions

VCEA provides a number of services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria, working in close collaboration with proprietors. The services and functions are set out in VCEA's Constitution and relate to:

- Government funding of Catholic schools
- School registration and compliance
- Enterprise bargaining
- Long service leave
- Representation and advocacy
- Catholic identity
- Research
- State-wide performance of Catholic schools
- Data collection
- State-wide accreditation

Criteria 2: Operations, supply chains and organisational structure

Information on the operations of VCEA can be found in the Financial Report included in the VCEA 2023 Annual Report. This document can be found on the [VCEA website](#).

The Annual Report outlines the operations of VCEA throughout 2023 and provides an overview of the reorganisation of the governance structures, functions and operations that occurred during 2023 at the direction of the VCEA Members, the Catholic Bishops of Victoria. The Annual Report will also be available on the Australian Charities and Not-for-profits Commission (ACNC) website.

It is noted that out of VCEA's \$3.4 billion 2023 expenditure, 99.6% relates to direct distributions of government grants to systemic schools in Victoria and distributions to incorporated diocesan education entities.

VCEA's operational expenditure, excluding depreciation and amortisation of \$134,179, was \$15.3 million, representing only 0.45% of VCEA's total operational expenses.

Risk Management

VCEA has adopted a strategic, consistent, and structured enterprise-wide approach to risk management to achieve an appropriate balance between realising opportunities and minimising unexpected outcomes. VCEA recognises that risk arises in all aspects of its operations and at all stages within the life cycle of those operations. This is true of modern slavery risks.

Risk management is an integral part of sound management practice and an essential element of good corporate governance and responsible stewardship. It reinforces accountabilities, enhances decision-making and improves outcomes.

The VCEA Board understands the importance of risk management as a facet of good governance and has implemented an approach to its management of risk that aligns with *ISO 31000:2018 Risk management – Guidelines*. At VCEA risk management refers to the set of principles and policies, framework, culture, processes and coordinated activities used to direct and control the organisation regarding risks that arise in its pursuit of its objectives.

The VCEA Board is accountable for overseeing and monitoring the assessment and management of risk.

In 2023 the Board was supported in its risk management role by the Audit and Risk Committee (ARC), which was responsible for the review and endorsement of the Risk Management Framework, Risk Appetite Statement and Risk Management Policy, for approval by the Board.

The ARC met four times during 2023. At each meeting it considered the enterprise risk register. The register outlines those risks that management identifies as requiring ongoing review due to the level of exposure faced or where the risk is outside of VCEA's risk appetite, which is set annually by the Board. VCEA's exposure to modern slavery was considered in 2023 but did not trigger an exposure that required reporting to the ARC i.e. the exposure was deemed to be below VCEA tolerance.

Organisational Structure and Workforce Profile

For the majority of 2023, VCEA operations were delivered via a Service Level Agreement (SLA) with Melbourne Archdiocese Catholic Schools Ltd (MACS) while VCEA worked to directly appoint staff. Amongst other business units, procurement, risk management and IT services were included in the 2023 SLA with MACS.

VCEA was progressively staffed throughout 2023, with staff recruited via open external channels including Seek and executive recruitment agencies or transferring directly from MACS. VCEA also contracted agency staff in 2023 to support day-to-day operations. Contractors were also engaged in the provision of IT services and where this occurred, staff were primarily located at MACS.

As at 31 December 2023, there were 53 people working at VCEA as set out below:

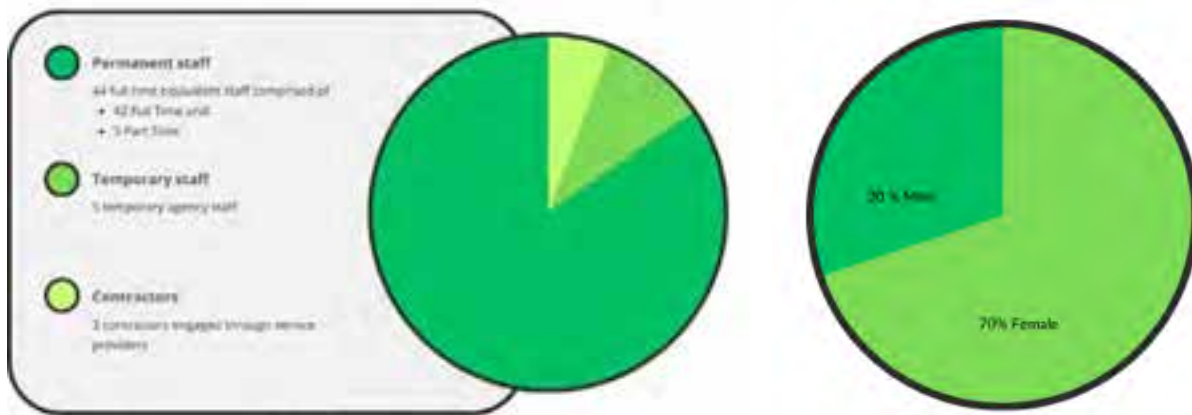


Figure 1.1 - Workforce profile as at 31 December 2023

When fully staffed, VCEA will employ approximately 75 staff. The portfolios and management structure are shown below.

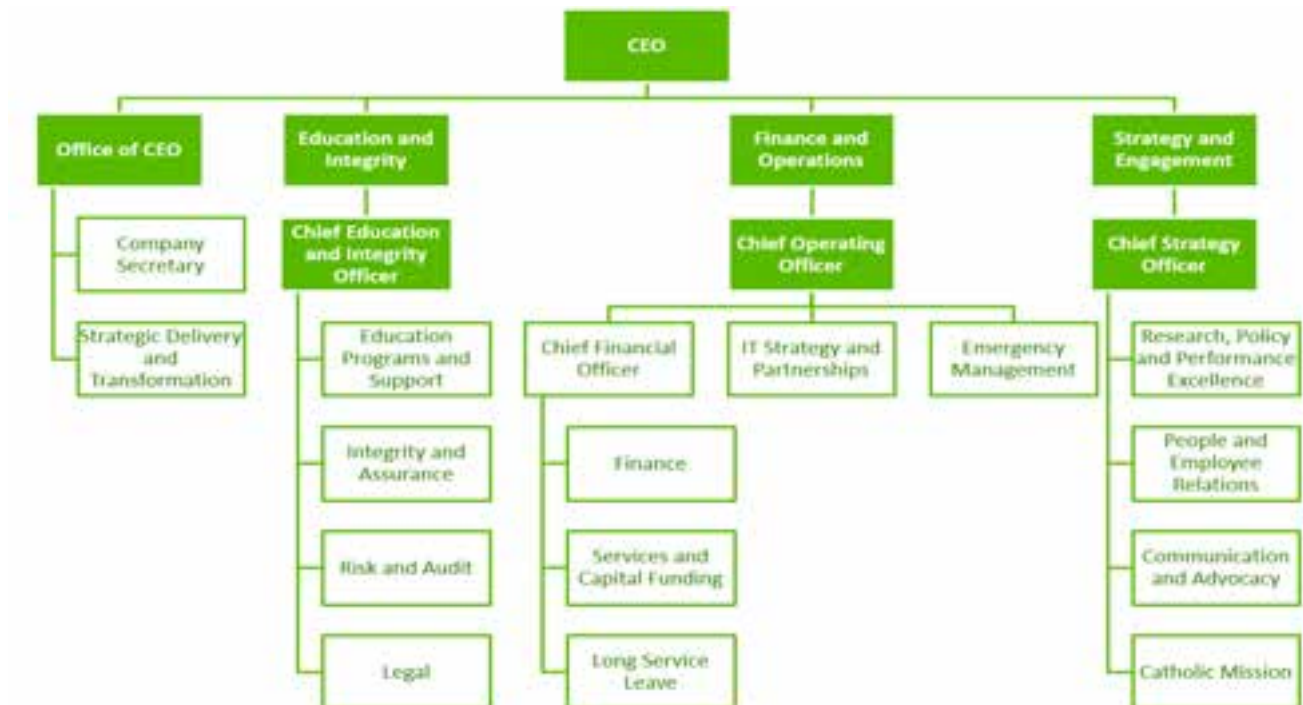


Figure 1.2 Organisational Structure

Criteria 3: Modern Slavery risks

Risks in Operations and Supply Chains

VCEA monitors the risks of modern slavery practices in operations and supply chains and the potential to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain.

- **Cause:** Refers to situations where an organisation's actions or decisions might directly create conditions that could lead to human rights violations, including modern slavery.
- **Contribute to:** Indicates scenarios where an organisation's activities indirectly contribute to human rights violations or modern slavery, even if they are not directly causing them. It might involve benefiting from practices that are linked to violations.
- **Directly linked:** Instances where modern slavery is directly connected to an organisation's operations or supply chain through the activities of another entity that they have a business relationship with.

VCEA's suppliers are predominantly located in Australia and are predominantly service related. As such, VCEA has rated its exposure to modern slavery risk as low. We recognise, however, that our suppliers' supply chains may extend outside of Australia. VCEA's modern slavery risk assessment practices are not yet sufficiently mature to extend beyond Tier 1 of our operations and supply chain. Tier 1 in a supply chain refers to the first level of suppliers directly linked to an entity and typically consists of primary suppliers that provide goods and services directly to the organisation.

Our relationship with the Australian Catholic Ant-Slavery Network (ACAN) assists us in gaining insight into our operational activity partners and suppliers. With ACAN's support we continue to operate an ongoing monitoring system of our suppliers. Whilst VCEA has determined that the risk of encountering modern slavery practices in our operations is low, the highest area of exposure has been identified as ICT hardware (laptops, computers and mobile phones) within the VCEA supply chain. These goods may be manufactured using conflict and/or forced labour in the early stages (Tier 2 and beyond) of their supply chains.

According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the Global Slavery Index and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.

<https://www.walkfree.org/global-slavery-index/>

VCEA supplier data has been reviewed against the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labour Organisation (ILO) definitions of modern slavery.

- Of the 192 VCEA suppliers engaged in 2023, 49 suppliers have completed the ACAN supplier survey
- 7 suppliers have joined Sedex (Supplier Ethical Data Exchange) platform
- VCEA continued with risk identification activities throughout 2023 for all new suppliers

In 2023, VCEA procured a range of goods and services to support its operations. Suppliers represent a combination of services provided to schools, funded by government grants, and VCEA operational suppliers. Modern slavery risks associated with VCEA for 2023 have been identified across 13 spend categories using the ACAN Category Risk Taxonomy. These range from high-risk IT Hardware through to low-risk Professional Consultancy. These 13 categories represent an increase in the spend categories from nine in 2022. This reflects the changes to VCEA's structure outlined under Category 1 and 2.

The graph below shows an analysis of supplier expenditure with 50% considered low risk, 15% medium risk, and 29% high risk, based on spend.

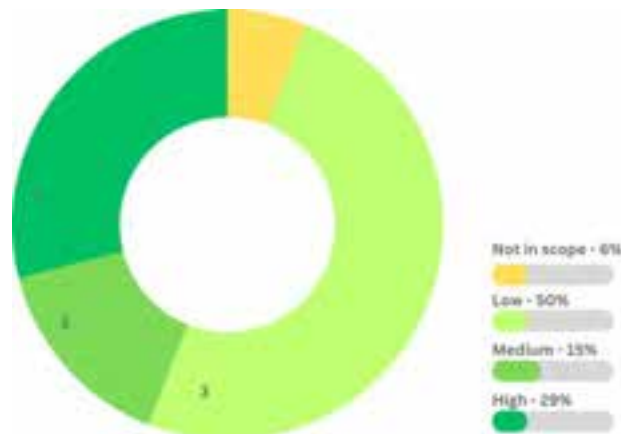


Figure 2.1 Risk by category and spend

In 2023, VCEA's main categories of expenditure were in the following areas. The most significant change from 2022 was in Professional Consultancy (low risk) which increased.

- Professional Services
- IT Hardware
- IT Software and network services
- License Fees

A total of 29 suppliers were within the high-risk category (ACAN Category Risk Taxonomy), of which 13 provide VCEA with ICT Hardware. This represents an increase in the number of suppliers in the high-risk category, over 2022.

The top 20 suppliers by spend, equated to approximately 80% of total expenditure to external suppliers. Our largest procurement categories included Professional Services and ICT Hardware. The graph below shows an analysis of the top 20 suppliers' expenditure by percentage.

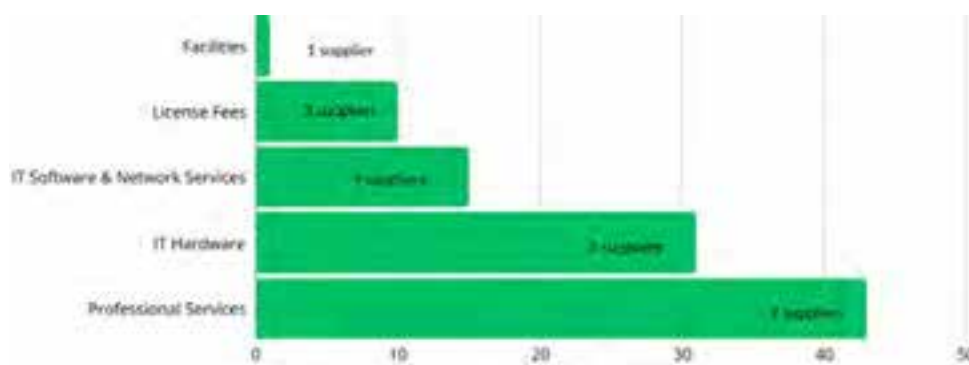


Figure 2.2 - Top 20 suppliers by spend

IT Hardware Procurement

VCEA recognises the higher risk of modern slavery exposure within the IT hardware supply chain and takes a responsible sourcing approach. When sourcing IT hardware, well known larger companies are preferred who are aware of and meeting their own modern slavery obligations in their supply chains.

Where a supplier is identified as high or medium risk (using the ACAN Taxonomy) during a tender process, a due diligence process is implemented by MACS through its SLA with VCEA. This process is informal and is undergoing continued improvement. The due diligence process seeks to account for if and how modern slavery risks are being managed by suppliers, which includes any/all of the following actions:

- requesting details on the suppliers' approach to addressing modern slavery within their operations or supply chain including the provision of relevant policies; and
- imposing modern slavery clauses in standard contract templates, including binding suppliers to the ACAN Code of Conduct.

Vendors do not proceed through the tender process if they are unable to provide this information or do not accept the modern slavery clauses and the ACAN Code of Conduct in standard contract templates.

Employment Risk

In 2023, VCEA established a directly employed workforce. VCEA also accessed labour hire and professional consultancy support to deliver on key aspects of the renewal.

The People and Culture team at VCEA oversees compliance with labour, employment and immigration laws through various policies and procedures. VCEA is committed to ensuring appropriate controls including policies, procedures and guidelines are in place to protect against modern slavery across the organisation's internal employment operations and to ensure the safety and wellbeing of employees. VCEA continues to develop and renew people policies to ensure that the suite of policies addresses applicable employment laws and that internal procedures are efficient and effective.

VCEA uses two major instruments of employment, the Catholic Education Multi-Enterprise Agreement 2022 (**CEMEA 2022**) and individually negotiated employment contracts. Approximately 18% of staff were covered by the CEMEA 2022 in 2023.

Competency based position descriptions, along with related policies and procedures support VCEA in the recruitment, selection and appointment of employees. It is a condition within VCEA appointment processes that employees provide a valid and current Working with Children Check (**WWCC**), criminal record check and evidence of working rights prior to commencement.

The People and Culture team also work closely with external labour hire agencies to vet consultants and short-term temporary staff to ensure all have valid working rights.

The following VCEA Board approved policies outline VCEA's expectations and were available during 2023.

Policy	Purpose
Board Charter including a Director Code of Conduct	To ensure high standards of behaviour are observed by the Directors in the context of their role.
Whistleblower Policy	To govern and promote ethical behaviour at VCEA and to encourage and manage appropriate and responsible whistleblowing.
Anti – Slavery Policy	To prevent and mitigate modern slavery risk within VCEA operations and supply chains, the policy seeks to ensure that modern slavery does not occur within VCEA operations, its business relationships and extended supply chains.

Policy	Purpose
Bullying Discrimination and Harassment Policy	To ensure that VCEA is a safe workplace, where the rights of all employees are respected and where all legal requirements, as outlined in relevant legislation, are adhered to.
Privacy Policy	To ensure VCEA protects and handles personal and sensitive information lawfully.
People and Culture policies	<p>A range of policies and procedures to support the safety and wellbeing of employees including;</p> <ul style="list-style-type: none"> • Working from home guideline • Employee Lifecycle Policy • Performance Planning and Review Policy • Injury Management and Rehabilitation Policy • Work Health, Safety and Wellbeing Policy
Employee Assistance Program ('EAP')	To promote a healthy and safe workplace culture through the provision of guidance and resources to help employees achieve a healthy work-life balance, manage stress, and navigate life transitions.
Risk Management Policy & Framework	The policy describes accountability for risk management, reporting protocols, and the approach for the identification, assessment and mitigation of risk. It references VCEA's Risk Management Framework which provides details on VCEA's risk appetite and processes for managing risk.

Criteria 4: Actions taken to assess and address Modern Slavery risks

ACAN participating entities are united in the belief that action against modern slavery is a fundamental Catholic social teaching. As such, with the support of ACAN and MACS procurement (provided under the existing SLA), VCEA achieved the following actions to address modern slavery risks in its operations.

- Embedded modern slavery risk controls in its procurement processes by incorporating contractual clauses which bind suppliers and service providers to addressing modern slavery risks into template contract documents, along with binding suppliers and service providers to the ACAN Supplier Code of Conduct. These template contracts incorporating modern slavery clauses and the ACAN Supplier Code of Conduct are issued in requests for tenders and other pre-contractual processes.
- Reported on the risks associated with operations, like modern slavery, through the enterprise risk register. The register is tabled quarterly at meetings of the Audit and Risk Committee and is focused on those risk rated high or extreme and/or those activities operating outside of risk appetite.
- Implemented a Modern Slavery Policy using the ACAN Risk Taxonomy.
- Continued to include modern slavery risks in due diligence procurement processes and to undertake risk assessments of suppliers and service providers.
- Through ACAN, invited suppliers to reflect on their own Modern slavery awareness and to complete the ACAN Supplier Survey.
- Through ACAN, invited suppliers to join Sedex (Supplier Ethical Data Exchange) platform.
- Continued participation in the Modern Slavery Risk Management Program (Program) with the Australian Catholic Anti-Slavery Network (ACAN).

Supplier Engagement with Sedex

In 2023, 31 high risk / high volume VCEA suppliers were invited for on-boarding to the Sedex platform by ACAN. Sedex is a data exchange platform designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts.

Once invited to join the platform as a supplier of VCEA, the suppliers are encouraged to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score). Seven suppliers took up this invitation to join Sedex. VCEA will continue to work with ACAN to encourage suppliers to join Sedex to:

- Manage the risk of modern slavery with existing suppliers
- Screen new suppliers as part of tenders and supplier on-boarding processes
- Gain visibility further upstream in the supply chains.

Criteria 5: Effectiveness of steps undertaken

Maturity Assessment

As a reporting entity CECV completed three gap analyses between 2019-2022 using the ACAN tool to review the four stable operational categories of Management Systems, Procurement and Supply Chain, Risk Management and Customers and Stakeholders. The fifth category Human Resources and Recruitment was not applicable to CECV as CECV did not employ staff directly at that time.

The shift to a Maturity Assessment from a Gap Analysis marks a strategic evolution in the ACAN approach to Modern Slavery risk taken by VCEA. It represents a reset point for continuous improvement that is timely given the operational renewal of VCEA and continuous improvement approach.

VCEA has now completed its first maturity assessment with an overall maturity score of 33%. Given the significant transformation in the operations of VCEA throughout 2023 including renewed governance, direct employment of staff, and the development of VCEA policies and procedures, a first-year reporting target of over 15% has been achieved.

Pillar	Maturity Score 2023
<p>Business process and governance</p> <p>Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities</p>	34%
<p>Operations</p> <p>Focuses on internal practices and how effectively we manage risks within our day-to-day activities.</p>	33%
<p>Supply chain</p> <p>Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.</p>	40%
<p>Worker engagement</p> <p>Addresses how we manage worker engagement and the standards upheld to prevent exploitation.</p>	33%
<p>Entity's programs and activities</p> <p>Looks at the broader initiatives and engagements we undertake to combat modern slavery.</p>	16%
<p>Grievance mechanisms and remediation</p> <p>Evaluates the channels available for reporting concerns and the processes for addressing them.</p>	43%

Sub Pillar	Maturity Score 2023
Governance Sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.	38%
Risk Assessment Identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.	57%
Risk Management Evaluates how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.	19%
Effectiveness of Actions Measures the impact of anti-slavery efforts and is what holds us accountable.	20%

VCEA will continue to strengthen its approach to modern slavery risk in 2024 through targeted actions in the context of the new governance and organisational structure and operating processes.

VCEA's modern slavery risk management program is incorporated into VCEA's procurement processes in accordance with VCEA's modern slavery controls, such as adding mandatory key contractual clauses to VCEA's template contracts. However, VCEA can more consistently embed the risk management program in supplier and employment practices across the organisation.

Areas of focus in 2024 will include modern slavery-related programs, activities and an assessment of our modern slavery risk management practices to monitor the effectiveness of actions. Where possible, metrics will provide a quantitative basis for evaluating actions and providing a clear, objective measure of whether and to what extent VCEA's goals are being achieved.

It is noted that VCEA's engagement with the ACAN program and participation in Domus 8.7 Remediation Services increases both our Risk Assessment and Grievance Mechanisms and Remediation scores. This will need to be considered in developing the renewed action plan.

Looking ahead

VCEA commits to the redevelopment of a multi-year modern slavery action plan with reviews at regular and appropriate intervals to ensure the actions remain relevant and effective and contribute to the modern slavery risk management approach. In 2024 VCEA commits to undertake the following steps:

Systems and processes	<ul style="list-style-type: none"> • Review and renew the Anti Slavery Policy • Develop a Staff Code of Conduct, Complaints and Grievances Policy, Equal Opportunity Policy and Procurement Policy • Appoint a Modern Slavery Liaison Officer (MSLO) and Whistleblower Protection Officer (WPO) and incorporate the roles into role mandates • Establish a cross disciplinary Modern Slavery Working Group (MSWG) with representation from key areas of the organisation including Risk, Legal, Finance and People and Culture teams. • Define roles and responsibilities of the MSWG in a Terms of Reference
Risk management	<ul style="list-style-type: none"> • MSWG to undertake a gap analysis and review of existing processes and actions that support risk mitigation and reporting • Prepare a renewed Modern Slavery Action Plan aligned to VCEA's governance structure, policies, processes and approach to effectively managing enterprise risk

	<ul style="list-style-type: none"> • Assess the effectiveness of VCEA’s control structures that address modern slavery risk • Monitor progress and effectiveness of actions (existing and new, based on the assessment above) • Review and renew the Risk Management Policy to ensure a consistent process for the identification, assessment, treatment, monitoring, and reporting of risk across all VCEA operations • Establish consistent risk reporting to the newly formed Finance Risk and Audit Committee • Develop and embed procurement related delegations
Procurement and supply chain	<ul style="list-style-type: none"> • Continue to assess risk within VCEA operations and supply chains • Include modern slavery requirements in standard VCEA market engagement documents e.g. requests for proposals • Embed modern slavery risk due diligence within the procurement process • Invite new high risk category suppliers of VCEA to complete the ACAN supplier survey
Engage, educate & respond	<ul style="list-style-type: none"> • Introduce modern slavery training modules for management, staff and the VCEA Board (Modern Slavery 101 and Modern Slavery Business Relevance) • Establish a remedy pathway to address and respond to modern slavery practices identified in operations or supply chain • Enhance engagement and participation in the ACAN Modern Slavery Risk Management Program by the MSWG

VCEA is committed to continuous improvement in partnering with our stakeholders to proactively work to reduce modern slavery.

Remediation

When suspicions of modern slavery practices come to VCEA’s attention through whistle blowers or other channels, VCEA will contact relevant law enforcement agencies if a person is in immediate danger or [Domus 8.7](#) for an assessment, investigation, action planning and implementation of a remediation process.

In 2024, training will be offered to VCEA staff to support them in recognising the causes of modern slavery, and the mechanisms available to address poor labour practices, unsafe working conditions and other indicators of modern slavery.

Criteria 6: Consultation with owned or controlled entities

VCEA has no controlled entities that require internal consultation.

In preparing the 2023 Modern Slavery Statement, the following functions have been consulted and/or have contributed material to ensure the statement accurately reflects the practice and policies applied. Consultation has also occurred with MACS concerning the provision of services to VCEA in 2023.

Team or function	Input subjects
Finance	Operations and supplier spend
Procurement (MACS)	Supply chains, goods and services procured, and processes for supplier diligence, on-boarding and management
Risk	Risk management approach with respect to modern slavery
People and Culture	Working conditions of employees and contractors, the implementation of training programs to educate on modern slavery risk and other steps to build a culture that places priority on modern slavery and other human rights abuse risks.
Legal	Contractual and legal obligations and legislative requirements
Communication and Advocacy	A description of the current operating context and renewed governance systems

Criteria 7: Any other relevant information

No further information at this time.



Modern Slavery Statement

2023

vcea.catholic.edu.au

Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2023



Diocese of Sale
Catholic Education Ltd

Inspiring *Faith* Inspiring *Learning*

Disclosure Note

This statement has been made on behalf of Diocese of Sale Catholic Education Limited (DOSCEL) ABN 91 621 266 993 and all entities owned and controlled by DOSCEL. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers DOSCEL as a single reporting entity.

This is DOSCEL's fourth Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing and addressing modern slavery risks during the 2023 Calendar Year Reporting Period, from 1 January 2023 to 31 December 2023.

Declaration

This Modern Slavery Statement was approved by the Board of Diocese of Sale Catholic Education Limited (DOSCEL) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) on
14 June 2024

A handwritten signature in black ink, appearing to read 'Garry McLean', is centered on the page. The signature is fluid and cursive.

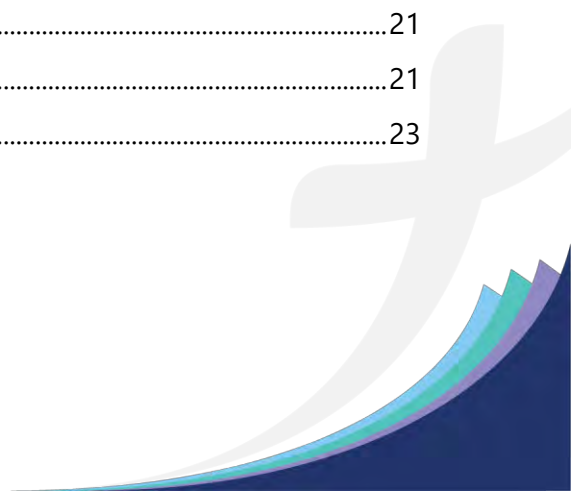
Garry McLean
Board Chair
Diocese of Sale Catholic Education Limited

Entity Details

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Statement from Bishop Gregory Bennet

Dear Sisters and Brothers in Christ,

As we embark on the 2023 modern slavery reporting period, I reflect on the challenges and opportunities ahead, building upon the groundwork laid in our 2022 statement.

In our pursuit to end modern slavery, we hold close the principles emphasised by Pope Francis in *Fratelli Tutti*, that everything is interconnected, and we are fellow travellers sharing the gift of our common home. This understanding shapes how we view our responsibility and approach to stewardship over the Earth. Instead of exploitation for personal gain, we must care for our planet, which in turn means caring for each other. Together, this forms a relationship of mutual responsibility, that is firmly grounded in the acknowledgement of God's affirmation in Genesis that all creation is inherently good. This also sits at the core of *Laudato Si'*, guiding us to prioritise values over profit margins.

The global prevalence of modern slavery, influenced by conflict, economic downturns, and climate change, remains a pressing issue. We are stewards of God's creation. We must hear the silent cries of the earth and share the burden of remedying the scars of exploitation. As we strive towards a more sustainable future, we take to heart the lessons of *Laudato Si'*, understanding the intricate links between environmental degradation and human suffering.

Transitioning to a low carbon future brings challenges, especially within the renewable energy sector, highlighting the need to address modern slavery risks in sustainable energy sources. Our society's growing sensitivity to sustainability and modern slavery concerns is evident with students advocating for a clean, healthy, and sustainable environment. We are encouraged by this shift and align our efforts with the global call for a sustainable future.

DOSCEL is approaching this task with a measured perspective. We are preparing for sustainability reporting, expanding our due diligence efforts, and participating in a digital reimagination project that includes improving technology capabilities for future procurement activities. Our advocacy extends to urging the government to provide pathways to permanency for those seeking safety in Australia, addressing forced labour implications with post-pandemic migration.

Anticipating significant changes resulting from the statutory review of the *Modern Slavery Act 2018* (Cth), DOSCEL welcomes the strengthening of the legislation and remains steadfast in its commitment to dismantling the structures perpetuating modern slavery. Our approach to modern slavery reporting is evolving and I am pleased to announce DOSCEL's new partnership with the Australian Catholic Anti-Slavery Network.

Amidst these challenges, let us remember the beacon of hope represented by the construction of St Josephine Bakhita Primary School in Clyde North, starting in 2023.

Named after the patron saint of victims of modern slavery, this school embodies our commitment to ethical procurement, illuminating the moral dimension of our economic decisions. May these efforts be a sign of our solidarity with our sisters and brothers throughout the world, and we accompany one another on the way to peace, justice and care for our common home.

A future that breaks ties with slavery awaits us.

Yours sincerely in Christ,

+ 

+ Greg Bennet
Bishop of Sale

Criteria 1: About us

Opening statement

Diocese of Sale Catholic Education Limited owns and operates all Catholic primary and secondary schools within the Diocese of Sale, excluding Catholic College Sale Ltd and Lavalla Catholic College, Traralgon.

Diocese of Sale Catholic Education Limited, (**DOSCEL**), ABN 91 621 266 993, was established in 2018. DOSCEL has been registered with the Australian Charities and Not-for-profits Commission (**ACNC**) since 2017.

In this Statement, we refer to *modern slavery*, as defined by the *Modern Slavery Act 2018* (Cth) (**the Act**), to include references to slavery, servitude, forced or compulsory labour, and human trafficking.

DOSCEL recognises that modern slavery happens at the most extreme end of the working spectrum, and that it involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term *modern slavery*, is used to describe situations where there are coercion, threats or deception.

We are dedicated to eliminating modern slavery from every facet of our operations and supply chain. Through ongoing due diligence, transparency, and collaboration with our stakeholders, we strive to create a world where exploitation is eradicated.

For the purposes of the Act, this is a single statement for the reporting entity, DOSCEL, which is submitting this Statement, as provided for in Section 13 of the Act. This is our fourth Modern Slavery Statement and illustrates our progress towards identifying, assessing, and addressing modern slavery risks during the 2023 Calendar Year Reporting Period, from 1 January 2023 to 31 December 2023.

Nurturing Faith, Inspiring Learning: The Mission of Catholic Education

Our mission in Catholic education is to provide exceptional educational opportunities firmly rooted in our Catholic identity, with the goal of fostering holistic growth and making positive contributions to the world. The mission of DOSCEL is deeply aligned with the evangelising mission of the Church, primarily realised through our network of Catholic schools.

At the heart of our educational approach lies a commitment to holistic development, encompassing spiritual, academic, social, emotional, and physical growth. Our curriculum prioritises faith formation, immersing students in Catholic teachings and values. We actively promote Catholic Social Teaching, instilling in our students a dedication to social justice, global citizenship, and service to others.

Furthermore, we embrace the integration of technology into our classrooms, equipping students with the digital skills essential for success in the modern world. Our teaching methods are tailored to cater to diverse learning styles, abilities, and interests, ensuring that every student receives personalised support, academically and personally. Collaboration with

parish priests, teachers, staff, and families remains fundamental to our mission of holistic student development.

Under the leadership of Most Rev. Greg Bennet, Bishop of Sale, and with the support of the Secretariat, parish communities, and the wider faith community, DOSCEL is steadfastly committed to the DOSCEL Strategic Plan 2020-2024, "Inspiring Faith, Inspiring Learning." This strategic plan outlines our key priorities and direction, guiding our efforts to provide high-quality education that nurtures both faith and academic excellence.

In alignment with our mission, we are excited to announce the construction of St Josephine Bakhita Primary School, located in the new Five Farms estate at Wild Goose Way, Clyde North. This addition to our network of schools reflects our dedication to meeting the educational needs of the community while fostering faith-filled environments that empower families and young people. Scheduled for completion in 2025, St Josephine Bakhita Primary School will serve as a beacon of faith and learning, shaping the lives of generations to come. Additionally, by naming the school after the patron saint dedicated to modern slavery victims, we aim to raise awareness and inspire action against modern slavery within our community.

Gratitude is extended to the Victorian and Commonwealth Governments for their ongoing significant support, which enables us to invest in new learning facilities and school infrastructure through the Catholic Capital Grants Program and school community funding. Notably, DOSCEL schools celebrated significant milestones in 2023 with 13 official Blessing and Opening Ceremonies to celebrate school projects completed over the past three years. The ceremonies acknowledge and thank all contributors who support our mission of enhancing Catholic education within our community.

Criteria 2: Organisational structure, operations and supply chain

Our structure and operations

DOSCEL governs 38 Catholic primary schools, five of the seven Catholic secondary schools and the Secretariat in the Diocese of Sale (Figure 1). Appendix 1 shows the complete list of entities owned and operated by DOSCEL. Catholic College Sale Ltd is governed by a College Board on behalf of the members, the Marist Provincial and the Bishop of Sale, and Lavalla Catholic College, Traralgon is governed by Marist Schools Australia, and are therefore not covered by this Statement.

In the calendar year from 1 January to 31 December 2023, DOSCEL's annual consolidated revenue reached \$394.37 million, with employee-related expenses totalling \$251.0 million. During this period, DOSCEL schools educated 10,472 primary school students and 7,667 secondary students. Additionally, DOSCEL employed a workforce comprising 2,699 school staff and 106 Secretariat staff.

In 2018, the governance of schools in the Diocese of Sale transitioned to Diocese of Sale Catholic Education Limited (DOSCEL), a Company limited by guarantee, with the Bishop of Sale as the sole member. The Bishop appointed a Chair and Board of Directors to govern DOSCEL in partnership with the Chief Executive Officer/Director of Catholic Education.



Figure 1: Location of DOSCEL schools in the Diocese of Sale

DOSCEL’s primary responsibility is to support and advance Catholic education while complying with legal requirements, with a focus on creating safe professional environments across all schools and workplaces, as well as a commitment to child safety.

The Chief Executive Officer/Director of Catholic Education is supported by the DOSCEL Secretariat, working closely with schools to provide high-quality educational opportunities. Inspired by the teachings of Jesus, Catholic schools enable learning, faith, life and culture to converge within a safe and supportive environment. Catholic schools are inclusive, welcoming and focus on nurturing each student’s unique potential.

The structure of the DOSCEL Secretariat Senior Management Team altered in 2023 and consisted of:

- Chief Financial Officer – Finance (appointed 2023).
- Chief Compliance Officer, Executive Manager – Industrial Relations/Human Resources.
- Chief Operations Officer, Deputy Director – Catholic Identity, Leadership, Learning and Teaching.
- General Manager – Learning and Teaching.
- General Manager – Infrastructure and Support Services (appointed 2023).
- General Manager – Information and Technology.
- Senior Manager – Catholic Identity and Religious Education.

In 2023, the DOSCEL Board, including the Chair and Deputy Chair, was comprised of nine Directors. The Board oversees corporate governance, regulatory compliance, Church Laws, risk management, and sets the strategic direction. A Directors' Code of Conduct is in place.

In 2023, the Conflict of Interest Policy was reviewed and updated, following approval by the DOSCEL Board.

Four Committees enhance the Board's decision-making capacity:

- Catholic Identity, Leadership, Learning and Teaching.
- Finance, Audit and Risk.
- Planning, Building and Financing.
- Culture, Ethics and Conduct (established in 2022).

DOSCEL's Risk Management Framework is presented and reviewed at each Finance, Audit and Risk Committee and DOSCEL Board meeting. A Delegations Policy and Register are in place, updated with Committee and Board approval.

The Catholic Education Commission of Victoria Ltd ('**CECV**') underwent a name change on 5 December 2023 and is now known as Victorian Catholic Education Authority Ltd ('**VCEA**'). VCEA represents Catholic education providers in Victoria, advocating for students' needs and managing government funding. The Bishop of Sale is a member of VCEA.

The Victorian Registration and Qualifications Authority ('**VRQA**') is responsible for regulating education and training in Victoria, with DOSCEL's relationship maintained through VCEA, the peak body for Catholic school education.

Figure 2 illustrates the DOSCEL organisational structure.

Our modern slavery governance framework

In September 2023, DOSCEL officially joined the Australian Catholic Anti-Slavery Network ('**ACAN**') and completed our orientation. We are now focussed on building a productive working relationship. For the first time, the DOSCEL Modern Slavery Statement is included in the ACAN Compendium of Modern Slavery Statements.

To facilitate our anti-modern slavery efforts, a new role has been established at DOSCEL, a dedicated Strategic Sourcing Adviser ('**SSA**') who serves as the Modern Slavery Liaison Officer ('**MSLO**') with ACAN. The MSLO works alongside the Chief Financial Officer to implement the ACAN Risk Management Program across DOSCEL operations and supply chain, with a focus on achieving the DOSCEL Modern Slavery Framework and risk mitigation activities.

The Chief Financial Officer presents the annual DOSCEL Modern Slavery Statement, endorsed by the Chief Executive Officer, to the DOSCEL Board via the Finance, Audit & Risk Committee.

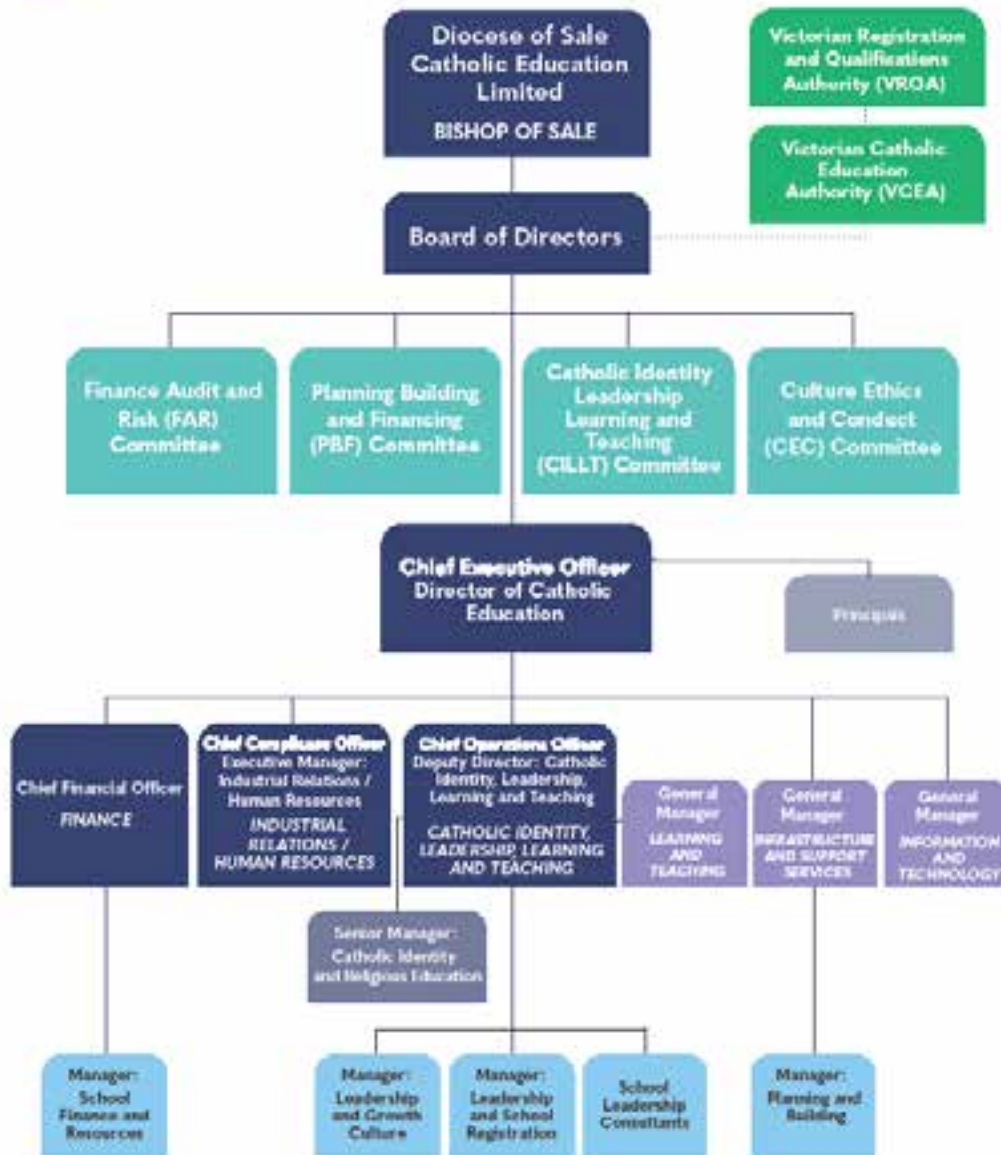


Figure 2: 2023 DOSCEL Organisational Structure

Our supply chain

In September 2023, DOSCEL commenced participation in the ACAN Modern Slavery Risk Management Program, marking a significant shift in our supply chain due diligence. The program, in collaboration with Sedex, enhances our capabilities in supplier mapping and engagement. This initiative aligns with our commitment to combating modern slavery and improving transparency within our supply chain.

DOSCEL's decentralised procurement system, while posing challenges in data collection, has been the subject of ongoing efforts for improvement. Currently, this is a manual process where approximately two weeks is employed to collect and consolidate spend data from primary schools, secondary schools, and the Secretariat. The list of top 50 suppliers by spend is then reconciled to understand the due diligence activities undertaken for each supplier, providing insights into the reach of our Modern Slavery Framework. This year, the data has been aligned with the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labor Organization definitions of modern slavery.

During the 2023 calendar year, we spent approximately \$105.5 million with external suppliers. Our top 50 spend equated to approximately \$53.8 million and comprised 51% of our total spend to external suppliers. Our largest procurement categories remain the same as the previous reporting year, Building and Construction (including architects), ICT Hardware / ICT Software and Network Services, and Labour Hire (largely related to the sourcing of relief teachers).

Looking more closely at our top 50 suppliers by spend, 80% have operations solely based in Australia, 10% have a global presence and the remaining 10% have operations in one or more countries including New Zealand, United Kingdom, South Africa, China, and the Philippines. DOSCEL is currently linked with 6 suppliers on Sedex and we are actively encouraging membership for our suppliers interested in improving their social and environmental performance.

An internal audit of payment data for the 2022 calendar year revealed that DOSCEL had approximately 5,000 suppliers, ranging from one-off purchases to longer-term contracts. This estimate has increased to around 7,000 suppliers for the year 2023. The significant change in estimates between 2022 and 2023 reflects our limited understanding of our supplier base beyond those with expenditures under \$50,000, particularly when considering the top 50 suppliers list.

We acknowledge the trend towards sustainable procurement involving supply chain consolidation. DOSCEL is currently in the initial stages of mapping our supply chain and we are committed to gaining greater transparency of our existing suppliers. Furthermore, a new enterprise system will underpin procurement activities in the future. The VCEA Digital Re-imagination initiative is shaping the digital future of Catholic Education in Victoria. This encompasses the digital reimagining of the ICON enterprise system and has implications for procurement among other capability areas. DOSCEL is actively participating in the shaping of this future technology and business process ecosystem. The ICON system, originally designed in 2013, is due for renewal, prompting a review to capture current business requirements and improve functionality.

This year we have extended our supply chain descriptions beyond our top 3 high risk spend categories to include cleaning and property maintenance services, and school uniforms given these categories exist in our top 50 supplier list and the recognised modern slavery risks associated. Descriptions of these supply chains and risks are provided in the next section covering Criteria 3.

Criteria 3: Modern slavery risks in our operations and supply chain

The UN Guiding Principles on Business and Human Rights are recognised as the global standard for preventing and addressing business-related human rights harm. The 'risks of modern slavery practices', means the potential for our entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain – in other words, the risks that our entity may be involved in modern slavery. The concepts of cause, contribute to and directly linked to modern slavery, are set out in the UN Guiding Principles and are part of a continuum of conduct and are defined below. This means that an entity's risks may not always fit neatly into one of these categories.

UN Guiding Principles on Business and Human Rights Concepts

- **Cause:** Refers to situations where an organisation's actions or decisions might directly create conditions that could lead to human rights violations, including modern slavery.
- **Contribute to:** Indicates scenario's where an organisation's activities indirectly contribute to human rights violations or modern slavery, even if they are not directly causing them. It might involve benefiting from practices that are linked to violations.
- **Directly linked:** Instances where modern slavery is directly connected to an organisation's operations or supply chain through the activities of another entity that they have a business relationship with.

DOSCEL's human rights due diligence and risk assessment practices are not yet sufficiently mature to extend beyond Tier 1 of our operations and supply chain. Tier 1 in a supply chain refers to the first level of suppliers directly linked to an entity and typically consists of primary suppliers that provide goods and services directly to the organisation. This limitation makes it challenging for us to identify or detect instances where a direct link to modern slavery might exist. We are looking to improve in this area as we develop our capability over time.

Our 2023 desktop review is revealing persistent high-risk categories in the areas of Building and Construction, Information and Communications Technology, and Labour Hire. With regards to managing modern slavery risks, DOSCEL takes a targeted approach by focussing its efforts on procurement areas that carry the highest potential to cause or contribute to modern slavery.

DOSCEL values suppliers that prioritise fair labour practices and environmental responsibility. We believe in supporting industries that care for workers and the environment. Sourcing responsible suppliers helps DOSCEL promote sustainable practices.

Below are supply chain descriptions (that cover Criteria 2), along with the common modern slavery risk factors relevant to our identified high-risk procurement categories.

Building and construction

Our building projects aim to provide quality learning environments, including general learning areas, grounds, and educational spaces. In collaboration with government-funded programs, we have secured substantial funding assistance. Our supply chain encompasses primary and secondary school building projects, including the addition of new general learning areas and associated facilities, and refurbishments.

We acknowledge that we are in the process of maturing our ethical procurement practices for building and construction, and we are committed to ongoing improvement in this area. Our goal is to continually enhance our practices to ensure they align with ethical standards and promote responsible sourcing.

Risks: The construction industry is characterised by a mobile workforce and frequent staff turnover. This creates significant modern slavery risk factors including:

- Downward pressure on costs and time schedules.
- Substantial migrant labour presence.
- Heavy reliance on agency and subcontracted workers.
- Challenges in tracking complex supply chains.

Information and communications technology

The Information and communications technology supply chain at DOSCEL encompasses the entire lifecycle of technology products and services. It involves sourcing, distribution, installation, maintenance, and disposal of hardware, software, and networking components.

Our Information and communications technology supply chain ensures efficient digital classrooms, administrative systems, cybersecurity, and student experiences and requires coordination among vendors, internal departments, and stakeholders for optimal educational and operational outcomes.

Risks: Technology companies often have suppliers in regions with elevated modern slavery risks, including areas with weak law enforcement, significant migrant worker populations, and documented instances of modern slavery. This connection is often influenced by the amount of money spent on equipment. Additionally, environmental risks stem from the electronics industry's resource-intensive production processes, such as e-Waste generation and the use of conflict minerals. Addressing these concerns requires sustainable sourcing practices.

Labour hire

DOSCEL is committed to meet the staffing needs of schools and the DOSCEL Secretariat by utilising both internal and external hiring processes, including recruitment agencies, to source appropriate candidates.

In addition, careful oversight of external labour hire practices is applied, ensuring adherence to labour laws and standards. DOSCEL has established clear expectations in relation to the provisions of the Act that our service providers acknowledge, understand, and comply with.

Furthermore, DOSCEL is dedicated to providing all employees with conditions and benefits in excess of the National Employment Standards ('NES') including scheduled salary increases and leave entitlements.

Risks: While the education sector in Australia is considered low risk, it is important to acknowledge that labour hire in certain industries can carry substantial modern slavery risks. Vulnerable workers facing poverty, illiteracy, discrimination, and migration challenges, may be lured into exploitative jobs where they receive little to no pay and are unable to leave due to manipulation, debt bondage, or document confiscation.

Cleaning and property maintenance

The cleaning and property maintenance services supply chain for DOSCEL Secretariat and school buildings is characterised by Service Agreements with various providers for tasks such as general cleaning, floor care, gardening, building and property maintenance, security services and waste management.

Each school contracts independently, requiring diligent oversight to ensure ethical labour standards are maintained.

Risks: Cleaning and maintenance services are recognised as high-risk sectors, necessitating specific attention to safeguard worker welfare within this supply chain. The risks of modern slavery may exist in this type of work as suppliers have been known to subcontract workers, potentially increasing the risk of modern slavery. Other risk indicators include unusually low pricing.

School uniforms

The school uniform supply chain at DOSCEL primary and secondary schools encompasses suppliers responsible for manufacturing, distributing, and retailing uniforms to students. Uniforms are accessible through on-site school uniform shops or nearby local retailers.

DOSCEL is prioritising suppliers demonstrating transparent and ethical practices throughout their supply chain, particularly those using environmentally friendly materials.

Risks: Concerns regarding modern slavery stem from the garment manufacturing process, which may involve factories with substandard labour practices, and sourcing materials such as cotton, which pose risks of forced labour in harvesting.

Criteria 4: Actions taken to assess and address risks

In response to the evolving modern slavery policy landscape, driven by the recent statutory review of the Act, DOSCEL is committed to enhancing its performance in addressing modern slavery risks within its operations and supply chain. With renewed determination and the establishment of a new partnership with ACAN, along with the establishment of a new dedicated SSA role, DOSCEL is fostering collaboration, knowledge-sharing, and preparing for skill-building across all departments to ensure ethical procurement practices.

Seeking proactive insights into anticipated changes in reporting criteria, DOSCEL participated in key events such as 'The Future of Modern Slavery Reporting', hosted by Fair Supply in Melbourne. This engagement provided valuable insights and best practices, positioning us to confidently navigate the demands of modern slavery reporting.

Moreover, DOSCEL contributed to the global conversation on addressing modern slavery by participating in 'IMPACT! Procure with Purpose', a segment of the Big Ideas Summit series. This gathering facilitated exchanges of vital ideas, plans, experiences, and innovations aimed at addressing past, present, and future challenges.

As we mark five years since the introduction of the Act and witness the alarming rise in global slavery, DOSCEL is intensifying its commitment to preventing and eradicating modern slavery. This includes our significant flagship project, St Josephine Bakhita Primary School in Clyde North, named after the patron saint of modern slavery victims, reflecting our commitment to justice in the light of God's grace.

Additionally, DOSCEL remains focussed on ethically sourcing school uniforms, acknowledging the prevalence of modern slavery in fibre growth and harvesting, and garment manufacturing. We are seeking assistance from ACAN how we can best address this concern in our supply chain.

In the following section, we outline the initiatives accomplished during the 2023 reporting period.

Resources dedicated to addressing modern slavery

Australian Catholic Anti-Slavery Network

In September 2023, DOSCEL became a member of ACAN, and in doing so joined a Catholic community recognised by its shared belief and commitment to ending modern slavery. As an ACAN participating entity, DOSCEL has access to shared resources highly developed for modern slavery risk prevention and mitigation. Moreover, in coming together with Catholic entities in Australia at ACAN, DOSCEL is better positioned to take action, as it contributes to and leverages collective purchasing spend and has a more coordinated response.

DOSCEL attendance at ACAN webinars:

- The MSLO attended the October and November ACAN Modern Slavery Working Group Webinars. Noting, the DOSCEL Building and Infrastructure Team also attended the November ACAN Modern Slavery Working Group Webinar.
- The MSLO attended ACAN Program Sessions: Sedex and Supplier Engagement, and a Supplier Webinar.

Strategic Sourcing Adviser

DOSCEL has significantly improved its internal resources and capabilities by appointing a SSA that acts as the MSLO to ACAN. This role was created to ensure modern slavery compliance, reporting, and our commitment to ethical sourcing practices. Furthermore, it encompasses a heightened focus on social and environmental performance, strengthening our dedication to ethical sourcing.

St Josephine Bakhita Catholic Primary School

By constructing a school named after the patron saint dedicated to modern slavery victims, we aim to not only provide quality education but also to inspire our community to actively participate in efforts against modern slavery.

We are thrilled to announce that extensive planning has paved the way for construction with a significant milestone being the turning of the sod on 22 September 2023. Construction is expected to conclude in 2025, and enrolments are set to begin in Term 4, 2024, with the first term scheduled for commencement in 2025. A principal will be appointed in 2024, who will engage the local community and foster a sense of social responsibility, empathy, and commitment to justice within the school.

In 2023, the SSA was invited to join the St Josephine Bakhita Primary School Working Group and delivered a presentation introducing the topic of modern slavery, emphasising opportunities and collaboration, particularly within the context of procurement of goods and services for the school, with careful consideration to modern slavery implications.

Project Details

- **Location:** St Josephine Bakhita Catholic Primary School will be located at 40 Wild Goose Way, Clyde North, within the Clyde Creek Victorian Planning Authority Precinct Structure Plan.
- **Scope:** Stage 1 of the project involves the construction of eight general learning areas, specialist and teacher resource areas, an administration area, and a staff room, accommodating up to 700 students at full enrolment.
- **Funding:** The \$11.7 million project is partially funded by a \$5 million grant from the 2021-2022 Victorian Government Capital Funding Program.

Project Actions

- **Strategic partners:** We are working closely with the architect and builder to avoid and minimise modern slavery from the building supply chain including registration to Sedex and a commitment to address any modern slavery concerns.
- **Procurement of goods and services for the school:** In evaluating potential suppliers, preference will be given to those embracing a human rights approach to modern slavery risk identification and mitigation.
- **Identify opportunities:** We recognise the importance of creating a culture of health and human rights within the school community, and we intend to explore opportunities through strong leadership, education, community engagement and support programs.

School uniforms

DOSCEL is actively working towards prioritising partnerships with school uniform providers that uphold ethical manufacturing practices and utilise environmentally friendly materials. In

recent partnerships, school uniform suppliers have demonstrated their commitment to ethical manufacturing practices throughout their supply chain. Notably, one supplier has provided transparency by disclosing the locations of their manufacturing facilities and has implemented measures to promote fair labour practices and environmentally sustainability.

As part of our ongoing commitment to ethical sourcing, DOSCEL has introduced a short form modern slavery questionnaire to assist schools in evaluating potential uniform suppliers. This tool assists schools in evaluating potential uniform suppliers, enabling them to assess efforts to prevent modern slavery in supply chains ensuring alignment with DOSCEL’s values and ethical standards.

To further improve our efforts, DOSCEL is actively collaborating with ACAN to explore additional strategies and tools available to us. Together, we aim to strengthen our approach to mapping and monitoring our uniform supply chain. We acknowledge that achieving our goal of responsibly and ethically sourced student uniforms may take some time, but we remain dedicated to this endeavour.

Awareness training

As an ACAN participating entity, DOSCEL has access to comprehensive resources for modern slavery risk prevention, including flexible training modules. To meet our reporting goals, 50 DOSCEL Secretariat staff either involved in procurement processes or part of the St Josephine Bakhita Working Party completed this training, and there are plans to expand this initiative next year.

Supplier questionnaire

A modern slavery questionnaire is included in the supplier tender process for the procurement of high spend Building and Construction, and Information and Communications Technology. We have focussed on managing risks associated with higher spend suppliers. A more comprehensive version of the questionnaire is applied to suppliers where the spend value exceeds \$250K. The questionnaire evaluates supplier policies and practices in modern slavery prevention to facilitate our preventative measures to modern slavery risks.

In 2023, the modern slavery questionnaire has been introduced when seeking quotes for financial services. We understand the significance of the financial services sector in relation to modern slavery rests in its connection to every industry and the resulting increased risk of harm to people.

EOI supplier tender process includes DOSCEL modern slavery questionnaire	2021	2022	2023
Building and Construction	√	√	√
Information and Communications Technology	√	√	√
Financial Services	-	-	√

Modern Slavery Risk Profiling – Close the Gap Program

To close potential gaps, a targeted program was launched towards the end of 2023 to triage suppliers that landed on our top 50 list of suppliers in 2022, who hadn't been screened for modern slavery risks in more than 12-months and encourage high-risk suppliers to join Sedex, thereby improving transparency and accountability. Suppliers who complete the DOSCEL modern slavery questionnaire are provided with general feedback including a risk rating and modern slavery support document that includes access to free awareness training and information on services available.

Contracts

We have introduced modern slavery clauses to tender documentation for procurement related to building and construction, and cleaning services to ensure our suppliers align with our dedication to uphold human rights and foster a responsible and sustainable supply chain. This approach is consistent with our previous statement and will remain an important feature of our modern slavery prevention strategy.

Contractual Controls – Modern Slavery Contract Clauses	2021	2022	2023
Building and Construction	√	√	√
Cleaning Services	√	√	√

Vetting potential suppliers

For high risk spend categories, DOSCEL supplements its due diligence activities with further checks such as reviewing websites, checking whether a voluntary or mandatory modern slavery statement has been made publicly available and considering any available media coverage and its credibility. All new suppliers undergo the vetting process for modern slavery risks prior to entering into service agreements.

We recognise that whilst reviewing publicly available information can provide some insights, it may not reveal the full extent of a supplier's operations or potential issues.

Service Agreements

All DOSCEL Service Agreements include modern slavery clauses, irrespective of the monetary value of the services provided. This minimum standard has been maintained from the previous year.

A review of modern slavery clauses in our standard DOSCEL Service Agreement has commenced with the aim to strengthen the sufficiency and effectiveness of the clauses.

In addition to this, a new Education Recruitment Service Agreement has been introduced, which establishes a centralised recruitment agency contract for sourcing relief teachers. This initiative includes the implementation of an interview panel and features updated modern slavery clauses.

These clauses have also been revised for the building contract associated with St Josephine Bakhita Primary School.

Policy, standards, and programs

DOSCEL is committed to ensuring appropriate controls including policies, procedures and guidelines, and standards are in place to protect against modern slavery across the organisation’s internal operations. Below is a summary table describing these protective measures.

Policy, standards, and programs	Description	Role in mitigating modern slavery risk
Code of Conduct (DOSCEL Secretariat)	<p>Formal set of rules, principles, and ethical standards that sets out the professional standards of behaviour and actions of all employees of the DOSCEL Secretariat. The Code also focuses on the safety and well-being of children and young people.</p> <p>These standards exist alongside the standards of behaviour and performance required of employees under their contract of employment, DOSCEL policies, industrial agreements and relevant State and Federal legislation.</p>	Vital tool in mitigating modern slavery risk as it establishes our ethical foundation necessary to prevent, identify and address instances of modern slavery within DOSCEL’s operations and supply chain.
Victorian Child Safe Standards	Framework that contributes to creating safe, transparent, and accountable environments that prioritise the protection and well-being of children and young people.	<p>The introduction of new Victorian Child Safe Standards (‘CSS’) during 2022 was rolled out to all DOSCEL schools and builds on the significant work that has been undertaken in all DOSCEL schools to keep children and young people safe.</p> <p>Key changes to the CSS include the requirement to provide greater clarity on the governance, systems, and processes to keep children and young people safe.</p>
DOSCEL's Commitment Statement to Child Safety	Sets out DOSCEL’s commitment to providing a safe and nurturing culture for all children and young people in the Diocese of Sale.	DOSCEL commits to providing a safe and nurturing culture for all children and young people in the Diocese of Sale through implementing rigorous risk-management and employment practices.

Policy, standards, and programs	Description	Role in mitigating modern slavery risk
Complaints and Grievances Management Policy and School Complaint Handling Procedures	Framework that provides parent(s), guardian(s), carer(s) and/or student(s) and other members of school communities to make complaints via an effective complaint-handling system that has a clear process for resolving complaints, treats people fairly, is timely and provides those people involved in a complaint with a fair opportunity to respond to issues and to present their views.	Empowers individuals to contribute to the prevention of modern slavery by reporting concerns and violations.
Whistleblower Policy	Sets out guidelines and procedures established by DOSCEL to provide a confidential and secure mechanism for individuals to report concerns about unethical, illegal, or improper conduct within DOSCEL without fear of retaliation.	Empowers individuals to contribute to the prevention of modern slavery by reporting concerns and violations.
Employee Assistance Program ('EAP')	Promotes a healthy and supportive workplace culture.	Provides confidential and professional assistance to employees who may be experiencing personal or work-related issues that could affect their well-being and job performance. The EAP offers guidance and resources to help employees achieve a healthy work-life balance, manage stress, and navigate life transitions.

Case study – Strengthening supplier engagement and due diligence

In the 2023 procurement of Information and Communications Technology hardware and accessories, DOSCEL made a deliberate choice to partner with a supplier showing a commitment to enhancing their response to modern slavery prevention, rather than opting for a top performer in modern slavery due diligence disclosure. Despite initial shortcomings, the supplier demonstrated a willingness to learn and improve.

Through open dialogue and collaboration, DOSCEL is engaging with the supplier to address potential modern slavery risks, leveraging Sedex and ACAN Program Management to identify and rectify any existing issues.

Additionally, in the process of assessing finance lease options, DOSCEL recognises the role of the financial services sector in modern slavery prevention. Understanding the sector's potential impact across industries, DOSCEL set high standards for lenders, requiring a proactive approach to managing modern slavery risks.

To ensure alignment with these standards, DOSCEL introduced a multi-step screening process. This included gathering non-financial information from publicly available sources and requesting financial institutions to complete a modern slavery checklist. These measures provided valuable insights into the strengths and vulnerabilities of potential suppliers.

Through these initiatives, DOSCEL continues to strengthen its supply chain and advance its efforts in combating modern slavery.

Annual desktop review

DOSCEL completes a periodic internal audit of its suppliers where annual payment data is compiled and the 50 top suppliers by spend are assessed to provide insights into our spending patterns, supplier relationships and procurement processes. The desktop review has been particularly important for DOSCEL as it has created an opportunity for engagement and collaboration, particularly with departments associated with procurement in high-risk categories of Building and Construction, and Information and Technology industries and more recently Financial Services.

By focussing on suppliers with substantial financial transactions, DOSCEL can identify areas where there might be a higher potential of modern slavery. In addition to this, the method is one way that DOSCEL can prioritise its efforts on suppliers that have a greater impact on its operations and supply chain. This is a strategic approach and allows for a targeted and effective risk management strategy.

To determine the potential risks of modern slavery among our top spend suppliers, the data is surveyed to identify the high-risk categories we are utilising the most and to identify the level of due diligence that has been completed in these supplier relationships.

The annual desktop review has been completed over four reporting periods, allowing us to collect data for comparison. DOSCEL Secretariat payment data, along with primary and secondary schools, for the 12-month period, 1 January 2023 to 31 December 2023 is included in the internal audit. The results are summarised and discussed in the next section where we evaluate the effectiveness of our actions.

Remediation

DOSCEL is fully committed to collaborating with our suppliers to address issues, ensure effective remedies, and implement preventative measures in line with UN Guiding Principle 31, which emphasises the important of providing effective grievance mechanisms for affected stakeholders, including workers in supply chains.

Previously, DOSCEL referred to the Complaints and Grievances Management Policy, School Complaint Handling Procedure, and Whistleblower Policy. However, recognising the need for a more accessible and anonymous avenue for communication, we have transitioned to utilising DOMUS 8.7 as our primary grievance mechanism. Domus 8.7 provides ease of access and swift response that our internal policies cannot adequately provide.

DOMUS 8.7 is a reliable channel for workers, suppliers, and other stakeholders to report concerns related to modern slavery. This service ensures ease of access and anonymity for individuals seeking assistance. Upon reporting a concern, an assessment and case file are promptly created, and appropriate workflows are implemented based on the severity of the situation. While immediate danger situations are prioritised, all concerns are addressed on a needs basis.

In the event that indicators of modern slavery are observed, individuals are encouraged to utilise the DOMUS 8.7 service to report their concerns.

Through the implementation of DOMUS 8.7 and working towards establishing clear remediation procedures, DOSCEL is committed to ensuring that anyone who has concerns has access to a safe and effective pathway for addressing modern slavery concerns.

Below is a table indicating that no referrals to Domus 8.7 were made regarding workers in our operations and supply chain during the 2023 reporting period. Additionally, DOSCEL received no reports through internal grievance mechanisms concerning modern slavery indicators or incidents. It's important to note that the absence of reports does not necessarily indicate the absence of modern slavery.

2023	ACTIVITY	DOSCEL
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Criteria 5: Assessing the effectiveness of actions taken by us

At DOSCEL, we are committed to continuously evaluating the effectiveness of our actions in addressing modern slavery risks. Our efforts encompass a range of initiatives, including the development of policies and processes, provision of awareness training for staff, and the establishment of clear metrics to gauge progress.

Through a combination of data driven analysis, policy review, collaborative partnerships, and stakeholder feedback, we have ensured our strategies remain adaptive, responsive, and impactful.

The following section outlines an assessment of our ongoing efforts to combat modern slavery for the reporting period:

- The SSA delivered a presentation to the St Josephine Bakhita Working Party to introduce the topic of modern slavery and the opportunity for collaboration especially within the context of procurement of goods and services for the school.

- A total of 50 DOSCEL Secretariat staff completed two ACAN Training Modules, Introduction to Modern Slavery, and Modern Slavery Business Relevance.
- A total of 31 suppliers that landed on the 2022 top 50 list of suppliers were invited to complete the DOSCEL modern slavery questionnaire as part of the Modern Slavery Risk Profiling – Close the Gap Program. Of these, a total of 11 suppliers responded with completed questionnaires by 31 December 2023. A risk assessment was completed, and feedback provided to suppliers on ways they can strengthen their approach to modern slavery. This represents a 35% supplier engagement rate. We are continuing to receive responses and are continuing the program into 2024.
- As of 31 December 2023, DOSCEL had 6 suppliers registered on Sedex, providing transparency and accountability in our supply chain management practices.
- A new Education Recruitment Service Agreement, with updated modern slavery clauses has been introduced. The modern slavery contract clauses were updated for the building contract for St Josephine Bakhita Primary School. A major cleaning contract is also undergoing modern slavery clause review as well.
- We received commendation from a leading asset finance company, acknowledging DOSCEL as one of the first non-government entities they have observed to undertake a rigorous level of due diligence in financial services procurement.

Top 50 suppliers – Procurement data insights

- In 2023 the top three spending categories were Building and Construction, Information and Communications Technology, and Labour Hire. This scenario has remained consistent across the previous three reporting periods.
- Among our top spend suppliers, 30% have consistently been on the top 50 list for three consecutive years, while 38% have appeared for two consecutive years (e.g., 2022 & 2023). Additionally, 6% have appeared twice but not consecutively (e.g., 2021 & 2023) and 26% are new to the list as of 2023. This suggests that DOSCEL's spending patterns show a degree of predictability, with a preference for established suppliers.
- Out of the top 50 suppliers, 13 are reporting entities under the Act and were not contacted to complete a DOSCEL modern slavery questionnaire. Instead, we review their modern slavery statements, which are accessible on the Australian Government Modern Slavery Statements Register.
- Out of the 37 suppliers not subject to reporting under the Act, we had screened 21 for modern slavery risks through our questionnaire by 31 December 2023. We're actively engaging with our top 50 suppliers through our Modern Slavery Risk Profiling – Close the Gap Program, aiming to expand the reach of our Modern Slavery Framework across all spending categories. The table below shows the growth of our modern slavery risk screening, with roughly a 20% increase each year.

Reporting Year	2021	2022	2023
A. Total number of top 50 suppliers that are reporting entities under the Act.	7	10	13
B. Total number of top 50 suppliers that are not reporting entities under the Act and completed the DOSCEL modern slavery questionnaire by 31 December 2023.	5	14	21
Percentage = $B / (50 - A) \times 100$	12%	35%	57%

Criteria 6: Consultation with entities owned or controlled

This statement was developed with input from staff at the DOSCEL Secretariat and from primary and secondary schools in the Diocese of Sale. This consultation involved gathering information on supplier payments and exchanging disclosure information regarding modern slavery issues.

DOSCEL is dedicated to a collaborative approach in addressing modern slavery risks throughout our supply chain. We actively engage with our procurement staff to exchange knowledge and seek insights for achieving best practices.

Additionally, senior management, executives, and directors have been kept informed about the actions taken during this reporting period.

In preparing this statement, we consulted various departments within the DOSCEL Secretariat, including Finance, Information Technology, Infrastructure and Support Services, and Industrial Relations and Human Resources. We are also working closely with the working party planning the new St Josephine Bakhita Primary School to enhance our procurement processes.

DOSCEL regularly consults with ACAN for guidance on implementing our Modern Slavery Framework.

Criteria 7: Current and future initiatives

DOSCEL strives to reach best practice human rights due diligence for ethical sourcing of products and services for the Secretariat and for the schools it owns and controls.

Throughout the reporting period, DOSCEL invested significantly in resourcing and capacity building, focussing on awareness campaigns, internal working group development, and establishing our partnership with ACAN. These efforts have extended the reach of our due diligence activities and introduced new processes.

Looking ahead to 2024, DOSCEL is transitioning towards the development of a multi-year plan to address modern slavery, guided by ACAN. This strategic shift will allow us to optimise resource allocation for sustained impact, fostering a more integrated strategy that holistically addresses modern slavery risks.

While our due diligence efforts have primarily focussed on Tier 1 (direct) suppliers, multi-year planning aims to expand these efforts further down the supply chain. Furthermore, by expanding our planning horizon, DOSCEL aims to cultivate a clearer long-term vision for combating modern slavery, positioning us to make meaningful and lasting change.

Appendix 1 – Entities owned and operated by DOSCEL



Diocese of Sale
Catholic Education Ltd

**Catholic Education
Office**
WARRAGUL
ABN 12 716 912 401



Nagle College
BAIRNSDALE
ABN 12 659 477 973



**St Francis Xavier
College**
BEACONSFIELD
ABN 68 814 427 817



**St Peter's
College**
CRANBOURNE
ABN 13 100 996 768



**Mary MacKillop
Catholic Regional
College**
LEONGATHA
ABN 67 237 962 919



Marist-Sion College
WARRAGUL
ABN 96 914 121 604



**St Mary's
Primary School**
BAIRNSDALE
ABN 99 751 861 942



**St Catherine's
School**
BERWICK
ABN 36 256 164 819



**St Michael's
Primary School**
BERWICK
ABN 20 750 217 023



**Columba Catholic
School**
BUNYIP
ABN 42 951 717 425



**Lumen Christi
Catholic
Primary School**
CHURCHILL
ABN 32 934 149 808



**Our Lady Star
of the Sea
Primary School**
COWES
ABN 85 122 734 010



**St Thomas
the Apostle
Primary School**
CRANBOURNE EAST
ABN 30 917 760 611



**St Agatha's
Primary School**
CRANBOURNE
ABN 35 217 156 106



St Therese's Primary School
CRANBOURNE
ABN 61 587 505 023



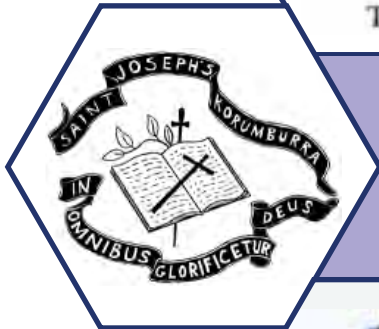
St Ita's Primary School
DROUIN
ABN 81 170 311 593



St Michael's School
HEYFIELD
ABN 32 427 767 599



St John School
KOO WEE RUP
ABN 49 188 161 463



St Joseph's Primary School
KORUMBURRA
ABN 30 588 371 259



St Brendan's School
LAKES ENTRANCE
ABN 87 996 634 606



St Laurence O'Toole Primary School
LEONGATHA
ABN 89 522 669 939



St Mary's Primary School
MAFFRA
ABN 40 849 663 739



St Kieran's Primary School
MOE
ABN 24 939 316 336



Sacred Heart Primary School
MORWELL
ABN 68 481 560 440



St Vincent de Paul Primary School
MORWELL EAST
ABN 94 949 730 469



St James Catholic School
NAR NAR GOON
ABN 44 243 521 204



Don Bosco Primary School
NARRE WARREN
ABN 71 386 192 144



Mary MacKillop Primary School
NARRE WARREN NORTH
ABN 66 897 749 404



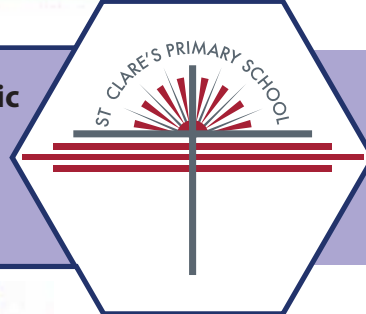
**Trinity Catholic
Primary School**
NARRE WARREN
SOUTH
ABN 50 374 081 685



**Immaculate Heart of
Mary School**
NEWBOROUGH
ABN 64 121 604 203



**St Brigid's Catholic
Primary School**
OFFICER
ABN 67 249 383 806



**St Clare's
Primary School**
OFFICER
ABN 75 610 985 359



**St Joseph's
School**
ORBOST
ABN 29 140 710 293



St Patrick's Primary School
PAKENHAM
ABN 51 527 438 298



**St Mary's
Primary School**
SALE
ABN 45 721 166 576



**St Thomas'
Primary School**
SALE
ABN 58 573 917 491



**St Patrick's
Primary School**
STRATFORD
ABN 62 467 701 955



St Joseph's Primary School
TRAFALGAR
ABN 23 218 937 906



**St Gabriel's
Catholic School**
TRARALGON WEST
ABN 61 718 702 364



**St Michael's
School**
TRARALGON
ABN 62 095 609 409



**St Joseph's
Primary School**
WARRAGUL
ABN 53 017 543 950



**St Angela of the Cross
Primary School**
WARRAGUL
ABN 86 597 965 923



**St Joseph's
Primary School**
WONTHAGGI
ABN 19 090 361 804



St Mary's School
YARRAM
ABN 37 713 649 762

MODERN SLAVERY STATEMENT

2023

1 January - 31 December



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) and Sandhurst Catholic Early Childhood Education and Care (SCECE&C Ltd) are committed to the safety, participation and empowerment of all children.

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This statement has been made on behalf of Catholic Education Sandhurst Limited (CES Ltd) ABN 94 643 894 384 and Sandhurst Catholic Early Childhood Education and Care (SCECE&C) ABN 98 643 978 205. 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 94 643 894 384
120 Hargreaves Street Bendigo Vic 3550
PO Box 477, Bendigo Vic 3550
P: 03 5443 2377
E: enquiries@ceosand.catholic.edu.au
E: mslo@ceosand.catholic.edu.au
W: www.ceosand.catholic.edu.au



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

ABN 98 643 978 205
120 Hargreaves Street Bendigo Vic 3550
PO Box 477, Bendigo Vic 3550
P: 03 5443 2377
E: scececenquiry@ceosand.catholic.edu.au
W: www.scecec.org.au



MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the governing body of Catholic Education Sandhurst Limited as defined by the *Modern Slavery Act 2018 (Cth)*¹ ("the Act") on Tuesday 14 May 2024.



Dr Daniel White

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

Signature of Responsible Member

This Modern Slavery Statement was signed by a responsible member of Catholic Education Sandhurst Limited as defined by the Act on Tuesday 14 May 2024.



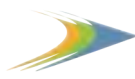




Most Reverend Shane Mackinlay

Bishop of Sandhurst

VISION

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) and the two kindergartens conducted by Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C 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.

We believe:

-  that the Gospel is 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 identity of the Sandhurst Catholic Schools and Early Learning Centres 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 and kindergartens.

CES Ltd Modern Slavery achievements in 2023

To begin the CES Ltd Modern Slavery eradication journey, several initiatives stated in 2021, when CES Ltd was formed, to build a framework for the future of CES Ltd. These initiatives were further developed and embedded in 2022 and 2023 with the below milestones achieved;

- Developed a Modern Slavery Action Plan, promoted on CES Ltd website to current and future suppliers.
- Included Modern Slavery clauses in supplier contract templates.
- Utilisation of Vendor Panel for tender processes to assist with supplier selection including responding to Modern Slavery requirements.
- Attendance at ACAN webinars.

Our plans for 2024

To strengthen our mitigation practices going forward the following initiatives are in development for 2024:

- A Modern Slavery communications strategy.
- Modern Slavery awareness training to be rolled out through a new training program currently being implemented (CompliLearn).
- Release the CES Ltd Procurement Policy with greater focus on striving to abolish modern slavery throughout our supply chain.
- A due diligence program for key suppliers.
- A supplier Code of Conduct.
- A contact system for escalation protocol and remedy pathways policy and framework review.
- 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's 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

and

CES LTD
BOARD CHAIR

Dr Daniel White



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. Pope Francis has encouraged us to appreciate this community in widest possible sense, and we are becoming increasingly aware that our activities often have impacts stretching far beyond our local community.

There are many ways in which the various forms of modern slavery can affect the operations, business partnerships 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 and Sandhurst Catholic Early Childhood Education and Care Ltd is committed to doing all in its power to assist in eliminating these practices.

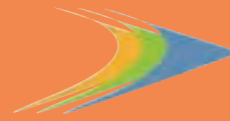
This is the third Modern Slavery Statement of Catholic Education Sandhurst Ltd since its new corporate structure was established in January 2021. We are very pleased to see that over the last year, the Company has taken significant steps to embed awareness of modern slavery in its operations, and to further identify and address ways in which it might be at risk of supporting modern slavery.

The Company's plans for 2024 focus especially on communication and training across its schools, kindergartens and offices. This will assist in promoting wider awareness in staff and students and identifying both potential risks and potential opportunities for addressing them. We are confident that these strategies will help all involved in Catholic education in the Sandhurst Diocese to become more alert to the risks 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

Dr Daniel White
CES Ltd Board Chair

REPORTING CRITERION 2

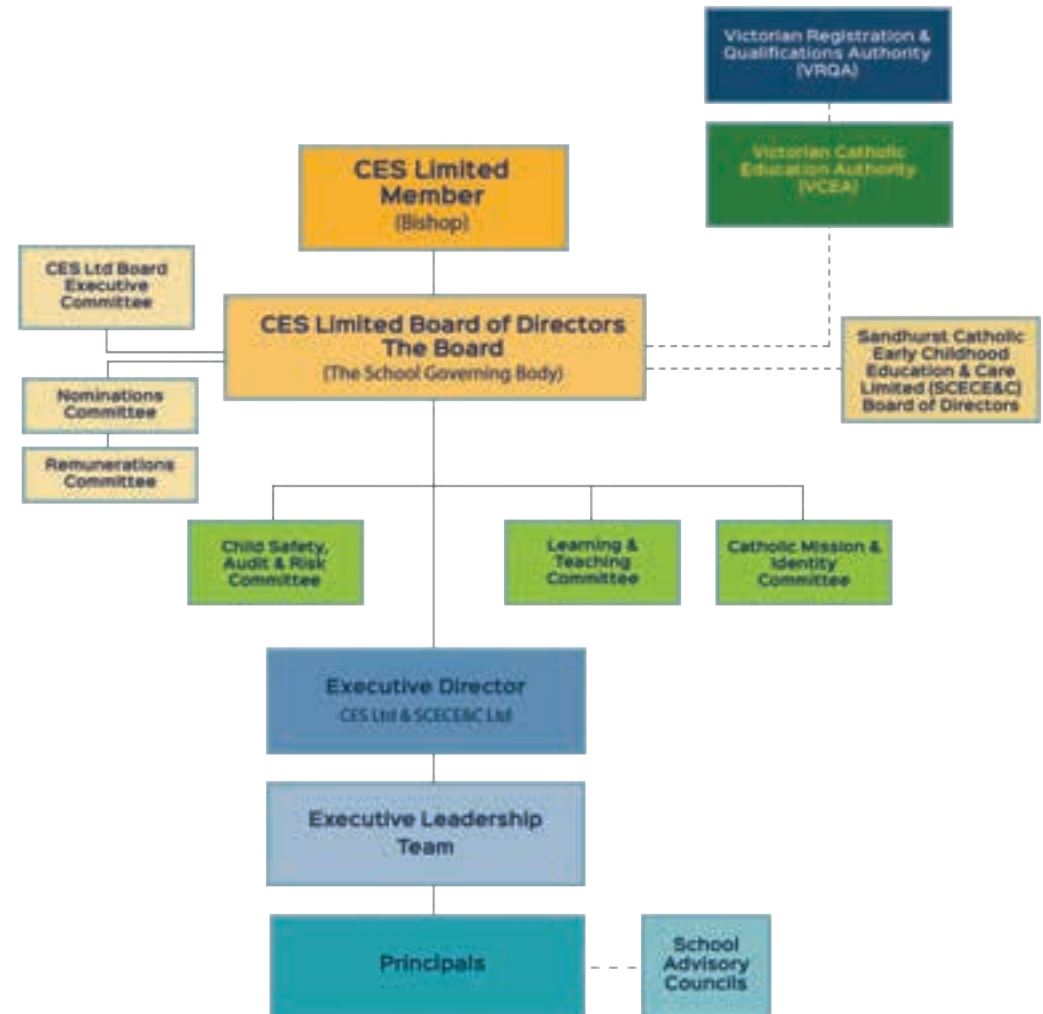


Catholic Education Sandhurst Limited (CES Ltd) - Governance Framework

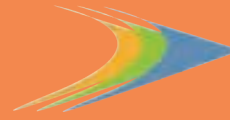
In 2021 the Bishop (Bishop Shane Mackinlay) established the Company, Catholic Education Sandhurst Limited (CES Ltd), to assume the ownership and operation of fifty-two Catholic schools previously operated in an unincorporated form, and to be responsible for the operation of any further schools that will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

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 the Board to ensure that each school 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 CES Ltd 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 2



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 1359 – 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.

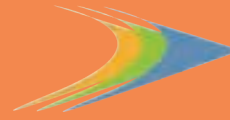
The Executive Director has delegated responsibility to report to the Board on the implementation of the policies:

- 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 Sandhurst Catholic schools; and
- fulfil its legal obligations in respect of each Sandhurst Catholic school.

REPORTING CRITERION 2



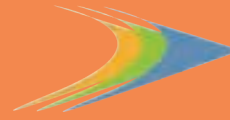
Child Safety, Audit and Risk Committee (CS,A&R Committee)

Supporting the responsibilities of CES Ltd and SCECE&C Ltd Boards are their respective CS,A&R Committees. The Terms of Reference of the committees state that the committees are to provide strategic advice and high-level thinking on matters pertaining to child safety, auditing, risk mitigation, financial and investment management, OH&S and modern slavery, ensuring quality reporting and compliance with statutory and regulatory requirements.

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

SCECE&C Ltd 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, with a growth strategy to develop further Early Learning Centres. From January 1, 2021, SCECE&C Ltd 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 Kindergarten Strathfieldsaye. SCECE&C Ltd 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 Ltd operates through an independent representative and expert Board of Directors and 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

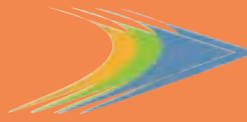
“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a 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

For 169 years, Catholic schools have been an integral part of the Diocese of Sandhurst, with the first school opening on the Bendigo Goldfields in 1853. Since then, 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 proud to be part of the long tradition of Catholic education in Australia, providing countless young people with enriching experiences and skills they acquired in Catholic learning environments.

Today, CES Ltd oversees and operates fifty-two Catholic schools, offering Primary, Secondary, and Specialist Settings to cater for the diverse needs of the community. We take pride in our responsibility to provide high-quality education that upholds our values and traditions. Additionally, CES Ltd will continue to operate future schools established by the Company known as Sandhurst Catholic Schools, further expanding our contribution to the education landscape of the region.

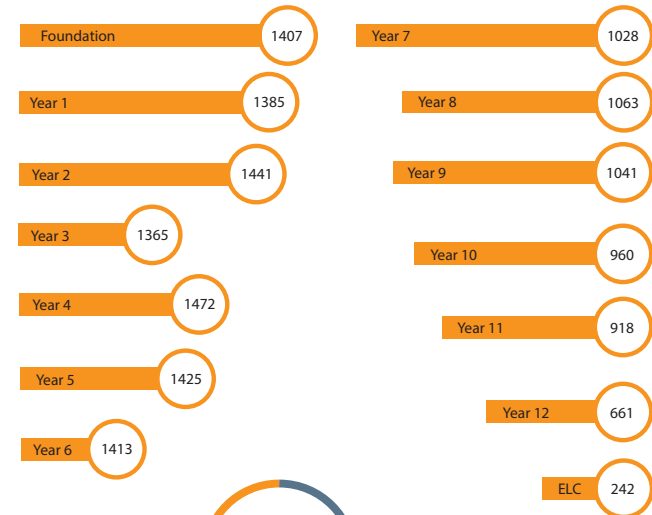
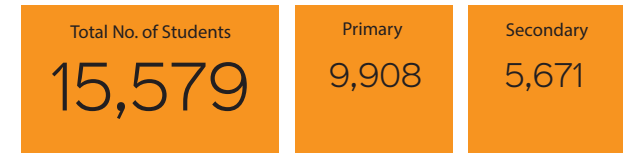
REPORTING CRITERION 2



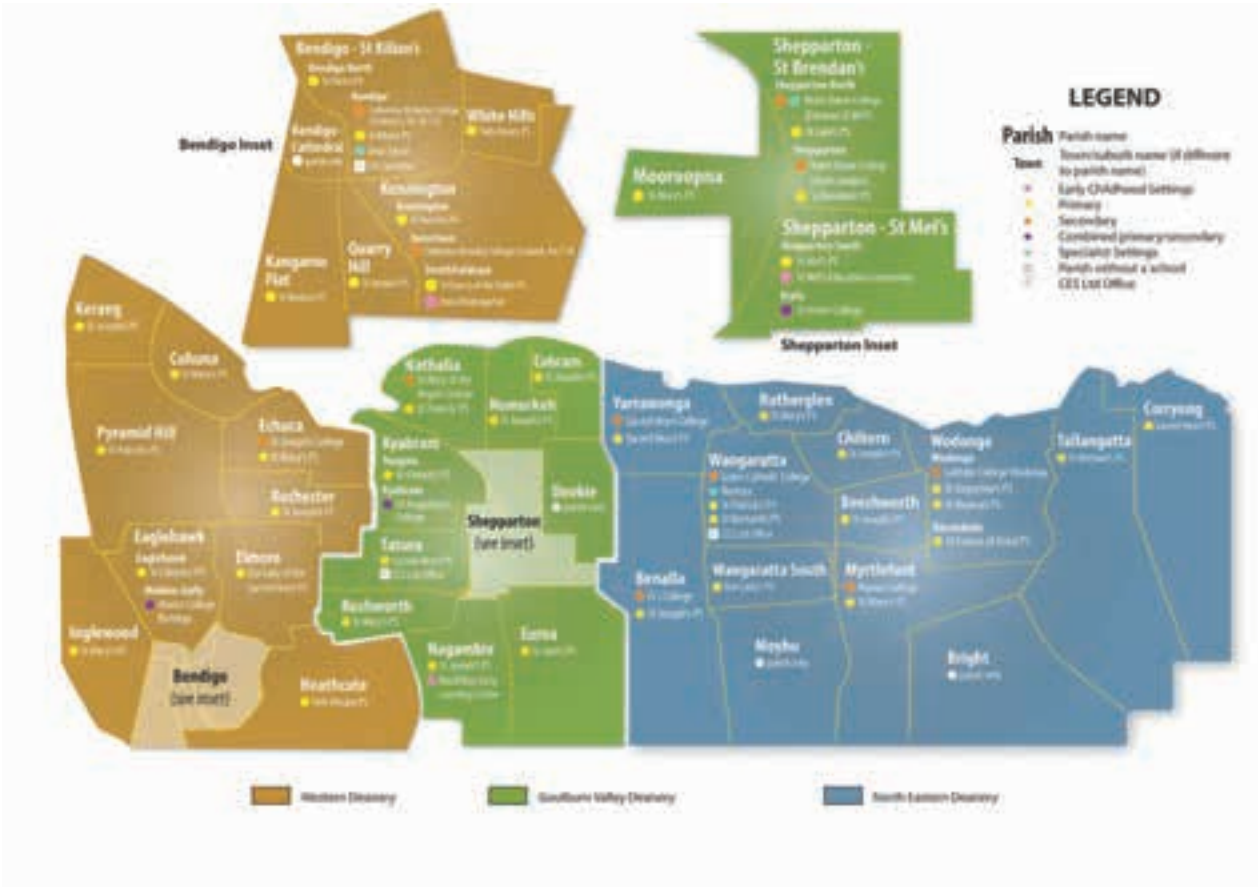
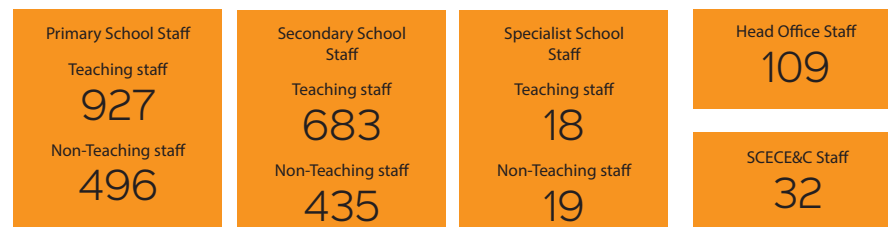
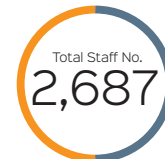
Workforce Profile



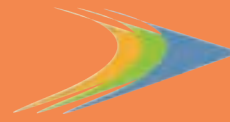
CES Ltd Student Population



CES Ltd Staff Population



REPORTING CRITERION 2



The CES Ltd Head Office Structure

The CES Ltd Head Office provides support for the management of all CES Ltd schools as well as SCECE&C Ltd. The CES Ltd Executive Director, together with the CES Ltd Executive Leadership Team, is responsible for providing leadership and direction across all areas of the company's operations. This includes ensuring compliance with regulations and standards, as well as driving the continuous improvement of both CES Ltd schools and the CES Ltd Head Office. Their goal is to foster a culture of excellence and innovation while upholding the values of the Catholic education community.

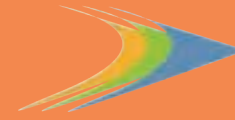
In 2022, CES Ltd underwent a significant restructure and created a new team to oversee Strategy Risk and Governance. The purpose of this team is to ensure that CES Ltd are operating within Victorian Catholic Education Authority (VCEA)¹, The Victorian Registration and Qualifications Authority (VRQA)² and legislative requirements.

The two entities collectively employ a team of 109 staff members located across three regional locations: Bendigo (Head Office), Tatura, and Wangaratta. The CES Ltd Head Office is deeply committed to fostering a collaborative partnership with each school and parish community, as well as the broader Catholic education community of Victoria. They are dedicated to working in a spirit of co-responsibility to shape the culture, improve performance, and enhance the capacity of both the schools and the Catholic Education Office.



1. The VCEA is the single body representing Catholic education providers in Victoria, working on behalf of diocesan education companies in Melbourne, Ballarat, Sale and Sandhurst, and Religious Institute and Ministerial Public Juridic Person education entities to promote Catholic education and advocate for students' needs. They are also responsible for receiving, distributing and reporting on government funding provided for Catholic schools in Victoria

2. The Victorian Registration and Qualifications Authority (VRQA) is Victoria's education and training regulator. They are an independent statutory authority that works to assure the quality of education and training in Victoria. They apply standards to education and training providers and accredit courses and qualifications.



Operations and Supply Chains

As an educational institution our largest expenditure is the salaries of teachers, educators and support staff whose salaries and employment related costs represents the majority of the organisation's annual expenditure. In 2023 CES Ltd had a total turnover of \$350 million which includes all consolidated entities.

The total workforce profile of CES Ltd includes 2,687 direct employees, while the total number of goods & services, contractors and suppliers is in excess of 12,000.

Schools are supported through CES Ltd in providing support services to schools which include:

- Leadership
- Catholic Mission, Learning and Teaching
- School Development and Support
- People and Culture
- Student Pastoral Wellbeing
- Operations
- Strategy, Risk, and Governance

Delegations Framework

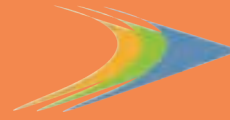
At present schools have full autonomy to engage suppliers, however as part of the incorporation changeover a Financial Delegation oversight and approval process has been implemented dependent on the value of the engagement. The purpose of the Delegations Framework is to establish a framework for delegating powers, duties or functions of the CES Ltd Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

Pope Francis's message is to make a choice for respecting the rights and dignities of every human being by mitigating modern slavery risk in our supply chain and is the strategic goal for Procurement at CES Ltd.

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

Pope Francis (2014)

REPORTING CRITERION 2



CES Ltd has developed the following procurement values to guide decision making.



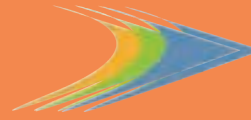
Responsibility – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our 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 across the Sandhurst region. CES Ltd adopts Social Procurement practices to actively promote accessibility and inclusion across our Supply Chain seeking to create a positive influence and opportunities within local communities to support growth for First Nations communities, inclusion of all genders and sexualities and opportunities for Victorians with disabilities.

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



Operational Risks

CES Ltd faces various operational risks that can have a significant impact on the organisation's reputation and operations. One of the most critical operational risks is modern slavery, which is a grave violation of human rights that affects millions of people globally. CES Ltd has continued its partnership with the Australian Catholic Anti-Slavery Network (ACAN), allowing CES Ltd to establish a robust relationship that will continue to assist us to identify and assess risks within the organisation, reducing the chance of modern slavery practices within our supply chains.

The modern slavery operational risks outline three key areas that CES Ltd and SCECE&C Ltd need to consider identifying and addressing modern slavery risks within the organisation. These areas include supplier engagement, supply chain mapping, and due diligence.

Service Provider and Supplier engagement is a crucial component of modern slavery risk management within CES Ltd. Service Providers and Suppliers can pose a significant risk if they engage in unethical practices such as forced labour or human trafficking or unknowingly procure goods from high-risk international regions.

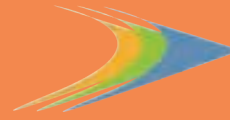
By engaging with Service Providers and Suppliers and ensuring that they adhere to ethical standards, CES Ltd can reduce the exposure to modern slavery risks. CES Ltd will also continue to encourage and support our schools with their Supply Chain in taking steps to mitigate modern slavery risks within their own supply chains.

Supply chain 'Category Mapping' is another critical aspect of modern slavery risk management that CES Ltd will continue to explore. The aim is to have a comprehensive understanding of our supply chains and identify any areas where modern slavery risks may exist. This includes identifying countries or industries that are at high risk for modern slavery and understanding the risks associated with specific products or services. Working towards categorising and mapping supply chains will enable CES Ltd Procurement & Contracts team to develop effective strategies to mitigate modern slavery risks and ensure that our organisation is not contributing to this issue.

Due diligence is the final area that CES Ltd will continue to focus on educating and supporting our staff, schools and SCECE&C Ltd centres to manage the operational risks associated with modern slavery. This includes reviewing Service Provider, Contractor and Goods & Services contracts and high expenditure goods and materials purchases, as the organisation become more resourced and mature in this area, assessing their labour practices, and monitoring their compliance with ethical standards.

With the support of the CES Ltd Board and the Child Safety, Audit and Risk Committee, CES Ltd has a Risk Management Framework that defines our risk operating model, appetite, responsibilities, and methodology.

REPORTING CRITERION 3



This Framework supports the approach to managing modern slavery risks through good governance and accountability following the ISO 3100:2018 Risk Management – Guidelines. Our Risk Management Framework and accompanying policies are crucial in effectively managing operational risks, including those associated with modern slavery. These documents provide a structured approach to identifying, assessing, and mitigating risks, and ensuring that we continue to operate in a responsible and sustainable manner.

Our People

CES Ltd takes the responsibility towards our staff, students and community very seriously. CES Ltd is committed to providing a safe and inclusive work environment where all employees and workers are treated fairly and with respect. CES Ltd believe that treating our staff well is not only the right thing to do, but it also makes good business sense, as it helps us attract and retain top talent and maintain our reputation as a responsible and ethical organisation.

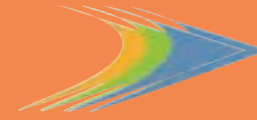
To mitigate the risk of modern slavery within our operations, CES Ltd have implemented several measures. These include:

- **Robust recruitment practices:** CES Ltd have established clear policies and procedures for recruitment and selection, including background checks and references, to ensure that all employees and workers are recruited in a fair and transparent manner.
- **Training and awareness:** CES Ltd are introducing training and awareness programs for our employees and workers to help them recognise and report any signs of modern slavery or other unethical practices.
- **Ethical standards and code of conduct:** CES Ltd have established clear ethical standards and a code of conduct that all employees and workers are required to follow. This includes a commitment to respect human rights and to report any suspected cases of modern slavery or other unethical practices.
- **Feedback mechanisms:** CES Ltd is working towards establishing clear feedback mechanisms that employees and workers can use to raise concerns or complaints about any issues they may face at work.

In addition to these measures, the organisation is working towards having the appropriate resources to regularly review and monitor our operations to identify and address any potential risks of modern slavery. Our aim is to work closely with our suppliers and partners to ensure that they are adhering to ethical standards and that they are taking appropriate measures to manage any modern slavery risks within their own operations.

CES Ltd, believe that our people are our greatest asset, and are committed to treating them with the respect and dignity they deserve. By taking proactive steps to mitigate the risk of modern slavery within our operations, CES Ltd is not only fulfilling our responsibilities as a responsible organisation, but also contributing to a fairer and more just society.

REPORTING CRITERION 3



Through the ACAN Program, CES Ltd and SCECE&C Ltd continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers and often contracted through labour hire companies.

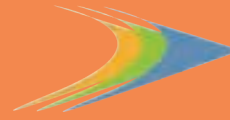
Labour Hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from the community.

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant Workplace Health and Safety (WHS) risks such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environments. Modern slavery risks are similar to those faced by cleaners. Subcontracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.



Supply Chain Risks

CES Ltd's finance systems are currently decentralised, with finance accounting systems (Technology One, SAS and Synergetic) being used across the organisation as a finance function, as opposed to a complete Supply Chain Purchase to Pay (P2P) management system. The decentralisation of data and inconsistent data entry across these platforms requires future resource investment to manage supply chain risk and improve analysis and reporting in the future.

As such the volume of goods and service providers, and the risk analysis is a high-level view based on school and head office data.

Using the data available from all CES Ltd entities capturing invoice history valuing \$119m AUD to capture the top 50 suppliers of this data pool by spend as well as suppliers of key high-risk goods and services.

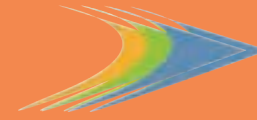
The highest risk areas identified for Educational institutions are:

1. Building and Construction
2. Furniture and Office Supplies
3. ICT Hardware
4. Cleaning and Security
5. Events and Events Management
6. Food and Catering Services

Key Expenditure Categories



REPORTING CRITERION 3



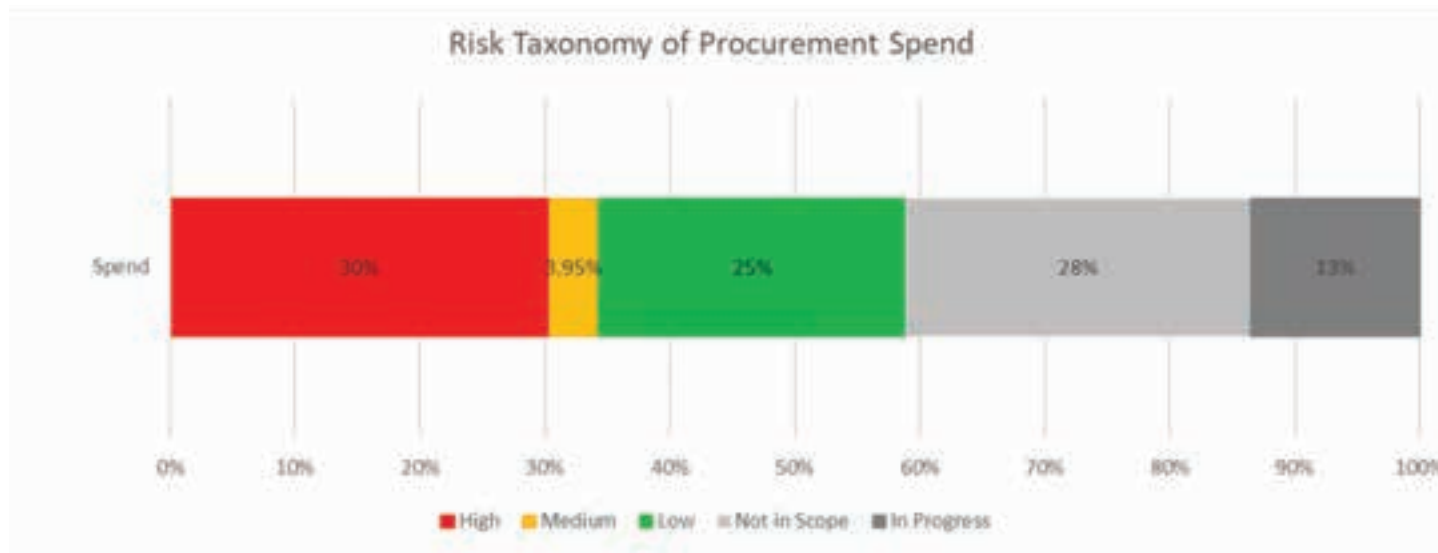
Spend Data Analysis

CES Ltd High Risk Spend Categories

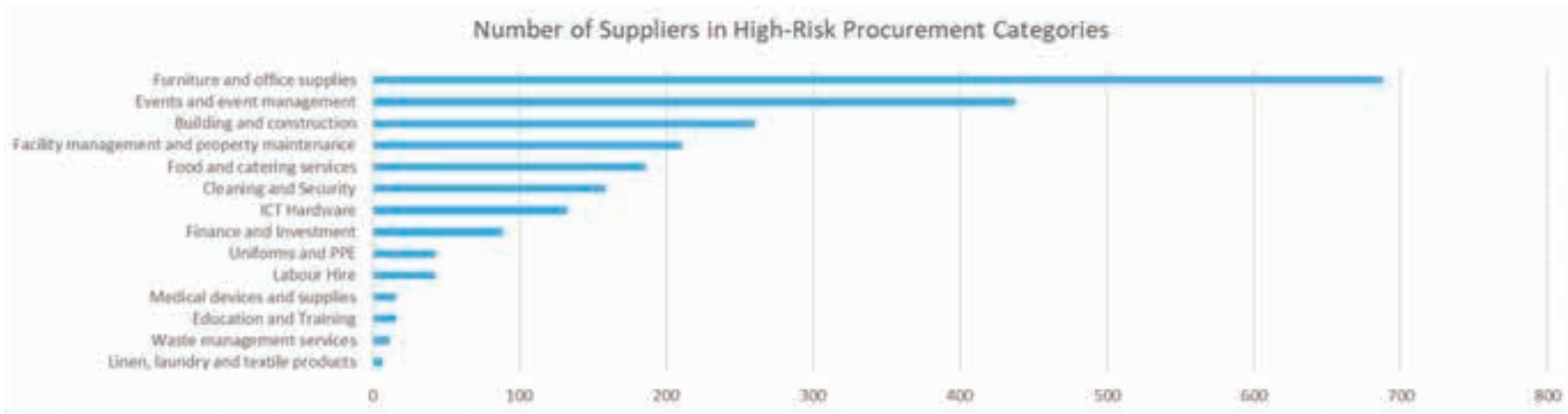
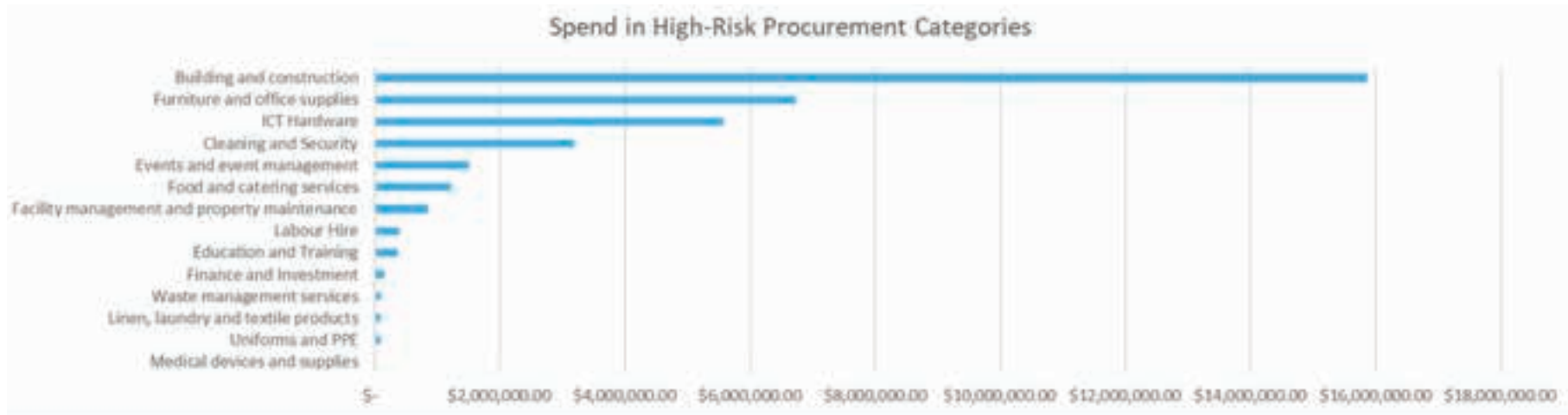
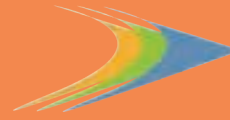
CES Ltd High Risk Spend for the calendar year 2023 was \$36.2m from a total of 2,302 suppliers. The split between high and low risk for spend was 30% and 25% respectively and the number of suppliers was 18% high risk and 2% low risk.

Building & Construction related spending (\$15.8m) presents the greatest spend risk for CES Ltd at 44% of total high risk spend, although the lower number of suppliers (261) helps mitigate this risk.

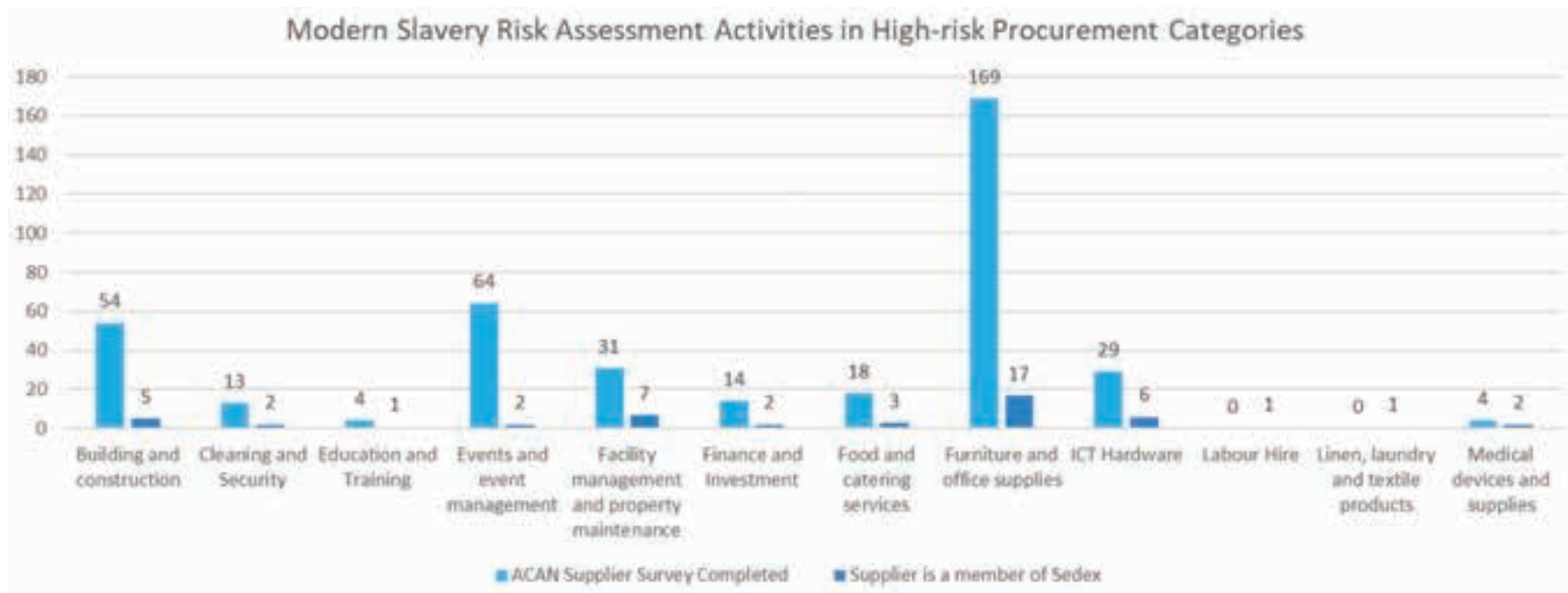
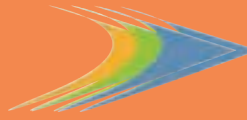
The Furniture and Office Supplies category accounts for the highest number of high-risk suppliers (688) and the second highest spend (\$6.7m). These two spending categories account for 63% of CES Ltd high risk spend.



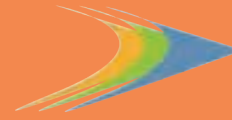
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REPORTING CRITERION 3

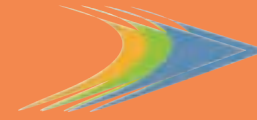


When procuring goods and services the table below identifies 4 key risk factors which can indicate an increase of modern slavery in supply chains:

Sector	Example of Goods or Service with Potential Risk	Example of Labour Rights Risk
Industry Sector	CES Ltd and SCECE&C 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
Commodity or Product	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 and SCECE&C 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.
Geographic Location	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 and SCECE&C 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.
Workforce Profile	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 will implement a process to engage with high spend suppliers and invite them to join Sedex and Vendor Panel. In doing so, Service Providers, Contractors and Suppliers will be able to complete a comprehensive self-assessment questionnaire (SAQ). CES Ltd will have access to results of the SAQ and any corresponding red flags factors that may contribute to modern slavery practices. Currently CES Ltd has a decentralised data system and collation of this data is under development.

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 considered a High Risk procurement activity. A review of this process may be required in future by CES Ltd.



Actions taken to assess and address risks

In 2023 CES Ltd Procurement Team commenced tendering to mitigate risk in the high-risk area of Cleaning Contractors, as well as Chemical and Consumable suppliers with the aim to provide schools and offices with a Preferred List of Providers that have been vetted to Modern Slavery Risk and inducted with Modern Slavery Training.

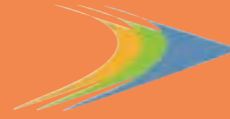
The Procurement Team is continuing to work with Schools and Offices internally to promote and educate staff on the Procurement goal and values. These tools are to support our social value decision making processes in alignment with the CES Ltd Strategic Plan and Catholic Social Teachings and are designed to encourage a balanced, conscious, “moral decision” based on value alignment, that supports our strategic plan objectives for “Responsible Stewardship Communities”.

The current practices involving the schools and offices using three different accounting systems and autonomy over supplier selection, has caused a high-risk issue with data integrity and insight reporting. Due to inconsistent data across various accounting systems, the consolidation of the information is difficult to gain category analysis of the Supply Chain.

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

- **Continued partnership with the Australian Anti-Slavery Catholic Network (ACAN)**
- **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.
- **CES Ltd Modern Slavery Policy** - CES Ltd implemented a Modern Slavery Policy in 2021. 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 on Operations and Supply Chain.**

REPORTING CRITERION 4

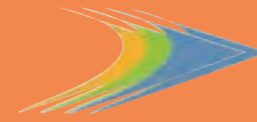


- **Completed Modern Slavery awareness training through ACAN** - The two MSLO have completed modern slavery training-learning modules and are developing a training session for all of the organisation. E-learning modules cover;
 - » ACAN- Modern Slavery 101
 - » ACAN- Business Relevance
 - » ACAN- Implementing a Modern Slavery Risk Management Program
- Commemorating the Feast Day of St Josephine Bakhita on the 8th February to recognise victims of modern slavery.
- CES Ltd **Social Justice Reference Group** initiatives / website

Supplier engagement in 2023

- CES Ltd continued to include modern slavery clauses in the terms of Service Agreements and in tendering RFP templates for offices and schools to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CES Ltd.
- 57 suppliers became members of Sedex, one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains. The CES Ltd Procurement team now has visibility over these suppliers, Self -Assessment Questionnaire responses and social audit results.
- Sedex provided schools with the resources to help make sustainable and ethical sourcing decisions.
- The Guiding Principles of Procurement continued to support Schools and Business units to view Procurement activities as a conscious moral decision
- In 2023 CES Ltd conducted a tender for cleaning providers developed a preferred supplier list that included modern slavery requirements.

REPORTING CRITERION 4



Modern Slavery Action Plan and Road Map

CES Ltd is committed to following 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
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

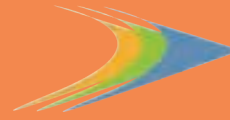
STEP 4: Engage, Educate and Respond

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

REPORTING CRITERION 4



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.

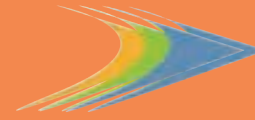
When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact the Modern Slavery Liaison Officers (MSLO) in the first instance. Then the MSLO will contact the relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation,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

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, CES Ltd agencies have access to the expertise and independent advice available through Domus 8.7. CES Ltd agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

REPORTING CRITERION 5



Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach

Domus 8.7 overview:

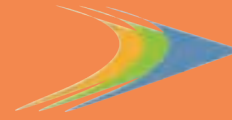
- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA

Measuring Effectiveness of actions taken

Modern Slavery Baseline

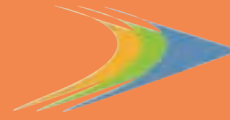
The Baseline data demonstrates continuous improvement and captures the direct impact of actions, and helps CES Ltd understand the pace of change and set future direction. The data demonstrates increased engagement with suppliers of goods and services. The increased completion of the ACAN supplier survey improved identification of suppliers where the completion of the SEDEX SAQ would support managing modern slavery risk in their own operations and supply chains.

REPORTING CRITERION 5



Catholic Education Sandhurst	Activity	2023	2022
Internal / Staff	Hours spent on modern slavery activities	30	30
	Individual staff completed e-learning	0	0
	E-learning modules completed	5	0
External / Supplier Engagement	Number of suppliers across high-risk categories	12597	n/a
	Number of ACAN Supplier Surveys completed	317	0
	Supplier staff attending capacity building webinars	1	0
	Invited to join Sedex	148	0
	Joined Sedex	57	0
	Sedex SAQ completed	0	0
	Social audits	0	0
	Corrective actions	0	0
DOMUS 8.7 External Referrals	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

CES Ltd Board and Child Safety, Audit and Risk Committee 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.



Maturity Assessment

The Maturity Assessment provided by ACAN replaced the previous Gap Analysis and assists entities in determining areas of focus. The Assessment helps focus on the maturity of our modern slavery risk management approach to aim for continuous improvement. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

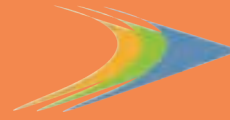
1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

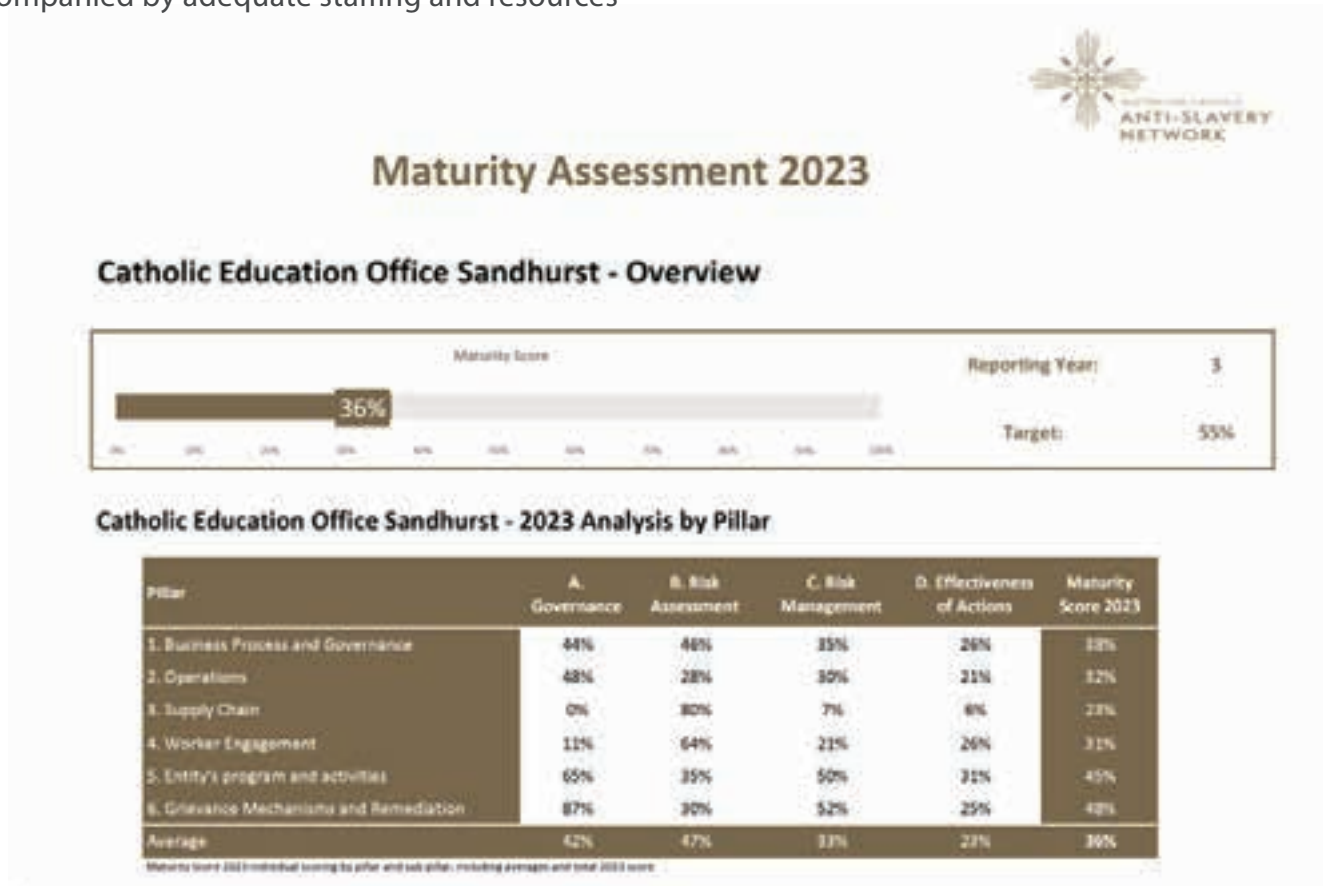
This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.-
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

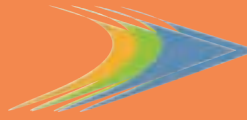
REPORTING CRITERION 6



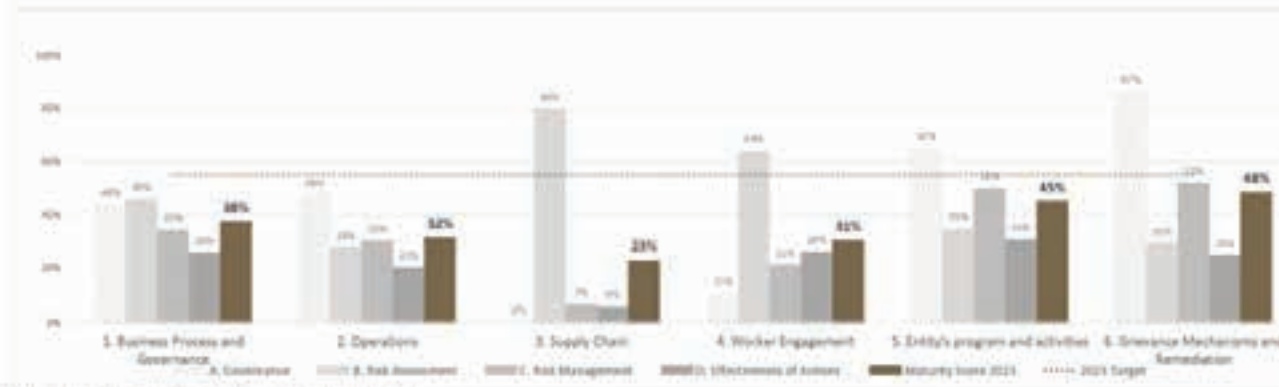
For 2023, CES Ltd's score falls in the 31% - 50% range indicating an Emerging Practice level. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means our processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources



REPORTING CRITERION 6



Maturity Score 2023 comparative to target and maximum scoring, by pillar

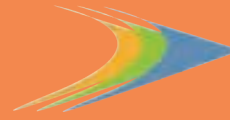


Maturity Score 2023 comparative individual scoring by pillar and sub-pillar

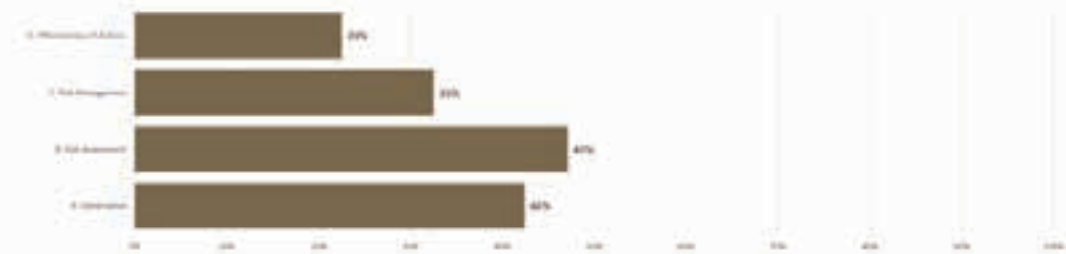
Notes:

- Participation in Donor 8.7 Remediation services was incorporated into scoring of pillar 6: Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Donor 8.7 Remediation services activities.
- Participation in the ACAN Program was incorporated to Supply Chain, increasing the level of score across Risk Assessment (ACAN Terms and supplier engagement activities) and Effectiveness of Actions (Baseline Data). This will be removed in the 2024 Maturity Assessment for entities not actively participating in the ACAN Program activities.

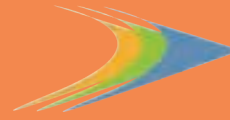
REPORTING CRITERION 6



Milady Issue 2021. Comparative analysis of 2021 performance by sub-pillar with sub-pillar description



Milady Issue 2021. Comparative analysis of 2021 performance by sub-pillar



Action Planning 2024

Catholic Education Office Sandhurst - Action Planning 2024

Recommended focus Areas for 2024

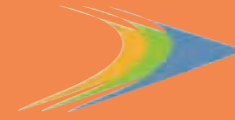
Pillars:	
4. Worker Engagement	31%
2. Operations	82%

Sub-Pillars	
D. Effectiveness of Actions	22%
C. Risk Management	83%

2024 Commitment of Actions - Entity Profile

The Entity has committed to the following actions on their 2023 Entity Profile:

Action 1	A modern slavery communications program & training for head office staff & principals
Action 2	A due diligence program for key suppliers is in development
Action 3	A contact system for escalation protocol and remedy pathways policy and framework review

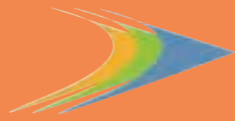


Consultation with Entities Owned or Controlled

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 the CES Ltd Chief Operating Officer consulted with different functional departments across CES Ltd and SECEC&C Ltd as well as ACAN and other participating members of the ACAN network.

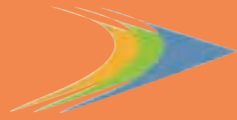
This consultation with ACAN and other departments has informed the approach to ensure it is appropriate and effectively tailored to reflect our organisational context and will be an ongoing consultation process for future initiatives, activities and statements.



CES Ltd Modern Slavery Liaison Officers participated in the following ACAN webinars:

2023	ACAN Webinar topics
23 February	Working Group Updates
30 March	Working Group Updates
27 April	Working Group Updates
25 May	Working Group Updates
29 June	Working Group Updates
27 July	Working Group Updates
31 August	Working Group Updates
28 September	Working Group Updates
26 October	Working Group Updates
30 November	Working Group Updates

2023	ACAN Supplier and capacity building
15 March	Construction and Capital Works
10 May	Modern Slavery and Sustainability
12 July	Goods Manufactured Overseas
13 September	Principles of Grievance Mechanisms, Worker Voice and Remediation
8 November	Labour Related Services



The Catholic response to modern slavery - Australian Catholic Anti-Slavery Network

The Catholic Church has a history of anti-slavery action from working to end Transatlantic slavery to supporting people impacted by modern slavery and by tackling its root causes.

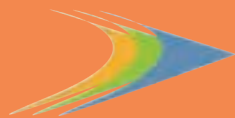
Catholic anti-slavery initiatives focused on prevention, support and systemic drivers are delivered across the world every day by clergy, lay Catholics, parishes and large organisations such as Caritas, the International Catholic Migration Commission and the Order of Malta. ACAN participating entities are united in the belief that action against modern slavery is fundamental Catholic Social Teaching. Pope Francis has called modern slavery “a crime against humanity.” He has pledged with other global religious leaders to rid the world of this affront to human dignity and human freedom.

Catholic schools, hospitals, aged care facilities, universities, community services, investment and finance are just some of the Catholic institutions that touch the lives of millions of Australians. 1 in 5 Australian children are educated in Catholic schools (approximately 800,000) and 1 in 10 hospital patients and aged care residents receive care in Catholic facilities.

The extent of the supply chains is therefore highly significant and constitutes the major exposure to modern slavery for Catholic entities in Australia. ACAN brings together Catholic entities to leverage their collective purchasing spend, share resources and coordinate action to manage modern slavery risk across their industry sectors.

Catholic entities participating in ACAN are strongly positioned to respond effectively to the statutory requirements in the Modern Slavery Act with a comprehensive risk management program. The Modern Slavery Statements of Catholic entities will also form a compendium of Catholic principles and action for the advancement of human dignity and the common good. CES Ltd and SCEC&C Ltd are proud to be working in partnership with ACAN and network participants to deliver on the commitment to end Modern Slavery.





Remediation Pathways Domus 8.7

Through the ACAN Program, CES Ltd has access to the expertise and independent advice available through Domus 8.7. CES Ltd Schools, Offices & Early Learning can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.





Catholic Education Sandhurst Ltd



DIOCESE
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



Diocese of Ballarat Catholic
Education Limited (DOBCEL)
**Modern Slavery
Statement
2023**

*As partners in
Catholic education
and open to God's presence,
we pursue fullness of life for all.*

Acknowledgement of Country

DOBCEL respectfully acknowledges Aboriginal and Torres Strait Islander people as the First Peoples of this country, the traditional owners on whose lands we live and work throughout the Catholic Diocese of Ballarat.

We also pay our respect to the original custodians of the land, Elders past, present and emerging, and pay tribute to those who have contributed to the social, economic, cultural, political and spiritual life of our community.

We recognise and celebrate the diversity of Aboriginal peoples across Western Victoria and acknowledge their deep spiritual attachment and enduring culture which keeps them connected to the lands, waterways and skies.

This acknowledgement affirms our commitment to the ongoing journey of Reconciliation and the importance of healing between Indigenous and non-Indigenous peoples, and our responsibility to ensure that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported to embrace their culture and identity as Australia's First Nations peoples.

Child Safety

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to the safety, participation and empowerment of all children.



Disclosure Note

This statement has been made on behalf of the member and directors of **DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED** ABN 68 894 686. This Statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers all entities owned or controlled by the **DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED (DOBCEL)**.

This is DOBCEL's third Modern Slavery Statement and sets out the progress that DOBCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2023 Calendar Year Reporting Period, from 1 January 2023 to 31 December 2023.

Declaration

This Modern Slavery Statement was approved by the Board of Diocese of Ballarat Catholic Education Limited (DOBCEL) in accordance with *section 13 of the Modern Slavery Act 2018 (Cth) 1 ("The Act")* on 24th June 2024.



Bishop Paul Bird

Bishop of Ballarat and Company Member

Diocese of Ballarat Catholic Education Limited Board

Mr Terrence Harney

Board Director and Chair

Diocese of Ballarat Catholic Education Limited Board

Entity Details

DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED (DOBCEL)

ACN: 629 894 686

ABN: 94 493 967 364

ADDRESS: 200 Gillies St North, Lake Wendouree VIC 3350

PHONE: 03 4344 4350

WEBSITE: www.dobcel.catholic.edu.au

MODERN SLAVERY LIAISON OFFICER: Sarah Page (spage@dobcel.catholic.edu.au)

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A Message from the Bishop

Last December, on the 75th anniversary of the promulgation of the Universal Declaration of Human Rights (1948), Pope Francis reaffirmed that this document “is like a master plan, from which many steps have been taken, but many still need to be made, and unfortunately, at times, backward steps have been taken. The commitment to human rights is never finished!”

One of the tasks calling for ongoing attention is that of countering slavery. In various forms, modern slavery continues to trample on people’s right to choose their work and have their personal freedom respected.

In 2018, the Australian government passed the Modern Slavery Act which sets out the reporting requirements for Australian entities on slavery risks in their businesses. Modern Slavery Statements outline the steps that organisations have taken to limit slavery practices within the supply chains for their operations.

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to working with each of our school communities so that we play our part in ridding the world of slavery, which is such an affront to human dignity.

This is DOBCEL’s third Modern Slavery Statement and sets out the progress that DOBCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2023 Calendar Year.

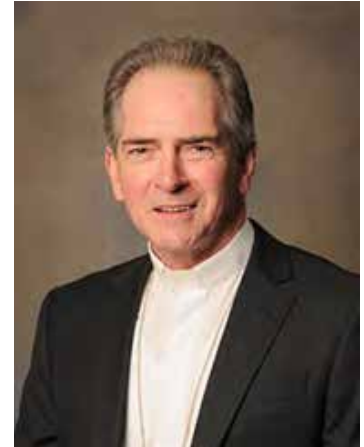
As we publish this Statement, we pray for those who suffer under the yoke of slavery and we commit ourselves to doing what we can so that they will be freed from such burdens and their rights will be truly respected.

May God bless us all.



Paul Bird CSsR

Bishop of Ballarat



A Message from the Executive Director

Dear Colleagues and Partners,

As we prepare to launch our 2023 DOBCEL Modern Slavery Statement, I am reminded that action against modern slavery is fundamental to Catholic social justice. DOBCEL is dedicated to collaborating with each of its school communities in order to contribute to the global effort to eradicate this violation of human freedom and dignity.

Respecting and upholding the sanctity and value of every human life is essential to our shared humanity. The shared conviction that every life has value, and that human dignity is the foundation for all other rights and obligations is the cornerstone of the Church's Catholic social justice teachings and the universal, unalienable, and inviolable principles of international human rights.

DOBCEL's plans for 2024 focus primarily on improving our supplier engagement and our communication and education in the area of modern slavery across our diocesan schools and offices so that together, we can stand united in our call by Pope Francis to take action to eradicate modern slavery globally.

*As partners in Catholic Education,
open to God's presence,
we pursue fullness of life for all.*

With every blessing,

Mr Tom Sexton
Executive Director



Reporting Criteria 1&2: About Diocese of Ballarat Catholic Education

About us

The Diocese of Ballarat has a total of 64 primary and secondary schools, delivering a high-quality, faith-based, and affordable education option in rural and regional settings from the Murray to the Sea. DOBCEL is responsible for the governance of 58 of these schools. There are six colleges in the diocese governed by Religious Institutes or Ministerial Public Juridic Persons (RI/MPJP). The Diocese is divided into four zones, the Northern, Mid Northern, Southern and Central zones, and has over 18,500 students enrolled in 52 Primary Schools (Foundation to 6), one Foundation to Year 8 School and 11 Secondary Schools (years 7-12).



The Diocese of Ballarat is diverse and geographically extensive, covering the western third of Victoria, extending from the Murray River in the North to the Southern Ocean. To the West it is bounded by the Archdiocese of Adelaide and the Diocese of Port Pirie, to the north by the Diocese of Wilcannia Forbes and to the East by the Diocese of Sandhurst and the Archdiocese of Melbourne.

The Diocese includes a number of provincial centres and large rural areas. There is a wide range and mix of primary industry and tourism, and many places of natural beauty including the Great Ocean Road, the Grampians, the towns of the Murray River, the Little Desert and the goldfields.

Our Vision

*As partners in Catholic education
and open to God's presence,
we pursue fullness of life for all.*

Our Mission

Together we journey towards this vision through:

- proclaiming and witnessing the Good News of Jesus Christ
- ensuring quality learning that promotes excellence and fosters the authentic human development of all
- living justly in the world, in relationship with each other and in harmony with God's creation
- exploring, deepening and expressing our Catholic identity in diverse ways
- enabling each one of us to reflect more fully in the image of God



DOBCEL Modern Slavery Risk Management Initiatives 2023

To support the work of meeting our modern slavery responsibilities, DOBCEL appointed a Modern Slavery Liaison Officer. The purpose of the Modern Slavery Liaison Officer role:

- Provide input and advice to DOBCEL on issues related to modern slavery.
- Actively support the development and implementation of DOBCEL’s modern slavery action plan
- Establish implementation goals and targets.
- Monitor and review effectiveness of actions taken.

DOBCEL renewed participation in the Australian Catholic Anti-Slavery Network (ACAN) modern slavery risk management program (ACAN Program 2023 - 2026).

DOBCEL Management Strategic Priorities 2024:

- *Building inclusive Catholic learning communities.*
- *Empowering all to flourish.*
- *Enhancing family engagement, governance and stewardship.*
- *Fostering inspiring leadership.*
- *Achieving best practice.*

Strategic priorities for DOBCEL are illustrated in the diagram below:



DOBCEL Board



*“Every man, every woman who has to take up the service of governance, must ask themselves two questions:
Do I love my people in order to serve them better?
Am I humble and do I listen to everybody, to diverse opinions in order to choose the best path?
If you don’t ask these questions, your governance will not be good.”*

— Pope Francis

DOBCEL Board Strategic Priorities 202024:

The DOBCEL Board Strategic Intent is an overarching document which outlines:

- **Embedding a culture of child safety in our Diocesan Educational Communities** by promoting best practice in a child safe environment.
- **Witnessing the gospel values defined by the Catholic tradition** by promoting formation for mission.
- **Establishing and ensuring clarity in our vision, ethos and strategic direction** by being a competent Board.
- **Building a culture of full engagement** by respecting the dignity and voice of all in our community.
- **Being responsive to the “cry of the earth and the cry of poor”** by supporting and promoting initiatives and programs.
- **Being an empowering Board** by supporting and strengthening leadership across our Catholic Education community.
- **Being innovative and creative in promoting efficiency and accountability** by having high expectations and being transparent in our actions.
- **Planning for the future and being proactive** by developing resourceful, diverse, and innovative responses, policies and programs.



Our Governance Framework

School governance in the Diocese of Ballarat is structured as follows:

- 58 schools are governed by Diocese of Ballarat Catholic Education Limited (DOBCEL)
- 6 colleges are governed by Religious Institutes or Ministerial Public Juridic Persons (PJP Schools)

Bishop Paul Bird established a company limited by guarantee, Diocese of Ballarat Catholic Education Limited (DOBCEL) in 2021 and appointed a Board of Directors to govern parish schools. The Board of the company reports directly to Bishop Paul as the Bishop of the diocese and as the member of the company. It also approves education policies in consultation with and for the diocesan education community.

The day-to-day management of the schools governed by the company is delegated to the Executive Director, Catholic Education, and Principals of these schools have the appropriate delegations to lead and manage their schools and their staff.

The Executive Directors’ role is to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met, including DOBCEL’s operational response to modern slavery.

DOBCEL Governance Model

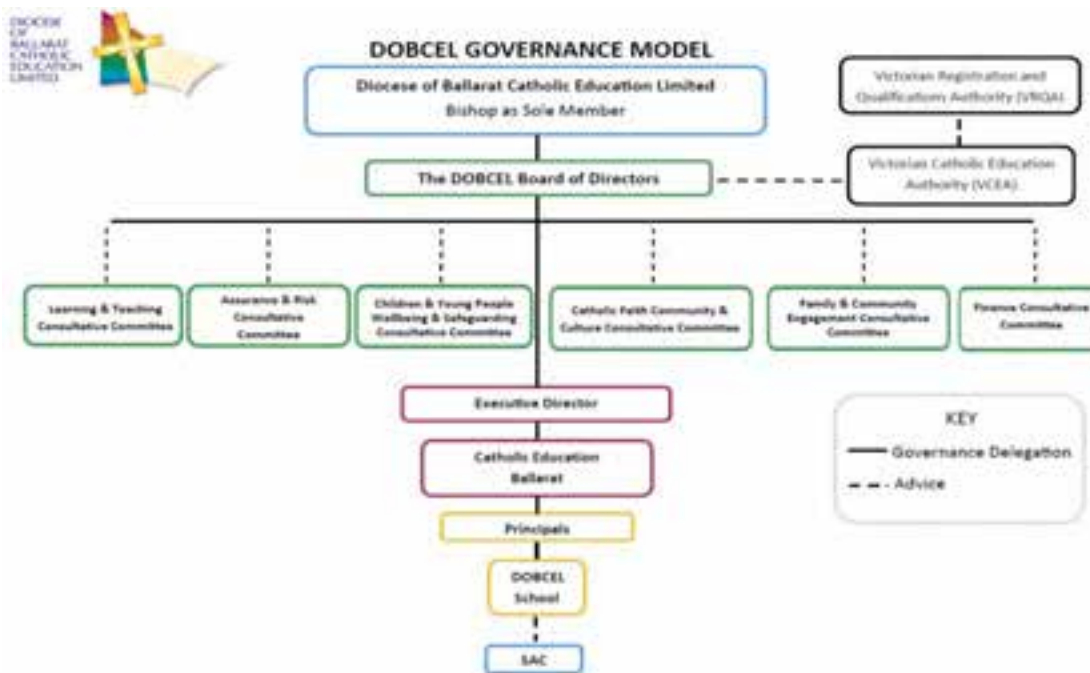


Chart 1 - Governance Structure of DOBCEL

Our Organisational Structure

Diocese of Ballarat Catholic Education Limited (referred to as DOBCEL), is the entity established by Bishop Paul Bird to act as the governing body for schools in the diocese.

DOBCEL was established to fulfil the following objectives:

- To ensure consistency and professionalism of governance for parish schools.
- To ensure the continued pastoral ministry of priests in parish schools.
- To allow the ongoing engagement of parish and local communities.
- To ensure effective and transparent stewardship of education resources.
- To allow the Diocese of Ballarat to address Recommendation 16.6 of the Royal Commission
- To allow Catholic education authorities to meet the Victorian Government’s requirement for organisations that receive government funding (including schools) to be governed by incorporated legal entities.



Chart 2 – Organisational Structure of DOBCEL (2023)

Our Operations

Within the Diocese of Ballarat, the Bishop has responsibility for Catholic education. As the sole Member of DOBCEL, the Bishop delegates responsibility for the governance oversight of schools (other than those governed by RI/MPJP) to the DOBCEL Board, which is established as a skills-based Board. The Executive Director assists the DOBCEL Board in meeting their responsibilities for school governance and accountability.

DOBCEL is a learning community of all 58 schools who provide quality teaching and learning outcomes for Prep to Year 12 students, in line with the strategic priorities of:

- ***Building inclusive Catholic learning communities.***
- ***Empowering all to flourish.***
- ***Enhancing family engagement, governance and stewardship.***
- ***Fostering inspiring leadership.***
- ***Achieving best practice.***

Educational and Office Services

Our People

DOBCEL has standards and codes of conduct for employees and volunteers to maintain a safe and healthy environment. Our commitment to these standards requires that we conduct background referencing for all persons engaging in direct or regular involvement with children, young people and/or vulnerable adults.

The Executive Director provides annual certifications to confirm compliance with all legal requirements in the employment of staff and obligations under Australian employment and Child Safety legislation, regulations and orders.

The whistle-blower policy and procedures provide staff, volunteers, and the community with an effective mechanism to identify and escalate any concerns including those relating to modern slavery. DOBCEL encourages reports of suspected instances of improper conduct and will investigate any report made. Reports can be made without fear of retribution and with full confidentiality if required.

A Summary of Key Information:

Our Schools



18,992
Students



2,995
Staff



58
Schools

58 Schools, comprising

52 Primary Schools

1 Primary to Year 8 School

5 Secondary Schools

4 Offices

Income

In 2023 DOBCEL reported a total revenue of \$297 million of which \$286 million was recurrent funding. The main source of this income was Australian and Victorian Government grants for the provision of educational services.

20.47% of students in the Diocese of Ballarat attend a Catholic School

2.73% of students identify as Aboriginal or Torres Strait Islander

19.67% of students have a disability

\$249m Australian and State Government grants

\$34m School fees and levies

\$14m Other Income

The following 58 schools are governed by Diocese of Ballarat Catholic Education Limited (DOBCEL):

1. **St Thomas More Primary**, Alfredton
2. **St Mary's Primary School**, Ararat
3. **St Brigid's Primary**, Ballan
4. **St Patrick's Primary School**, Ballarat
5. **St Alipius Parish Primary School**, Ballarat East
6. **St Francis Xavier Primary School**, Ballarat East
7. **St Columba's School**, Ballarat North
8. **Mercy Regional College**, Camperdown
9. **St Patrick's Primary**, Camperdown
10. **Sacred Heart Primary School**, Casterton
11. **St Joseph's Primary**, Charlton
12. **St Mary's Primary School**, Clarkes Hill
13. **Sacred Heart Primary**, Colac
14. **St Mary's Catholic Primary School**, Colac
15. **Trinity College**, Colac
16. **St Joseph's Primary School**, Coleraine
17. **St Brendan's Primary School**, Coragulac
18. **St Augustine's Primary School**, Creswick
19. **St Michael's Primary School**, Daylesford
20. **Lumen Christi Primary School**, Delacombe
21. **St John's Primary School**, Dennington
22. **St Mary's Primary School**, Donald
23. **St Brendan's Primary School**, Dunnstown
24. **St Malachy's Primary School**, Edenhope
25. **St Patrick's Primary School**, Gordon
26. **St Mary's Primary School**, Hamilton
27. **St Joseph's Primary School**, Hopetoun
28. **St's Michael and John's Primary School**, Horsham
29. **St Brigid's College**, Horsham
30. **St Patrick's Primary School**, Koroit
31. **Siena Catholic Primary School**, Lucas
32. **St Augustine's Primary School**, Maryborough
33. **Our Lady of the Sacred Heart Primary School**, Merbein
34. **Sacred Heart Primary School**, Mildura
35. **St Paul's Primary School**, Mildura
36. **St Coleman's Primary School**, Mortlake
37. **Damascus College**, Mount Clear
38. **Emmaus Catholic Primary School**, Mount Clear
39. **Our lady Help of Christian's Primary School**, Murtoa
40. **St Patrick's Primary School**, Nhill
41. **St Joseph's Primary School**, Peshurst
42. **St Patrick's Primary School**, Port Fairy
43. **All Saints Primary School**, Portland
44. **St Joseph's Primary School**, Red Cliffs
45. **St Aloysius Primary School**, Redan
46. **St Mary's School**, Robinvale
47. **St Mary's Primary School**, Sea Lake
48. **St James' Primary School**, Sebastopol
49. **St Patrick's Primary School**, St Arnaud
50. **St Patrick's Primary School**, Stawell
51. **St Mary MacKillop College**, Swan Hill
52. **St Mary's Primary School**, Swan Hill
53. **St Thomas' Primary School**, Terang
54. **St Mary's Primary School**, Warracknabeal
55. **St Joseph's Primary School**, Warrnambool
56. **Our Lady Help of Christian's Primary**, Warrnambool East
57. **St Pius X Primary School**, Warrnambool West
58. **Our Lady Help of Christian's Primary School**, Wendouree

These schools are supported by offices in Ballarat, Horsham, Mildura, Swan Hill and Warrnambool.



Our Supply Chain

DOBCEL continues to utilise a decentralised procurement model, with the exception of banking services, audit and compliance contracts, fleet procurement and major capital works. There are over 8,085 suppliers engaged throughout the reporting period with some duplication of suppliers across schools.

Consistent procurement and purchasing approaches are currently being scoped as a whole of system review of digital ambitions within Catholic Education Victoria. This is expected to lead to a system able to cater for the identification and mitigation of supplier and supply chain risks, while also enhancing reporting. Until this capability is developed, without centralised contracts or procurement systems in place, responsibility for contracts of short- and medium-term durations rest at different levels of the organisation, including schools, DOBCEL office and service centres.

Complex, higher value contracts are managed within the DOBCEL office (i.e. construction, design, consulting, system wide programs and initiatives).

Our key suppliers have been identified in our top 80% of spend, and all purchases are undertaken with Australian representatives domiciled in Australia.

The range of goods and services acquired through procurement ranges from consumables, IT equipment, motor vehicles, building and construction materials, uniforms, cleaning services and office and school equipment.

Across the diocese, there is currently a high degree of independence within schools to work with local suppliers, providing support and employment to local communities.

Based on the nature of the spend within the diocese, sectors that have been identified as high risk include building and construction, ICT and cleaning. Further sectors may be added as additional risk assessments are undertaken.



Reporting Criterion 3: Modern slavery risks in operations and supply chains

The highest risk areas identified for Educational Institutions are:

1. Building and Construction
2. Office Stationery & Supplies
3. Information & Communications Technology (ICT)
4. Uniforms
5. Facilities Management
6. Security Services
7. Cleaning Services
8. Events & Entertainment
9. Labour Hire
10. Waste Management
11. Furniture
12. Fleet Management
13. Software Development

DOBCEL high risk categories spend:



Chart 3 - DOBCEL High-Risk Procurement Category - Category Spend.

DOBCEL high risk categories by number of suppliers:



Chart 4 - DOBCEL High-Risk Procurement Category - Number of Suppliers.

2023 Consolidated Spend Profile

The following charts reflect the total 2023 expenditure across all categories for DOBCEL:

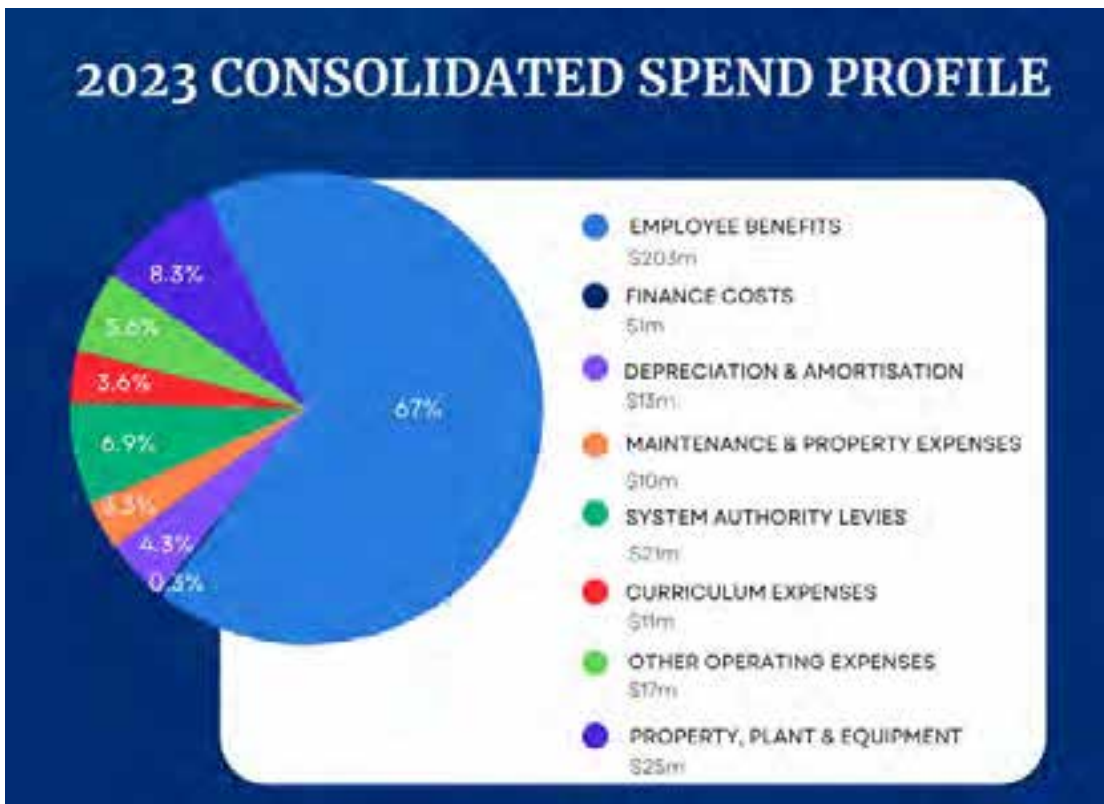


Chart 5 - consolidated spend profile.

2023 High Risk Sector Analysis Spend

High Risk spend breakdown:



Chart 6 – high risk sector analysis of spend.

Reporting Criterion 4: Actions taken to assess and address risk

DOBCEL followed the ACAN supplier engagement plan:

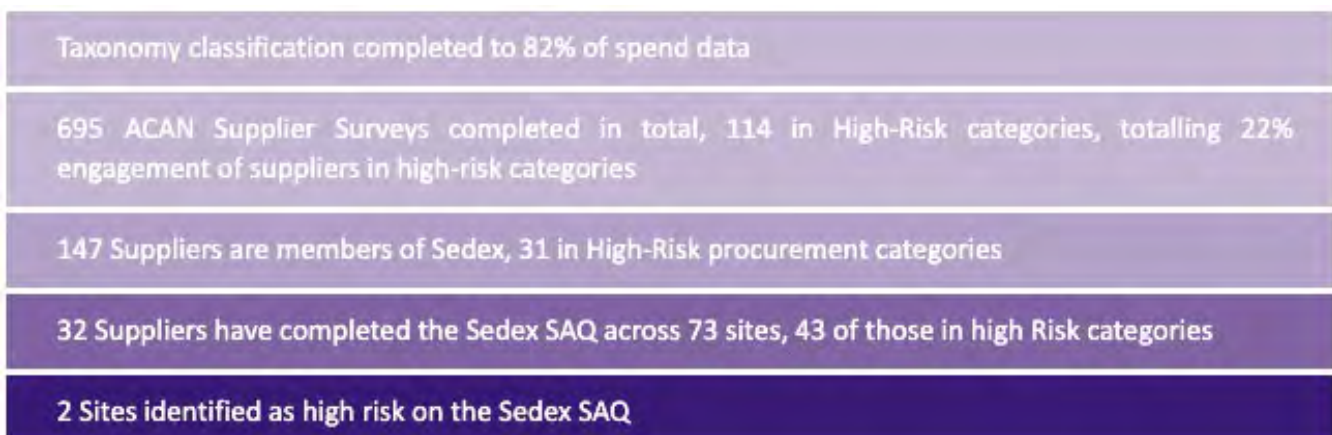
1. Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high-risk categories were invited to complete the ACAN Suppliers Survey.
3. ACAN Suppliers Survey analysis to determine the following:
 - Suppliers were members of Supplier Ethical Data Exchange (Sedex)
 - Suppliers willing to join Sedex
 - Suppliers classified as not required to join Sedex
4. Suppliers were assisted with the process to join Sedex and provide support to complete the Sedex Self-Assessment Questionnaires (SAQ)
5. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier’s management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN Program identifies common suppliers shared across multiple Catholic school systems. Data relating to common suppliers increase leverage and reduce duplication of supplier engagement by multiple Catholic schools systems.

An important part of the supplier engagement plan included an invitation to suppliers to attend the 2023 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

- Business relevance and the Modern Slavery Act
- Catholic customer/buyer expectations
- How to access ACAN e-learning
- Sedex supplier membership

DOBCEL Supplier Engagement results for 2023 show a significant increase in activity:



Through the ACAN Program, DOBCEL is a member of Supplier Ethical Data Exchange (Sedex.) Sedex is a global non-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers in order to promote ethical and sustainable practices throughout the supply chain.

As members of Sedex, DOBCEL continues to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

The ACAN Program supported suppliers to DOBCEL with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Gaining visibility upstream in relevant supply chains
4. Monitoring and reporting on progress of supplies
5. Development of an ACAN prequalification register of suppliers

ACAN Program Members supported DOBCEL by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:

1. Designate a role to drive modern slavery engagement
2. Complete a 5-minute ACAN pre-assessment survey
3. Watch or participate in ACAN supplier webinars
4. Join Sedex as a Supplier Member and complete a Self-Assessment Questionnaire (SAQ)



Remediation Domus 8.7 Partnership

DOBCEL is committed to ensuring it provides appropriate and timely remedies to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if DOBCEL is found to have caused or contributed to modern slavery.

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, DOBCEL has partnered with Domus 8.7 - an independent program which provides remedy to those impacted by modern slavery. By partnering with Domus 8.7 DOBCEL can help those impacted by modern slavery to achieve meaningful outcomes that can be reported on and continuously improve risk management and response.

Where DOBCEL is directly linked to modern slavery by a business relationship, we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. It is recommended that remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with DOBCEL to ensure a victim-centred remediation process is implemented to the satisfaction of DOBCEL.

Should there be suspicion of modern slavery practices through whistle-blower or other channels, staff are advised to contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, DOBCEL agencies will have access to the expertise and independent advice available through Domus 8.7. DOBCEL schools can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.



Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights-based approach

In the 2023 reporting period, there were no worker referrals to Domus 8.7 concerning our operations and supply chain, as shown in the table below. Furthermore, no reports about instances or indicators of modern slavery were submitted to DOBCEL via internal grievance procedures. It's crucial to remember that a lack of reports does not always imply the presence of modern slavery.

2023	ACTIVITY	DOBCEL
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0



Reporting Criterion 5: Measuring Effective and Continuous Improvement

Maturity Statement

In 2023 DOBCEL scored within 31% - 50% range of the ACAN Maturity Assessment, indicating an Emerging Practice level. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence.

DOBCEL processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

Diocese of Ballarat Catholic Education Limited - Overview

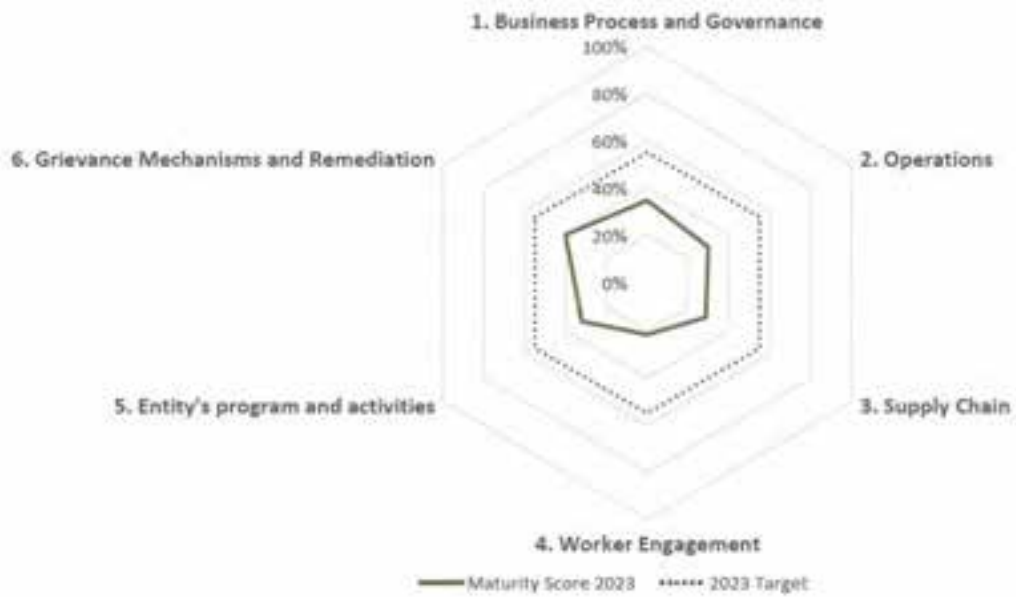


Diocese of Ballarat Catholic Education Limited - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	34%	38%	36%	31%	35%
2. Operations	41%	28%	28%	22%	30%
3. Supply Chain	8%	80%	14%	12%	29%
4. Worker Engagement	9%	20%	25%	33%	22%
5. Entity's program and activities	40%	10%	50%	28%	32%
6. Grievance Mechanisms and Remediation	55%	30%	50%	25%	40%
Average	31%	34%	34%	25%	31%

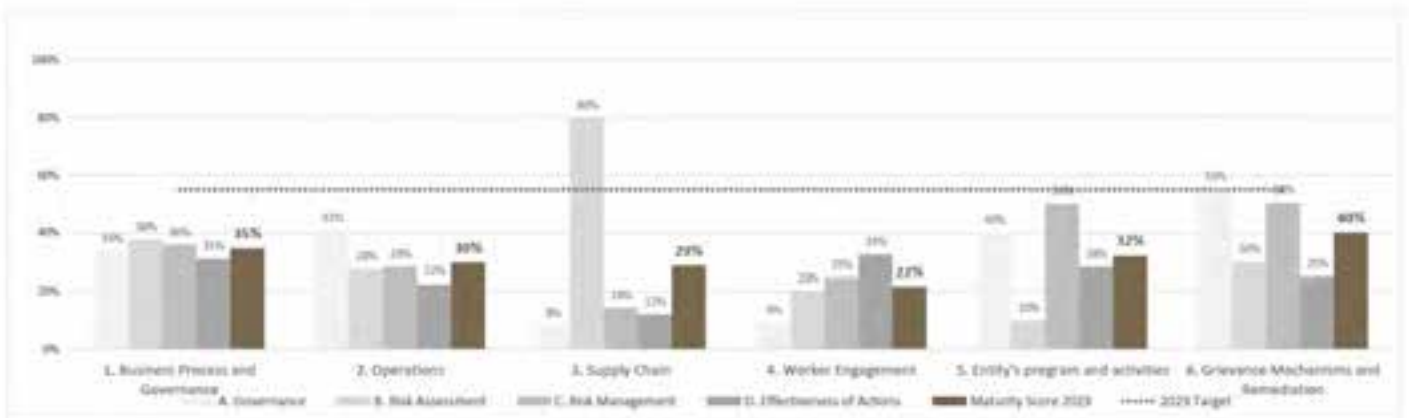
Maturity Score 2023 individual scoring by pillar and sub-pillar, including averages and total 2023 score

Maturity Score 2023 Comparative to Target and Maximum Scoring, by Pillar



Maturity Score 2023 Comparative to Target and Maximum Scoring, by Pillar

Maturity Score 2023 comparative to target and maximum scoring, by Pillar



Maturity Score 2023: comparative individual scoring by pillar and sub pillar

Notes:

- Participation in Domus 8.7 Remediation Services was incorporated into scoring of pillar 6, Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Domus 8.7 Remediation Services activities.
- Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Taxonomy and supplier engagement activities) and Effectiveness of Actions (Baseline Data). This will be removed in the 2024 Maturity Assessment for entities not actively participating in the ACAN Program activities.

Modern Slavery Action Plan

In 2024, DOBCEL will be implementing Supplier Engagement Action Plans with a focus on suppliers identified as high risk. This will be supported by the development of an entity-wide eFinance system to support procurement processes. This will be further supported by an education and awareness program for staff who directly engage suppliers for many goods and services.

Priorities for 2024:

Action 1	<i>Staff Training - All Staff complete e-Learning MS 101 module</i>
Action 2	<i>Register suppliers on Sedex (Supplier Ethical Data Exchange)</i>
Action 3	<i>Expand awareness and training within entity</i>
Action 4	<i>Review DOBCEL's Modern Slavery Policy</i>
Action 5	<i>Review DOBCEL's processes for the collection of data</i>
Action 6	<i>Target Supplier Engagement</i>

DOBCEL's aspirational goal is to identify risks associated with modern slavery in our operations, business partnerships and supply chains, in our pursuit of *Fullness of Life for All*



Next Steps for 2024

Modern slavery risk management is a shared responsibility at DOBCEL. The Modern Slavery Working Group will contribute to our efforts to ensure people are not harmed by the activities of DOBCEL, its suppliers and business partners. It will also build professional skills and experience, across our team, in an important and emerging area of social sustainability and business.

A key priority for 2024 and beyond is the establishment of a Modern Slavery Working Group (MSWG), with a key focus on the enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). KPIs will continue to be developed by the MSLO and the MSWG and linked to the Action Plan for 2024.

To support the development of KPIs, the following metrics will be used from 2023 to assess the effectiveness of activities and initiatives.

DOBCEL will establish a Modern Slavery Working Group in 2024 with representatives across the organisation, including:

- Modern Slavery Liaison Officer (MSLO)
- Finance
- IT & Cyber Security
- Planning and Infrastructure
- People and Development
- Education Officer: Catholic Identity and Mission

The Modern Slavery Working Group will meet regularly to discuss the seven criteria set out in the legislation, and how DOBCEL can implement policies and procedures in order to meet the Modern Slavery Statement reporting requirements. This will include:

- Developing Anti-Slavery Working Group Terms of Reference
- Establishing of Anti-Slavery Procedures
- Actively supporting the development and implementation of DOBCEL modern slavery action plan.
- Assisting DOBCEL to determine priority actions to be undertaken and establish annual goals and targets.
- Monitoring and reviewing actions taken to assess and address modern slavery risks and evaluate their effectiveness.
- Writing of DOBCEL Procurement Policy and Procedures
- Analysis of vendor/supplier spend
- Agreement on contract clauses for major and minor contracts
- Planning for rollout of ACAN eLearning modules
- Project planning to ensure DOBCEL meets the requirements of the *Modern Slavery Act 2018* (Cth).

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 58 DOBCEL schools.

For the preparation of this statement the DOBCEL Modern Slavery Liaison Officer consulted with functional departments across DOBCEL, including Business Services, Office Finance, IT and Cybersecurity, Assurance and Risk, Planning and Infrastructure, People and Development, Human Resources, Child Safety Teams and Catholic Identity and Mission Team as well as ACAN and other participating members of the ACAN network.

This consultation with ACAN and other departments has informed the 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.

A Modern Slavery Liaison Officer (MSLO), from the Catholic Identity and Mission Team, has been appointed and her responsibilities include:

- Enabling understanding and promoting awareness of the requirements of the modern slavery act 2018 within the organisation.
- Representing DOBCEL in the Australian Catholic Anti-Slavery Network.
- Developing and implementing an organisational Modern Slavery Action Plan.
- Supporting procurement supply or contract management processes in relation to supplier engagement.
- Monitoring entity spending in high-risk categories in relation to modern slavery risks.
- Completing the annual maturity assessment and reporting to the Australian Catholic Anti-Slavery Network.
- Reporting modern slavery activity and progress through the DOBCEL Assurance and Risk committee.

The MSLO works closely with the Executive Leadership Team to collaborate on the organisation's approach to modern slavery. The MSLO participates in the ACAN monthly webinars and engages with ACAN expertise to assist in addressing risk of modern slavery and to keep informed of new initiatives.

Reporting Criterion 7: DOBCEL Current and Future Initiatives

“The joys and the hopes, the griefs and the anxieties of the people of this age, especially those who are poor or in any way afflicted, these are the joys and hopes, the griefs and anxieties of the followers of Christ.”

Vatican II’s Pastoral Constitution of the Church in the Modern World; GS 1-10

Catholic Identity and Mission Team

Directly collaborating with Schools and Student Communities

Prior to the incorporation of DOBCEL, the Catholic Identity and Mission Team (CI&M) has for many years been actively working to support schools, both DOBCEL and RI/MJPJ, within the diocese. Responding to Jesus' mission of bringing "Good news to the poor" through both action and word, the CI&M Team assists staff and school communities in responding to God’s mission, which is summarised in the gospel Luke 4:14–21.

Vatican II reminds us to ‘*read the signs of the times*’, including the successes and failures regarding reverence for the human person, human dignity and creation, and to take stock of our world in light of the Gospel. The work of CI&M Team is grounded in the well-developed understanding of the principles of Catholic Social Teaching, particularly in demonstrating respect and compassion for the dignity of all humankind. This work is grounded in sound theology and the traditions of the Church, together with appreciation of the changing needs of students and families in diverse cultures. It is based on providing witness to Jesus Christ and the gospels in ways that engage and influence our students in their search for identity and meaning.

The following roles comprise the CI&M Team: A Catholic Identity and Mission Leader, four Primary Religious Education Officers, a Secondary Religious Education Officer, an ECSI for School Improvement Officer, a Formation and Mission Education Officer and a Social Justice Education Officer.

The CI&M Team brings to life our DOBCEL vision, to promote *Fullness of Life for All*

The purpose of the CI&M Team is;

- To bring the wisdom of the evolving Catholic story and vision into dialogue with the contemporary world.
- To connect "The Mission of the Church" with the work CI&M do in our school communities.
- To educate and empower all members of our DOBCEL community to connect with scripture and live our call to bring *Fullness of Life for All*

Catholic Social Teachings are at the heart of our work, thus some of the work carried out by the CI&M Team includes:

- Incorporating eco spirituality into daily practices.
- Extending staff knowledge of Catholic Social Teaching, Social Justice, and Modern Slavery through professional learning opportunities available for teachers and school staff within our diocese.
- Leading DOBCEL Staff in opportunities for formation through participation in workshops aimed at raising awareness of Global, National, Victorian and local outreach charities and organisations, including St Vincent de Paul, Caritas, The Ballarat Soup Bus, The Soup Kitchen Mildura and raising awareness of modern slavery.
- Fundraising within the organisation, through staff payroll deductions and activities.
- Building capacity in teaching and learning to become recontextualising Catholic dialogue schools.
- Continuing to edit and design units of work and resources in the Religious Education curriculum, 'Awakenings', to reflect the Laudato Si' initiative, in caring for our common home and response to the Cry of the Poor, and the Cry of the Earth.
- Being actively involved in the Ballarat Diocese Social Justice Commission (BDSJC), where our Social Justice Officer serves as the Executive Officer.

The mission of the BDSJC is to:

- Spread awareness of Catholic Social Teachings within the diocese, including in schools, parishes, and other Catholic organisations.
- Aim to tackle social justice issues through the lens of the Gospel.
- Stand up for those facing injustice.
- Work alongside others to promote justice, peace, and stewardship of God's creation.
- Interpreting and discerning the signs of the times; motivated by Vatican II, working to alleviate poverty and marginalisation as presented in its many forms.
- Presenting the Bishop's Social Justice Statement to our school communities and the Catholic Education Offices.
- Staff Formation including Principals Induction.
- Networking with those involved in promoting social, economic and ecological justice, including the Ballarat Diocese Social Justice Commission, involvement with Caritas, Catholic EarthCare Australia, Ballarat EarthCare Group, etc.



DIOCESE
OF
BALLARAT
CATHOLIC
EDUCATION
LIMITED



CATHOLIC EDUCATION BALLARAT

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Modern Slavery Statement 2023

Disclosure Note

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (CAM). This modern slavery statement is a joint statement made on behalf of the following three reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

<https://melbournecatholic.org/modern-slavery-statement>

In the Statement we will refer to the “Catholic Archdiocese of Melbourne (CAM)”, as a single name reference to include agencies. This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statement for 2023.

This statement was approved by the Most Rev Peter A Comensoli,
Archbishop of Melbourne on 22 June 2024.

The Catholic Archdiocese of Melbourne, 383 Albert Street,
East Melbourne (ABN 64 047 619 369) info@cam.org.au
<https://melbournecatholic.org/>



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Approval from

Most Rev Peter A Comensoli, Archbishop of Melbourne



As a Catholic community, we believe that every person is made in the image of God, and that we each share in the responsibility to uphold the inherent value, dignity and freedom of all - especially the most vulnerable and forgotten in our global communities.

Modern Slavery can occur in many forms, and with any persons regardless of age or culture. It is often an invisible crime against humanity, hiding behind the many gifts and benefits we enjoy in Australian society.

The tragedy of human slavery is that it is a condition of human decisions and actions. Therefore, eradication of all networks of abuse, whether they be social, economic or environmental must be at the forefront of our global fraternity, and most importantly the intention of our daily Christian living.

This is no easy task. Slavery does not occur in isolation, and is a complex network of exploitation. As such, the decisions we make every day about what we buy and what we use has significant impact upon countless lives and communities.

The Catholic Archdiocese of Melbourne and its agencies are important models in the education and empowering of good practice and awareness. Embedding the commitment to the eradication of slavery in all its forms within our own Archdiocesan operations and supply chains, is a decisive and important action of Catholic Social Teaching to end the dehumanising exploitation of others.

Once again, I endorse this Statement as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. The Compendium is an important record of the collaboration that has taken place across the Church in Australia to provide practical ways that we can work together on this issue.

The Catholic Archdiocese of Melbourne continues to strengthen its due diligence and update its policies, agreements, contracts and templates to reflect our commitment to respecting human rights and will continue to drive best practice and take action in our agencies to end modern slavery in our generation.

I thank all those who have brought their wisdom and expertise to the preparation and ongoing engagement of this Statement and acknowledge with deep gratitude the efforts of staff across our Archdiocese who daily work to implement change and good practice.

As Archbishop, I approve and endorse this Modern Slavery Statement for the Catholic Archdiocese of Melbourne as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 June 2024 and confirm the renewal of the Catholic Archdiocese of Melbourne participation in the ACAN Program 2023-2026.

May St Josephine Bakhita, our Patron Saint for all victims of modern slavery & human trafficking guide us in strength, mercy and love.

With every grace and blessing,

Yours sincerely in Christ Jesus,

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE

CRITERIA 1 AND 2

About CAM, MACS, and CDF

This modern slavery statement is a joint statement made on behalf of the following three reporting entities all of whom share the Archbishop Peter A Comensoli as the principal stakeholder.

Catholic Archdiocese of Melbourne (CAM)	ABN 64 047 619 369
Melbourne Archdiocese Catholic Schools Ltd (MACS)	ABN 18 643 442 371
Subsidiaries of Melbourne Archdiocese Catholic Schools:	
• Melbourne Archdiocese Catholic Schools Early Years Education Ltd	ABN 37 653 741 612
• Melbourne Archdiocese Catholic Specialist Schools Ltd	ABN 75 653 741 836
Catholic Development Fund (CDF)	ABN 15 274 943 760

All the entities are registered as charities with the Australian Charities and Not-for Profits Commission.

Annual information statements, financial reports, and other information for those entities can be found at www.acnc.gov.au.

The Catholic Archdiocese of Melbourne

The Catholic community in Melbourne is made up of a rich tapestry of people, many and varied, of all ages, cultures and backgrounds from the greater Melbourne area. Although we come from all different walks of life, we are united by our faith and our love for God and neighbour. We strive to live our lives according to the way of Jesus Christ in our homes, our workplaces and throughout the wider community.

Presided over by the Archbishop of Melbourne, the Archdiocese comprises approximately 1 million Catholics, and is the largest Archdiocese in Australia. We draw strength from our parish communities – where we care for one another and the wider community – and in the deep love of God who knows and loves us deeply and passionately. As friends of Jesus, we strive to live out the Gospel message and make him known in our local communities. Though we are by no means perfect, we trust in God's steadfast love to achieve in our midst, the great things Jesus promised.

We are blessed with 206 parishes, 292 schools and a wide range of organisations and agencies that assist us in caring for each other and the wider Melbourne community.

Melbourne Archdiocese Catholic Schools

Melbourne Archdiocese Catholic Schools (MACS) was established by Archbishop Peter A Comensoli in 2021 and is responsible for the governance and operation of approximately 292 Catholic primary and secondary schools in the Archdiocese of Melbourne. We employ over 16,000 teaching and non-teaching staff, who serve more than 114,000 students.

MACS also provides a range of services to support the 39 religious institute or ministerial public juridic person (RI/MPJP) schools that are not governed by MACS.



Educating more than
114,000 students



throughout
292 schools

Genuine partnerships with parents, parishes, religious institutes and the community actively support Catholic schools in educating students. We are committed to supporting schools to offer rich, deep and varied learning experiences to our students that support the development of the whole child.

We aim to assist schools to build teaching and leadership capabilities in communities of professionals who increasingly share system responsibility for school improvement and for achieving the best outcomes for our students.

We are committed to ensuring that we offer schools the most effective support to enable all students in Catholic schools to be engaged and creative learners who value excellence and effort, who see the importance of faith, and who have the knowledge, skills, hope and commitment to contribute to peace, justice and the flourishing of the human community.

Catholic Development Fund

CDF is here to help put faith into action. We do this through the delivery of financial solutions that balance margin and mission, for the common good.

Since 1956, CDF has been supporting communities and continually improving an approach that allows us to provide a unique level of support across our footprint of Catholic primary and secondary schools, parishes, and more recently healthcare and social service providers.

Our primary role is to support the work of Catholic organisations. While this work is increasingly complex and the demand for services grows, the needs of Catholic organisations can't always be met by the traditional banking sector. However, our values-based approach to lending, backed by our rigor and professionalism as a financial organisation, allows CDF to give Catholic organisations every possible chance to put their faith into action.

To this end, our lending is based on a unique set of criteria when compared to other financial organisations:

- We are guided by [Catholic Social Teaching](#), that provide a set of principles for building a society based on love, respect and human dignity.
- We are committed to the common good, and the fact that we are a Development Fund, and not a bank, means we have the freedom to support our customers who otherwise may not be eligible for support from the traditional banking sector. In over 60 years of work devoted to the common good, CDF has never registered a bad debt.
- Funding from within means Catholic endeavours and enterprises can be relatively self-sufficient, rather than relying on a banking system exposed to unpredictable and volatile market influences.

Investments with us continue to grow our social mission and demonstrate, through faith in action, the fundamental values of the Church and its very real contribution to a fair, cohesive, and productive society.

All entities continued efforts to engage with suppliers to understand and reduce their (and our) modern slavery risks.

Mission and Strategy

CAM	MACS	CDF
<p>Archbishop Comensoli: <i>“We seek to live the Gospel of Jesus Christ and plant the seeds of that faith that was given to us into our local communities. Those communities are made up of our parishes, schools, hospitals and social service organisations; and all those many communities, groups and movements that are a part of our local Church.”</i></p>	<p>Catholic schooling seeks to provide the young with the best kind of education possible, one that fosters a formation of the whole person that is deeply and enduringly humanising (Francis 2019, n. 223).</p> <p>“Education is integral to the mission of the Church to proclaim the Good News. First and foremost, every Catholic educational institution is a place to encounter the living God who in Jesus Christ reveals his transforming love and truth.” (Benedict XVI 2008).</p> <p>This relationship elicits a desire to grow in the knowledge and understanding of Christ and his teaching.</p> <p>With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:</p> <ul style="list-style-type: none"> • Encounter God in Christ and deepen their relationship with him. • Pursue wisdom and truth encouraged by a supportive academic culture. • Grow in the practice of virtue, responsible freedom and serving the common good. <p>MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World in August 2022.</p> <p>At the heart of the strategy is MACS’ purpose: ‘Forming lives of faith, hope and love in the light of Jesus Christ’ and vision: ‘Every student is inspired and enabled to flourish and enrich the world’.</p> <p>The strategy has four pillars through which its programs and initiatives are organised, that are: inspired by faith, flourishing learners, enables leaders, and enriched communities.</p> <p>Since its release, MACS has launched several key programs and initiatives to support the delivery of the Strategic Plan to facilitate delivery of the key principles underlying the plan.</p>	<p>CDF supports the mission of the Church by helping to build Christ-centred, redemptive, and transformative communities in the Archdiocese of Melbourne, Diocese of Sale, and Diocese of Sunbury.</p> <p>It does this by pooling the savings of the Catholic community to fund the constructions of schools, parishes, hospitals, aged care, and social service facilities.</p> <p>CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care.</p>

Organisational structure and geographic regions

CAM	MACS	CDF
<p>The organisational structure of the Catholic Archdiocese of Melbourne is displayed in Criteria 7, Figure 1, page 25.</p> <p>Our work is organised into different entities and agencies.</p> <p>This structure provides clear responsibilities and accountabilities, and it also dictates our governance structure.</p>	<p>The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Criteria 7, Figure 2, page 25.</p> <p>MACS Office and the Catholic Leadership Centre is based in East Melbourne.</p> <p>It is supported by four regional offices in the north (Moonee Ponds), south (Moorabbin), east (Croydon), and west (Werribee) of Melbourne.</p>	<p>The organisational structure of the Catholic Development Fund is displayed in Criteria 7, Figure 3, page 26.</p> <p>CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care.</p>

Operations commenced on 1 January 2021, including Catholic Education Melbourne ceasing and becoming part of MACS with the 292 schools.

MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (MPJP) schools in the Archdiocese that are not governed by MACS.

CDF supports a range of Catholic organisations across a multitude of sectors that impact the broader community at an enormous scale, including:

- 1 in 5 school students in Victoria
- 25% of Private Hospital Care in Australia
- 5% of Public Hospital Care in Australia
- 20% of Aged Care and support for the Elderly in Australia
- 22 Development Funds Across Australia

Governance framework

CAM	MACS	CDF
<p>The Catholic Archdiocese of Melbourne governance framework is set up as a 3-tiered system, with delegated authority to the appropriate entity and level within the hierarchy.</p> <p>The Archbishop is responsible for the careful supervision of the administration of all goods and services. He is supported by an Executive Leadership Team and various consultative bodies and committees to assist and advise him on these matters.</p>	<p>The board of MACS was established in 2020 by Archbishop of Melbourne Peter A Comensoli.</p> <p>The MACS board is responsible for ensuring the organisation meets all fiduciary and strategic requirements, and that operations are aligned with our mission and purpose in fulfilment of ecclesial, legal, and statutory obligations.</p> <p>The board holds the Executive Director and Executive Leadership Team accountable for the management and delivery of our objectives and implementation of policies.</p> <p>Archbishop Comensoli appoints the members of the board.</p> <p>The MACS board has established the following six board committees:</p> <ul style="list-style-type: none">• Catholic Mission and Identity Committee• Child Safety and Risk Management Committee• Education Strategy and Policy Committee• Finance and Audit Committee• Governance Committee• People and Culture Committee.	<p>CDF is governed by the Archdiocese of Melbourne as an undertaking of the Archbishop and has an advisory board to the Archbishop.</p> <p>The CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, Investments, Deposits and Risk Management.</p>

Profile and operations

CAM	MACS	CDF
Throughout the 2023 reporting period, CAM engaged with 1156 suppliers with a total expenditure of \$36.39M.	MACS total income for the reporting period was \$2,349.50M. The main expenditure being \$1,622.12M on the salaries of employees. Other expenses totalled \$669.34M.	The CDF has an annual revenue \$59.20M and expenditure of approximately \$7.70M excluding the salaries of its 56 staff. In its operations, the CDF engages principally with other Catholic entities and banks.

The main categories of expenditure across CAM, MACS, and CDF were in the following areas:

- Staff costs (salaried employees)
- Building and construction
- Cleaning and security services
- Facility management and property maintenance
- Events and event management
- Furniture and office supplies
- ICT Hardware
- Uniforms and PPE
- Food and catering services
- Waste management services
- Finance, investment, and portfolio positions
- Labour hire

Summary of 2023 activities

Throughout 2023, CAM, MACS, and CDF continued participation in the Australian Catholic Anti-Slavery Network modern slavery risk management program (ACAN Program). The ACAN Program provided CAM, MACS, and CDF staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Other actions completed in 2023 by all three reporting entities include:

- The continuation of standard procurement practice to invite suppliers to join Sedex (Supplier Ethical Data Exchange), an on-line system that allows suppliers to maintain data on ethical and responsible practices and allows suppliers to share data with customers; and
- The acceleration of collecting supplier engagement data.

In addition to these activities, MACS also undertook the following:

- Included modern slavery requirements into the standard MACS market engagement documents.
- Tender evaluations now include a tenderers completion of a modern slavery risk assessment as a scored criterion.
- The supplier set up and onboarding process has been strengthened and suppliers must complete a modern slavery risk assessment.
- Suppliers in high-risk categories are required to pass the modern slavery assessment and register their compliance on the Sedex platform.
- The Modern Slavery Working Group (MSWG) has extended its representation across the MACS organisation and has formalised their purpose with a Terms of Reference.
- The MSWG has agreed to a Modern Slavery Action Plan (MSAP) for 2024.
- The MSWG members completed an ACAN questionnaire that has assisted MACS to develop their 2023 Statement.
- The Procurement Team has completed the following ACAN Modern Slavery training modules:
 - Modern Slavery 101 – Introduction to Modern Slavery
 - Modern Slavery – Business Relevance
 - Modern Slavery – Grievance Mechanisms and Remedy
 - Modern Slavery – Implementing a Modern Slavery Risk Management Program
 - Modern Slavery – Risk Management for Suppliers

CRITERIA 3

Modern slavery risks in operations and supply chains

Supply Chain Risk

CAM

Analysis of CAM supply chains is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile.

The supplier categories assessed as high risk, include:

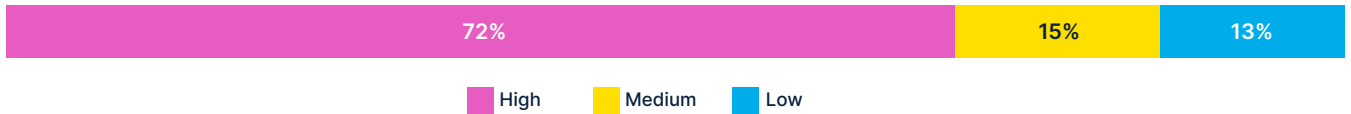
- Building and construction
- Cleaning and security services
- Events and event management
- Facilities management and property maintenance
- Food and catering services
- Furniture and office supplies
- ICT hardware

CAM does not have any staff provided by external providers or labour hire companies.

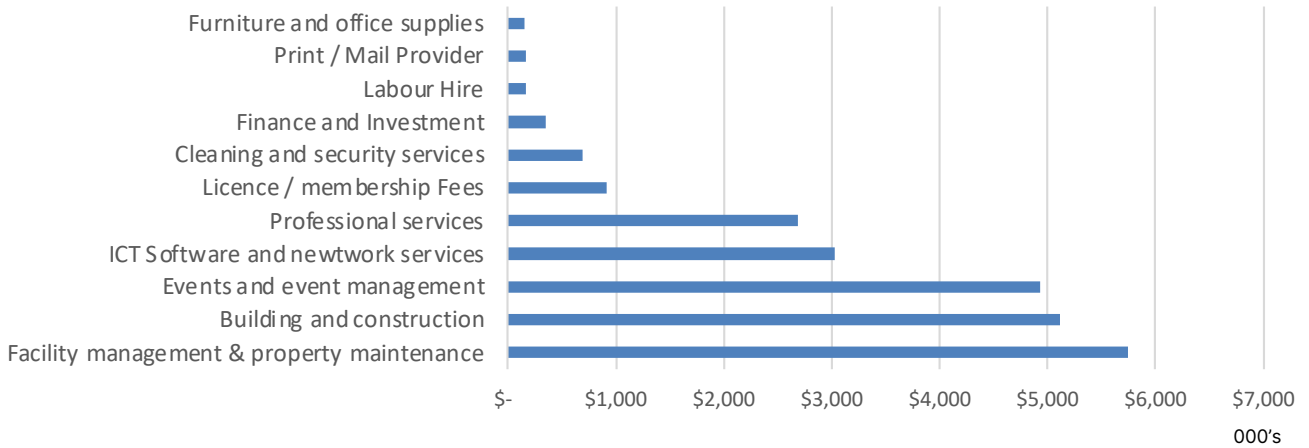
When engaging suppliers to deliver operational services, CAM endeavours to create and maintain long-term relationships and to build trust and transparency.

CAM Spend in High-Risk Categories

Spend Profile by Modern Slavery Taxonomy of Risk



CAM Procurement Spend in High Risk Categories

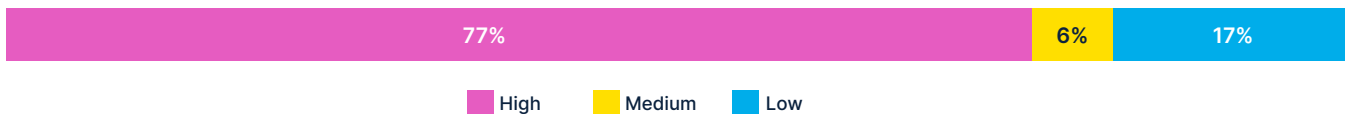


MACS

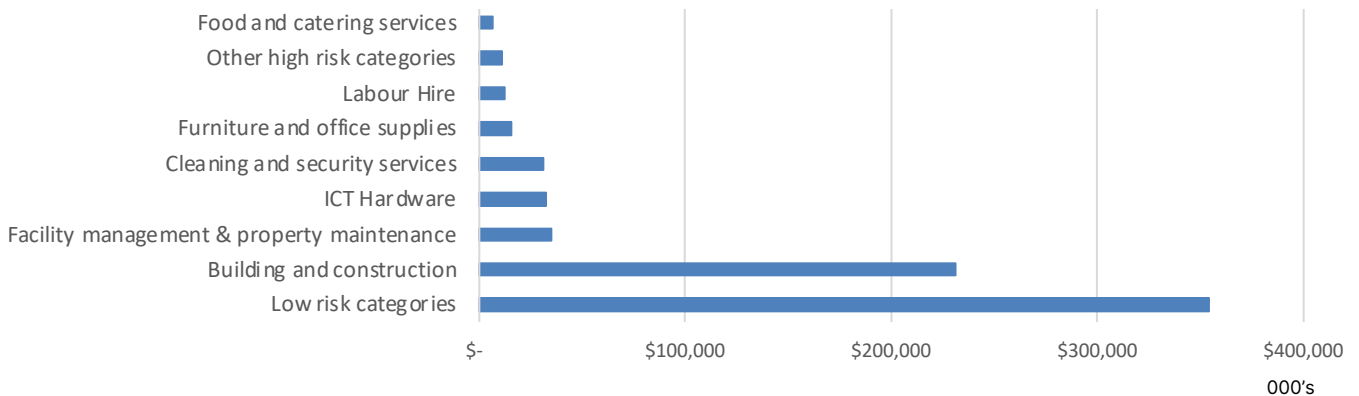
Modern slavery risks associated with MACS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. An analysis of MACS' spend on goods and services in 2023 is represented in the chart below. All low risk spend categories have been grouped together. The 'Other high-risk' categories include smaller spending categories such as uniforms, PPE, food, and catering.

ACAN will help us to engage with suppliers to develop a risk profile specific to each major supplier across operational activities and associated with the supply chains of goods. In addition, the MACS Procurement team has now commenced a category management service that will further inform the risk profiling of major suppliers in high-risk categories.

Spend Profile by Modern Slavery Taxonomy of Risk



MACS Procurement Spend in High Risk Categories



CDF

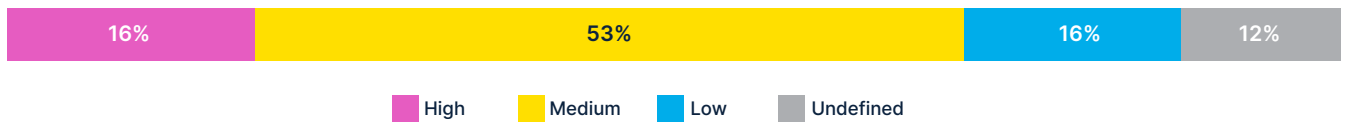
Analysis of CDF supply chains is based on ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

The supplier categories assessed as high risk, include:

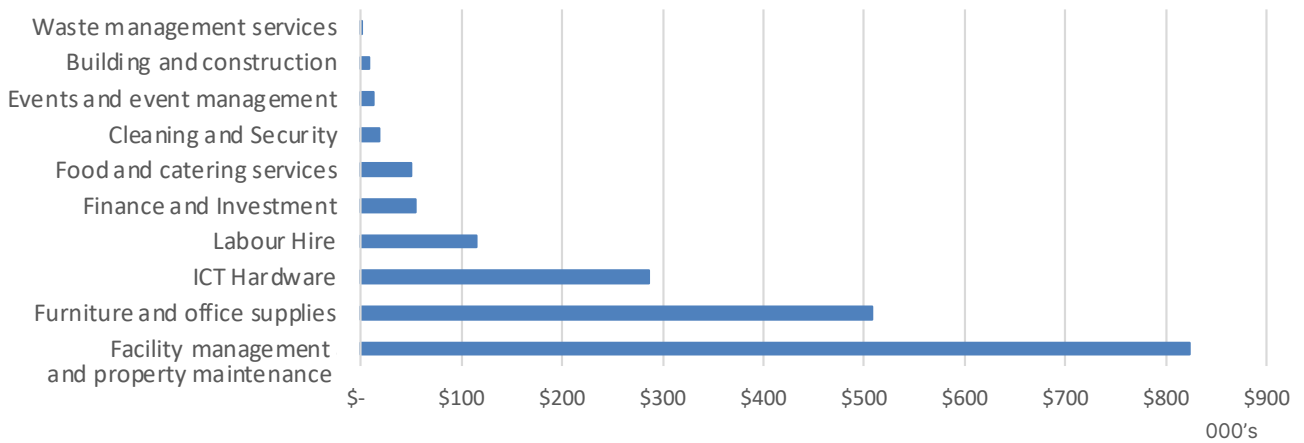
- Building and Construction
- Cleaning and Security
- Events and Event Management
- Facility Management and property maintenance
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT hardware
- Labour Hire
- Waste Management services

When engaging suppliers to deliver operational services, CDF tries to establish and maintain long-term relationships and to build trust and transparency.

Spend Profile by Modern Slavery Taxonomy of Risk



CDF Procurement Spend High-Risk Categories



Operational Risk

CAM and CDF

Through the ACAN Program, CAM and CDF continue to focus activities with suppliers of labour, and the operational risk associated, in the following high-risk labour supply chain areas.

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements.

Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers often contracted through labour hire companies.

BGIS supply Facilities Management and Property Services to CAM. As such, there are inherent modern slavery risks associated with the use of Australian based sub-contractors (and their sub-contractors/suppliers) and the overseas supply chain of materials and equipment.

Labour hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders
- international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel, and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community.

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment.

Modern slavery risks are like those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire.

Migrants and low-skilled workers are used in waste collection, handling, and material recovery facilities.

MACS

MACS is responsible for the governance and operation of 292 parish primary schools, regional and archdiocesan secondary colleges in the Archdiocese of Melbourne in the greater Melbourne area.

The care, safety and wellbeing of children and young people is a central and a fundamental responsibility of MACS. As such MACS does not tolerate improper conduct by our employees or volunteers and MACS is committed to strengthened practice for the protection of children in line with Victorian government child safety requirements.

MACS has multiple codes of conduct and follows industry requirements relevant to schools under the Victorian Regulation and Qualification Authority (VRQA).

Our employees and volunteers act in accordance with a range of codes, policies and procedures which support the governance and operation of MACS schools to deliver high-quality education and a nurturing school environment for all students. These include the Child Safety and Wellbeing Policy, Child Safety Code of Conduct, Recruitment Policy, Reportable Conduct Policy, Whistleblower Policy, Responsible Persons Policy, Code of Conduct for School Advisory Councils, Engaging Works through Labour Hire Providers Policy, Duty of Care Policy for MACS schools, Complaints Handling Procedures for MACS Schools and PROTECT – Reporting Obligations Policy.

In 2023, 16,736 people were employed by MACS, of which a high proportion (94%) work at MACS schools. 82% of employees are women and approximately 97% are Australian citizens or permanent residents and all employees are engaged in Australia. Just over 200 staff hold temporary visas. MACS operates in accordance with a specific policy, the Employment and Sponsorship of Visa Holders and Overseas Workers Policy to ensure that when a visa holder is employed or where MACS seeks to sponsor an employee on a visa, that there is compliance with immigration and right-to-work requirements under Australian law.

Conditions of employment for all employees are established for most staff under a multi-enterprise bargaining agreement which provides a wide range of benefits and flexibility to staff. MACS frequently discusses conditions for employees with trade unions across all MACS schools and offices, who act on the employee's behalf to represent their interests and in the development of the multi-enterprise agreement. A small proportion of employees are covered by modern awards or common law. On occasion, MACS engages staff through agency and other labour hire arrangements and follows requirements under the Labour Hire Licensing Scheme in Victoria and our policy on Engaging Workers Through Labour Hire Providers, to ensure labour hire agencies are compliant with these requirements.

As listed above and referenced on websites for individual MACS schools or the MACS website, there are a range of policies and codes which govern how MACS operates and these policies are enlivened by the core values of integrity, excellence and respect.

CRITERIA 4

Actions Taken to Assess and Address Risk

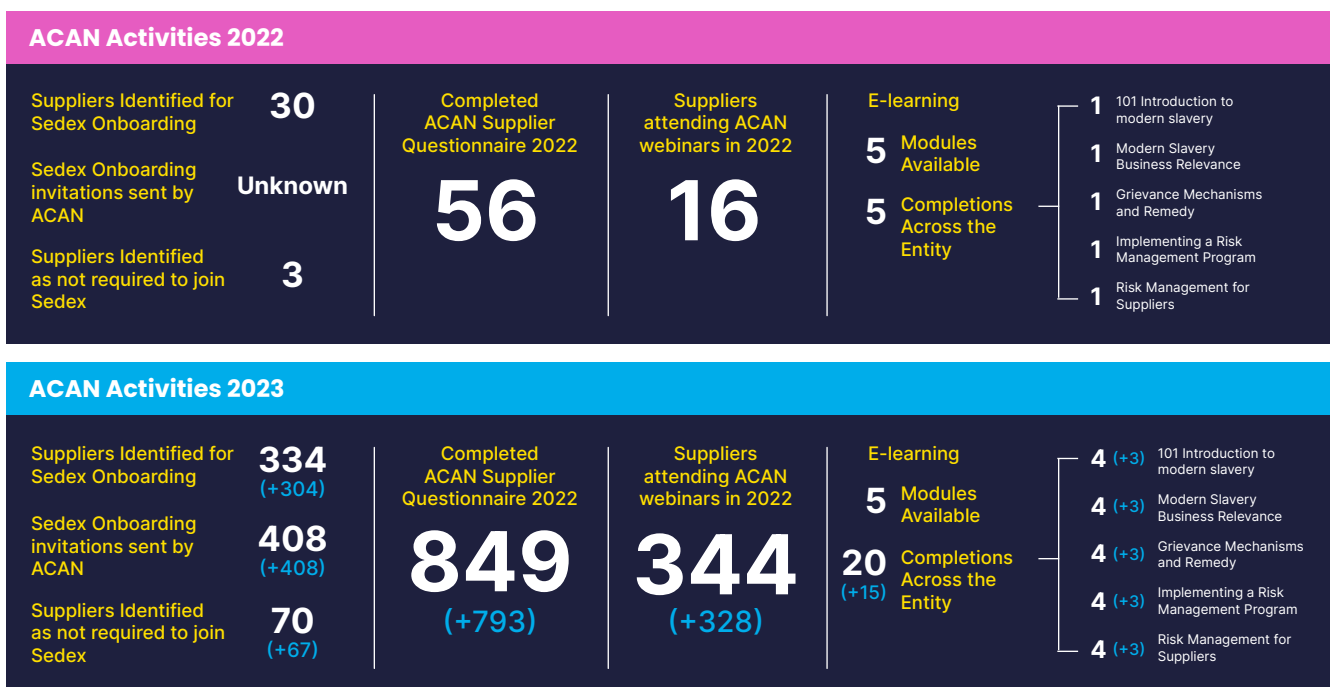
For the 2023 reporting period, CAM, MACS, and CDF participated in the ACAN Program for assessing and addressing the risk of modern slavery within each respective organisation and followed the following supplier engagement plan:

- Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
- Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey.
- Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
- ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic entities within ACAN. As a result, this data increased leverage and reduced duplication of supplier engagement from multiple Catholic entities.

An important part of the supplier engagement plan included an invitation to suppliers from CAM, MACS, and CDF to attend the 2023 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an fundamental understanding of modern slavery.

Overall, there were 849 suppliers to CAM, MACS, and CDF that completed the ACAN Supplier Survey, and 344 suppliers attended the webinar series.



Since mid-2021, the ACAN Program has provided CAM, MACS, and CDF with membership to the Sedex - Supplier Ethical Data Exchange.

Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains. It provides a platform for businesses to share information and collaborate with suppliers and buyers, to promote ethical and sustainable practices throughout the supply chain.

As members of Sedex, CAM, MACS, and CDF continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex provides CAM, MACS, and CDF a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

The ACAN Program supported suppliers with onboarding to Sedex and participation in assessment surveys, questionnaires, eLearning modules, and webinars.

CAM, MACS, and CDF intend that Sedex will be further utilised during 2024 to:

- Manage the risk of modern slavery with existing suppliers.
- Validate inherent risk against actual risk.
- Screen new suppliers as part of tenders and supplier on-boarding processes.
- Gain visibility further upstream in the supply chains.
- Monitor and report on progress in the profile of suppliers.

E-learning

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program.

CAM, MACS, and CDF will incorporate the ACAN e-learning modules into their internal Learning Management System to provide greater oversight and accountability.

The ACAN modern slavery modules are summarised as follows:

- **Module 1:** Modern Slavery 101 (MS101)
- **Module 2:** Business Relevance
- **Module 3:** Implementing a Modern Slavery Risk Management Program
- **Module 4:** Grievance Mechanisms and Remedy

Remediation

CAM, MACS, and CDF intend to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the UN Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities, and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to mitigate future risks if CAM, MACS, and CDF are found to have caused or contributed to modern slavery.

Due to the complexity of remediation, specialist resources are required to ensure the best outcomes for people impacted by modern slavery. To this end, CAM, MACS, and CDF will access Domus 8.7 to provide remedy to people impacted by modern slavery.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Through Domus 8.7, CAM, MACS, and CDF will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response.

CAM, MACS, and CDF staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions, and other indicators of modern slavery.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Action Plan 2024

CAM

Action	Timeframe	Status
Management Systems		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2021	Ongoing
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2024	In progress
Risk Management		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2021	Ongoing
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022-24	In progress
Procurement and Supply Chain		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021	Ongoing
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2022-24	In progress
Develop protocols for reviewing suppliers and for following up on adverse findings.	2022-24	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2021-24	In progress
Human Resources and Recruitment		
Activate the ACAN e-learning modules and make available to staff, boards, and senior management.	2024	In progress

Most of CAM's risk relates to the Facilities Management and Property Services provided by BGIS. BGIS prepare their own Modern Slavery Statement. Some of the key actions taken by BGIS to mitigate Modern Slavery risk is to consider its existence in the development of the following:

- Policies, procedures, and governance
- Code of business conduct and ethics
- Modern Slavery Act framework
- Sustainable procurement framework
- Procurement policy and sustainable procurement policy
- Vendor code of conduct
- Subcontracts
- Whistleblower policy
- Modern Slavery framework and supplier due diligence
- Anti-bribery and corruption
- Supplier pre-qualification
- Modern Slavery questionnaire

MACS

Action	Timeframe	Status
Management Systems		
Include assurance activities in new MACS assurance plan including checks in supply chain/suppliers/contractors for Modern Slavery compliance.	2024	In progress
Develop a governance structure that clearly defines role, responsibilities, and accountability for ethics compliance and modern slavery risk management across MACS.	2024	In progress
Risk Management		
Implement comprehensive set of measures to manage business ethics risks within MACS.	2024	In progress
Update Enterprise Risk Register, and all risk register templates to include Modern Slavery more prominently as an independent risk.	2024	In progress
Procurement and Supply Chain		
Utilise the ACAN Program's resources to initiate a detailed supply chain risk assessment, focusing on modern slavery risks. This includes integrating ACAN Supplier Survey results to identify and engage Tier 1 suppliers for Sedex membership and onboarding them onto the Sedex platform. By facilitating transparency and collaboration, the Procurement Team can more effectively manage supplier risk and enhance ethical procurement practices.	2024	In progress
Embed modern slavery considerations into all stages of the procurement process, from requests for proposals (RFx) and tender evaluations to contract awarding and management. Ensure that contracts include clear modern slavery clauses and compliance requirements. This activity will help establish ethical procurement practices and ensure that modern slavery risks are addressed throughout the procurement lifecycle. Currently undertaking in recruitment agency tender project.	2024	In progress
Human Resources and Recruitment		
Activate the ACAN e-learning modules and make available to staff, boards, and senior management.	2024	In progress

CDF

Action	Timeframe	Status
Management Systems		
Continue to develop policies, principles, and processes, and integrate these into management tools.	2024	In progress
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities, and develop KPIs.	2024	In progress
Risk Management		
Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2024	In progress
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2024	In progress
Procurement and Supply Chain		
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2024	In progress
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2024	In progress
Develop protocols for reviewing suppliers and for following up on adverse findings.	2024	In progress
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2024	In progress

CRITERIA 5

Measuring Effectiveness

During 2024, CAM and CDF will be committed to continually improving our approach partnering with our stakeholders and working to reduce modern slavery.

The CAM Action Plan is structured around the five risk categories analysed with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

CAM is progressing to identify and mitigate modern slavery risks in our practices and understands this is an ongoing process. We seek to continuously refine and improve our approach to manage Modern Slavery Risks effectively and transparently.

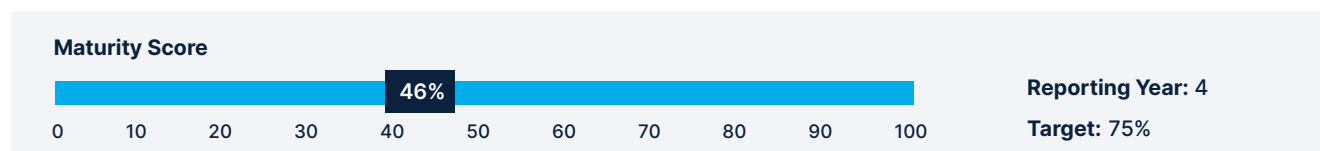
In 2024 the CAM priorities are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment.
- Continue to expand our training programs for staff and increase awareness of Modern Slavery risks, particularly to staff engaged in 3rd party purchasing activities and contractor engagement.
- Form a new Modern Slavery Working Group and appoint members to the group.
- Identify a Modern Slavery Liaison Officer (MSLO).
- Inclusion of modern slavery clauses in standard contract templates.

MACS

MACS has completed an assessment of its maturity in relation to modern slavery. The assessment revealed several opportunities to strengthen the modern slavery risk framework. The summary of maturity assessment follows.

Melbourne Archdiocese Catholic Schools - Overview



Melbourne Archdiocese Catholic Schools - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business process and governance	62%	54%	38%	35%	47%
2. Operations	55%	25%	25%	19%	31%
3. Supply chain	68%	80%	35%	44%	57%
4. Worker engagement	14%	62%	22%	22%	30%
5. Entity's program and activities	100%	30%	50%	38%	55%
6. Grievance mechanisms and remediation	78%	60%	57%	38%	58%
Average	63%	52%	38%	33%	46%

The MACS MSWG are scheduled to meet several times during 2024 with priorities to:

- Discuss the gap assessment results with a particular focus on the low percentage scores.
- Progress the tasks outlined in the MACS Modern Slavery Action Plan.
- Prepare content for the 2024 statement.
- Look ahead to 2025 in terms of further actions to improve future gap assessments.

Effectiveness Assessment

During 2024 and beyond, CAM, MACS, and CDF will continue to use its Sedex membership to improve visibility and reporting into supply chains.

The Sedex membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will significantly reduce risk of being directly linked to modern slavery, lower the risk of directly causing modern slavery, and diminish the risk of indirectly causing modern slavery.

A key priority is the enhancement of reporting capabilities, metrics, and development of Key Performance Indicators (KPIs). KPIs will continue to be developed by CAM, MACS, and CDF. To support the development of KPIs, baseline metrics have been developed to begin assessing the effectiveness of activities and initiatives.

Base Line Data

	ACTIVITY	Catholic Archdiocese of Melbourne	Catholic Development Fund	Melbourne Archdiocese Catholic Schools	Catholic Archdiocese of Melbourne - collated
Internal / Staff	Hours spent on modern slavery activities	50	10	60	110
	Individual staff completed e-learning	0	0	0	0
	E-learning modules completed	0	0	0	0
External / Supplier Engagement	Total number of suppliers	1156	207	30579	31942
	Number of suppliers with visible contact information and ABN	45	0	13897	13942
	Number of suppliers across high-risk categories	31	41	10254	10326
	Number of ACAN Supplier Surveys completed	4	20	849	873
	Supplier staff attending capacity building webinars	3	0	344	347
	Invited to join Sedex	0	0	370	370
	Joined Sedex	1	5	57	63
	Sedex SAQ completed	2	0	17	19
	Social audits	1	0	2	3
	Corrective actions	0	0	0	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0	0	0
	Referrals for advice and assistance	0	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0	0
	Individuals with modern slavery cases remediated	0	0	0	0

The Base Line Data table above indicates that CAM, MACS, and CDF need to devote more time to educate their staff on modern slavery risk and more time with their suppliers to reduce the risk of modern slavery in the supply chains.

CAM, MACS, and CDF will undertake reviews of their action plans at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective.

CRITERIA 6

Consultation

CAM, MACS and CDF anticipate that our consultation process will continue to develop in future reporting periods.

CAM consulted with different departments including People & Culture, Property & Infrastructure and Finance when preparing this statement.

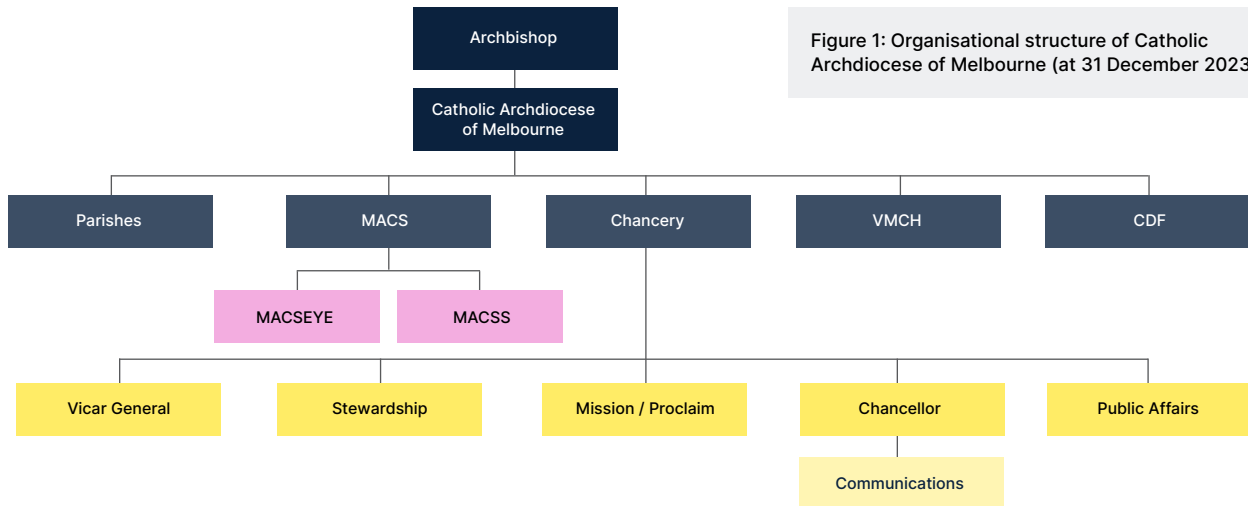
MACS has consulted widely with their subsidiaries, their MSWG and departments, such as Procurement, Legal, Communications, Risk, Compliance, People and Culture, and Finance teams, when preparing this statement.

CDF consulted with CDF Risk officers and different departments within CDF such as IT, Marketing and Client Services when preparing this statement.

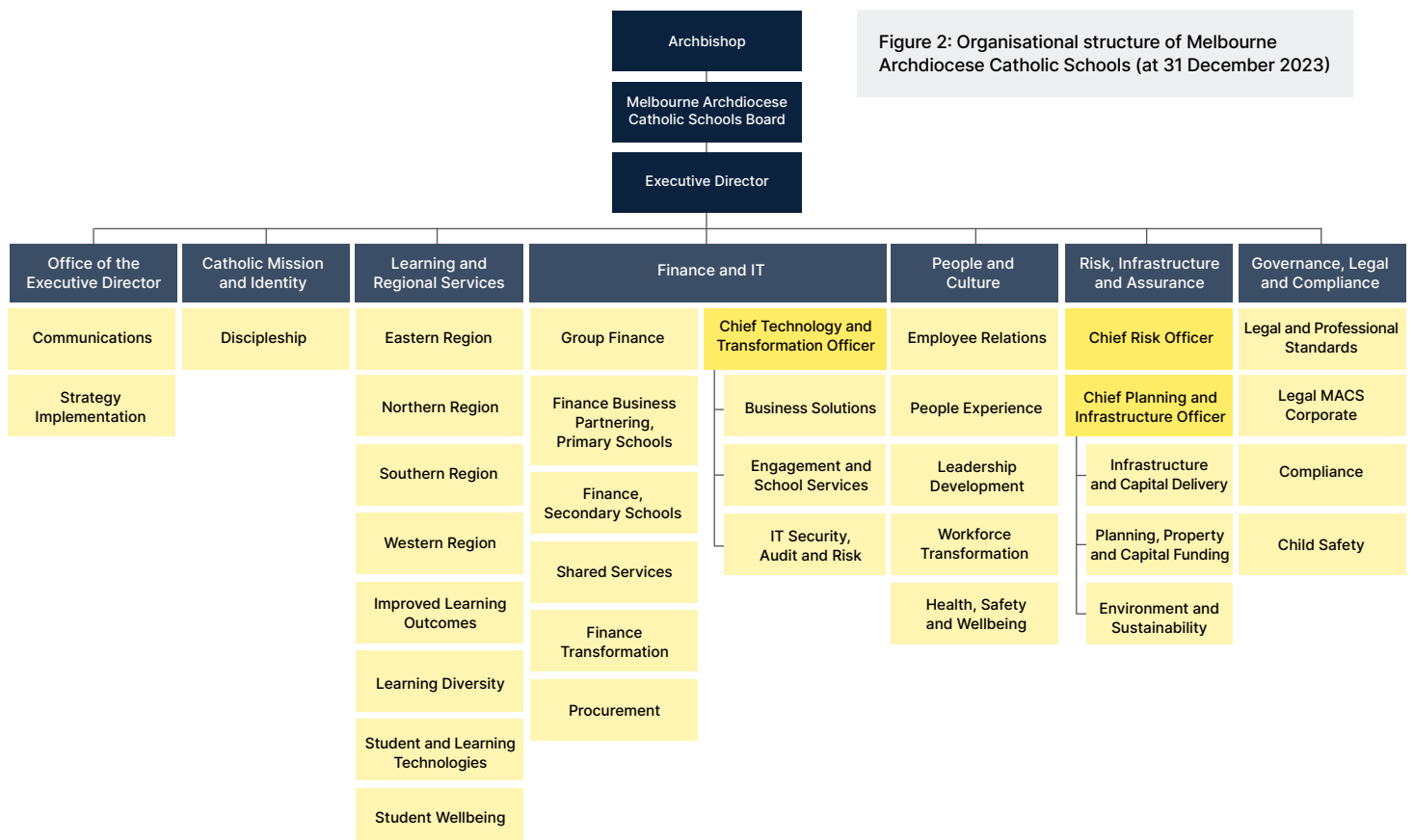
CRITERIA 7

Organisational Charts

Catholic Archdiocese of Melbourne



Melbourne Archdiocese Catholic Schools



Catholic Development Fund

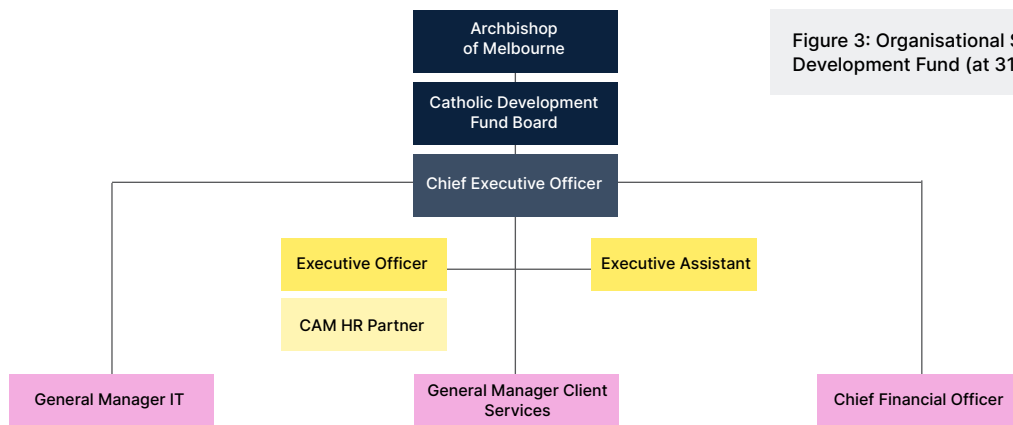


Figure 3: Organisational Structure of Catholic Development Fund (at 31 December 2023)



CATHOLIC ARCHDIOCESE
OF MELBOURNE



Melbourne Archdiocese
Catholic Schools



CATHOLIC DEVELOPMENT FUND

Modern Slavery Statement

1 January to 31 December 2023

Villa Maria Catholic Homes Ltd ABN 32 004 364 103

VMCH



Chair's introduction



At the core of VMCH's Catholic values is its commitment to assisting the poor and marginalised, particularly those people living with a disability and older people. It is our responsibility as an ethical provider, that we are deeply committed to ensuring the welfare and dignity of all individuals associated with our services. VMCH recognise the unfortunate reality of modern slavery and understand that our sector is not immune to such practices. These can manifest in various forms, including forced labour, exploitation of migrant workers, and unfair employment practices.

We categorically condemn all forms of modern slavery and are committed to implementing rigorous measures to ensure that such practices have no place in our operations or supply chains. We strive to maintain transparency, fair labour practices, and respect for human rights at all levels of our organisation.

Our commitment extends beyond mere compliance with legal obligations. We believe in the inherent dignity and sacredness of every individual and are dedicated to upholding it. We will continuously review and update our policies and procedures to combat Modern slavery, provide necessary training to our staff, and work collaboratively with our partners to promote ethical practices throughout the sector.

This Statement is our fourth public regulatory disclosure specifically addressing modern slavery in line with the requirements of **Modern Slavery Act 2018 (the Act)**. We have always been committed to improving the rights and wellbeing of people across our operations.

In 2023, the Board continued its commitment to the eradication of modern slavery through the risk appetite statement which sets the tone for risk. We have no appetite to engage in, or engage with, any form of modern slavery. It therefore continues to take a leadership

position and clearly and unequivocally states the position for all within the organisation. This position is also reflected in our policies, procedures, and practices.

We do not tolerate behaviour that is in breach of the law, which is non-compliant with our policies, or which does not align with our ethical values. We expect our employees, contractors, volunteers, and suppliers to operate in a manner which is consistent with our values and standards. This Statement sets out the steps we have taken in 2023 to identify and address modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we continue our education and awareness of modern slavery risks.

This Statement has been prepared and reviewed by VMCH's Modern Slavery Working Group, the VMCH Executive and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 1 May 2024.

We are pleased to be part of the Australian Catholic Anti-Slavery Network (ACAN) and acknowledge the support ACAN has provided in developing VMCH's modern slavery mitigation plans.

This Statement is submitted as part of the ACAN compendium, consequently this report is for activities to the year ending 31 December 2023.

Together, we can make a difference and contribute to the eradication of modern slavery.

A handwritten signature in black ink, appearing to read 'Julien O'Connell'.

Julien O'Connell A.O.
VMCH Board Chair

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1

Criteria 1 and 2: The Reporting Entity and our Structure

The reporting entity covered by the Statement is Villa Maria Catholic Homes Ltd (ACN 004363103) (VMCH). VMCH is a not-for-profit company limited by guarantee. VMCH's registered office is Level 3, 486 Albert Street, East Melbourne, Victoria.

1.1 About VMCH

VMCH is a Catholic profit for purpose organisation, providing services to over 10,000 people across Victoria. Our Mission is to continue the caring ministry of Jesus by creating choices, offering hospitality, and building inclusive, compassionate, sustainable communities. We are especially committed to supporting people who are disadvantaged and marginalised.

We strive to be a Catholic leading provider of high-quality disability, specialist education, residential and aged care and retirement living services. Our values of love, joy, hospitality and courage are not just words to us, they guide us in everything we do.

In accordance with our values, we are committed to respecting and promoting human rights, which includes the commitment to work to eradicate the many forms of modern slavery that exist. We aim to ensure that decisions made by VMCH do not allow modern slavery to continue within our operations, business relationships and extended supply chains.



1.2 Living our Vision and Mission

We aim to be recognised as a transformative leader in the provision of exceptional care, services, and accommodation. Fulfilling the caring ministry of Jesus, we are committed to creating genuine places of belonging, through service and compassion for all aged, disadvantaged and people with disability.

As a Catholic organisation we observe the teachings and practices of the Catholic Church by celebrating the life of individuals and their communities as expressed in their physical, social, and spiritual well-being.

Our Values

bringing
Love

We foster connections and show compassion for one another with kindness and respect.

creating
Joy

We create a culture of happiness and positivity, celebrating life and the uniqueness of all.

embracing
Hospitality

We welcome all to our community, bringing comfort and a sense of belonging.

showing
Courage

We do what is right, regardless of our fears, the challenges or consequences.

1.3 2023 Modern Day Slavery Risk Management Initiatives

In 2023, we continued our work on increasing awareness through communication, online learning and developing a network of champions throughout the organisation. We also partnered with other Catholic entities within our ACAN network to better tackle supplier engagement. We found that by teaming up with other Catholic entities we could better leverage our collective purchasing spend, share resources, and coordinate action to manage our risk. We implemented several initiatives and reached some key milestones by adopting this approach. These are summarised below.

- Continued membership of ACAN to leverage best practice materials and approaches.
- Further roll out of the modern slavery online training to employees to raise awareness of risks, and how to identify and confidently report incidents.
- Any new tenders (including request for tenders and requests for proposals) included a mandatory compliance requirement that the tenderer comply with VMCH's Modern Slavery Policy as part of the final agreement.

- Continued to bring together the network of modern slavery champions for discussion and presentations regarding modern slavery to improve awareness and engagement on of modern slavery within our organisation. Guest speakers presented to the modern slavery champions to ensure experiences from others was part of the learning process for VMCH.
- Considered further the overall work of VMCH including modern slavery within an ESG framework. Thereby recognising the interrelationship between modern slavery, environmental (including climate change) social and governance activities.
- Worked with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.



1.4 Our plans for 2024

VMCH is steadfast in its commitment to take action along the path to identify and mitigate modern slavery risk. Our plan for 2024 is to focus on three key priorities:

i) We will be an Ethical Employer

To be an ethical employer, improve standards for staff at VMCH and provide a decent, fair, and safe place to work.

We will also invest in our staff offering training opportunities in literacy providing tools to staff to provide independence particularly for our staff from non-English speaking backgrounds.

ii) We will consider where our products and services come from and demand they've been made free from exploitation

Use our influence and leverage to improve standards for people working in our supply chains, ensure they have a decent, fair, and safe place to work and tackle worker exploitation where we find it. We will actively look to work with more Australian based suppliers and review our linen contract.

iii) We will increase transparency and understanding across VMCH and externally

To continue to work transparently and collaboratively across VMCH to better identify modern slavery risk, encouraging staff and volunteers to report any concerns they observe.

We will continue to reinforce and further build on previous year's actions of VMCH's modern slavery programme in:

- **Governance** – continue to develop the governance around our modern slavery programme so it holds the right people to account and drives continuous improvement and the completion of our modern slavery strategy. This includes developing our ESG framework and plan.

- **Policies** – ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- **Strategic Partnerships** – identify and work with appropriate external partners who can challenge, drive and support us in delivering our Modern Slavery Strategy and Programme.
- **Training and awareness** – ensure all VMCH staff, contractors and volunteers are aware of modern slavery risk, know the signs to look out for and how to respond to concerns.

Through these measures, we aim to create an environment that is free from modern slavery and promotes the dignity and respect of all individuals. We believe that by taking a proactive and comprehensive approach, we can make a significant contribution to mitigating modern slavery risk for VMCH.

Further Commitments for the future are highlighted in Section 6.

1.5 Organisational Structure and Operations

VMCH is proud to work in partnership with people of all ages and abilities to achieve their individual goals and dreams, remain connected to their communities and enjoy their independence. Our **3,020+** staff members are dedicated to supporting **10,000** people across metropolitan Melbourne, regional Victoria, and southern New South Wales. We offer a vast range of services including residential aged care, retirement living, affordable housing options, community and home-based senior support, disability support, carer support and education.

Our People

3,020+
staff supported
10,000
people



Mission

400+
volunteers



4
op shops and a warehouse

24
pastoral care practitioners
supported people
across over

40
sites including affordable
housing, aged care and
disability services

Retirement Living

578
retirement living
apartments/units
across



14
locations

416
people living in our
affordable homes across

22
locations

Residential Aged Care

1,077
people provided
homes in aged
care across



14
locations

102
people provided with end
of life care at O'Neill House

Disability Services

1,085
NDIS clients

61
students enrolled
at St Paul's College




3,109
carers supported

109
children who attend Early Learning
and Therapy programs

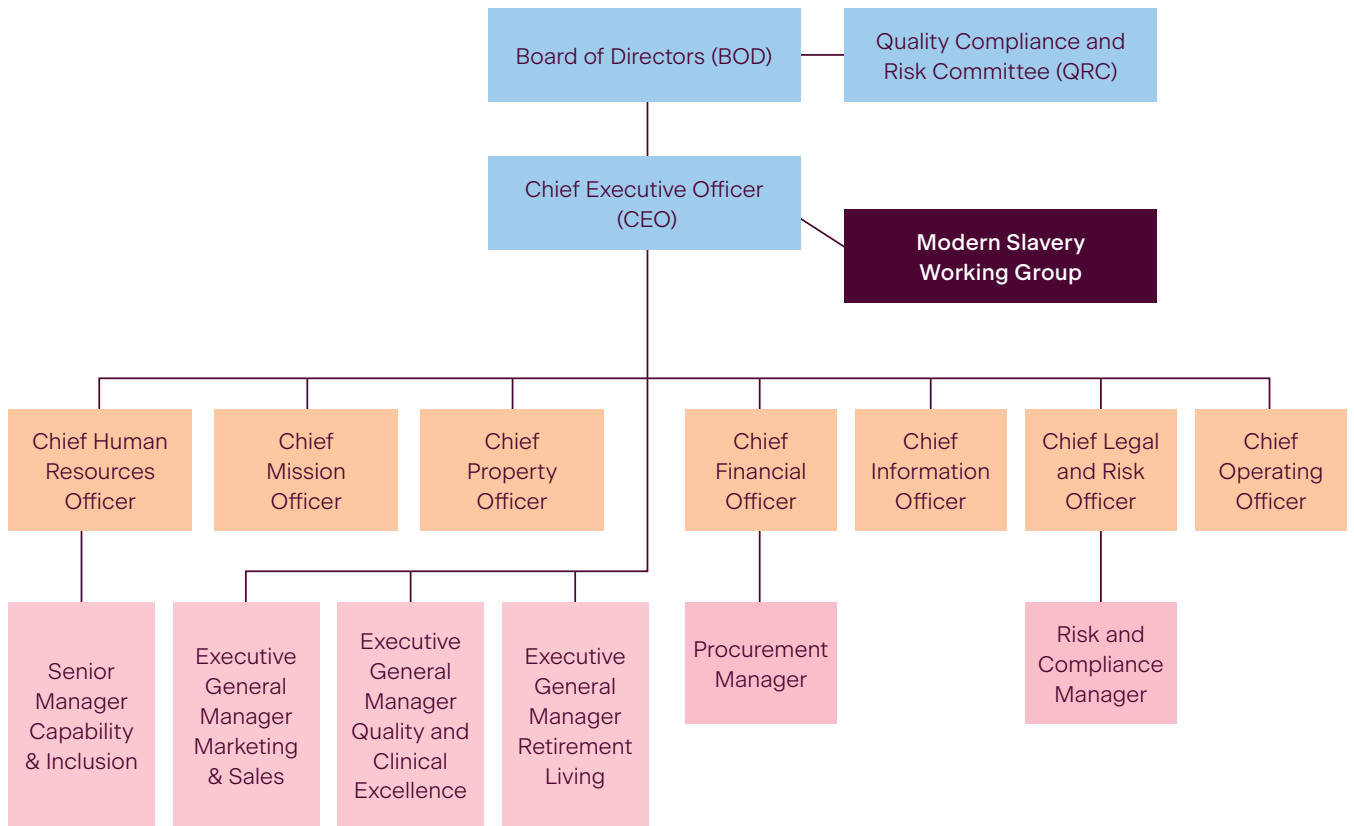
90
residents living in our
Shared Disability
Accommodation

At-Home Aged Care

3,255+
people supported
across metropolitan
Melbourne, regional
Victoria and southern NSW
with allied health, and in-home
and carer support



Organisational structure



Our structure includes a procurement function and a risk function which provide support to the operational areas. In 2023 we recruited a Capability and Inclusion manager that reports to our Chief Human Resources officer. This role provides expert advice and guidance, to our organisation by ensuring a strategic and consistent approach to the delivery of skills, jobs and increased diversity within the workforce and our supply chain.

1.6 Governance Structure

VMCH is governed by a robust structure that ensures the highest standards of care and allows for the mitigation modern slavery risk, including identification and reporting of modern slavery. The Board of Directors, with its diverse expertise, sets the strategic direction, including our commitment to identifying and mitigating modern slavery risk.

The Board has responsibility for ensuring a reporting culture and an enterprise risk management framework exists within VMCH.

The Quality Compliance & Risk Committee (QCR), assists the Board in its responsibilities relating to:

- Assessing the effectiveness of VMCH's overall risk management framework.
- Supporting a prudent and risk aware approach to decisions made within VMCH.

The QCR reviews a wide range of matters relating to Clinical Governance, Quality and Compliance frameworks. This includes all matters related to client care, safety and support and non-financial risks (including modern slavery risks) within which the organisation operates in accordance with VMCH's risk appetite and risk management framework. It also reviews the modern slavery risk as part of the overall risk management responsibilities.

The Board modern slavery commitment is operationalised, through policies and the delegations of authority, by our CEO and executive team, who implement policies, conduct training, and oversee day-to-day operations to ensure modern slavery risk is mitigated within our organisation or supply chains.

VMCH also has a modern slavery working party and modern slavery champions group that play a crucial role in monitoring compliance with these policies are the Modern Slavery working and champions groups. The objectives of these working groups are to:

- Provide input and advice to VMCH on issues related to modern slavery.

- Actively support the development and implementation of VMCH's modern slavery action plan.
- Assist VMCH in determining priority actions to be undertaken and establishing annual goals and targets.
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness, and;
- Ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).

Regular audits through our internal auditors are also conducted to identify any potential risks or instances of non-compliance within our policies and procedures of modern slavery.

Our governance structure therefore ensures accountability, transparency, and a commitment to the dignity and respect of all individuals associated with our services.

1.7 Our Strategic Plan

Modern slavery fits within the 2023 VMCH Strategic Plan, under the headings:

Effectiveness

- Excellent Board governance practices.
- Understanding and managing modern slavery risks.
- Implement ethical investment practices.

Clients

- Continued training and implementation of "knowing our people".

Mission

- Continued formation of staff through orientation, formation program, and dissemination of weekly reflections based on our values, screen savers highlighting Easter and Christmas with a focus of thinking of others. Continued investment in the formation of VMCH staff in our mission, vision and values and in the traditions of our catholic identity and heritage.

1.8 Supply Chain

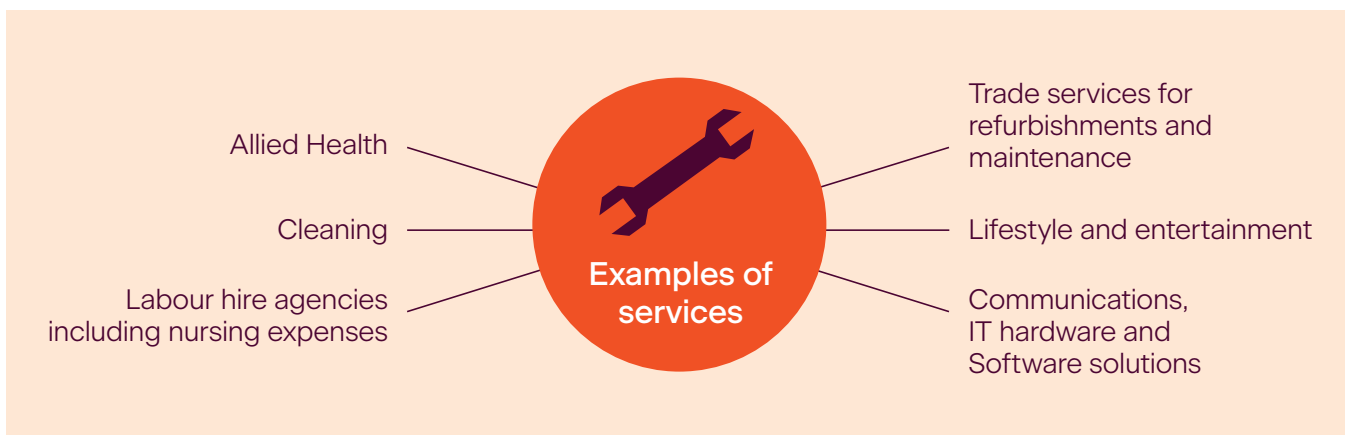
VMCH has **2,751** active suppliers, who supply a range of goods and services to enable VMCH to maintain our operations and provide excellent care to our clients, residents, and students. Greater emphasis has been made within our contractor space with more vigorous checks in place for hiring. VMCH also has a central system to store contracts for suppliers.

Our supply chain is diverse and encompasses small local businesses through to national and global businesses. We deal predominantly with suppliers with an Australian presence, and many have their head office in Australia. Examples of goods and services sourced are included in the table below.

Professional services are generally provided by locally based suppliers.

Our procurement team is working hard at trying to source all products, especially in our construction space from local suppliers.

Examples of what we source:



VMCH has a robust tender process in place to review our tenders for potential modern slavery risks. We start by conducting a thorough risk assessment of each tender, focusing on the nature of the work, the geographical location, and the labour practices involved.

We then scrutinise the supply chains of potential contractors, ensuring they have transparent labour practices and adhere to international human rights standards. We also require potential contractors to demonstrate their commitment to preventing modern slavery, which can include their policies, training programs, and reporting mechanisms. This rigorous approach ensures that our business practices align with our commitment to human rights and social responsibility.

2

Criteria 3: Identifying modern slavery risks in operations and supply chain

2.1 Modern slavery risk factors

Modern slavery risks may exist due to many factors. Risk indicators include the following:

- **Sector and industry risks:** Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.
- **Products and services risks:** Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.
- **Geographic risks:** Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socioeconomic factors like poverty.
- **Entity risks:** Some entities may have modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.
- **Indicators of modern slavery:** A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. Some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.

2.2 Understanding modern slavery within VMCH's context

In 2023, VMCH continued to develop its understanding of modern slavery risk. We developed key processes to assess elevated modern slavery risk areas within our business supply chain, have meticulously reviewed and significantly transformed our tender process to ensure it aligns with our commitment to ethical practices and social responsibility. We also partnered with other Catholic networks to strengthen our approach to onboarding suppliers.

As part of our **protected disclosure whistleblower policy**, employees, volunteers, and the community are provided with effective mechanisms to identify and escalate concerns including those regarding modern slavery. VMCH continues to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, if required.

We continued our membership, with Australian Catholic Anti-Slavery Network (ACAN), <https://www.acan.org.au/>.

As part of ACAN, VMCH has accessed the work and resources made available by ACAN, this includes Sedex, training modules and having access to key speakers.

2.3 Modern Slavery Gap Analysis

We undertook a gap analysis in December 2022 and again in December 2023. This part of our commitment to continuing to analyse our work in the modern slavery area. The table below has the results of the gap analysis.

Our analysis revealed areas that require further attention. Although we initially believed we performed well in December 2022, upon further review, we acknowledged the need for additional planning in our business systems. Our commitment remains to achieve our goals in all other areas, aiming for a 5.0% over time.

		Dec-22		Dec-23		Change
		Score	Avg	Score	Avg	
Management Systems	Governance	4.0	3.8	4.5	3.4	↓
	Commitment	4.0		4.5		
	Business Systems	4.0		3.0		
	Action	4.0		3.0		
	Monitoring and Reporting	3.0		3.0		
Risk	Risk Framework	4.0	3.5	4.5	3.6	↑
	Operational Risk	4.0		4.0		
	Identifying External Risks	4.0		3.0		
	Monitoring and Reporting on Risk	2.0		3.0		
Procurement	Policies and Procedures	4.0	3.6	5.0	3.6	—
	Contract Management	4.0		5.0		
	Screening and Traceability	3.0		3.0		
	Supplier Engagement	4.0		3.0		
	Monitoring and Corrective Actions	3.0		2.0		
Human Resources	Awareness	4.0	4.0	4.5	4.0	—
	Policies and Systems	4.0		4.5		
	Training	4.0		4.0		
	Labour Hire/Outsourcing	4.0		3.0		
Stakeholders	Customer Attitude	3.0	3.5	3.0	3.3	↓
	Information Provision	4.0		4.0		
	Feedback Mechanism	3.0		3.0		
	Worker Voice	4.0		3.0		

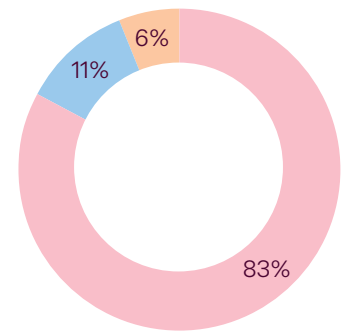
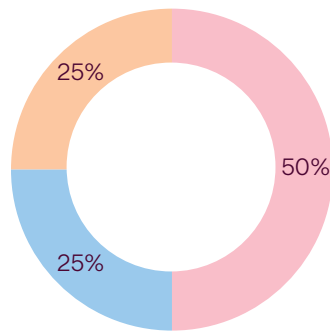
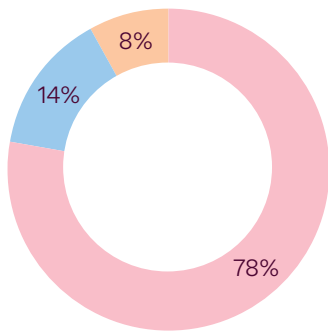
2.4 Operational and Supply Chain Risks

VMCH recognises that modern slavery risk may occur in our organisation and extended supply chain. Therefore, we monitor our supplier base for high-risk suppliers and categories to identify risk factors. VMCH analysed its top 50 suppliers (see the table below) and identified that of the top 50 spend suppliers, 39 were categorised as potentially high risk. The risk was assessed based on the supplier category.

There are four high risk categories highlighted:

1. Building and construction
2. Cleaning and Laundry
3. Direct Care & Services
4. Labour Hire and Recruitment (the risk within this category is labour hire using agency staff)

Risk by suppliers		Risk by categories		Risk by spend	
Number of suppliers	High risk suppliers	Spend by categories	High risk categories	Total spend \$	High risk suppliers
50	39	8	4	\$44,985,430	39



● High risk ● Medium risk ● Low risk

3

Criteria 4: Action taken to assess and address Modern Slavery Risks

Actions taken to assess and address modern slavery risks are outlined below.

3.1 Governance Framework

- VMCH continues to be a member of the ACAN with a modern slavery liaison officer (MSLO) representative. ACAN is a network of over 45 Catholic entities. VMCH's MSLO attended ACAN monthly meetings. These meetings aimed to understand the potential modern slavery risks and provide member organisations, including VMCH, with resources to assist in the modern slavery mitigation plans.
- The VMCH Board reviewed its risk appetite statement. Specifically, it included the Board's position on modern slavery, namely, that VMCH has no appetite to engage in, or engage with, any form of modern slavery.
- A Modern Slavery Working Party continued to meet, to provide input and advice to VMCH on issues related to modern slavery; actively support the development and implementation of VMCH's modern slavery action plan; assist VMCH determine priority actions to be undertaken and establish annual goals and targets; monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).
- The Modern Slavery Policy which, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provide a framework to ensure direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which finding and further treatments for modern slavery can be incorporated to ensure best practice.
- The ACAN supplier surveys were also completed by our suppliers and assessed by ACAN.
- The supplier code of conduct was in place.
- Continued work with the SEDEX tool (www.Sedex.com) to map our supply chain and assist in evaluating the risk of modern slavery within it. Sedex is a membership organisation that we have been able to access through our membership of ACAN. It provides an online platform to assist us in managing modern slavery risks within our supply chain.
- VMCH was part of the ACAN Health Working Group that considered procurement suppliers across the Catholic health sector to consider ways to encourage suppliers to join Sedex.

3.2 Contracts and Tenders

- Standard clauses regarding modern slavery are incorporated into all relevant agreements and are part of the standard tender materials VMCH now uses for its procurement activities.
- Our tender process includes the VMCH's Modern Slavery Policy, and any tenderer must accept and comply with the VMCH's Modern Slavery policy to be considered as part of the tender, along with agreeing and signing the Contractor Code of Code.

3.3 Training and Education

- Online training was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers. All the modern slavery champions have undertaken online training.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Webinars where leading experts on Modern Slavery presented about their experiences were accessed by suppliers and VMCH staff.
- The Modern Slavery Working Party took part in a training workshop to assist in engaging with suppliers.
- Monthly ACAN Working Webinars are attended by the Chief of Risk and Legal Officer and the Risk and Compliance Manager. These working webinars are facilitated by ACAN staff, topics covered are program updates, government updates, and guest speakers.
- Information is shared on VMCH's SharePoint to all staff on any changes in laws or regulations.
- Each meeting that the working group holds is opened with a prayer for St Josephine Bakhita patron Saint and acknowledgement of country.

3.4 Communication

- VMCH used its multiple communication channels/mediums with staff to raise awareness of modern slavery issues so that staff are informed about, and can be aware of, modern slavery issues. For example, on 8 February VMCH highlighted to all staff, through electronic media and thought for the week, the Feast Day of St Josephine Bakhita – the patron Saint of victims of modern slavery and human trafficking. On this day we pray for all those affected by these crimes, and the people that volunteer and work to eradicate them.

- Modern slavery champions were identified and came together as a group of staff who would be most likely to order goods or services and would need to be aware of, or identify, potential modern slavery issues.

3.5 Procurement and Operational Actions

- We recognise that due to the nature of VMCH's workforce characteristics and required skillsets, there are modern slavery risks within our operations. To mitigate this, we are working to reduce our reliance on agency staff use wherever possible.
- In 2023, there was a focused effort on reducing reliance on agency staff through the scheduling project. The project focused on reducing the level of agency used by each residential aged care site, instead encouraging the use of permanent staff. This means that staff are engaged by VMCH, which lowers our modern slavery risk associated with workforce characteristics.
- In addition, the nursing, aged care, and disability sectors are subject to industry enterprise agreements to ensure fair pay and working conditions for at-risk labour. Staff also have access to internal grievance mechanisms to voice any modern slavery concerns.
- There is a Procurement Hub on our intranet that all staff can access to assist them with all matters relating to procurement and contract management. Within this portal staff can access a preferred supplier list, the procurement policy, forms, and information about Modern Slavery.
- When hiring new employees, we are committed to hiring Australian citizens or people with appropriate working rights in Australia. We also ensure that our remuneration framework and enterprise agreements pay people at or above and in accordance with Australian employment laws.

3.6 Investments

- VMCH's Investment Management Policy and Procedures guide VMCH's investment strategy and sets out that investments will be made in a socially responsible manner that broadly reflects VMCH's values. To achieve this, VMCH has adopted a policy of excluding business activities and conduct is contrary to VMCH's values and the teachings of the Catholic Church, cause or perpetuate injustice or suffering, or infringe human rights. In addition, investment in companies is also excluded where their practices are unacceptable from a human rights or modern slavery perspective.
- Investment advisors must comply with VMCH's Investment Management Policy and Procedures when providing investment advice to VMCH.

3.7 Remediation Action

- VMCH is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery.

- To address this, Domus 8.7, a not-for-profit, has been established to provide remediation services and a confidential advisory service to individuals affected by modern slavery. Domus 8.7 will triage cases and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available. Additionally, Domus 8.7 will help build the capacity of Catholic social services and parishes to address the issues and risks of modern slavery, engage in policy advocacy and research, and engage with businesses and suppliers.
- Through Domus 8.7, VMCH aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any grievances related to modern slavery will be mediated through Domus 8.7, and VMCH is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence. To recognise the causes of modern slavery and escalate poor labour practices and unsafe working conditions, both staff and stakeholders of VMCH are being equipped with the necessary skills to spot cases when they present themselves.
- Over the past year, VMCH did not find any cases of modern slavery in its operations and supply chains. This may have been due to the risk assessment still being too unspecific and in need of fine tuning. Once proper channels to identify victims are established and when suppliers are being probed in greater detail, this may change.

4

Criteria 5: Effectiveness Assessment

Our GAP analysis highlights the improvements and challenges we have as an organisation. We are more robust in our modern slavery policies and process and therefore have clear expectations with our suppliers, contractors and staff. We have strengthened our induction and onboarding processes and have now a resource dedicated to modern slavery.

VMCH will assess the effectiveness of the actions taken through a variety of review mechanisms including:

- Annual review of the effectiveness of our policies and procedures relating to modern slavery. These will be assessed on whether they are fit for purpose in the day-to-day aspects of the organisation and will be updated as required.
- Regular review and improvement of VMCH's due diligence processes as they relate to suppliers.
- Review of reported risks internally e.g., through the grievance or protected disclosure (whistleblowing) processes.
- A workplace engagement survey where employees can anonymously provide feedback about job satisfaction, working conditions, concerns, improvement ideas, etc.
- Regular review of suppliers.



5

Criteria 6: Describe the process of consultation with any other entities the reporting entity owns or controls

We do not own or control any other entities and therefore this criterion is not applicable.

6

Criteria 7: Other – Future Commitment

VMCH has outlined specific actions for 2024 that directly address the identification, management, and mitigation of modern slavery risks, our major project for the year is in our business systems area and integrating within our management tools ways to manage modern slavery holistically rather than silo based. We also need to address modern slavery more regularly at an executive level.

Some more specific actions are listed below:

- Continue to develop the governance around our Modern Slavery Programme so it holds the right people to account and drives continuous improvement and the completion of our Modern Slavery Strategy. This includes our commitment to our ESG framework and plan.
- Ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- Identify and work with appropriate external partners who can challenge, drive, and support us in delivering our Modern Slavery Strategy and Programme. Further develop our metrics in developing our engagement with suppliers.
- Ensure all VMCH staff, contractors and volunteers are aware that Modern Slavery is happening, know the signs to look out for and how to respond to concerns.

The mandatory requirements under s 16 of the Modern Slavery Act 2018 (Cth) and the sections in this Statement that address the requirements are set out in the table below.

	Mandatory requirement	Where found in VMCH's statement
1.	Identify the reporting entity	Section 1: The Reporting Entity and our Structure
2.	Describe the reporting entity's structure, operations, and supply chains	Section 1: The Reporting Entity and our Structure
3.	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity	Section 2: Identify Modern Day Slavery risks in operations and supply chain
4.	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	Section 3: Actions taken to assess and address Modern Day Slavery Risks
5.	Describe how the reporting entity assesses the effectiveness of these actions	Section 4: Effectiveness Assessment
6.	Describe the process of consultation with any entities the reporting entity owns or controls	Not applicable to VMCH
7.	Provide any other relevant information	Section 6: Other – Future Commitment



More information

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Join the conversation





Archdiocese
of Hobart

Modern Slavery Statement

1 January 2023 – 31 December 2023



Disclosure Note

This statement has been produced on behalf of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart.

This statement covers all entities owned or controlled by the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart.

Archdiocese of Hobart

ABN 24 097 986 470

Catholic Diocesan Centre

35 Tower Road, New Town, TAS 7008

hobart.catholic.org.au

Endorsement

This Modern Slavery Statement was approved by the principal governing body of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 29 May 2024. This Modern Slavery Statement is signed by a responsible member of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart

A handwritten signature in black ink that reads "Chris Ryan".

Chris Ryan

Trustee & Executive Director, Administration & Finance
Archdiocese of Hobart

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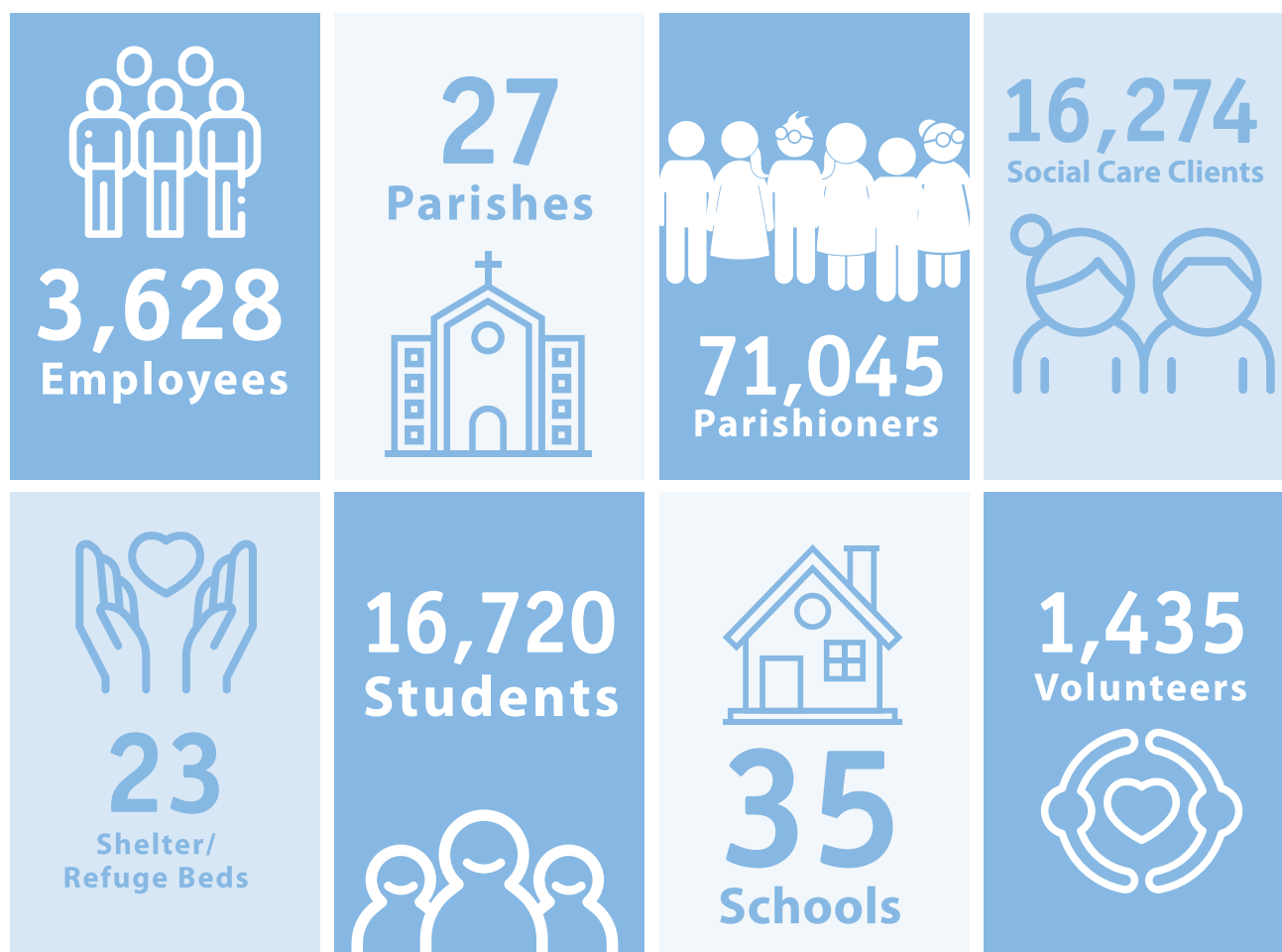
About the Archdiocese of Hobart

The Catholic Church has been serving the people of Tasmania since the arrival of Fr Philip Conolly in 1821.

Over the next 30 years the ministry of Fr Conolly and other pioneering priests, the Sisters of Charity and the first Bishop of Hobart, Robert Willson, was largely dedicated to helping the male and female convicts living across Tasmania. In 1842, the Diocese of Hobart was established and was later elevated to an Archdiocese in 1888.

The Archdiocese seeks to make Jesus Christ the centre of all that it does. All works and agencies of the Archdiocese give expression to their Catholic identity and seek to serve the broader mission of the Church. The Archdiocese and its agencies also endeavour to embody the principles of Catholic Social Teaching including respect for the dignity of the human person.

All those employed within the Archdiocese are encouraged to reciprocate and demonstrate respect, truthfulness, integrity, hospitality, forgiveness and justice towards each other, and those that they serve in their respective roles. The eradication of modern slavery in the Archdiocese's operations and supply chains is an extension of the Archdiocese's mission and Catholic identity which it seeks to reflect in its operations and supplier relationships.





Statement from Archbishop Julian Porteous

I am pleased to endorse the fourth Modern Slavery Statement for the Archdiocese of Hobart and commit the Church in Tasmania, its agencies and enterprises, to a continued program of practical measures that, in solidarity with people of faith, leaders in governments and businesses, and all men and women of good will, can help animate the compassion and concern necessary to completely eradicate the exploitation of vulnerable people around the world especially women and children.



Through prayer, education, advocacy, and practical action, we continue our journey to fulfill the mission of the Church, proclaiming Jesus Christ and the gospel of God's love and mercy to the world. Pope Francis reminds us that ending modern slavery practices demands patience, perseverance, and courage from each one of us. We expect all our employees, contractors, and suppliers to comply with all aspects of our policy as we act to eliminate modern slavery practices from our operations, business partnerships and supply chain.

May our witness bear abundant fruit through the intercession of Saint Josephine Bakhita.

Archbishop Julian Porteous

Archbishop of Hobart

Identity & Mission of the Archdiocese of Hobart

We are people of God, loved unconditionally by God.

We are called into a communion of life and love with Jesus Christ, who impels us to deepen our relationship with each other and with all people. We are inspired by the Holy Spirit of God to use our gifts in the service of others and as stewards of creation.

Organisations covered by this Statement

The following organisations are covered under this Modern Slavery Statement:

Parent

Roman Catholic Church Trust Corporation of the Archdiocese of Hobart

ABN 24 097 986 470

Agencies

Catholic Education Office Hobart

ABN 43 854 833 448

CatholicCare Tasmania

ABN 79 984 899 862

Catholic Development Fund Tasmania

ABN 21 429 090 329

Catholic Education Centre

ABN 55 210 770 582

Centacare Evolve Housing Limited

ABN 23 154 824 969

Centacare Tasmania Housing Ltd

ABN 31 118 194 737

Fourth Sector Enterprises

ABN 55 118 413 086

St Mary's Cathedral Restoration Appeal Inc

ABN 24 166 819 681

St Joseph Affordable Homes Inc

ABN 96 397 668 255

The Blueline Laundry Inc

ABN 77 795 370 902

The Trustee for Samaritan Projects Tasmania

ABN 16 655 388 053

The Trustee for Samaritan Projects Welfare

ABN 16 088 936 310

Parishes

**Bellerive/Lindisfarne
Catholic Parish**

ABN 48 311 435 045

Bridgewater/Brighton Parish

ABN 69 529 535 324

Burnie/Wynyard Parish

ABN 17 159 156 995

Campbell Town Catholic Parish

ABN 93 254 686 172

Cathedral Catholic Parish

ABN 32 131 849 117

Central Tas Catholic Parish

ABN 72 241 711 244

Circular Head Catholic Parish

ABN 12 609 147 089

Claremont Catholic Parish

ABN 81 446 747 286

Flinders Island Catholic Parish

ABN 84 590 870 735

George Town Catholic Parish

ABN 97 928 439 546

Glenorchy Catholic Parish

ABN 20 550 721 345

Huon Valley Catholic Parish

ABN 80 537 700 319

King Island Catholic Parish

ABN 56 529 285 418

Kings Meadows Catholic Parish

ABN 39 719 124 194

Kingston-Channel Catholic Parish

ABN 97 895 023 407

Launceston Catholic Parish

ABN 65 906 348 035

Meander Valley Catholic Parish

ABN 65 531 591 674

Mersey Leven Catholic Parish

ABN 22 402 858 041

Moonah/Lutana Catholic Parish

ABN 49 250 195 502

Oatlands Catholic Parish

ABN 11 842 804 966

Pontville Catholic Cemetery

ABN 15 646 506 960

Richmond Catholic Parish

ABN 88 913 042 469

Sandy Bay Catholic Parish

ABN 70 705 223 199

Scottsdale Catholic Parish

ABN 12 641 163 317

South Hobart Catholic Parish

ABN 53 842 301 643

St Mary's Catholic Parish

ABN 81 271 388 480

Swansea Catholic Parish

ABN 83 121 636 272

West Coast Catholic Parish

ABN 74 486 213 689

West Tamar Catholic Parish

ABN 46 350 971 589

Schools & Colleges

Corpus Christi Catholic School

ABN 61 097 642 154

Guilford Young College

ABN 76 019 833 993

Holy Rosary Catholic School

ABN 75 092 701 811

Immaculate Heart of Mary Catholic School

ABN 76 620 874 983

John Paul II Catholic Primary School

ABN 44 049 110 657

Larmenier Catholic Primary School

ABN 17 465 270 592

MacKillop Catholic College

ABN 89 094 211 541

Marist Regional College

ABN 60 165 188 918

Mt Carmel College

ABN 32 359 023 154

Our Lady of Lourdes Catholic School

ABN 68 416 731 625

Our Lady of Mercy School

ABN 89 892 817 584

Sacred Heart College (New Town)

ABN 36 205 940 483

Sacred Heart School Geeveston

ABN 12 223 562 136

Sacred Heart Catholic Primary School (Launceston)

ABN 87 361 757 372

Sacred Heart Catholic School Ulverstone

ABN 94 448 741 301

St Aloysius' Catholic College

ABN 41 300 940 448

St Anthony's Catholic School

ABN 11 317 538 056

St Brendan-Shaw Catholic College

ABN 64 137 590 249

St Brigid's Catholic School (New Norfolk)

ABN 94 743 620 170

St Brigid's Catholic Primary School (Wynyard)

ABN 22 182 779 426

St Cuthbert's Catholic School

ABN 61 571 914 083

St Finn Barr's Catholic Primary School

ABN 85 668 818 546

St James Catholic College

ABN 45 240 090 480

St John's Catholic School

ABN 29 599 894 790

St Joseph's Catholic Primary School (Queenstown)

ABN 22 380 630 458

St Joseph's Catholic Primary School (Rosebery)

ABN 86 751 886 993

St Mary's College

ABN 70 118 296 643

St Patrick's Catholic College Prospect

ABN 87 092 083 980

St Patrick's Catholic School Latrobe

ABN 83 243 281 322

St Paul's Catholic School

ABN 91 439 681 183

St Peter Chanel Catholic School

ABN 11 902 907 409

St Therese's Catholic School

ABN 42 361 686 522

St Thomas More's Catholic Primary School

ABN 39 185 389 074

Star of the Sea College

ABN 95 621 969 049

Stella Maris Catholic Primary School

ABN 24 165 090 763

Organisational Structure

About the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart

In Tasmania, The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart, 'The Trust', operates in the civil law through the Roman Catholic Church Property Act 1932. This Act of the Tasmanian Parliament, amended in 2005, confers upon the Roman Catholic Archbishop of Hobart and his appointed trustees a legal identity or body corporate with authority under civil law to manage the affairs of the Church in Tasmania.

The Act provides for 'The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart' (Church Trust Corporation) to be the employer as appropriate, and to provide an agency with a Common Law status to more readily facilitate dealings with Federal and State governments with regard contractual and grant obligations. The Act provides for functional agencies and operations of The Trust including:

- Parishes
- Catholic Education Tasmania
- Archdiocesan Schools & Colleges
- CatholicCare Tasmania; and
- Catholic Development Fund

There are three enterprises referred to in the Governance Chart in Figure 1 that are controlled by the Archdiocese that are not entities of The Trust:

- Blueline Laundry Inc.
- Centacare Evolve Housing Limited; and
- St Joseph Affordable Homes Inc.

Blueline Laundry and St Joseph Affordable Homes are registered charities governed by Rules of the Association. These rules are ratified by the members of the Association who are members of the Board of these entities.

The Diocesan Finance Council (DFC) is the principal Archdiocesan consultative body for matters associated with finance and administration. It prepares an annual budget, provides counsel to the Archbishop on a range of issues and on occasions it is required to provide consent for the sale of assets above a value determined by the Australian Catholic Bishops Conference. Advice and recommendations from Agency bodies are first directed to the DFC as matters to be considered, before being presented to the Archbishop for his approval.

In the Archdiocese, the various works of the Church are organised into distinct agencies. This structure provides clear distinctions as to responsibilities, management and governance. It also assists with compliance requirements associated with government funding and taxation requirements.



Governance Framework

As a body corporate, the Trust is the proprietor of the agencies of the Church. Through these agencies, the Trust holds property and intangible assets, conducts commercial activities and employs or otherwise engages many people. Under civil law, some incorporated entities of the Church hold their own assets and employ staff. The Body Corporate is a legal entity with perpetual succession with the Trustees being appointed and removed entirely at the Archbishop's discretion.

As enterprises of the Archdiocese, its other associated entities including St Joseph Affordable Homes Incorporated, Blueline Laundry Incorporated and Centacare Evolve Housing Limited are also subject to the Archdiocese of Hobart Board Code of Conduct and associated Tier 1 policies.

While in most cases the Trust and respective associations have shared members, as a statutory body corporate under the *Roman Catholic Church Property Act 1932*, the Trust excludes these separately incorporated bodies.

As an employer the Trust fulfils its obligations to ensure that all workers, including volunteers, adhere to external legislative requirements and internal organisational policies and procedures through the proper authority as prescribed in canon and civil law and observing the principle of subsidiarity.

The Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) was formed in the 2019. It comprises representatives from all Archdiocesan agencies and entities and reports to the Executive Director, Administration & Finance. The Committee's role includes:

- Developing and maintaining the Archdiocese Modern Slavery Prevention Policy and Principles
- Preparing Modern Slavery Statements for the Department of Home Affairs.
- Providing education and awareness resources to staff, boards and volunteers
- Overseeing efforts of AoH Agencies and entities to educate suppliers and stakeholders on Modern Slavery Compliance; and
- Progressing Modern Slavery Prevention initiatives.



Our Operations

Catholic Parishes

There are 27 parishes in the Archdiocese located across Tasmania generally with a priest in residence appointed as the parish priest or administrator. Most parishes have a parish secretary to assist in parish administration. Parish suppliers include insurance, altar supplies and property maintenance services. Parishes can also have short term supply arrangements for items such as food and beverage and flower suppliers.



Church Office

The Archdiocesan Church Office provides logistical, ICT, corporate and other administrative support services to the operations of the Archdiocese of Hobart and is based in New Town, Tasmania. The Church Office employs 57 staff. The Church Office has several long-term suppliers in the areas of professional services, fleet management, property and maintenance services and ICT hardware and software.



Centacare Evolve Housing (CEH)

CEH was formed in 2014 from a joint venture between the Trust and Evolve Housing Ltd. Its mission is to provide secure and stable social housing and community development programs. Their housing stock of over 3000 homes is primarily located in the Brighton/ Bridgewater area of Tasmania. CEH has offices in New Town, New Norfolk and Launceston with its head office and most of its 60 employees based at Bridgewater. With its own in-house maintenance team and a significant pipeline of ~500 new social and affordable homes Centacare Evolve Housing engages nearly 30 long-term suppliers in the area of building, construction and maintenance.

Catholic Education Tasmania (CET)

CET runs 38 Catholic schools and colleges that offer early learning, kindergarten, primary school, high school, and senior secondary education for 16,719 students across Tasmania. In 2023, CET had 2455 staff who are based at its head office located at New Town and at regional offices in Launceston and Ulverstone, and on campus at the 38 schools and colleges run by the school system. CET has a number of long-term supply arrangements in place in the area of professional services, uniform supplies, maintenance services, ICT providers, educational supplies and building and construction. It has short term supply arrangements in place for educational services, food and beverage and other areas of operation.

Catholic Development Fund (CDF)

For over 60 years, Catholic Development Fund Tasmania (CDF) has provided a treasury function to support Catholic Education Tasmania, Parishes, Welfare agencies, Affordable Housing organisations, Aged Care facilities and many other Catholic entities throughout Tasmania. Services and facilities we provide include transaction banking services, loans for capital projects, loans for working capital, corporate credit cards, online banking services and EFTPOS and donation facilities. Through this collective approach, our clients are contributing to the ongoing work of the Catholic Church here in Tasmania.

CatholicCare Tasmania (CCT)

CCT has been the primary social services agency of the Archdiocese across Tasmania since 1960. They have 450+ employees located across the state and offer a variety of programs and projects across key areas: early learning and care, family services, affordable housing, multicultural services, counselling and emergency relief. CCT's head office is located in New Town, Tasmania. It delivers services from its head office, and at offices in Launceston, George Town, Devonport and Burnie. CCT has a number of long term suppliers in the area of professional services, building and construction and maintenance services. They have short term supply arrangements in place in the food and beverage area.



Blueline Laundry Inc (BLL)

The Blueline Laundry Inc Association is a Social Enterprise with a long and proud history of service to the people of Tasmania. Since commencing operations in 1893, as a laundry that employed disadvantaged women and girls, BLL has evolved to a fully commercial and competitive entity that operates two social enterprise laundries and a social enterprise commercial cleaning business. BLL not only offers employment, but training, and personal development for people with disabilities and for those from disadvantaged backgrounds. Employing over 240 staff, with approximately 70% either working with a disability, or from a culturally or linguistically diverse background, BLL aims to create meaningful employment opportunities. In recognition of this, BLL was recognised as a 'Business for Good' in 2022, with certification as a Social Enterprise and was subsequently recognised as an Employer of Choice in 2023. BLL has long-term supply arrangements in place around laundry chemicals, linen supplies, and utilities.



St Joseph Affordable Homes Inc. (SJAH)

St Joseph Affordable Homes is a building and construction social enterprise established in July 2020 to improve life and employment outcomes (including apprenticeships) for disengaged young Tasmanians. In three years of operation 269 dwellings were completed with a secured pipeline of another 579 scheduled for completion by 2027. St Joseph Affordable Homes delivers an in-house apprenticeship scheme that currently employs 36 young people across a range of trades: carpentry, plumbing, painting, bricklaying and carpet laying. It has an established a supply chain involving 93 long-term suppliers for key building materials and trade services.

CRITERIA 3

Modern Slavery Risks in Operations & Supply Chains

In our unwavering commitment to ethical business practices and the inherent dignity of every individual, we embark on a crucial endeavour to confront the scourge of modern slavery within our supply chains. This section of the report is a testament to our dedication to transparency, accountability, and the pursuit of justice. Recognising that modern slavery remains a grave concern in today's global economy, we acknowledge our responsibility to diligently assess and mitigate the risks present in our supply chains. Through collaborative efforts with our suppliers, we pledge to identify, evidence, and address these risks comprehensively, guided by a framework rooted in human rights, integrity, and the teachings of our shared humanity. Together, we strive to foster a supply chain ecosystem where exploitation finds no refuge, and where every individual is treated with the dignity and respect they deserve.

Spend Categories

The Archdiocese is continuing to build on its previous years works in terms of analysing modern slavery risks in its supply chain and operations. The use of a risk taxonomy developed by the Australian Catholic Anti-Slavery Network has been employed to categorise the risks for modern slavery in the Archdiocese's supply chain in terms of high, medium and low risk.

We are working closely with our contractors in the building and construction industry, which is the areas of biggest spend in terms of procurement.

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

Our Supply Chain

The supply chain for Archdiocesan entities is provided in the following table:

Entity	Types of Goods & Services Procured	Location of suppliers	
		Tier 1	Tier 2
Parishes	Insurance, altar supplies, maintenance services, office supplies, ICT services, cleaning services, food and beverage, utilities and vehicle/vehicle services	Australia	Unknown
Church Office	Professional services, insurance, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
Catholic Education Tasmania	Professional services, insurance, building and construction, uniforms supplies, education services, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
CatholicCare Tasmania	Professional services, insurance, building and construction, maintenance services, office supplies, utilities, ICT services and fleet management	Australia	Unknown
Centacare Evolve Housing	Professional services, insurance, building and construction, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
Catholic Development Fund	Professional services, insurance, financial services, office supplies and ICT services	Australia	Unknown
St Joseph Affordable Homes	Professional services, insurance, building and construction material, trade services, office supplies and fleet management	Australia	Unknown
Blueline Laundry	Laundry chemicals, linen, utilities, uniform supplies and PPE	Australia	Europe, Pakistan

Table 1 Provides and overview of the supply chain across the Archdiocese.



CRITERIA 4

Actions taken to assess and address risk

The Archdiocese of Hobart participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan which is as follows:

1. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
2. Supplier in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed the survey results and determined the following:
 - Suppliers already members of Sedex
 - Suppliers willing to join Sedex
 - Suppliers classified as not required to join Sedex
3. Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self Assessment Questionnaires (SAQ).
4. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

An important part of the supplier engagement plan included an invitation to suppliers to the Archdiocese of Hobart to attend the 2022 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

- Business relevance and the Modern Slavery Act
- Catholic customer/buyer expectations
- How to access ACAN e-learning
- Sedex supplier membership

Since mid-2021, the ACAN Program has provided the

Archdiocese of Hobart with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain. As a member of Sedex, the Archdiocese of Hobart continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- Improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- Enhanced risk management: Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- Increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- Access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- Competitive advantage: By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Cleaning/labour hire companies can be considered high risk for modern slavery for several reasons including high turnover rates, fragmented workforce and hidden nature of the work given it is often done often out of hours. During 2023, the Archdiocese of Hobart supported one of its agencies, Blueline Laundry to begin a new arm of its business and venture into cleaning services. Having commenced operations in Hobart in 1893, Blueline Laundry is the longest-serving commercial laundry in Tasmania, with an

established reputation for outstanding service and benefits to the community.

Blueline Laundry's point of difference is it's non-discriminatory employment choices, actively employing people with a disability or experiencing disadvantage. We are proud to be able to engage Blueline to undertake the cleaning services for our Head Office and Archives building, as well as a number of our Churches and Presbyteries.



Actions taken to assess and address risk

During 2023, The Archdiocese and its agencies completed or progressed the following items to assess or address risks within the supply chain.

Action	Action Status	Comments
Renew membership of ACAN.	Completed	ACAN continued to provide valuable support, training and resources for the continuance of the Archdiocese's compliance program.
Provided modern slavery update to all Archdiocesan agency boards.	Completed	The policy was communicated across all agencies and controlled entities. E-learning initiatives including the Modern Slavery module were rolled out to Boards. Regular updates are provided to the board.
Initiate supplier engagement activities with suppliers in high risk categories.	Work in Progress	There were a number of supplier engagement activities with high risk supplier that will be more structured in 2024.
Incorporate modern slavery clauses in building and construction supply contracts.	Work in Progress	This has been initiated for suppliers to SJAH. Staff changes in CET slowed the progress of this activity that will be progressed in 2024.
Circulate ACAN Modern Slavery 101 e-learning module for all staff and members of Archdiocesan boards.	Completed	This action was completed.
Develop CET Modern Slavery School kit for implementation in 2024.	Work in Progress	This action was commenced but was not finalised. It will be carried over to 2024.
Develop Modern Slavery Parish kit for implementation in 2024.	Work in Progress	This action was commenced but was not finalised. It will be carried over to 2024.
Conduct a comprehensive review of all high-risk Tier 1 suppliers across the supply chain of the Archdiocese and its agencies.	Work in Progress	Deskstop reviews were performed to identify suppliers who submitted Modern Slavery Statements to the Border Force website and these statements were downloaded. Other high- risk suppliers were reviewed using the Dunn & Bradstreet database to ascertain their revenue and head count.

Supplier Engagement

St Joseph Affordable Homes is an active ministry of The Catholic Church and an entity of The Archdiocese of Hobart. St Joseph Affordable Homes has been established to support the Catholic Church in Tasmania to advance its mission. St Joseph Affordable Homes further supports the delivery of CatholicCare Tasmania and Centacare Evolve Housing's (CEH) vision for human flourishing, as articulated in The Archbishop's Charter for CatholicCare Tasmania.

As part of the Catholic Church, St Joseph Affordable Homes requires that all people engaged in partnership with us, including as trade Contractors and Suppliers, regardless of their particular faith, tradition or belief system, when working in a professional capacity with St Joseph Affordable Homes, adhere to codes of conduct and respect aligned to the Mission, Vision and Values of the Catholic Church.

St Joseph Affordable Homes uses the environment of building and construction to deliver on its purpose to improve individual, family and community wellbeing, in particular through providing sustainable life-skills, training, employment opportunities and apprenticeships for young Tasmanians.

The Archdiocese and its agencies value our suppliers greatly and work closely with them to ensure they are aware of our Modern Slavery obligations as part of our induction process.

All St Joseph Affordable Homes contractors have signed a Period Trade Contract which has the following Modern Slavery clause included:

To meet the requirements of the Modern Slavery Act 2018 (Cth), the Archdiocese of Hobart is implementing systems and controls to ensure that modern slavery is not taking place anywhere within our operations or supply chains. St Joseph Affordable Homes, expects all of its workers, contractors and suppliers to:

- a) Not knowingly cause or contribute to modern slavery in any form.
- b) Actively take measures to identify, and eliminate modern slavery from their operations.
- c) Undertake due diligence of their suppliers and subcontractors to ensure modern slavery is not taking place in these supply chains and downstream businesses
- d) Comply with all applicable legislation and regulations of the jurisdictions in which the supplier is conducting business.
- e) Comply with all applicable State, Australian and international anti-slavery and human trafficking legislation and regulation.

During 2023 an additional 60 contractors and suppliers were inducted and agreed to the modern slavery clause in the period trade contract.

We are continuing to engage with contractors in relation to the suppliers they engage from a Tier 2 and Tier 3 perspective and will continue this work in 2024 and beyond.

Modern Slavery Prevention Policy

Our Modern Slavery Prevention Policy serves as a cornerstone for organisational integrity, responsibility, and ethical conduct. This policy which is supported by our Anti-Slavery Guiding Principles for Suppliers, provides clear guidance and standards for employees and stakeholders, outlining the organisation's commitment to eradicating modern slavery from its operations and supply chains. It sets a tone from the top, signalling to all involved parties that exploitation of any form will not be tolerated.

The Modern Slavery Prevention Policy also helps in risk identification and mitigation. By conducting thorough assessments of supply chains, operations, and business practices, the Archdiocese and its Agencies can proactively identify areas vulnerable to modern slavery and take necessary steps to address these risks.

Modern Slavery Risk Controls

We are looking to embed the following 7 modern slavery risk controls in purchasing practices as part of a comprehensive and systematic approach that integrates human rights considerations into all stages of the procurement process:

1. **Supplier Due Diligence:** Implement robust due diligence procedures to assess potential suppliers for modern slavery risks before engaging in business relationships. This may involve conducting risk assessments, background checks, and site visits to evaluate supplier practices, labour conditions, and adherence to ethical standards.
2. **Supplier Contracts and Codes of Conduct:** Include clauses in supplier contracts that explicitly prohibit modern slavery and require compliance with relevant laws and international standards. Develop and communicate clear codes of conduct outlining expectations regarding labour rights, fair wages, working conditions, and human rights throughout the supply chain.
3. **Supplier Monitoring and Auditing:** Establish mechanisms for ongoing monitoring and auditing of supplier performance to ensure compliance with contractual obligations and ethical standards. This may involve regular inspections, third-party audits, and performance evaluations to detect and address any instances of modern slavery or labour exploitation.
4. **Training and Awareness:** Provide training and awareness programs for procurement staff and relevant stakeholders to enhance understanding of modern slavery risks, signs of exploitation, and their responsibilities in mitigating these risks. Empower employees to identify and report concerns, and encourage open communication channels for addressing issues promptly.
5. **Risk Mapping and Assessment:** Conduct thorough risk assessments to identify high-risk areas within the supply chain where modern slavery may be prevalent. This includes mapping out tiers of suppliers, geographical regions, and industries with higher likelihoods of exploitation. Use this information to prioritize risk mitigation efforts and allocate resources effectively.
6. **Supplier Engagement and Collaboration:** Foster collaborative relationships with suppliers based on transparency, dialogue, and shared commitment to ethical sourcing. Engage suppliers in discussions about modern slavery risks, provide guidance and support for improving labour practices, and incentivize responsible behaviour through recognition and rewards.
7. **Continuous Improvement and Evaluation:** Regularly review and evaluate the effectiveness of modern slavery risk controls in purchasing practices. Seek feedback from stakeholders, monitor key performance indicators, and adapt strategies as needed to address emerging risks and evolving regulatory requirements.

By embedding modern slavery risk controls in purchasing practices, our organisations are demonstrating a commitment to ethical sourcing, human rights, and social responsibility.

E-Learning

During 2023 the Archdiocese of Hobart had employees complete the Introduction to the Prevention of Modern Slavery to newly inducted employees from the following agencies:

- St Joseph Affordable Homes Inc.
- Catholic Parishes
- Church Office
- Catholic Education Tasmania
- CatholicCare Tasmania
- Centacare Evolve Housing
- Catholic Development Fund (CDF)
- Blueline Laundry Inc (BLL)

The training unit, rolled out by Salt by GRC Solutions which, encapsulates the following modules:

- 1) What is modern slavery;
- 2) How often modern slavery occurs in supply chains;
- 3) How organisations are involved; and
- 4) Eliminating involvement in modern slavery.



Remediation

The Archdiocese is committed to ensuring it provides appropriate and timely remediation of people impacted by modern slavery in accordance with the Modern Slavery Act 2018. A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, Archdiocese of Hobart agencies have access to the expertise and independent advice available through Domus 8.7. AoH agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach

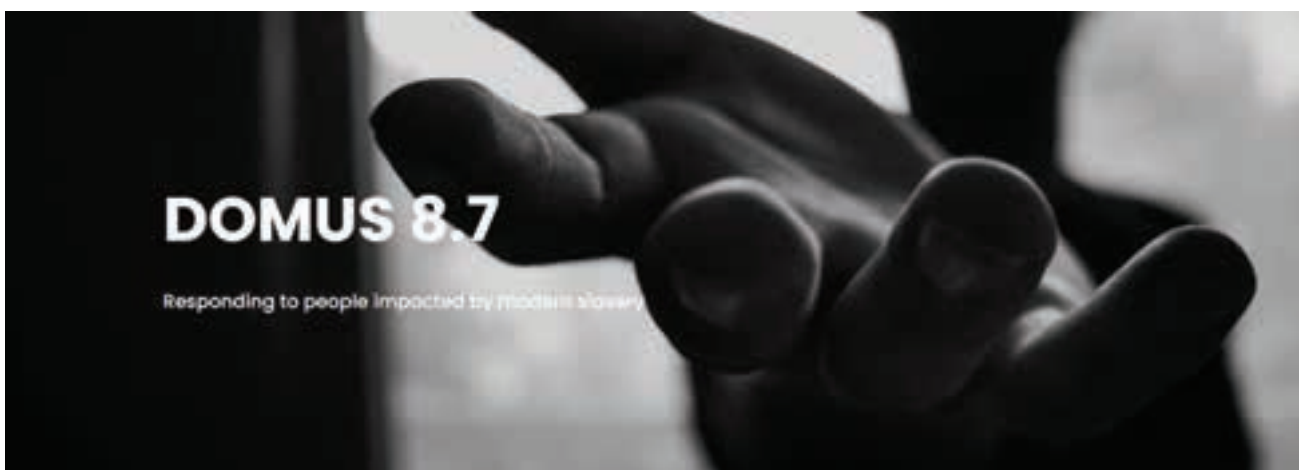
Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Additional information about Domus 8.7 and the process applied can be found on acan.org.au/domus87



Action Plan for 2024 & Beyond

Plans for 2024 & Beyond

The Archdiocese and its Agencies are committed to:

1. Employ a dedicated resource to interrogate our supply chains in further detail.
2. Continue onboarding suppliers to Sedex via ACAN's group membership;
3. Improve modern slavery prevention training in Catholic Education Schools and Colleges
4. Develop awareness resources for agencies to utilise;
5. Further embed the modern slavery prevention clauses as part of procurement practices for all new tender contracts with high risk suppliers;
6. Run a number of awareness sessions
7. Actively participate in Australian Catholic Anti-Slavery Network (ACAN) program to encourage collaboration between the broader Catholic network.



CRITERIA 5

Effectiveness

Over the course of 2023 the Archdiocese of Hobart made some serious ground on increasing education and training from our employees on the ground and our volunteers right up to our Board members.

Our Boards have placed a greater deal of focus on our Modern Slavery response and updates are included as part of Executive updates to Boards and the Diocesan Finance Council.

As our Modern Slavery Prevention program matures, we are working on developing tools and processes to identify and act on our modern slavery risks.

Our Archdiocesan Modern Slavery Committee act as a consultative committee that drive action in the areas of greatest need and risk and provide direction in relation to activities.

We also have an external Independent whistleblower service and information about our Modern Slavery Response and Program on our intranet and website.

Measuring effectiveness

The metrics in the table provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions, and helps AoH understand the pace of change and set future direction.

The data demonstrates engagement from suppliers of goods and services. The completion of the ACAN supplier survey improved identification of 4 suppliers where the completion of the SEDEX SAQ would support managing modern slavery risk in their own operations and supply chains.



CRITERIA 6

Consultation & Awareness Activities

During 2023, the Archdiocese and its agencies were involved in the following awareness raising activities.

CatholicCare Tasmania (CCT) Multicultural Programs

CCT's Multicultural Programs (MP) team provides support to people from migrant and refugee backgrounds as they settle into their new lives in Tasmania. They are at increased risk of experiencing forms of modern slavery due to challenges such as low literacy, education or English language skills; visa requirements; lack of awareness of work rights or safe work conditions; limited support networks; lack of access to reliable information; and due to racism and discrimination.

Multicultural Employment Services continues to provide employment support to people who may be at risk of labour exploitation or where there might be indications of poor work conditions. MP's caseworkers ensure their clients are aware of their rights and responsibilities as an employee including minimum wage and safe work conditions. Clients are referred to the Fair Work Ombudsman for more in depth information and support regarding their individual circumstances when required.



As a team, MP are committed to the prevention of modern slavery and ensuring that those who may have experienced forms of slavery here in Australia or abroad receive the support, care and information they need to thrive and live safely in the community. The MP team remain active and engaged in this area in relation to their clients and raising awareness. In the past 12 months the following activities have been undertaken:

SpeakNow: Identifying and responding to forced marriage.

An inter-agency training program was hosted by CatholicCare and facilitated by Anti-Slavery Australia on Forced Marriage and Modern Slavery in May 2023. The Speak Now program included representatives from Archdiocesan agencies, schools, hospitals and social services agencies to learn how to identify forced marriage and respond if someone is a victim or may become a victim of forced marriage. The impacts of forced marriage can be catastrophic and lifelong and those in attendance discussed some of the signs that they witness in people and how they have tried to support those that are affected. Some of the key takeaways from the training were:

- Be culturally sensitive and self-aware
- Support recovery through a trauma informed approach
- Promote choice and agency
- Respect peoples rights
- Recognise the rights of children and young people
- Prioritise safety but respect confidentiality

The MP team have an ongoing engagement with My Blue Sky and Anti-Slavery Australia who have provided resources regarding forced marriage, both in English and various other languages to provide to their clients.

Tasmanian Anti-Trafficking Network Meeting

The Multicultural Programs team are a member of the Tasmanian Anti-Trafficking Network Meeting facilitated by the Australian Red Cross. This meeting that is held bi-monthly discusses issues of Modern Slavery, antitrafficking, forced marriage and labour exploitation. It is a platform to assist educate one another, share important information and develop strategies on the identification, prevention and support for people who experience modern slavery. The team also facilitate referrals to Red Cross's support for Trafficked people program as required.

General Advice and Referrals

The program regularly support clients at risk of labour exploitation and provide assistance to understand work rights, Australian Labour laws, minimum wages and where they can access help. These targeted awareness raising sessions are encouraged through posters and in-language information within the MP Hub which are helpful to initiate conversations with clients on the topic of forced marriage and modern slavery.

Be Her's

The MP team continued to support and collaborate with Be Hers, a local charity who raise money and awareness about the issues of human trafficking both locally and globally. The team assisted with the development of their mentorship program which supports women at risk of modern slavery

Modern Slavery Conference – June 2023

In June 2023 our Archdiocesan Director Shared Services travelled to Melbourne to participate in the Australian Governments 2023 Modern Slavery Conference – Taking Action Together, hosted by the Attorney Generals Department.

The Conference, which was held across 3 days, covered a range of topics and encouraged the sharing of knowledge and information across sectors and businesses all working towards one key goal of eradicating modern slavery. We also heard from a number of victim survivors of modern slavery and learnt that while we have remedy pathways through domus 8.7, each victim survivor will be vastly different and need an individualised approach and response.

Some of the topics covered were:

- How to improve supply chain transparency;
- Fair and ethical recruitment;
- Responsible sourcing and procurement;
- Overview of the modern Slavery Act Review;
- Survivor voices, advocacy and leadership; and
- The power of partnership.

The conference also allowed us the opportunity to strengthen our connection with the ACAN network and network with other organisations.



CRITERIA 7

Other

Blueline Laundry

The team at Blueline Laundry began on the development and implementation of the Environmental Social and Governance (ESG) Framework in alignment with the seven principles of Laudato Si'. A working group of 12 employees are discussing ways in which the organisation can implement ESG principles, that also speaks to actions concerning modern slavery and human rights.

Catholic Education Tasmania

During the year to improve modern slavery prevention in Catholic Education Schools and Colleges, staff were required to complete an e-learning course Modern Slavery 101. The majority of staff were able to complete the course in 2023 and the remainder will complete the course in 2024. In addition, awareness information sessions were held in Schools.



Annexure A

During 2023, as part of the Australian Catholic Anti-Slavery Network, our Modern Slavery Representative attended the following webinars:

February	Statement Timeline and Fair-trade Certification
March	ACAN Supplier Survey Analysis Construction & Capital Works - Suppliers & Capacity Building Session
April	Integrating Modern Slavery, Sustainability, ESG and Laudate Si Measuring effectiveness and baseline data
May	Audit Quality Forum
May	ACAN Program – the next 3 years Modern Slavery & Sustainability - Suppliers & Capacity Building Session
June	Improving identification and response to modern slavery
July	Analysis of suppliers with completed Sedex SAQ Goods manufactured overseas - Suppliers & Capacity Building Session
August	Action planning sessions
September	A sustainable approach to Supply Chain Management Principles of grievance mechanisms, worker voice and remediation - Suppliers & Capacity Building Session
October	End of year pack, supplier engagement and due diligence basics
November	Labour related services Survivor advocate, pre-qualified supplier directory

Annexure B

Governance Chart

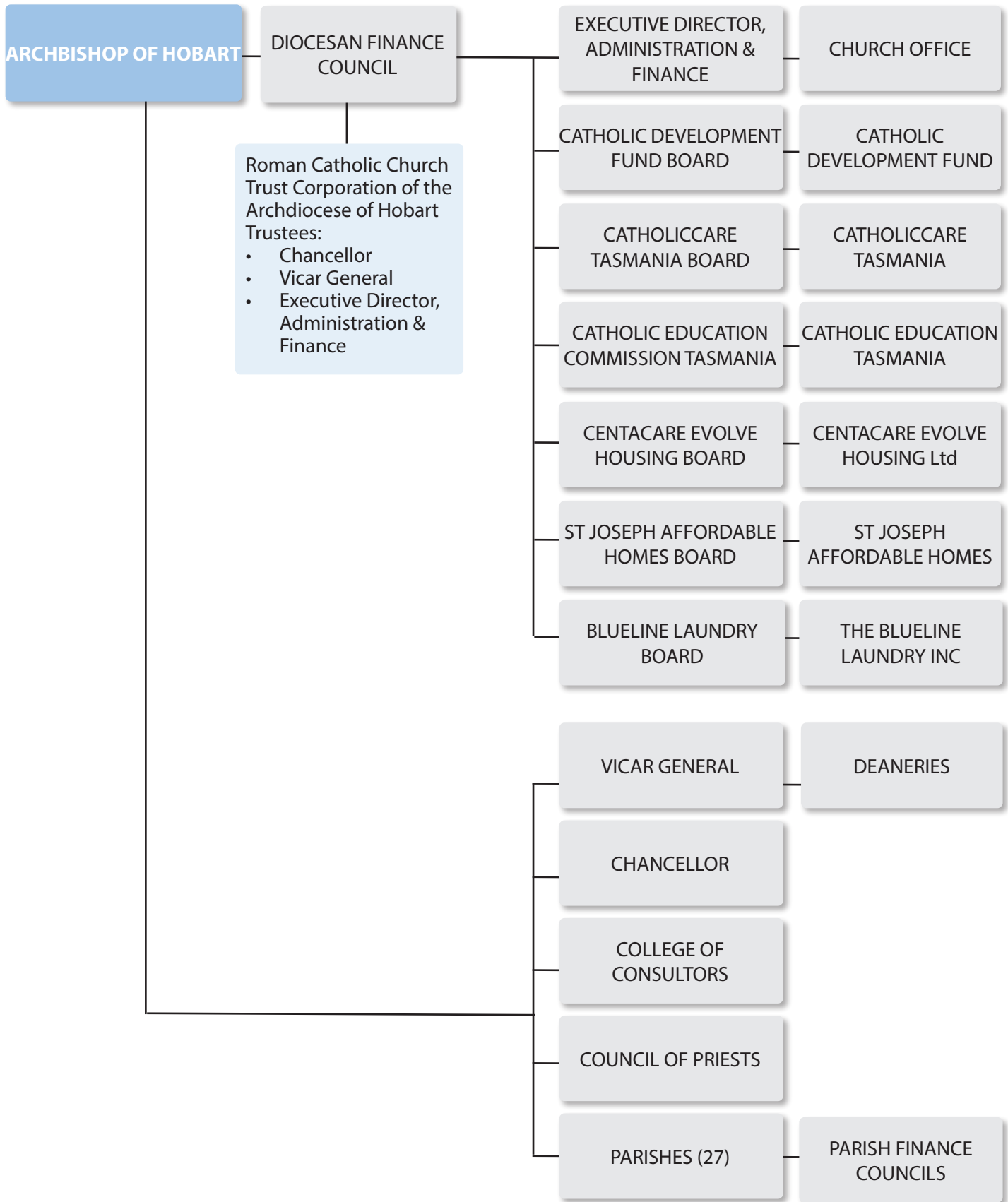


Figure 1 Displays the governance structure of Archdiocese of Hobart.



Archdiocese of Hobart

For further information

Archdiocese of Hobart

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Catholic Education Canberra Goulburn

Modern Slavery Statement 2023

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Disclosure: This statement has been produced on behalf of Catholic Education Diocese of Canberra Goulburn (CECG). This statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers CECG as a single reporting entity.

Approval

This Modern Slavery Statement was approved by the principal governing body of the Catholic Education Office Archdiocese of Canberra & Goulburn as defined by the Act on 17 June 2024. This Modern Slavery Statement is signed by a responsible member of the Catholic Education Office Archdiocese of Canberra & Goulburn as defined by the Act.

A handwritten signature in blue ink, appearing to read 'Ross Fox', is positioned above a thin horizontal line.

Ross Fox
Director
Catholic Education Canberra Goulburn
17 June 2024

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Criteria 1 & 2: About Us

Extending from Pambula on the south coast, to Crookwell in the North, through to the western point of Lake Cargelligo, the Archdiocese of Canberra and Goulburn covers both the ACT and NSW, a total of 88,000 square kilometres. There are 56 System Schools and 8 Catholic Early Learning Centres in the Archdiocese:

ACT

- 24 Primary Schools
- 5 Secondary Colleges
- 8 Catholic Early Learning Centres

NSW

- 19 Primary Schools
- 3 Secondary Colleges
- 2 K – 10 Schools (Central Schools)
- 3 K – 12 School

Our Catholic School System educates 22,000 students. We have 4,033 teachers and supporting staff across the system. We invite you to discover our schools and to acquaint yourselves with all that Catholic Education in the Archdiocese of Canberra and Goulburn has to offer.

We provide services in the following areas:

- Spirituality and Pastoral Care
- Education Information and Advice
- Administrative Advice and Information
- Human Resource and Other Services
- Financial Administration
- Planning and Facilities
- ICT Services
- Reporting
- Quality Control
- Advising and reporting to the Catholic Education Commission
- School Services

Our Purpose

“To be faith filled Catholic learning communities of hope, joy and wonder where all are welcome and inspired to grow to their potential.”

Our Vision

“Jesus Christ, our greatest teacher, calls us to share and witness to our Catholic Faith and Tradition, build inclusive communities and deliver contemporary quality learning opportunities for every person.”

*21,884 Students as at Aug 2023, Staff count as at 23 Oct 2023

2023 Modern Slavery Risk Management Initiatives

Catholic Education Canberra Goulburn (CECG) is an active member of the Australian Catholic Anti-Slavery Network (ACAN). Formed in December 2019, ACAN brings together a number of Catholic entities including dioceses, schools and universities, and organisations across the finance and investment, health, aged care and welfare sectors. It is coordinated by the Anti-Slavery Taskforce of the Archdiocese of Sydney which CECG has been an active member of upon its establishment.

This year CECG has utilised Supplier Ethical Data Exchange platform (SEDEX), the largest collaborative platform for sharing ethical supply chain data. It is a globally recognised innovative and supply chain management solution which has been utilised to engage suppliers and provide insights on supplier modern slavery supply chain risk.

CECG is continuing to undertake a concerted effort across the organisation to eliminate modern slavery from its supply chains.

Our Plans for 2024 and Beyond

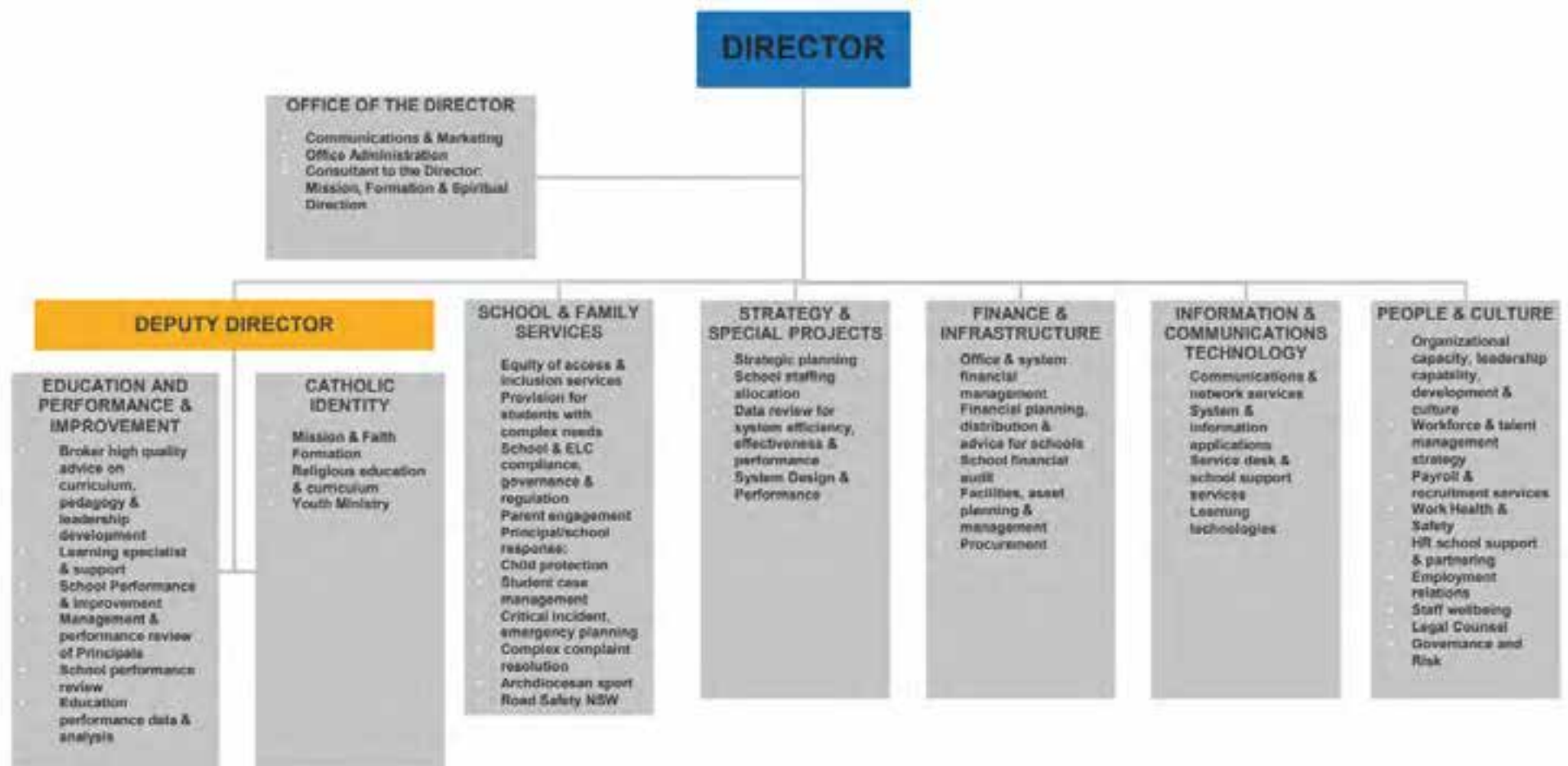
CECG is planning initiatives to expand its efforts to remove the potential risk of modern slavery in its supply chains throughout 2024 and beyond. These include:

- Increase the level of engagement with the SEDEX platform
- Continue the process of centralising procurement processes to ensure greater supervision and mitigation of its Modern Slavery risk exposure

CECG's aspirational goal is to eliminate all risks associated with modern slavery from all our service providers and suppliers within the multi-layered supply chains across all the industries CECG engages with to deliver educational services to the community.

Catholic Education Canberra Goulburn

Organisational Overview



Our Workforce Profile

4,033

Total headcount including casual employees.

2,446

FTE excluding casuals

Workforce cohort	FTE	Headcount
CEO		
CEO	171	184
Casual	-	10
ACT SCHOOLS		
Teacher	1086	1205
Learning Support	174	300
Other	172	211
Casual Teacher	-	259
NSW SCHOOLS		
Teacher	601	684
Learning Support	118	199
Other	86	131
Casual Teacher	-	239
EARLY LEARNING CENTRES (ELC)		
ELCs	101	123
ELC Casual	-	106
CECG SYSTEM		
General Casual system wide	-	382
TOTAL	2,515	4,033

*Data as at Oct 2023

Our Governance Framework

The Archbishop of Canberra and Goulburn is the President of the Catholic Education Commission (CEC). All CEC members are appointed by the Archbishop for a four year term with an option for a further four years by invitation of the Archbishop. The Archbishop appoints a Chair as an ex-officio member of the Commission.

CEC members are drawn from key stakeholder groups in the Archdiocese including:

- Clergy
- Parents (NSW and ACT)
- Principals (NSW/ACT and Primary/Secondary and Congregational)
- Catholic Agencies
- Australian Catholic University

The ex-officio members are Mr Ross Fox (Director of the Catholic Education Office of the Archdiocese of Canberra and Goulburn) who is the Executive Officer and Mrs Tiffany Wallace (Executive Secretary).

The Catholic Education Commission (CEC) has two standing committees: the CEC Finance, Audit and Risk Committee and the Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG). The CEC establishes working parties on a needs basis. Members of the CEC working parties are chosen in terms of their experience and expertise in a particular area.

Finance, Audit and Risk Committee

Objectives of the Finance, Audit and Risk Committee are to:

- Assist the Commission in discharging its responsibilities in relation to financial reporting practices, financial and accounting policies and procedures, management and internal controls and risk management.
- Provide a forum for communication between the Commission, CEO staff and auditors
- Ensure the integrity of CEO financial systems and internal controls.

Catholic School Parents Archdiocese of Canberra and Goulburn

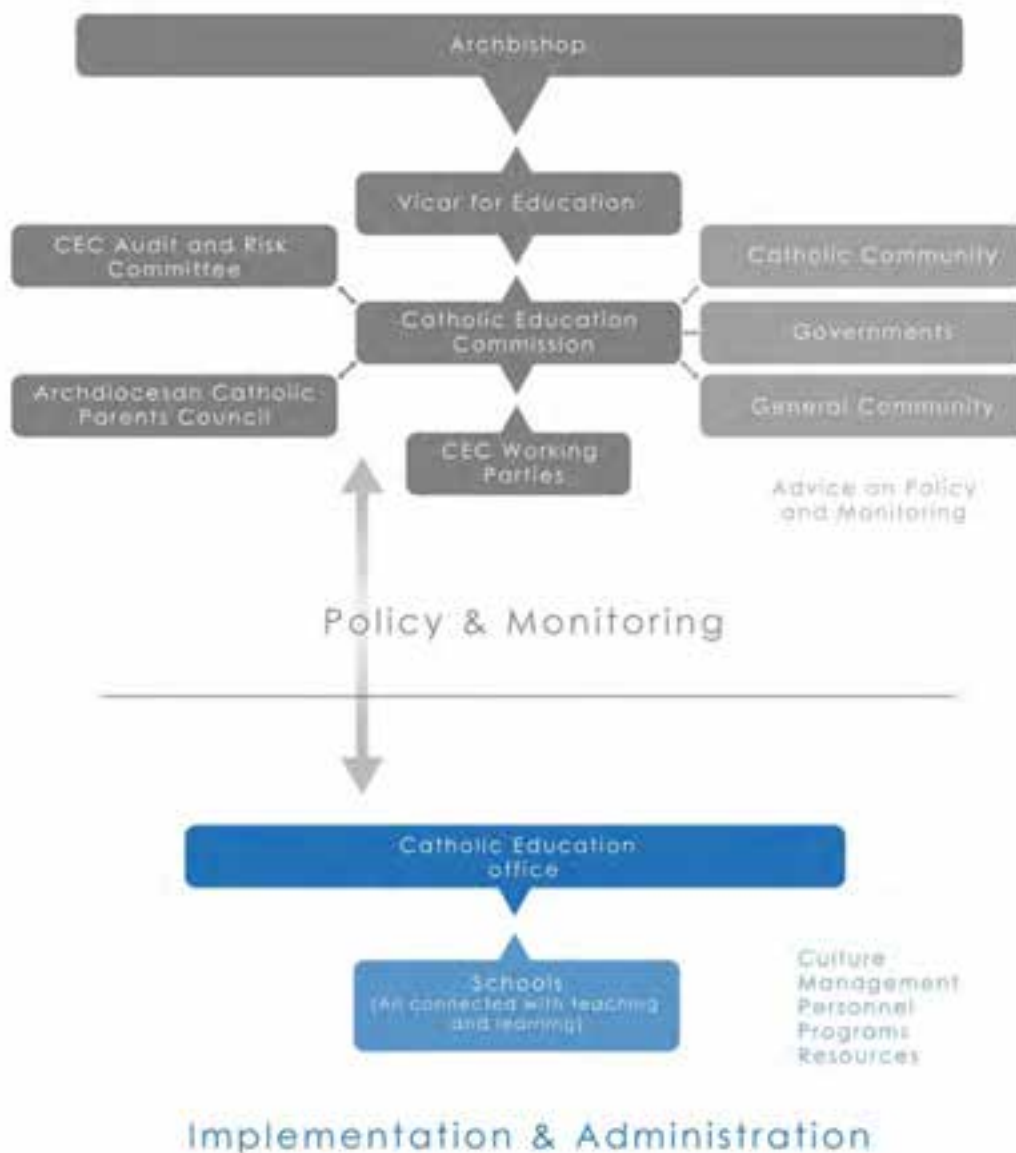
Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG) was formally launched on the 21 February 2014. CSPACG is the peak body representing the interests of all Catholic school parents in the Archdiocese of Canberra and Goulburn and is the largest non-government school parent body in the ACT.

CSPACG is the body officially recognised by the Archbishop and the CEC to represent the interests of families of children in all Catholic schools across the Archdiocese.

CSPACG is represented on the CEC and through it has significant access to and involvement in, mainstream education issues as well as input into policy and financial decisions. The Catholic school parent voice was sought by government and was invited to participate as a member of the steering committee leading a project exploring parental engagement.

Membership and Organisational Structure

Membership of CSPACG includes every systemic Catholic school and the group of Catholic congregational schools. CSPACG structure is made up of representatives from each of the recognised regions of the Archdiocese. Alternative representatives from each region may also attend meetings and act for the representative in their absence but there is only one authorised representative acting for the region at each meeting. A Chairperson, an expert representative and an executive officer also form part of CSPACG.



Our Operations

CECG's core function is to provide education to its 22,000 students across 56 schools and 8 Early Learning Centres supported by 4,033 staff members across CECG.

CECG's schools are spread across 88,000 square kilometres and operate both in suburban communities in the A.C.T. as well as regional communities in NSW. For compliance and state related issues, each site complies with either ACT or NSW regulations, based on its location. However, all schools are a part of the Canberra Goulburn Archdiocese.

The high-level services provided through the central office include, but are not limited to:

- Education Information and Advice
- Financial Administration
- Human Resources and other services
- Capital Planning and Facility Maintenance
- ICT Services
- Reporting and Quality Control

Our Supply Chain

CECG's engaged the services of 5324 suppliers throughout the reporting period. CECG has some centralised procurement functions and work is ongoing to bring the majority of procurement processes to the centralised office. CECG has a higher proportion of short term, changeable contracts. These contracts may exist at the school level or system level depending on the type of contract.

- Contracts with higher value and strategic alignment tend to exist at the system level and are managed by the central office (i.e. design, construction, consulting contracts).
- Contracts with lower value and lower strategic alignment tend to exist at the school level (i.e. waste removal, basic maintenance, etc.)

Across the CECG system, schools have a high level of autonomy in deciding which suppliers to work with for short term, low value contracts. This provides schools with the strategic flexibility required to support their communities and service their schools the way they see fit. Additionally, system wide contracts that require subcontractors in regional and remote areas may increase the risk of modern slavery issues.

However, as there are only minor variations in the goods and services procured by CECG schools, CECG is exploring additionally categories that may benefit through increased coordination. Some examples include furniture, ICT devices and stationary.

Schools may benefit from system level contracts in these categories through reduced distractions, reduced modern slavery risks, and reduced costs. Some categories that are already coordinated across the system and managed through the central office include electricity supply, security services and fire compliance.

In 2023 CECG has continued dedicated procurement resources who will assist in the streamlining of supply chain risks and actively involved in CECG's Modern Slavery Working Group.

Criteria 3: Modern slavery risks in operations and supply chain

CECG has taken a number of steps to identify its Modern Slavery risks in its operations and address its highest risk suppliers. In the delivery of educational services across our school system, CECG procures goods and services from a large number of industries, and engages in a broad range of activities to achieve its strategic objectives.

CECG has identified and assessed the risk exposure within CECG’s supply chains. The key areas of potential risk are highlighted below which are utilised in the delivery of educational services:

- Building & Construction
- Events & Event Management
- Finance & Investment
- Furniture & Office Supplies
- Labour Hire
- Waste Management
- ICT Software and Network Services
- Financial Expenses
- Cleaning & Security Services
- Facility Management & Maintenance
- Food & Catering Services
- ICT Hardware
- Uniforms
- Printing / Mail Services

The areas of risk noted above have been assessed against percentage of annual spend and respective Modern Slavery potential risk exposure. In 2023, CECG has continued focus on engaging our highest risk business being those in Building & Construction and Cleaning.

The category risk taxonomy has been specifically developed for ACAN based entities based on analysis of participating entity supplier datasets. It includes 11 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted CECG assess potential risk so it can prioritise engagement activities with suppliers.

Risk Taxonomy

The data in the tables below is a breakdown of the total value of payments as a total value and number of CECG’s high risk suppliers.

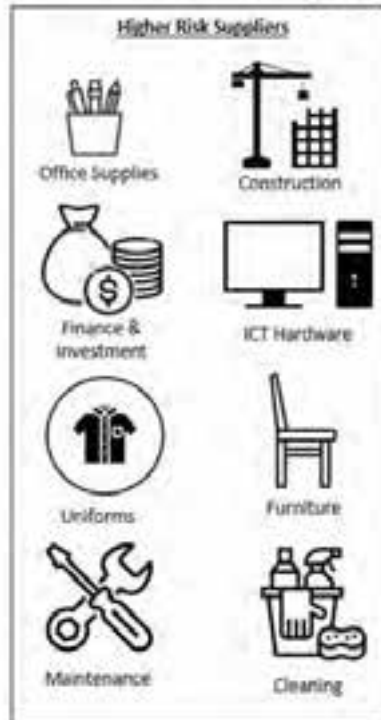
	Total	High Risk	Low Risk
CECG Supplier Spend	\$148.4M	\$75.2M	\$73.2M
Number of Suppliers	5324	388	4936

Percentage of spend in high-risk categories:

Category	Spend Description	% of Expenditure
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	24.5%
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	2%
Clothing Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	< 1%
Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	6%
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	1.5%
ICT	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime</p>	15.1%
Recruitment & Labour Hire	Wide range of traditional low-skilled / low paid work	1.2%
Waste management services	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	< 1%

*Data as at Dec 2021

Delivering Education Supply Chain



\$
148.4M



Catholic Education
Archdiocese of
Canberra Goulburn
56 Schools



Criteria 4: Actions taken to assess and address risk:

Throughout the reporting period, CECG has undertaken actions to address the Modern Slavery risks in its operations. Supported by its commitment to ongoing ACAN membership, CECG has assessed its operations and continued its planned actions to manage the existing and ongoing risk exposure.

Actions Taken throughout the reporting period:

1. *Monthly meeting of CECG's Modern Slavery Working Group (MSWG)*

CECG formed a MSWG in 2020 consisting of key members throughout the organisation in risk, procurement, finance and project teams. The MSWG has a formal Terms of Reference and meets on a regular basis to:

- Provide input and advice to CECG on issues related to modern slavery;
- Actively support the development and implementation of CECG's modern slavery action plan;
- Assist CECG determine priority actions to be undertaken and establish annual goals and targets;
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
- Ensure CECG meets the requirements of the Modern Slavery Act 2018 (Cth).

The MSWG has been a key driver throughout the reporting period to ensure CECG is undertaking material steps towards the elimination of Modern Slavery from its supply chains.

The MSWG met 6 times in 2023 and had 4 active members in the reporting period.

CECG has a nominated Modern Slavery Liaison Officer (MSLO) who chairs the MSWG and is the key relationship with ACAN. The MSLO participates in the monthly ACAN webinars and accesses ACAN tools and resources to adapt for CECG implementation.

2. *All new contracts require acceptance of Modern Slavery clauses*

CECG has ensured in 2023 that every new supplier contract includes CECG's Modern Slavery compliance clauses. The Modern Slavery clause was introduced in 2020, but as awareness of Modern Slavery increases throughout Australia's corporate environment, acceptance of this clause without adjustment has become embedded in every new service agreement.

In 2023, CECG signed 83 new agreements of which all contain CECG's robust Modern Slavery clause in an effort to mitigate Modern Slavery risk. Moreover, CECG has taken the position that as all service contracts expire and are renewed over time, renewal contracts will have this clause contained within it.

3. *Supplier Engagement*

CECG followed the ACAN Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

- i. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.

- ii. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with SEDEX membership
 - suppliers willing to join SEDEX
 - suppliers not required by CSPD to join SEDEX
- iii. Suppliers were assisted to join SEDEX and provided support to complete the SEDEX Self Assessment Questionnaires (SAQ).
- iv. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

In 2023, CECG made inroads with supplier engagement, summarised:

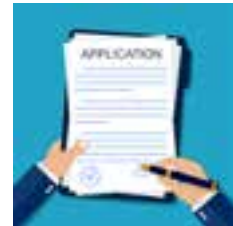
- 83 major contracts signed with modern slavery clauses
- 191 suppliers shared information via the ACAN supplier survey.
- 70 suppliers were invited to join SEDEX.
- 1 supplier completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- 10 suppliers participated in ACAN modern slavery capacity building webinars:



191 ACAN Supplier Surveys completed



10 suppliers attending capacity building webinars



70 new SEDEX applications

4. Engagement of SEDEX

CECG has this year actively engaged the Supplier Ethical Data Exchange platform (SEDEX), the largest collaborative platform for sharing ethical supply chain data. SEDEX is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

SEDEX provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of SEDEX, CECG can now utilise benefits of various services and resources aimed at managing supply chain risks, fostering supplier engagement, and promoting ethical and sustainable business practices. The advantages provided by SEDEX to CECG encompass:

- **Enhanced transparency:** Sedex offers a secure online platform for companies to exchange information regarding their ethical and environmental performance with stakeholders, suppliers, and customers. This fosters trust and confidence throughout the business and its supply chain.

- Improved risk management: Sedex equips businesses with tools to identify and address risks within their supply chains, such as labor rights violations, environmental breaches, and instances of corruption. This proactive approach can mitigate the likelihood of reputational harm, legal ramifications, and supply chain disruptions.
- Heightened efficiency: Sedex provides standardized templates and resources for suppliers to report on their ethical and environmental practices, streamlining the reporting process and alleviating administrative burdens for businesses.
- Access to expertise: Sedex offers training, support materials, and guidance on ethical and sustainable practices, empowering businesses to enhance their performance and comply with legal and regulatory requirements.
- Competitive edge: Demonstrating a commitment to ethical and sustainable practices enables businesses to bolster their reputation and brand value, thereby gaining a competitive advantage.

Addressing Remediation

CECG is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CECG is found to have caused or contributed to modern slavery.

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, CECG, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. CECG's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 CECG can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CECG is directly linked to modern slavery by a business relationship, CECG is committed to working with the entity that caused the harm 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 CECG to ensure victim centred remediation processes are implemented to the satisfaction of CECG.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies if there is immediate danger to a person or Domus 8.7 for an independent assessment, investigation, action planning and implementation of a remediation process.

CECG has made available the ACAN “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders.

Criteria 5: Measuring Effectiveness:

Measuring effectiveness

The metrics in the table provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions, and helps CECG understand the pace of change and set future direction.

The data demonstrates increased engagement from suppliers of goods and services. The increased completion of the ACAN supplier survey improved identification of 70 suppliers where the completion of the SEDEX SAQ would support managing modern slavery risk in their own operations and supply chains.

	ACTIVITY	2023	2022
INTERNAL / STAFF	Hours spent on modern slavery activities	19	18
	Individual staff completed e-learning	-	-
	E-learning modules completed	-	-
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	5324	2932
	Number of suppliers with visible contact information and ABN	2417	-
	Number of suppliers across high-risk categories	388	-
	Number of ACAN Supplier Surveys completed	191	-
	Supplier staff attending capacity building webinars	10	-
	Invited to join Sedex	70	-
	Joined Sedex	10	-
	Sedex SAQ completed	1	-
	Social audits	1	-
	Corrective actions	0	-
	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
Individuals with modern slavery cases remediated	0	0	

In 2023 ACAN has created an updated assessment utilised by CECG. This assessment introduces a shift from the initial Gap Analysis towards a focus on the maturity of our modern slavery risk management approach. It is essential to recognise the need for a reset to aim for continuous improvement. This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

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

2. Operations: Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. Supply Chain: Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. Worker Engagement: Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. CECG's Modern Slavery Program and Activities: Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. Grievance Mechanisms and Remediation: Evaluates the channels available for reporting concerns and the processes for addressing them. In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures. This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:
 - Governance: sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
 - Risk assessment: identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
 - Risk management: evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
 - Effectiveness: measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Areas where setbacks were identified included overarching awareness and supplier engagement. Steps have been taken in previous years however during the reporting period resourcing challenges have prevented the ideal best practice outcomes. CECG will address these challenges by refocusing attention on our engagement and awareness plans.

Maturity Assessment 2023

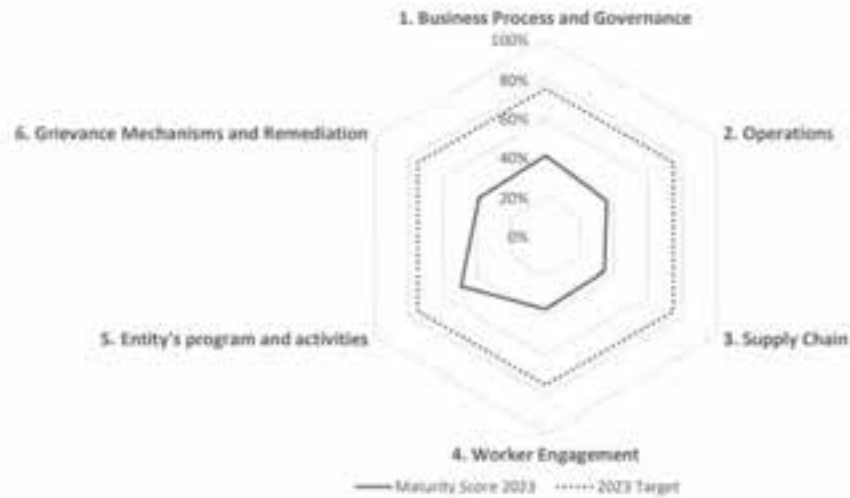
Catholic Education Canberra Goulburn - Overview



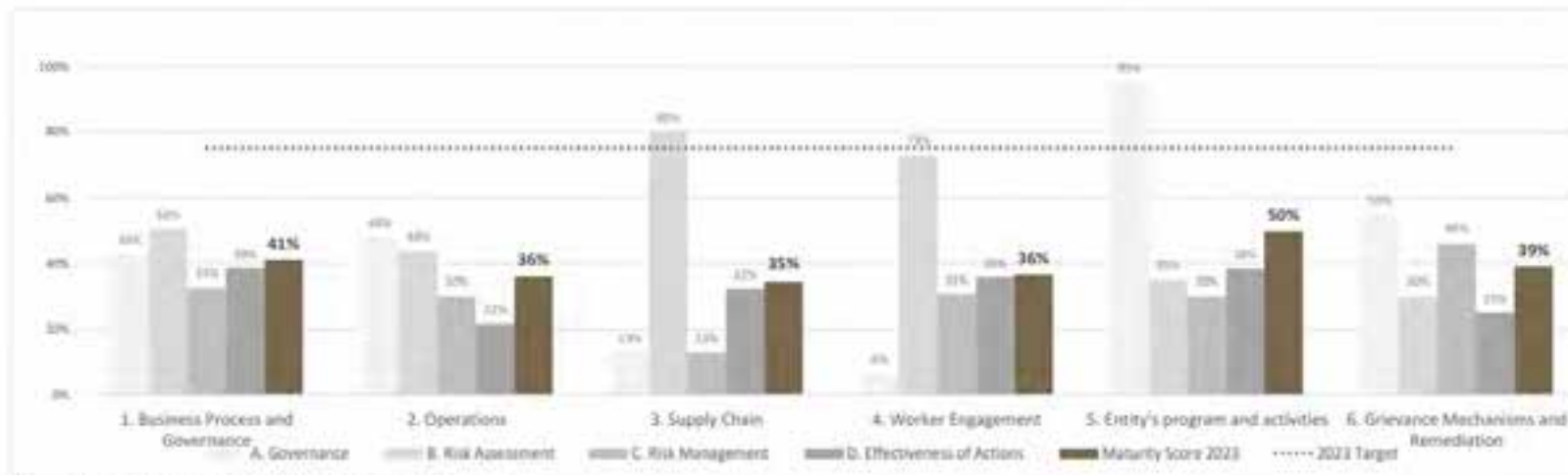
Catholic Education Canberra Goulburn - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	43%	50%	33%	39%	41%
2. Operations	48%	44%	30%	22%	36%
3. Supply Chain	13%	80%	13%	32%	35%
4. Worker Engagement	6%	73%	31%	36%	36%
5. Entity's program and activities	95%	35%	30%	38%	50%
6. Grievance Mechanisms and Remediation	55%	30%	46%	25%	39%
Average	43%	52%	30%	32%	39%

Maturity Score 2023 individual scoring by pillar and sub pillar, including averages and total 2023 score



Maturity Score 2023 comparative to target and maximum scoring, by Pillar



Maturity Score 2023: comparative individual scoring by pillar and sub pillar

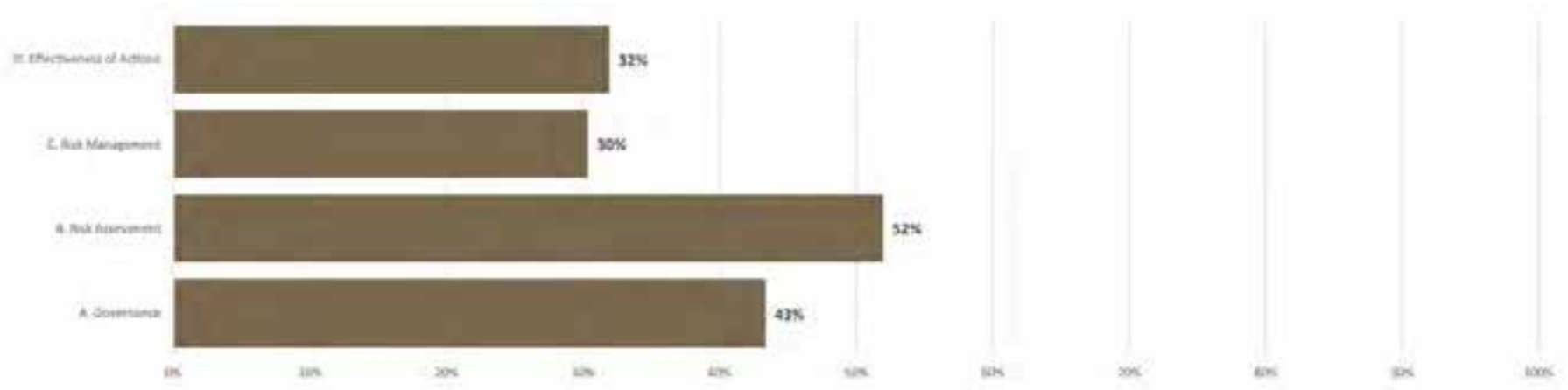
Notes:

- Participation in Domus 8.7 Remediation Services was incorporated into scoring of pillar 6. Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Domus 8.7 Remediation Services activities.
- Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Taxonomy and supplier engagement activities) and Effectiveness of Actions (Baseline Data). This will be removed in the 2024 Maturity Assessment for entities not actively participating in the ACAN Program activities.

Catholic Education Canberra Goulburn - 2023 Assessment by Sub-Pillar



Maturity Score 2023: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description

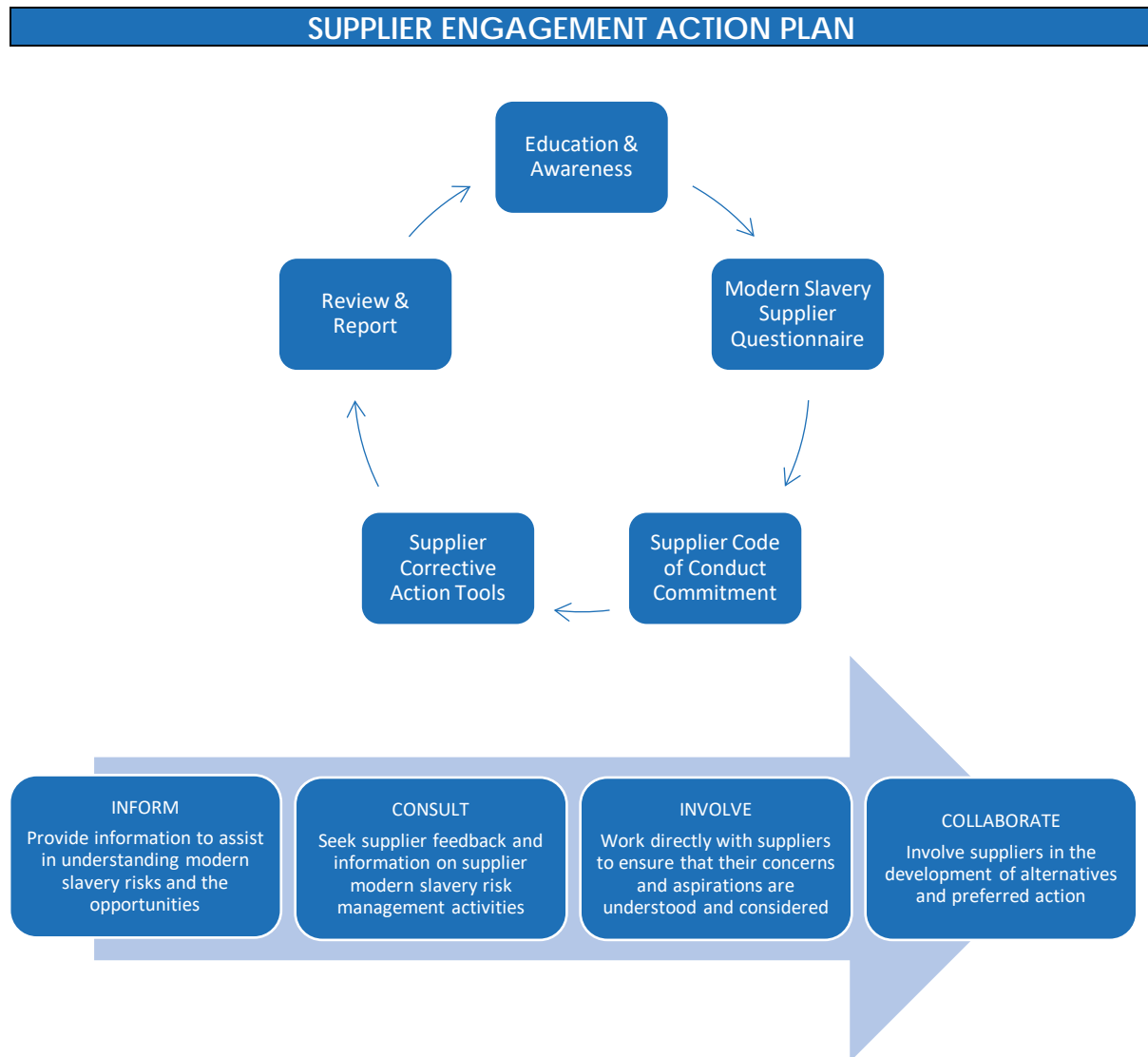


Maturity Score 2023: Comparative analysis of 2023 performance by sub-pillar.

Modern Slavery Action Plan

CECG continued efforts in 2024 to increase our Supplier Engagement Action Plan. A greater focus will be on supplier SEDEX engagement as well as continuing our ongoing efforts executing CECG’s supplier engagement plan.

CECG supplier engagement plan is the cornerstone of risk mitigation to eliminate Modern Slavery from our supply chains. In 2024 we will continue to execute the plan to all high-risk suppliers.



Education & Awareness

Throughout 2024 CECG will continue to undertake further actions to increase awareness with suppliers and guide them through educational material to assist them in identifying and mitigating Modern Slavery risk in their supply chains.

Our Review Process

CECG regularly reviews of our Modern Slavery action plan at regular appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consisting of five stages which include:



1. *Annual review of Modern Slavery Framework*

The annual review is undertaken to assess the effectiveness of the existing framework and identify areas of improvement. CECG continues building and strengthening its current controls, such as the ACAN assessment tool to drive areas requiring further attention and action.

2. *Regular check of the risk review process*

This stage is utilised to undertake a further assessment of existing risk identification methodology against CECG suppliers. Specifically, CECG endeavours to ensure that supplier data is captured and gain further insight into the supply chain map.

3. *Supplier & engagement feedback process*

Ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step to eliminating risk. A dedicated member provides a communication channel for information and feedback will assist in the ongoing improvement of the Modern Slavery framework.

4. *Annual supplier reports / attestation*

Supplier reports will assist in understanding our suppliers risk framework and risk exposure. Utilising this tool will assist in CECG directing resources where needed most. For example, further communication or education advice in relation to Modern Slavery.

5. *Corrective actions process*

In line with stages one through four, the corrective action process will be the activities to further enhance the Modern Slavery Framework.

Criteria 6

CECG does not own or control any other entities.

Criteria 7

No further pertinent information beyond that provided in the Statement is required.



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CATHOLIC
ARCHDIOCESE
OF SYDNEY

Modern Slavery Statement

ANNUAL REPORT

1 January 2023 - 31 December 2023



Disclosure

This statement has been produced on behalf of the Catholic Archdiocese of Sydney and key entities of the Archdiocese.

The Catholic Archdiocese of Sydney acknowledges and pays respect to Aboriginal and Torres Strait Islander Peoples as the First Nations Peoples of Australia, on whose ancestral homelands we live, serve, learn, worship and work; the homelands of Eora, Guringai, Dharawal, and Dharug peoples. We pay our respects to Elders past, present and emerging. We celebrate the histories, languages, cultures and spiritualities of Aboriginal and Torres Strait Islander Peoples. We respect their continuing connections to Country and Sea over thousands of generations, as the world's oldest living cultures. We seek to learn and embrace their care and love of Country.

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Michael Digges
Executive Director
Administration &
Finance for the Catholic
Archdiocese of Sydney



Most Rev Archbishop Anthony Fisher OP'

Authorisation by Most Rev Anthony Fisher OP Archbishop of Sydney

It brings me great satisfaction to submit our fourth annual Modern Slavery Statement, a reflection of the Catholic Archdiocese of Sydney's (CAS) ongoing efforts to align with the Australian Government Modern Slavery Act 2018 throughout 2023. This year's Statement not only underscores our own progress in key areas, it reaffirms our commitment to acting as one across the Church in Australia and its agencies. By doing so, we leverage our substantial organisational power to effect the strongest response possible to modern slavery. Our Statement stands proudly alongside other Catholic entities in the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements.

I extend my heartfelt gratitude to staff across the Archdiocese who play a crucial role in implementing our modern slavery risk management program. Through the concerted actions of our Catholic education authorities, individual schools, social and financial services, parishes, and the Archdiocese itself, we are making strides in dismantling the foundations that support and sustain modern slavery.

I am particularly pleased at the progress being made to provide welfare and pathways to justice for victim-survivors of modern slavery. Efforts to address modern slavery must include acts of charity in response to any person or persons impacted. Meanwhile, we must also remain steadfastly focused on prevention by challenging any dehumanising attitudes or business practices that may contribute to the exploitation of people on Catholic sites and in our supply chains.

True elimination of modern slavery necessitates a profound spiritual, moral, and cultural transformation over time — a conversion in which the very notion of slavery becomes inconceivable. This transformation demands a faithful and unwavering commitment from our leaders and staff to champion change, transcending mere compliance to



embody a core ethos that defines our engagement in all activities. Pope Francis himself highlights the need for patience, perseverance, and courage in this endeavour.

Looking forward, I am filled with hope for a time when all Catholic institutions can unequivocally demonstrate a stand against modern slavery. This vision encompasses every aspect of operations, from the procurement of products to the fair treatment and remuneration of all workers, ensuring freedom from modern slavery in all its forms. We seek divine guidance and strength in this mission, praying for the intercession of St Josephine Bakhita.

Together, let us continue to forge a path towards a world free of modern slavery, upheld by Catholic Social Teaching.

Yours sincerely in Christ,

Most Rev. Anthony Fisher OP



This Modern Slavery Statement was approved by the principal governing body of the Catholic Archdiocese of Sydney as defined by the Act on 15 May 2024. This Modern Slavery Statement is signed by a responsible member of the Catholic Archdiocese of Sydney as defined by the Act.

Sydney Catholic Schools

Sydney Catholic Schools (SCS) remains committed to the elimination of modern slavery and bringing our communities closer to achieving this vital goal.

Our action plan to ensure our supply chains are free from modern slavery includes a rigorous approach to governance that answers the call, inherent in our Catholic faith, to preserve human dignity.

To this end, the number of our suppliers who are registered with the environmental, social and governance platform SEDEX has increased three-fold in 2023.

All business managers and financial administration staff in our 147 schools have completed modern slavery training modules, and SCS initiated a social compliance audit with one of our largest building and construction suppliers.

Our goal is always to ensure that risks to people in our operations and supply chains are mitigated through improvements in management systems, policies, training, and stakeholder engagement. Our decisions are informed by our will to prevent unseen harm further afield.

This important work is managed and monitored by Sydney Catholic Schools Modern Slavery Working Group. Our organisation is an active participant in the Australian Catholic Anti-slavery Network (ACAN) modern slavery risk management program.

We are dedicated to supporting our communities, no matter how far from home – our staff, students, their families, our broader professional networks and the suppliers who support these communities to thrive.



Very Rev Dr Gerald Gleeson
Chair,
Sydney Catholic Schools Board





CatholicCare Sydney

CatholicCare Sydney has a vision for a society in which everyone feels supported and valued, irrespective of beliefs and abilities. CatholicCare Sydney is guided by five values – collaboration, compassion, courage, inclusion, and empowerment. Modern slavery is the antithesis of these values as it traps people in a relationship based on exploitation, where the value of a human person is diminished in the pursuit of wealth.

In 2023, CatholicCare Sydney advanced its anti-slavery risk management actions within the organisation by attending webinars, training staff, joining Sedex and assessing our network of suppliers. We have included modern slavery clauses in our supplier onboarding, and plan to

consolidate suppliers where possible to better assess and monitor risk. Significantly, we have established a Modern Slavery Working Group and Modern Slavery Liaison Officer to drive accountability within our organisation and collaboration with the Australian Catholic Anti-slavery Network (ACAN).

CatholicCare Sydney is committed to compliance with the Modern Slavery Act 2018 and working towards a world where modern slavery is eliminated from the practices of businesses and organisations worldwide. This requires a deep dive into our own supply chains and operations to understand how CatholicCare Sydney can address the structures and behaviours that contribute to modern slavery.



Alastair McGibbon
CEO, CatholicCare Sydney



John Leotta
Chair, CatholicCare Sydney Board







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CRITERIA 1 and 2: About the Catholic Archdiocese of Sydney

The Catholic Archdiocese of Sydney (CAS), under the leadership of Archbishop Anthony Fisher OP, serves the People of God in several metropolitan areas of Sydney including the eastern, southern, inner-western and south-western suburbs and the lower North Shore.

The Archdiocesan Head Office (Chancery) is located at 38 Renwick Street, Leichhardt, NSW 2040.

www.sydneycatholic.org

Archdiocesan entities covered by this Modern Slavery Statement:

Sydney Catholic Schools Limited (SCS) ACN 619137343 as Trustee for the Sydney Catholic Schools Trust ABN: 26158447082, L23 World Square, 680 George St, Sydney, NSW 2000.

www.sydcatholicsschools.nsw.edu.au

Catholic Development Fund (CDF) ABN: 73866037848
38 Renwick Street, Leichhardt, NSW 2040.

www.sydneycdf.org.au

CatholicCare Sydney Limited ACN: 614 283 484 as Trustee for the CatholicCare Sydney Trust ABN: 38 841 427 747,
2C West St, Lewisham, NSW 2049.

www.catholiccare.org

St Mary's Cathedral, Sydney
ABN: 13120232163
St Mary's Cathedral,
2 St Mary's Rd, Sydney, NSW 2000.

www.stmaryscathedral.org.au



129

Parishes



Serving

590,000

Catholics spiritually supported by



400 PRIESTS



CAS Agencies

Employing

9,525

Staff



147

Schools



Educating

72,802

Students



6

Social Service Programs

Supporting

32,000

People



Archdiocesan Entities



Annual Revenue
CCS - \$52.2m
SCS - \$1,382.0m
CAS - \$79.7m



Capital Works
SCS - \$193.3m
CAS - \$9.3m



Suppliers
CCS - 709
SCS - 5,679
CAS - 1,513



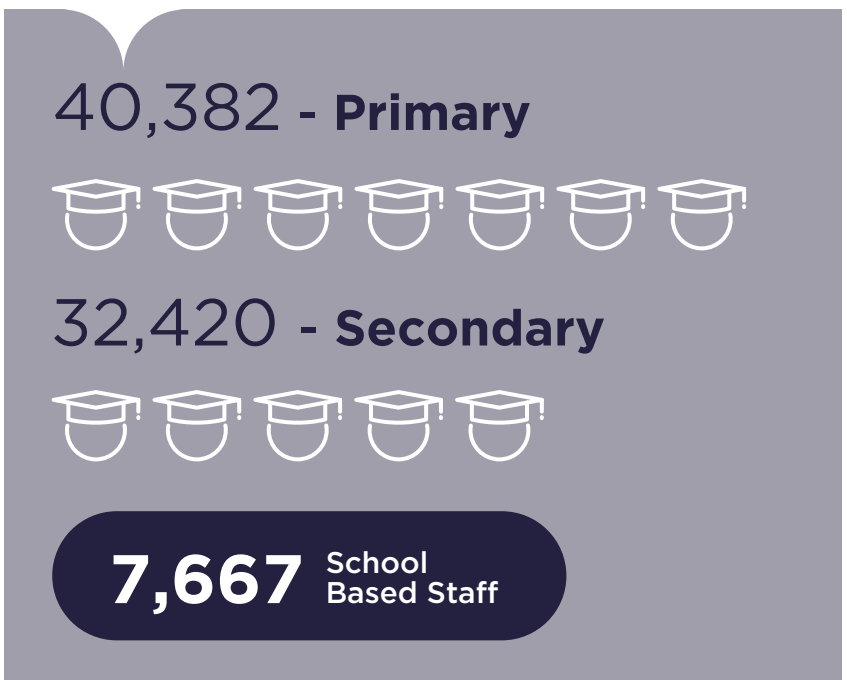
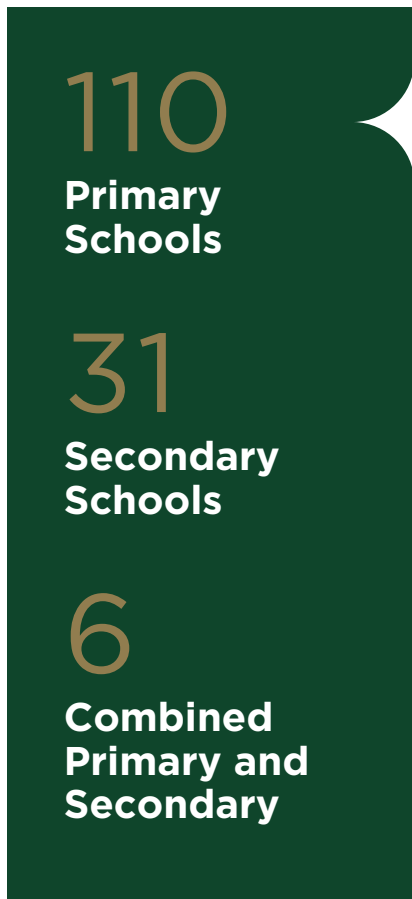
About Sydney Catholic Schools

Sydney Catholic Schools (SCS) is the system of 147 Catholic primary and secondary schools operating across the Archdiocese of Sydney providing more than 72,000 students with an affordable, high-quality Catholic education.

Catholic parishes are the cornerstone of local Catholic communities, which is why most parishes have access to Catholic schools with which to build an even stronger faith community.

Dedicated and hard-working educators deliver a strong faith-based education, catering for students with all interests and abilities through programs such as the Newman Selective Gifted Education Program, Arts HQ, and our vocational education offerings.

SCS's commitment is to make sure that every student feels welcome at school and has the support to thrive academically and socially.



Mission

Catholic Archdiocese of Sydney

The mission of the Archdiocese is that given by Jesus Christ to His Apostles: to preach the Good News of Salvation with love; to invite all people into unity with God through His Holy Church; and, to serve them with love and mercy by attending to their spiritual and corporal needs.

Sydney Catholic Schools

The Mission of SCS is 'to know and love Christ through learning'. The SCS vision is to create 'thriving Catholic communities through excellent teaching and learning'.

SCS priorities are:

- to participate in the life and mission of the catholic faith community
- to deepen knowledge and engagement with the catholic faith and tradition
- to build each student's capacity to continuously reason reflectively, logically and critically
- to embrace the interdependence of human existence as global citizens, who are responsible to and for themselves and others
- to provide an engaging, holistic learning experience, where students thrive academically
- to be places where every student excels in a multitude of ways, through personalised and self-paced learning

SCS values are:

- *truth* - seeking to know and live the truth
- *curiosity* - nurturing the search for meaning
- *collaboration* - engaging respectfully and meaningfully with others
- *excellence* - striving to achieve one's potential
- *empathy* - appreciating and responding to the views and needs of others.



Archbishop Anthony Fisher's great vision:

"A Church in which the Gospel is preached with joy, the wisdom of our tradition mined with fidelity, the sacraments celebrated with dignity and welcome, and the seminaries, convents and youth groups teeming with new life; a Church in which our parishes, chaplaincies and educational institutions are true centres of the new evangelisation, our laity theologically literate and spiritually well-formed, our outreach to the needy effective and growing, and God glorified above all."



About CatholicCare Sydney

CatholicCare Sydney is the social service agency of the Archdiocese of Sydney, and began as the Catholic Welfare Bureau in 1941. In 1958 the name changed to the Catholic Family Welfare Bureau, in 1973 it became Centacare Sydney, and in 2008 it became CatholicCare Sydney. Today CatholicCare Sydney employs more than 550 team members, and directly helps more than 32,000 people each year.

On behalf of the Catholic Archdiocese of Sydney, we collaborate with others to promote dignity, strengthen families and connect communities. We do this so that everyone can access meaningful opportunities and improve their wellbeing.

CatholicCare Sydney opens the door to all those who need support with relationships, parenting, ageing, disability, addiction, homelessness, or mental wellbeing concerns. Our organisation is guided by five values – collaboration, compassion, courage, inclusion, and empowerment.

Our values define how we approach each other, our clients, and our work. We aim to embody each value in everything we undertake and encourage others to do the same.

CatholicCare Sydney is a not-for-profit entity registered with the Australian Charities and Not-for-Profits Commission. In addition to the head office in Lewisham, other offices are located in Bankstown, Cabramatta West, Fairfield, Lakemba, Liverpool, Sydney City and Sutherland.

CatholicCare Sydney's annual revenue in 2023 was \$52,217,586.



Collaboration

We work together and respect the views of colleagues, clients, and stakeholders.



Compassion

We take the time to hear and understand the needs of others and ask how best we can support them.



Courage

We advocate, innovate, and speak up for ourselves and others, even when it seems difficult.



Inclusion

We welcome everyone, regardless of faith, background, gender, age, sexuality, identity, and ability.



Empowerment

We acknowledge people's strengths and dignity and ensure they have the tools to be in control of their own story.

Governance Framework

Catholic Archdiocese of Sydney

CAS is an unincorporated association and registered charity, under the supervision of Archbishop Anthony Fisher OP. The Governance structure of CAS includes the Curia, Council of Deans, Archdiocesan Finance Council, College of Consultors and Trustees, Council of Priests, Archdiocesan Property Committee and the Archdiocesan Investment Committee. There are nine Deaneries – Western, Sutherland, Northern, South West, Central, City, Eastern, St George and Concord.

CAS has several divisions or operations known internally as agencies which provide services, care and support to people in:

- education
- prayer, worship and liturgy
- solidarity and justice
- vocations and seminary
- youth and young adults ministry

In addition to pastoral care and religious ministry, CAS undertakes a range of commercial activities including long and short-term leasehold of properties, procuring goods and services, construction works and redevelopment of existing sites.

The largest agency of CAS is SCS with 147 systemic schools managed by Sydney Catholic Schools Limited as Trustee for the Sydney Catholic Schools Trust.

The Sydney Archdiocesan Anti-Slavery Taskforce

Archbishop Fisher established the Sydney Archdiocesan Anti-Slavery Taskforce (Taskforce) in May 2017 to enact his vision for the Archdiocese of Sydney to lead the Australian Catholic Church response to end modern slavery.

The Taskforce includes five modern slavery specialist staff, who coordinate the ACAN modern slavery risk management program, in response to the Modern Slavery Act 2018. The Taskforce specialist staff also manage Domus 8.7, an Archdiocesan agency providing independent advice, support and referrals to people impacted by modern slavery.

Sydney Catholic Schools

SCS is governed by the Sydney Catholic Schools Board of Directors (SCS Board). SCS Limited is the corporate trustee for Sydney Catholic Schools Trust and the approved authority to conduct and operate Catholic systemic schools in the Archdiocese of Sydney. The Board of Directors of the trustee is responsible for ensuring SCS is undertaking its activities for the purpose of the Trust, which is:

The advancement of education through the operation of an effective system of Catholic education at all levels which contributes to the total educational needs of young people in Catholic schools, in accordance with the principles of the Catholic Church.

The SCS Board is supported by the Executive Director, the executive leadership team and board advisory committees. The SCS Board is responsible for providing leadership and strategic guidance to SCS and for corporate governance. The SCS Board Audit and Risk Committee (ARC) assist the SCS Board to exercise due care, diligence and skill through the oversight of risk management, compliance activities and making recommendations to the SCS Board on those matters.

The SCS Modern Slavery Working Group (MSWG), chaired by the Director of Property and Finance, provides reports to the SCS ARC.

CatholicCare Sydney

The CatholicCare Sydney Executive Leadership team led by the Chief Executive Officer, reports to a nine-member Board, who in turn report to the Catholic Archdiocese of Sydney led by the Most Rev Anthony Fisher OP, Archbishop of Sydney.

In 2023, CatholicCare Sydney also joined the Australian Catholic Anti-slavery Network (ACAN) and appointed a Modern Slavery Liaison Officer. A Modern Slavery Working Group (MSWG) was established as part of the ESG Committee (under the Audit, Risk and Finance Committee) in 2023 to guide the organisation through modern slavery risk management actions.

Geographic area
of CAS operations



Organisational Structure

The Catholic Archdiocese of Sydney and Sydney Catholic Schools organisation charts are included in Appendix A.



CAS Agencies

Sydney Catholic Schools

For the reporting period 1 January 2023 - 31 December 2023, SCS revenue was \$1,377m[†], the main expenditure being \$987m[†] on the salaries of approximately 8,473 employees (school-based and central office staff). Throughout 2023 SCS engaged with over 5,600 suppliers. The significant areas of expenditure and investment were:

- building and construction*
- finance and investments*
- professional services
- facilities management and property maintenance*
- information and communication technology (ict) hardware* and software
- utilities
- events and event management, including transport services*
- furniture and office supplies*
- waste management services*
- advertising & marketing

*Note: *These spending areas are regarded as high-risk according to the ACAN Modern Slavery Category Risk Taxonomy. †subject to audit*

CatholicCare Sydney

In 2023 CatholicCare Sydney supported over 32,000 children, young people and adults throughout the Sydney community and beyond through the following services:

Children & Family Services provided 70,000 occasions of service through 21 programs that range from primary prevention to tertiary interventions. These include Family Law Services, Gambling Help Services, Men's Behaviour Change, Financial Counselling, Intensive Family Preservation, Parent Line, the HOPE Program, Family Dispute Resolution, Parenting Education, and the National Carer Gateway.

Home Care delivered 470 packages and provided in-home support, allied health services, and volunteer connections.

Disability Services provided more than 3,000 hours of Supported Employment, and more than 11,000 instances of attendance in the Group and Social Program, along with educational program and family support.

School Wellbeing Services supported 6,000 students and school leaders at 200 schools, with school counselling, onsite critical incident support, family support and remote clinical supervision.

Pastoral Services chaplains provided face-to-face services to 9,300 clients in hospitals, prisons, and mental health units, with 106 companions volunteering a listening ear or prayer to support those facing challenging or isolated situations.



Catholic Development Fund

Catholic Development Fund Sydney (CDF) was established by Cardinal Clancy in 1993. CDF is a mechanism through which the Church community of Sydney can make the most of Church financial resources and activities. CDF exists solely for the benefit of the membership of the Archdiocese and other members of the Church community. CDF is governed by a Charter and Rules and is administered through an Advisory Board.

CDF has an annual revenue of \$34.1M and expenditure of approximately \$1.6M excluding the salaries of its 12 staff. In its operations, CDF engages principally with other Catholic entities and banks.

CDF is committed to:

- maximising the use of Church funds by providing deposit and loans facilities to parishes, schools, religious orders, aged/healthcare entities and agencies of the Archdiocese
- managing the funds invested in CDF prudently, ethically and profitably for the good of the wider Church
- endeavouring to provide a stable and equitable interest rate environment
- providing professional, helpful and personal service to clients
- providing efficient and cost-effective transactional services to clients
- providing a surplus so that the charitable and pastoral works of the Archdiocese may continue
- continuing to support the mission of the Church in all aspects of activities

CDF operates on a not-for-profit basis whereby annual surpluses are distributed to:

- parishes through a rebate on their charitable works fund contributions
- the Sydney Archdiocese for its charitable and pastoral works
- the reserves of the CDF to ensure its ongoing financial stability

CDF has an Audit and Risk Committee and maintains a comprehensive set of policies including prudential standards, governance, General Manager's authorities, investments, deposits and risk management.



Peter Bokeyar
General Manager
Catholic Development Fund

CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

Through the ACAN Program, CAS agencies continue to focus activities on suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via sub-contracting arrangements with a high rate of non-compliance with workplace rights and entitlements.

Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers often contracted through labour hire companies.

Labour Hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery.

Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

CAS Supply Chain Risk

Analysis of CAS supply chains is based on the ACAN risk taxonomy across 23 categories and assessed against four key factors: geographic location, industry, commodity, and workforce vulnerability. The supplier categories assessed as high risk:

- building and construction
- cleaning and security services
- events and event management
- facilities management and property maintenance
- food and catering services
- furniture and office supplies
- ICT hardware
- labour hire

CAS Supplier Analysis

	Total	High Risk	Low Risk
CAS Spend	\$56M	\$31.5M	\$24.4M
CAS Number of Suppliers	1,006	547	459

CAS High Risk Suppliers by Area of Work

- 112 Building and construction
- 35 Cleaning and security services
- 39 Events and event management
- 132 Facility management & property maintenance
- 8 Finance and Investment
- 74 Food and catering services
- 82 Furniture and office supplies
- 23 ICT Hardware
- 4 Labour Hire
- 16 Linen, laundry and textile products
- 8 Medical devices and supplies
- 3 Uniforms and PPE
- 11 Waste management services



CatholicCare Sydney Supply Chain Risk

CatholicCare Sydney procures products and services from a large number of suppliers across a range of industries including:

- property maintenance
- cleaning
- waste management
- catering
- promotional and marketing goods
- information and communications technology (ict)
- uniforms
- labour hire
- fleet services
- furniture, office supplies and equipment hire

CatholicCare Sydney Supplier Analysis

	Total	High Risk	Low Risk
Spend	\$15.2M	\$2.1M	\$13.0M
Suppliers	709	80	629

CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

Sydney Catholic Schools

SCS Operations

SCS central office staff and school staff, including principals, are responsible for maintaining schools and each school's ability to educate students. SCS operations include:

- participating in the life and mission of the catholic faith community
- delivering an authentic high quality catholic education to students
- collecting fees and supporting families with fee assistance and bursary programs
- support, professional development, and administration of salaries for our workforce
- building and maintenance of buildings and facilities
- procurement of goods and services
- financial management
- compliance, risk and safety management
- providing information technology services
- marketing and communication services

SCS Workforce

SCS maintains standards of conduct based on Catholic Social Teaching for all employees and volunteers, and provides a safe work environment for everyone visiting or working on SCS premises. However, SCS recognises that there are areas with heightened risks of modern slavery such as security, cleaning and maintenance. These functions are outsourced and are managed with other high risk functions.

The SCS workforce is managed through multiple Enterprise Agreements in accordance with workplace laws and freedom of association, so the risk of modern slavery in SCS directly employed workforce is minimal. This is supported by a fair, merit-based recruitment process that ensures additional controls are in place during the hiring process.

SCS Supply Chain

Schools have autonomy to engage suppliers in accordance with SCS policies. However, for certain high value categories the SCS procurement team engages with suppliers on behalf of schools. This includes categories such as ICT, waste management, utilities and building works.

SCS procurement maintains a preferred suppliers list for schools to select suppliers. Suppliers on the list are vetted, reviewed and updated according to SCS requirements. SCS Procurement policy mandates due diligence processes, including ensuring new suppliers meet SCS modern slavery policy requirements.

SCS requires all suppliers to use standard SCS contracts except under exceptional circumstances. Standard SCS contracts include terms and conditions relating to modern slavery and more comprehensive clauses for high risk contracts. In the rare circumstances where a non-SCS templated contract is used, SCS negotiates to include appropriate Modern Slavery clauses to form part of the supplier's obligations.

SCS Supply Chain Risk

Modern slavery risks associated with SCS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories.

2023	Total	High Risk	Low Risk
SCS Spend & Investments	\$695.6M	\$482.3M	\$213.3M
SCS Number of Suppliers	5,679	2,445	3,234

SCS High Risk Spend and Investment Categories

SCS High Risk Spend and Investment Categories for calendar year 2023 was \$482.3m from a total of 2,445 suppliers. The split between high risk and low risk for spend was 69% and 31% respectively and the number of suppliers was 43% high risk and 57% low risk.

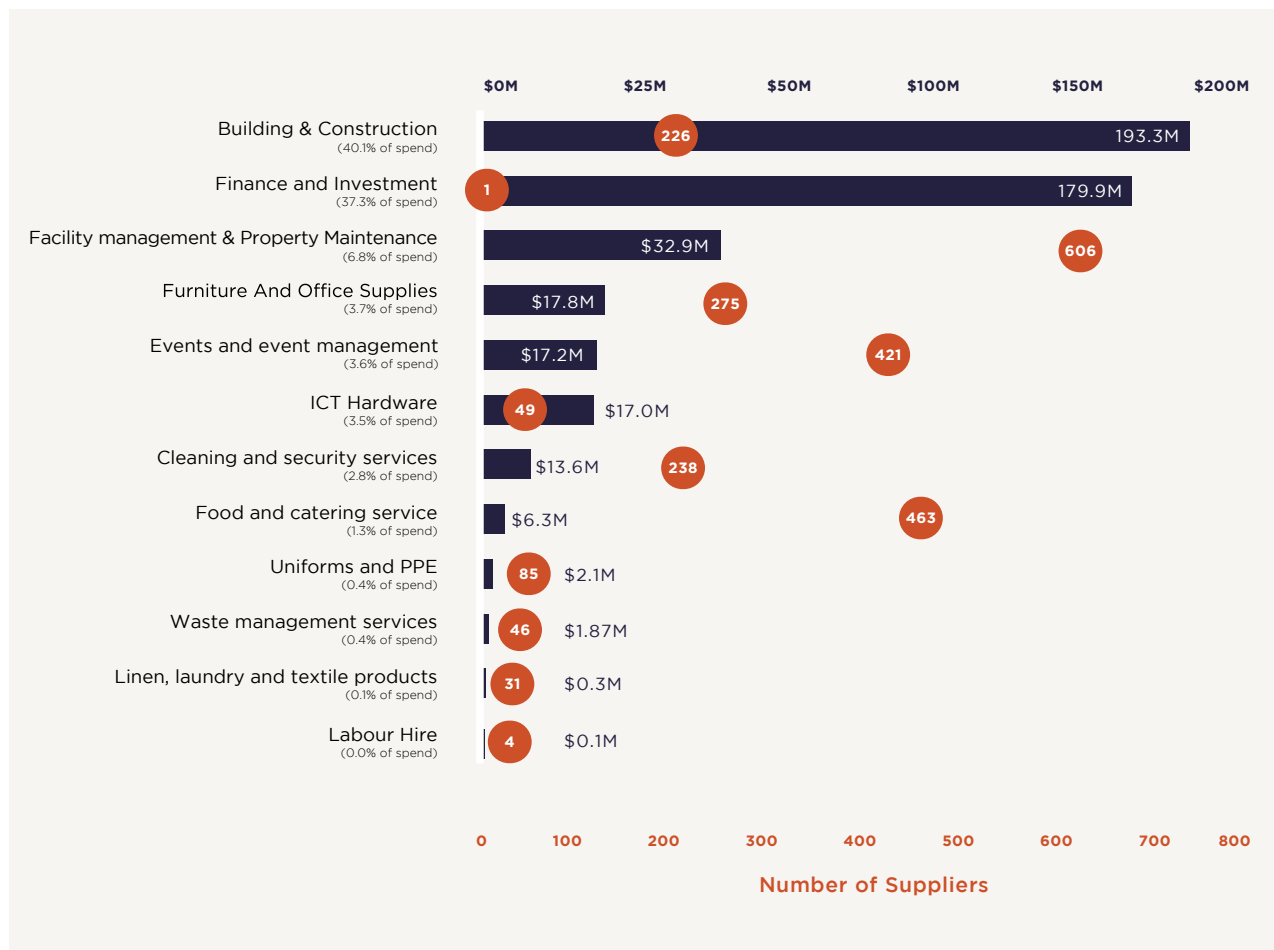
Building & Construction related spending (\$193.3m) presents the greatest spend risk for SCS at 40.1% of total high risk spend, although the lower number of suppliers (226) helps mitigate this risk. The \$179.9m allocated to Finance and Investment represents SCS' holdings with Catholic Church Insurance Asset Management (CCIAM). These holdings are subject to CCIAM's Catholic Values Policy which adheres to strict ethical investment practices for both Australian and global equities. The Facilities Maintenance & Property Maintenance category accounts for the highest number of high risk suppliers (606) and the third highest spend (\$32.9m). These three spending categories account for 84% of SCS' high risk spend and investments.



69% High Risk Spend



31% Low Risk Spend



CRITERIA 4: Actions taken to assess and address risk

CAS adhered to the ACAN Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

1. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with Sedex membership
 - suppliers willing to join Sedex
 - suppliers not required by cas to join Sedex
3. Suppliers were assisted to join Sedex and provided support to complete the Sedex Self Assessment Questionnaires (SAQ).
4. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic entities within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple entities.

CAS suppliers were invited to attend the 2023 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of:

- business relevance and the modern slavery act
- Catholic customer/buyer expectations
- how to access acan e-learning
- Sedex supplier membership

Suppliers who registered to attend the webinar series were sent communications including a link to complete the ACAN Supplier Survey.

Since mid-2021, the ACAN Program has provided CAS agencies with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains. Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of Sedex, CAS agencies continue to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- improved transparency: Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- enhanced risk management: Sedex provides tools to help businesses identify and manage risks in supply chains, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- increased efficiency: Sedex provides standardised templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- access to expertise: Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.
- competitive advantage: by demonstrating a commitment to ethical and sustainable practices, businesses can enhance reputation and brand value.

Sedex provides CAS agencies a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.



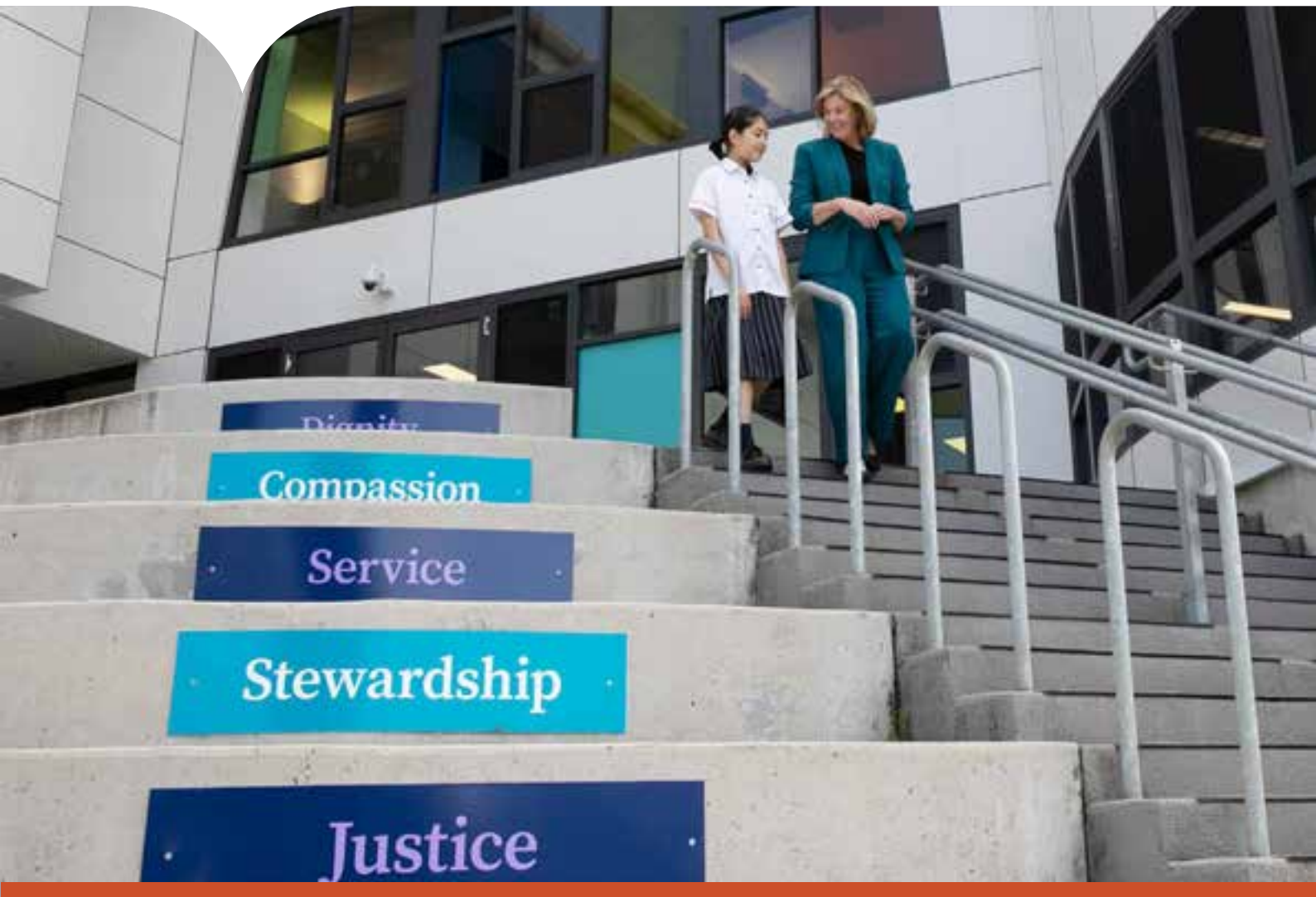
**eLearning
Supplier Bundle**

The ACAN Program supported suppliers to CAS agencies with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

ACAN Program Managers supported CAS agencies by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:

1. Designate a role to drive modern slavery engagement.
2. Complete the 5-minute ACAN Supplier Survey.
3. Watch or participate in one of three ACAN supplier webinars conducted in 2023.
4. Download the ACAN supplier powerpoint presentation and share with staff to raise awareness and ensure an understanding of CAS agencies' expectations in regard to the supplier-buyer relationship.
5. Join Sedex as a Supplier Member, complete a Self Assessment Questionnaire (SAQ) and connect with the respective CAS agency.
6. Provide access to Modern Slavery 101 and Modern Slavery Risk Management for Suppliers e-learning modules which include completion certificates as evidence of modern slavery training for CAS agencies and other customers.



CRITERIA 4: Actions taken to assess and address risk

CAS 2022 – 2025 Action Plan

CAS has undertaken many foundational activities and actions have been implemented. The next steps in the CAS Action Plan are to further address modern slavery risks and to provide a remedy pathway for modern slavery victims.

The CAS Action Plan is structured around risk categories analysed as part of the ACAN Maturity Assessment, with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions.

For the year 2023, CAS commenced, continued implementation and made some progress on the following:

Management Systems

CAS launched a modern slavery policy and will integrate this policy into processes, procedures and processes management tools.

CAS will work to integrate anti-slavery into governance structure and define metrics to measure, manage, and report.

Risk Management

CAS commenced working with the risk management team to update the CAS risk management register, and define how to measure risk in operations and supply chains. In 2024 - 2025 CAS will increase monitoring and reporting on risk.

Procurement and Supply Chains

In 2024 and 2025 CAS will continue to:

- issue updated contract clauses, supplier code of conduct and tender requirements to mitigate modern slavery risk.
- deploy the ACAN Program supplier engagement strategy.
- onboard relevant suppliers to Sedex, develop protocols for reviewing existing suppliers, assess prospective suppliers, monitor risk and response to adverse findings.

Human Resources and Recruitment

In 2024, CAS will continue to implement the following:

- all new position descriptions refer to modern slavery as follows: “The Archdiocese is committed to continuous improvement to assess and address the risk of modern slavery in its operations and supply chains and to report annually on these actions in the form of a Modern Slavery Statement.”
- all CAS job advertisements reference the CAS commitment to eradicating modern slavery.
- modern slavery is incorporated into a new People and Culture webpage <https://www.sydneycatholic.org/work-with-us/> along with the following statement: “Like all agencies of CAS, the People & Culture team are committed to ensuring the wellbeing and protection of children and vulnerable persons, and to eradicating modern slavery. Please see links below for more information on the work of these important ministries” and provide a link to the CAS modern slavery website.
- template CAS job interview questions include a question regarding modern slavery awareness and/or experience.
- CAS induction processes include modern slavery and completion of modern slavery e-learning modules.

Customers and Stakeholders

CAS will continue to lead and drive the ACAN Program.

CatholicCare Sydney Actions

CatholicCare Sydney established a Modern Slavery Working Group to guide the organisation's response to modern slavery risks.

A Modern Slavery Policy was communicated to all employees and uploaded to the internal website (intranet). This policy seeks to manage the risk of modern slavery within CatholicCare Sydney's operations, business relationships and supply chains. This policy also provides a robust framework to drive engagement with modern slavery risk management actions across CatholicCare Sydney.

The policy explicitly states that CatholicCare Sydney's final purchasing decisions shall not be based on price alone and that ethical business processes are an essential part of all value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers. The policy also commits CatholicCare Sydney to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

CatholicCare Sydney invited all preferred suppliers to complete its Supplier Survey, along with an invitation to join Sedex- the world's largest data platform for supply chain risk assessment.



CRITERIA 4: Actions taken to assess and address risk

2023 - Key SCS Achievements



Processes

Initiated a pilot modern slavery audit with a major SCS building and construction supplier.

Training


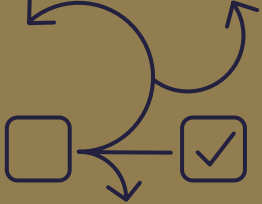



463 Completions

School Principals and finance administration staff completed the MS101 Introduction to Modern Slavery online course.

Awareness

Liturgical celebration of St Bakhita's Feast Day, February 8; Modern Slavery presentation by the NSW Anti-Slavery Commissioner to staff, business partners and suppliers, August 23.

Systems

Development of a Modern Slavery Spend Dashboard in CiA to provide a real-time view of SCS spending across high, medium and low risk suppliers.

Actions

Successfully completed 12 of 15 key performance indicators based on 2022 gap analysis, with 3 areas in progress.



12 of 15

2023 key performance indicators

792 Suppliers

completed the ACAN supplier pre-assessment survey.

267	86
Suppliers invited to join Sedex	Supplier staff attended ACAN webinars

20 Suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)



Governance

Modern Slavery Working Group meetings held monthly during 2023. KPI-driven action plan actively managed by the MSWG.



SCS's Summary of 2023 Modern Slavery Risk Management Activities

During the reporting period, SCS continued to work closely with Sydney Archdiocesan Anti-Slavery Taskforce (Taskforce) specialists to better understand, develop and action our risk management program. Refer to the specific activities listed below for further information.

In 2023, SCS implemented a number of initiatives and reached important milestones. These are summarised below:

- renewed the **ACAN modern slavery risk management program** for 2023 - 2026. Collaborated with other Catholic dioceses, social services and school systems.
- executed the **SCS Modern Slavery Action Plan** with Key Performance Indicators (KPIs).
- SCS Board and Audit and Risk Committee continued to review the SCS **Anti-Modern Slavery risk profile** and advise on mitigations.
- continued **on boarding suppliers** to Sedex via ACAN's pre-assessment survey. There were 792 ACAN Supplier Surveys completed, with 267 Suppliers invited to join Sedex.
- continued to expand the number of SCS staff completing **ACAN eLearning modules** via the SCS Learning Management System (LMS). 2023 focussed on School Principals (117 completions) and school-based finance administration staff (346 completions).
- hosted significant events to **raise awareness of modern slavery** including St Bakhita's Feast Day; A Modern Slavery presentation by the NSW Anti-Slavery Commissioner, and delivering a Modern Slavery keynote address for SCS Life-Month.
- SCS staff and suppliers participated in 10 **ACAN modern slavery capacity building webinars** throughout the reporting period. Webinars addressed sustainable and ethical procurement, and covered industries such as construction, food and beverage, textiles, cleaning and waste management, legal, and financial services.
- professional development** of SCS staff through in-person conferences, seminars, workshops and webinars.
- ensured all new contracts included **Modern Slavery as a mandatory criteria** when evaluating all suppliers and tenders.
- Modern Slavery clauses are included in **external suppliers non-standard contracts** that SCS enters into.
- initiated a **social compliance two-pillar SMETA audit** of one of SCS's largest building and construction suppliers.
- improved systems and processes** by implementing new modern slavery fields in supplier records, updating supplier industry categorisations, and creating a modern slavery spend dashboard.



CRITERIA 4: Actions taken to assess and address risk

SCS maintains a proactive approach to address and mitigate the risks of modern slavery. The SCS Modern Slavery Working Group (MSWG), a collaborative group of senior executives from all SCS Directorates, continues to focus on the delivery of the Modern Slavery action plan and track progress against key performance indicators.

In 2023, SCS implemented several initiatives as part of the ACAN modern slavery risk management program and the SCS Action Plan.

SCS actions focused on three areas:

1. Supplier engagement and assessment
2. E-learning and raising awareness
3. Improving systems and processes

Appendix B contains a timeline of these and other key activities.

SCS Supplier Engagement and Assessment

SCS continued to expand the scope of supply chain due diligence with 792 suppliers completing the ACAN Supplier Survey. Following the completion of the survey, 267 Suppliers have been invited to join the Sedex platform. In 2023 the number of SCS suppliers joining Sedex grew three-fold from 29 to 89. Suppliers mostly covered industries regarded as high risk according to the ACAN Category Risk Taxonomy, such as building and construction, cleaning services, property maintenance, textiles and clothing, and waste management.

Towards the end of 2023, with ACAN's support, SCS initiated the pilot of a Modern Slavery Social Audit (MSSA) of one of our largest building and construction suppliers - Lipman Pty Ltd. MSSAs enable businesses to assess their suppliers, monitor the health and safety of workers and signal zero tolerance of human rights abuses such as child and forced labour. Once an audit is complete, buyer and supplier businesses can work together to address any issues, based on a Corrective Action Plan Report (CAPR).

The Audit will commence in the first half of 2024 and will be conducted by Intertek, a global APSCA* accredited Social Auditing partner.

* Association of Professional Social Compliance Auditors



Dr James Cockayne, NSW Anti-slavery Commissioner, addresses SCS staff and key suppliers at an event to commemorate The International Day For Abolition of Slavery, August 23 2023.

MSSA deliverables include:

- meeting and interviewing management across all levels of the supplier's organisation where relevant.
- a comprehensive site tour of the facility, including an SCS representative.
- interviews with the supplier's employees and union/employee representative.
- a review of the supplier's documents, processes and systems, including Risk management, Health and Safety, Environment, Human Resources, Payroll and working hours, Communication channel, Business ethics, and company policies and procedures that relate to the legislative Acts and Codes relevant to the jurisdiction.
- preparation of a Audit Report for the SCS Board and Leadership team.
- if required, preparation of a Corrective Action Plan Report (CAPR).

E-Learning and Raising Awareness

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program.

Five ACAN e-Learning modules are delivered online:

- **Module 1:** Modern Slavery 101
- **Module 2:** Business Relevance
- **Module 3:** Implementing a Modern Slavery Risk Management Program
- **Module 4:** Grievance Mechanisms and Remedy
- **Module 5:** Modern Slavery Risk Management for Suppliers

The SCS MSWG determines which staff, based on their role, should complete these modules.

During 2023 SCS continued to expand the number of staff completing ACAN eLearning modules via the SCS Learning Management System (LMS). Stakeholders included School Principals (117 completions), school-based business managers and finance administration staff (346 completions), and suppliers (32 completions).

SCS hosted significant events in the reporting period to raise awareness of modern slavery including:

- the liturgical celebration of St Bakhita's Feast Day, February 8.

- a Modern Slavery presentation by the NSW Anti-Slavery Commissioner to over 100 CAS and SCS staff, business partners and suppliers, August 23.
- a keynote address delivered by the The Modern Slavery Liaison Officer at the SCS Life-Month event, A conversation on Modern Slavery with Sr Mary Leahy, September 20.

SCS staff and suppliers participated in 10 **ACAN modern slavery capacity building webinars** throughout the reporting period. Webinars addressed sustainable and ethical procurement, and covered industries such as construction, food and beverage, textiles, cleaning and waste management, legal, and financial services.

Professional development of SCS staff included the following events and training:

- MSWG members attended the 2023 Modern Slavery Conference *Taking Action Together*, Melbourne 27 - 29 June.
- MSWG members attended the *Modern Slavery: Leadership and Accountability for Social Change* seminar hosted by the University of Notre Dame, Sydney, September 14.
- the Modern Slavery Liason Officer attended the NSW Anti-slavery Commissioner's community networking event, November 30.
- attending SEDEX webinars on developments regarding the Supplier Assessment Questionnaire (SAQ).
- Modern Slavery presentations and updates at workshops/webinars for SCS Business managers and Finance administration staff.
- distributing 160 hard copies of the 2022 CAS and SCS Modern Slavery Statement to all directors and school principals.



CRITERIA 4: Actions taken to assess and address risk

Improving Systems and Processes

SCS continued to ensure all new contracts included **modern slavery as a mandatory criteria** when evaluating all suppliers and tenders. SCS considers the modern slavery risk level (high, medium, low) of the supplier's industry according to the ACAN Category Risk Taxonomy, and any policies, procedures and systems the supplier uses to manage modern slavery risks in their own operations and supply chain. Modern slavery clauses are included in external suppliers non-standard contracts that SCS enters into.

SCS finance and contract management systems continued to be enhanced to assist with supplier due diligence and improve reporting capabilities. This included:

- implementing modern slavery fields in supplier records in SCS' enterprise financial management system (CiA). This flags the modern slavery risk level (high, medium, low) for each supplier, and categorises the supplier according to the **ACAN Risk Taxonomy**.
- preparing data for the updating of supplier categorisations to improving the accuracy of supplier spend data.
- developing a **Modern Slavery Spend Dashboard** in CiA to provide a real-time view of SCS spending across high, medium and low risk suppliers.
- completing the **Sedex Supplier Assessment Questionnaire** (SAQ) on behalf of the SCS Central Office site.

SCS plans for 2024 and beyond:

- continued execution of the SCS Modern Slavery Action Plan to achieve specified KPIs.
- actively engage in, and encourage SCS suppliers to participate in, ACAN webinars and other learning and engagement opportunities.
- actively engage in ACAN action planning workshops.
- increase the number of suppliers joining Sedex and completing the SAQ.
- complete the pilot of a social compliance two-pillar SMETA audit.
- Continue improving data integrity by updating SCS systems and supplier onboarding processes, including mapping standard supplier classifications to the appropriate modern slavery risk category aligned with the ACAN Category Risk Taxonomy.
- Continue to enhance reporting capabilities from SCS finance and contract management systems (e.g. Modern Slavery Spend Dashboard)
- Celebration of the Feast Day of St Bakhita across SCS schools and the central office.
- Include Modern Slavery in appropriate curriculum across SCS schools.
- Remain vigilant regarding the mandatory inclusion of Modern Slavery clauses in all new supplier contracts.

The Most Rev Anthony Fisher OP Archbishop of Sydney addressed an event hosted by SCS to commemorate World Day Against Trafficking Persons. The event was attended by executive leadership from Catholic school systems across NSW.



Remediation



The right to effective remedy for people who have experienced modern slavery and other human rights abuses is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains.

Putting in place remediation policies also has a preventative effect, in and of itself, by improving decision-makers' understanding of the root causes of modern slavery and how business decisions, policies or practices can contribute to the harms experienced by victim survivors.

A documented remedy pathway is also an important requirement of the Modern Slavery Act 2018.

Through the ACAN Program, CAS agencies may access independent modern slavery support and advice through Domus 8.7. Any CAS agency, parish or supplier can refer people who may be impacted by modern slavery to obtain support and advice or seek guidance on how to respond to modern slavery concerns.

Domus 8.7 principles

Domus 8.7 is guided by the following principles:

- Independent modern slavery assessment, advice and guidance on next steps
- Ensures people impacted are provided support and services through informed consent
- Human rights-based approach

Domus 8.7 overview

The Domus 8.7 remedy pathway provides the following:

- support for a coordinated response when actual or prospective victim survivors are identified by CAS agencies, parishes, suppliers or other partners
- supports CAS capabilities to provide or cooperate in providing remedy
- offers solutions focused on mitigating future risk
- addresses a key mandatory reporting requirement of the MSA
- seeks to uphold Catholic Social Teaching

A human rights-based approach to remedy for people impacted by modern slavery prioritises the dignity, autonomy, and needs of victim survivors. This approach involves ensuring access to justice through legal representation and the right to compensation, comprehensive support services including health and mental health care and empowering survivors through education and economic opportunities. It emphasises that all actions are survivor-centered and aimed at restoring their full rights and dignity.

This approach also recognises that survivors are not passive recipients of aid but active participants in their journey towards recovery and justice by respecting their insights, experiences, and decisions. This method fosters an environment of mutual respect and collaboration leading to systemic interventions to prevent risk and future harms.

Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and is endorsed as a Public Benevolent Institution with Deductible Gift Recipient (DGR) status. It was established by Most Rev Anthony Fisher OP, Archbishop of Sydney as an agency of the Catholic Archdiocese of Sydney.



CRITERIA 5: Measuring Effectiveness

Modern Slavery Metrics across CAS Agencies

The below combined metrics demonstrate continuous improvement by CAS. These key metrics provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions, and helps CAS agencies to understand the pace of change and set future direction.

The data demonstrates increased engagement from internal stakeholders and suppliers of goods and services. The increased completion of the ACAN supplier survey improved identification of suppliers where the completion of the SEDEX SAQ would support managing modern slavery risk in their own operations and supply chains. It also identified 81% of CAS suppliers that completed the ACAN supplier survey have an annual revenue below \$5 million. These suppliers could benefit from additional training and support before completion of any additional self-assessment activity.

	Activity	2021	2022	2023
Internal / Staff	Hours spent on modern slavery activities	-	240	382
	Individual staff completed e-learning	171	150	587
	E-Learning modules completed (all modules)	572	441	671
External / Supplier Engagement	Total number of suppliers	5,830	6,232	8,520
	Number of suppliers across high-risk categories	-	2,587	3,527
	Number of ACAN Supplier Surveys completed	-	3	1,059
	Supplier staff attending capacity building webinars	-	40	182
	Invited to join Sedex	163	505	300
	Joined Sedex	21	21	68
	Sedex SAQ completed	5	8	28
	Social audits	0	0	5
	Corrective actions	0	0	28
Domus 8.7	Contacts made via worker voice / grievance mechanism	11	5	0**
	Referrals for advice and assistance	3	5	0**
	Individuals identified or referred for modern slavery assessment	0	0	0**
	Individuals with modern slavery cases remediated	3*	0	0**

* Carry over from 2020

** CAS Agencies only contacts and referrals made to Domus 8.7.

SCS Modern Slavery Effectiveness Measures

Over the reporting period SCS continued to implement the ACAN Modern Slavery Risk Management Program and measure effectiveness across Key Performance Indicators.

Progress was made in elearning and awareness raising, with 463 additional staff completing the Modern Slavery 101 online course via our PHRIS Learning Management System.

SCS adopted the ACAN Supplier Pre-assessment Survey as a filtering mechanism for determining those suppliers that we would encourage to join the SEDEX platform. To execute this strategy, ACAN reached out to over 2,400 SCS suppliers from modern slavery high-risk categories. Of those, 792 suppliers completed the pre-assessment survey and, of those, 267 were invited to join SEDEX.

	Activity	Sydney Catholic Schools
Internal / Staff	Hours spent on modern slavery activities	282*
	Individual staff completed e-learning	463
	Number of MSWG meetings	10
	E-learning modules completed	463**
External / Supplier Engagement	Total number of suppliers	5,679
	Number of suppliers across high-risk categories	2,445
	Number of ACAN Supplier Surveys completed	792
	Supplier staff attending capacity building webinars	86
	Invited to join Sedex	267
	Joined Sedex	29
	Sedex SAQ completed	20
	Social audits	1
	Corrective actions	0
Domus 8.7	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

* Hours attributed to the Modern Slavery Liason Officer only, excluding work done on producing the 2023 Modern Slavery Statement.

** Staff completed the ACAN Modern Slavery 101 online course.

CRITERIA 5: Measuring Effectiveness

SCS 2023 Key Performance Indicators

Key: ■ Completed ■ In Progress

Area	2023 KPI	2023 Target	Progress
Management Systems	Number of MSWG meetings in 2023	10	■
Management Systems	Deliver SCS MS Statement to ARC and Board	May 4, 2023 (ARC) May 17, 2023 (Board) (Dates subject to change).	■
Management Systems	Bi-annual delivery of MS Briefing Papers, including Risk Register, to SCS ARC	May 4, 2023 Nov 23, 2023 (Dates subject to change)	■
HR & Recruitment	Number of relevant SCS staff to have completed the MS 101 training module	All Principals & APs, BMs, Lvl6 Admin, all CO staff	■
HR & Recruitment	Number of relevant SCS staff to have completed all 4 MS modules	All SCS Board, ARC, SCS Executive, MSWG, Central Office Procurement staff	■
HR & Recruitment	Number of training events attended by MSWG member(s)	Attend 6 MS Webinars	■
HR & Recruitment	Celebration activities for the Feast of St Bakhita	Feb 8, 2023	■
Procurement & Supply Chain	Number of suppliers who completed the ACAN Supplier Survey	80% of SCS high-risk Suppliers > \$50K	■
Procurement & Supply Chain	Number of high-risk suppliers invited to join SEDEX	75 (suppliers >\$100k)	■
Procurement & Supply Chain	Number of policies and procedures that DO NOT include MS clauses where required.	0	■
Procurement & Supply Chain	Number of non-SCS-standard contracts that DO NOT include MS clauses (where relevant).	0	■
Risk Management	Pilot Social Compliance Audits	1	■
Risk Management	Percentage of modern slavery cases identified that were effectively addressed (remediated), or are in the process of being addressed, using an SCS Corrective Action Plan.	100%	■

SCS Future measures of effectiveness

As part of the SCS Modern Slavery Action Plan for 2024 and beyond, and considering insights from the ACAN Maturity Assessment, the key focus areas are:

- the continued enhancement of supply chain visibility by encouraging and incentivising suppliers in high-risk categories to complete the ACAN Pre-assessment Survey and, where appropriate, join the SEDEX platform.
- efforts to raise awareness of modern slavery in schools via staff professional development and new curriculum units will be measured.
- initiatives around supplier and worker engagement, such as social compliance audits and on-site “toolbox talks” for building and construction suppliers.

Key Performance Indicators will continue to be developed in collaboration with respective MSWG members.



CRITERIA 5: Measuring Effectiveness

(continued)

2024 Key Performance Indicators

Area	2024 KPI	2024 Target
Management Systems	Number of MSWG meetings in 2024	10 (bi-monthly)
Management Systems	Deliver SCS MS Statement to ARC and Board	May 2, 2024 (ARC) May 15, 2024 (Board) (Dates subject to change).
Management Systems	Bi-annual delivery of MS Briefing Papers, including Risk Register, to SCS ARC	May 2, 2024 Nov 14, 2024 (Dates subject to change)
HR & Recruitment	Number of relevant SCS staff to have completed the MS 101 training module	All SCS CO Staff All School Staff
HR & Recruitment	Number of relevant SCS staff to have completed all 4 MS modules	All school-based Business Managers
HR & Recruitment	Number of training events attended by MSWG member(s)	Attend 6 MS Webinars (e.g. ACAN)
HR & Recruitment	Celebration activities for the Feast of St Bakhita	Feb 8, 2024
	Social media, schools, students & staff, suppliers, inclusion in Units of Work	Ongoing
Procurement & Supply Chain	Number of suppliers who completed the ACAN Supplier Survey in 2024	300
Procurement & Supply Chain	Number of high-risk suppliers invited to join SEDEX in 2024	100
	Additional high-risk suppliers joining SEDEX in 2024	50
Procurement & Supply Chain	SAQ completions in Sedex in 2024	20
	"Toolbox Talks" delivered at SCS construction sites	5
Procurement & Supply Chain	Number of policies and procedures that DO NOT include MS clauses where required.	0
Procurement & Supply Chain	Number of non-SCS-standard contracts that DO NOT include MS clauses (where relevant).	0
Risk Management	Pilot Social Compliance Audits	1
Risk Management	Percentage of modern slavery cases identified that were effectively addressed (remediated), or are in the process of being addressed, using an SCS Corrective Action Plan.	100%



CRITERIA 6: Process of consultation with key Archdiocesan entities

The CAS Modern Slavery Working Group representatives include:

- Director of Finance
- General Counsel and Legal Counsel
- Director of People and Culture
- Property Services Manager
- Manager of Communications
- Catholic Development Fund Sydney, CEO
- St Mary's Cathedral, General Manager
- CatholicCare Sydney, Property Manager

The SCS Modern Slavery Working Group has the following representatives:

- Director of Finance and Property (Chair)
- Finance Projects Manager (MSLO)
- Chief Financial Officer
- Manager, Property & Facilities
- Procurement Manager
- Contracts Manager
- Legal Counsel, commercial law
- Supervisor: People & Culture Operations
- K-12 Religious Education Officer
- Diverse Learning Education Officer
- Supervisor: ICT Purchasing
- ACAN Representative

The CatholicCare Sydney Modern Slavery Working Group is comprised of members of the ESG Committee as follow:

- ESG Chairperson
- Finance
- Risk & Assurance
- People & Culture
- Procurement
- Communications

Related entities

The Taskforce engaged with the following Catholic organisations in relation to compliance activities of the Church in response to the Modern Slavery Act:

- Australian Catholic Bishops Conference
- Catholic Health Australia
- Catholic Mission
- Catholic Social Services Australia
- National Catholic Education Commission
- Southern Cross Care Western Australia
- Western Australian Catholic Migration and Refugee Office (WACMRO)



CRITERIA 7: Other

CAS provides the administrative support for the ACAN Program and employs five full time ACAN Program Managers.

Major achievements of the ACAN Program are documented in the ACAN Executive Summary of the Compendium of Catholic Modern Slavery Statements 2023.

Outreach and collaboration

The Taskforce executive presented at webinars, workshops and conferences on topics such as supplier engagement, remediation, ESG and the response of the Catholic Church in Australia to the Act (Refer to Appendix B).

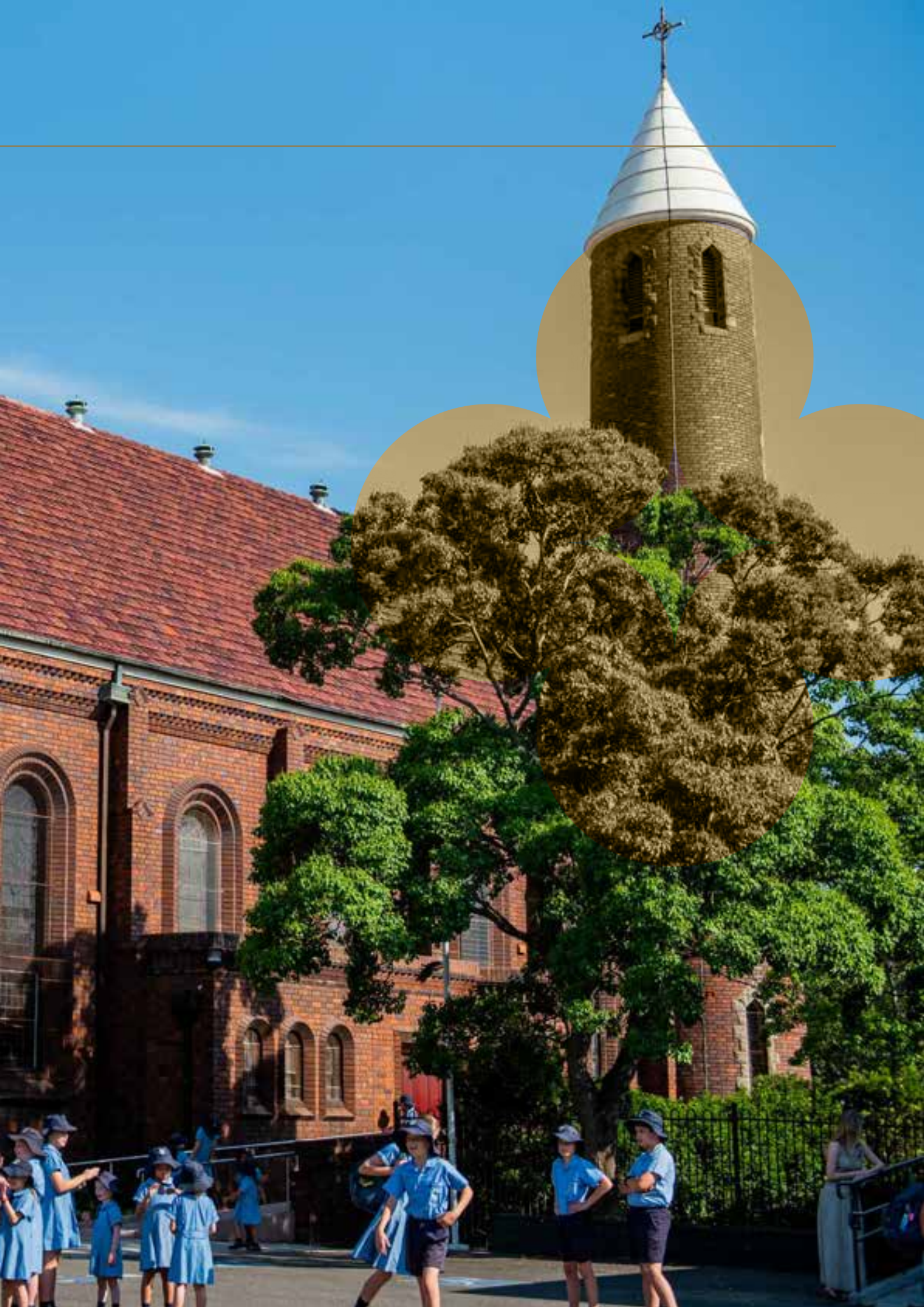
The Taskforce organised several in-person events in partnership with Sedex, ERM ESG and Sustainability Consulting and The University of Notre Dame. These events provided Catholic leadership and businesses the opportunity to identify areas for collaboration.

The Taskforce continued to host students in partnership with the Australian Catholic University (ACU) Thomas More Law School ProBono Internship Program. Fifty-two students participated in the Domus 8.7 index program benchmarking Modern Slavery Statements, undertaking 4,160 hours of research.

Communications: CathNews coverage of ACAN media releases

1. Catholic organisations unite in battle to end modern slavery 8th Feb
2. ACU to add modern slavery studies for all students 27th Feb
3. Anti-slavery network joins push to protect exploited migrants 2nd Mar
4. Catholics attend event to mark milestone in fight against modern slavery 7th Mar
5. Slavery survivor who became a campaigner wins Freedom Award 27th Mar
6. Number of people in Australia experiencing modern slavery rises to 41,000 24th May
7. ACAN backs recommendations in review of Modern Slavery Act 26th May
8. NSW Anti-slavery Commissioner launches three-year plan 22nd Jun
9. Compendium demonstrates Church's commitment to addressing modern slavery 2nd Aug
10. Australians take part in key modern slavery events in Europe 23rd Nov
11. ACAN welcomes legislation to establish an Anti-Slavery Commissioner 1st Dec

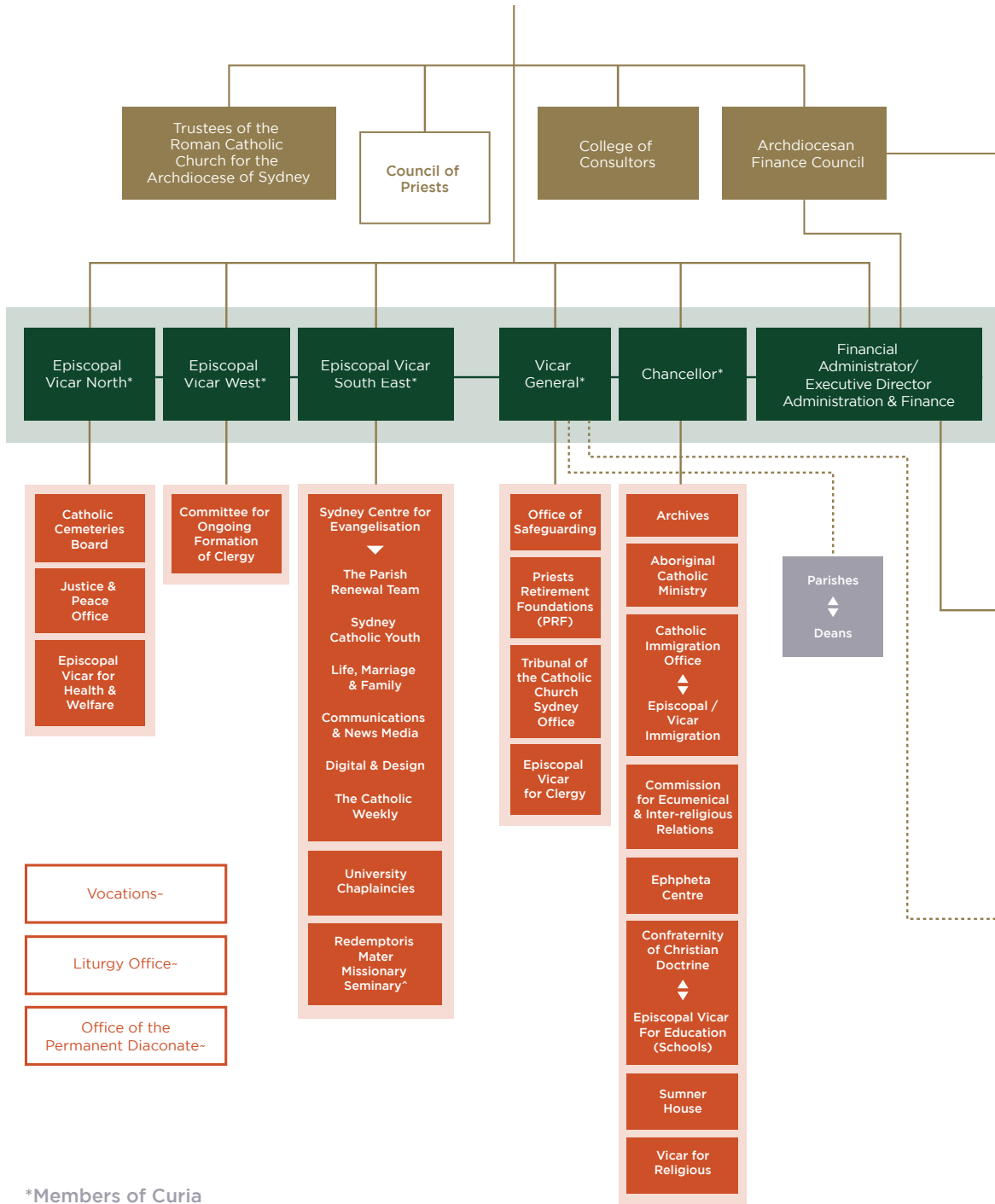




APPENDIX A ORGANISATIONAL CHARTS

CAS Organisation Chart

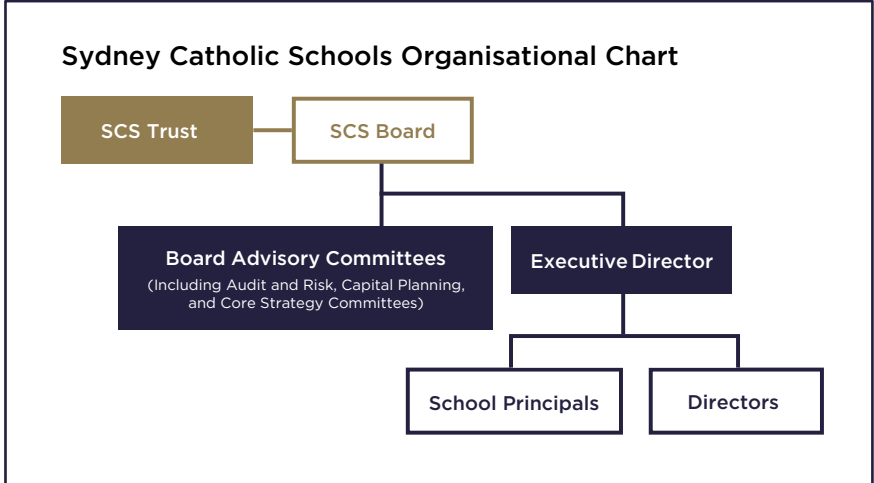
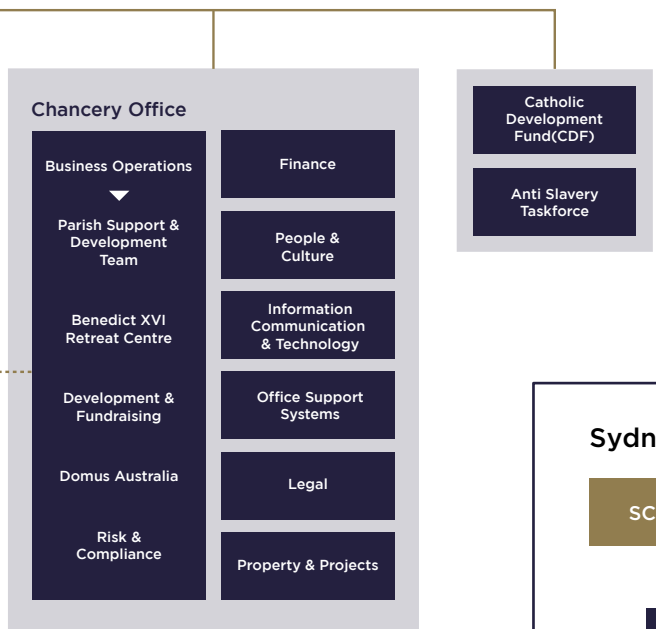
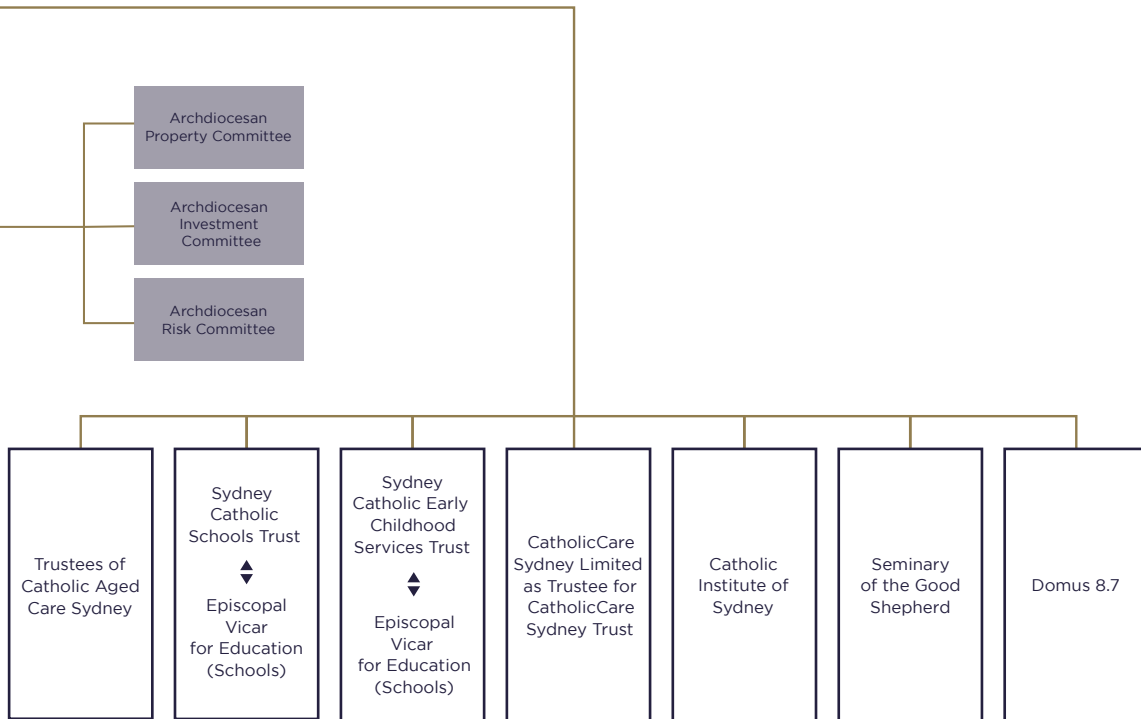
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*Members of Curia

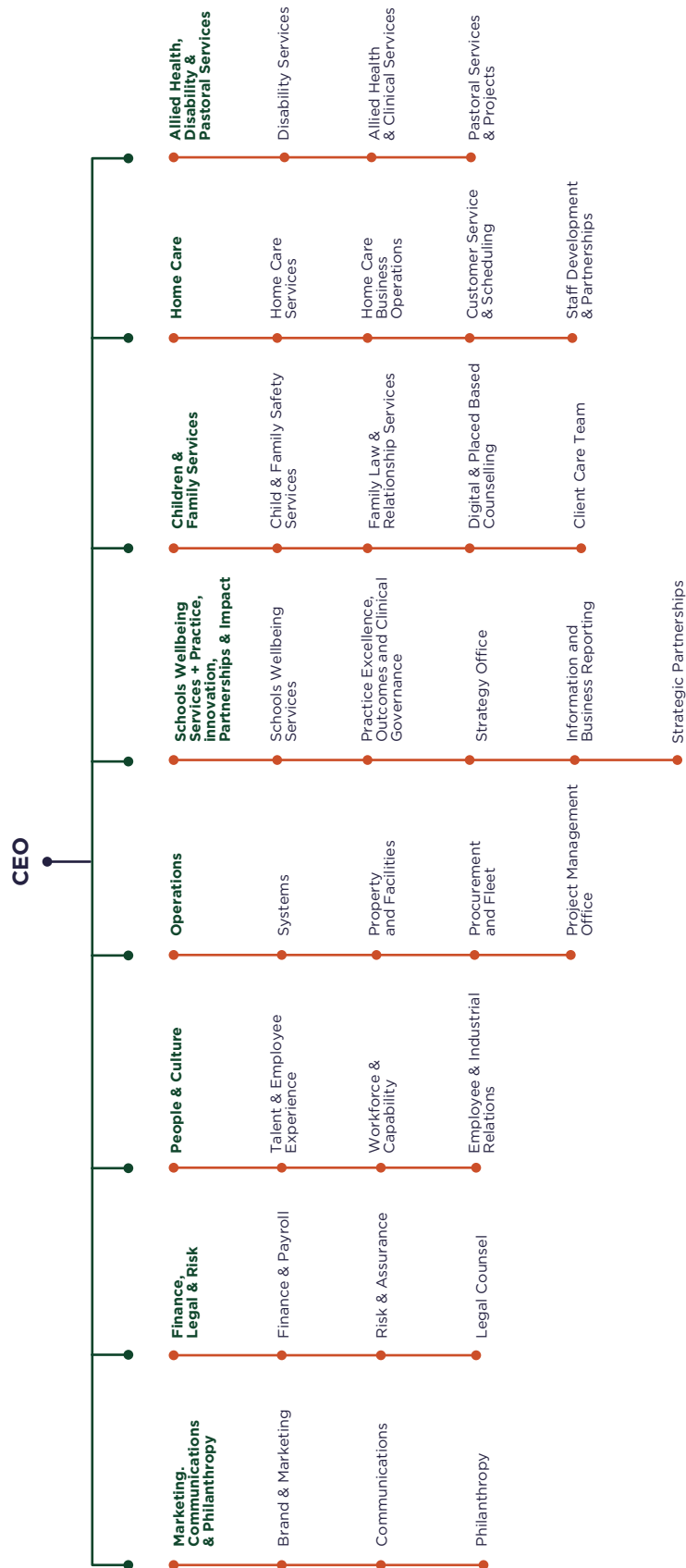
^Conducted by Redemptoris Mater Sydney Incorporated

-Subject to Outcome of Review



APPENDIX A ORGANISATIONAL CHARTS

CatholicCare Sydney Organisational Chart 2023



APPENDIX B

TIMELINE OF ACTIVITIES

2023 SCS Activities

Date	Activity
Feb 8	Celebration and Mass for St Bakhita's Feast Day
Feb 9	SCS Modern Slavery Working Group (MSWG) Meeting #1 2023
Mar 10	SCS completes survey for the Australian Catholic Anti-slavery Network (ACAN) Modern Slavery Compendium
Mar 10	SCS MSWG Meeting #2 2023
Mar 15	Modern Slavery Liaison Officer (MSLO) attends ACAN Supplier Webinar: Construction and Capital Works
Mar 22	Modern Slavery update for School Finance and Administration Staff (Zoom)
Mar 30	MSLO attends ACAN MSWG Webinar
Apr 14	SCS MSWG Meeting #3 2023
May 4	Modern Slavery Risk Register and 2022 SCS and CAS Modern Slavery Statement noted by the Audit and Risk Committee of the SCS Board
May 11	SCS MSWG Meeting #4 2023
May 17	2022 SCS and CAS Modern Slavery Statement approved by the SCS Board
May 25	MSWG members attend ACAN MSWG webinar
May 26	2022 SCS and CAS Modern Slavery Statement approved by the CAS Board
Jun 8	SCS MSWG Meeting #5 2023
Jun 27-29	MSWG members attend the Modern Slavery Conference - <i>Taking Action Together</i> , Melbourne
July 13	SCS MSWG Meeting #6 2023
July 24	Distributed 2022 SCS and CAS Modern Slavery Statement to all SCS Directors and School Principals
Aug 10	SCS MSWG Meeting #7 2023
Aug 17	MSLO attends SEDEX webinar on new Supplier Assessment Questionnaire (SAQ)
Aug 23	SCS hosts a presentation by the NSW Anti-Slavery Commissioner to over 100 CAS and SCS staff, business partners and suppliers
Aug 28	ACAN Supplier Pre-assessment Survey distributed to over 2,500 high-risk SCS Suppliers
Aug 31	MSWG members attend ACAN MSWG webinar
Sept 14	SCS MSWG Meeting #8 2023
Sept 14	MSLO attends the <i>Modern Slavery: Leadership and Accountability for Social Change</i> event at The University of Notre Dame, Sydney
Sept 20	MSLO delivers a keynote address at SCS community event, <i>A Conversation About Modern Slavery</i>
Sept 28	MSWG members attend ACAN MSWG webinar
Sept 30	All SCS school finance administration staff complete the ACAN <i>Modern Slavery 101</i> online course
Oct 9	All SCS school principals complete the ACAN <i>Modern Slavery 101</i> online course
Oct 12	SCS develops v1 of <i>Modern Slavery Spend Dashboard</i> tool
Oct 17	Modern Slavery update for School Finance and Administration Staff (Zoom)
Oct 18	SCS MSWG Meeting #9 2023
Oct 26	MSWG members attend ACAN MSWG webinar
Nov 23	Modern Slavery Risk Register and 2024 Modern Slavery Action Plan noted by the Audit and Risk Committee of the SCS Board
Nov 30	MSLO attends the NSW Anti-slavery Commissioner's community networking event
Nov 30	MSWG members attend ACAN MSWG webinar
Dec 6	SCS MSWG Meeting #10 2023
Dec 18	Modern Slavery <i>Toolbox Talk</i> Planning Meeting with ACAN & SCS Property Team







CATHOLIC
ARCHDIOCESE
OF SYDNEY

Modern Slavery Statement

ANNUAL REPORT

1 January 2023 - 31 December 2023

Email: antislavery@sydneycatholic.org

Catholic Archdiocese of Sydney ABN 72 823 907 843

Polding Centre 133 Liverpool St Sydney NSW 2000

www.sydneycatholic.org

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Modern Slavery Statement 2023



Catholic Schools
Parramatta Diocese





Authorisation

by Catholic Schools Parramatta Diocese (CSPD) Limited Chair Elizabeth Crouch AM

I am pleased that for the fourth year, Catholic schools in the Diocese of Parramatta has produced a Modern Slavery Statement. Whilst this is the fourth statement for Catholic schools in the Diocese, it is the first under the newly established structure of Catholic Schools Parramatta Diocese Limited (CSPDL). The previous three statements have been jointly submitted with the Diocese of Parramatta.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church has a pivotal role in ensuring that our workplaces and practices are free from any forms of modern slavery.

CSPD remains committed to ensuring that modern slavery in all its elements is eradicated from the supply chains for all the good and services procured each year by CSPD. We work closely with our colleagues in the Australian Catholic Anti-Slavery Network (ACAN) to harness the significant organisational power to bring about the change required.

We all have a part to play in confronting modern slavery and ensuring our supply chains are ethical and respect the dignity of each person.

On behalf of the Board of CSPDL, we fully support this statement and encourage everyone Catholic Schools in the Diocese of Parramatta to learn more and find ways to ensure we continue to strive for a world free of modern slavery.

Elizabeth Crouch AM

Catholic Schools Parramatta Diocese Ltd Chair

13 June 2024

Disclosure note

This statement has been made on behalf of Catholic Schools Parramatta Diocese Ltd. Covering the reporting period 1 January 2023 to 31 December 2023 this statement focuses solely on work performed by Catholic Schools Parramatta Diocese Ltd **ABN 66 661 001 798**.

Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

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Approval

This Modern Slavery Statement was approved by the principal governing body of The Diocese of Parramatta as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 31 May 2024 This modern slavery statement is signed by a responsible member of Catholic Schools Parramatta Diocese Ltd as defined by the Act.



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Reporting criteria 1 and 2:

About Catholic Schools Parramatta Diocese

The diocese has a system of 80 schools which are managed by a separate entity named Catholic Schools Parramatta Diocese (CSPD). After becoming an incorporated company limited by guarantee on 1 January 2023, the organisation changed its name from Catholic Education Diocese of Parramatta (CEDP) to CSPD. In 2023, CSPD managed 58 primary schools, 22 secondary schools, two trade and inquiry campuses, three high support learning settings, six Catholic early learning centres and 52 before and after school care centres. CSPD has 44,000 students and employs more than 5,000 teaching and non-teaching staff.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is the sole Member of the incorporated entity under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Board of Directors is responsible for the overall governance and strategic direction of the organisation. It provides “overall superintendence”, overseeing both performance and compliance in accordance with the organisation’s purpose and objectives. The Board delegates the responsibility for the management of the schools to the Executive Director of Schools, Mr Jack de Groot, and the Executive Leadership Team. CSPD has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

The Diocesan schools’ system is largely reliant on Commonwealth and State Government funding for the continued delivery of quality education and the provision of educational services to the Catholic and wider community. CSPD reviews all its operating budgets prepared by the individual schools and aggregates these school budgets with its own ‘head office’ functions in preparing consolidated operating and capital budgets. CSPD’s revenue for 2023 was \$893,519,000.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CSPD provides quality learning and teaching in a faith-centred environment.





Purpose, intent and priorities

The purpose, intent, and priorities of CSPD are:

Purpose

Catholic education is a work of love, for the full human development of students, grounded in the person of Jesus Christ and at the service of society. All staff share in the evangelising mission of the Church as they work to bring about a synthesis of faith, life and culture in their communities.

The system of schools in the Diocese of Parramatta is a work of the Church, under the leadership of our Bishop and in collaboration with priests, parents, students and staff, to realise the mission of bringing the person of Jesus Christ into the lives of the young people in our care and their families.

Intent

Our intent is to transform the learning of each student and enrich the professional lives of staff within a Catholic learning community.

Priorities

CSPD's 2020-2025 priorities continues to be in the following areas:

1. Mission is counter cultural;
2. Learning is owned by the learner;
3. Equity is the norm; and
4. Everyone is a leader.



Our organisational structure

Executive Director of Schools (from 30 January 2023)

Deputy Executive Director of Schools and Director Strategic Delivery (to 28 February 2023) then **Deputy Executive Director of Schools and Director Learning** (from 1 March 2023)

Director Finance and Infrastructure

Director Mission (to 5 September 2023)
then **Acting Director Mission**

Director Wellbeing

Director Data Intelligence (to 16 October 2023)
then **Chief Information Officer** (from 20 November 2023)

Director People and Culture (new position from 12 March 2023)

Director Communications and Engagement
(new position from 16 October 2023)

Director Legal and Governance (new position to commence in 2024)

CSPD has established a working Modern Slavery working group with a representation from each of the directorates listed above. The Working Group is jointly sponsored by the Director Mission and Director Finance and Infrastructure.

Our operations

CSPD manages 82 Catholic Schools - (58 primary schools, 22 secondary schools and two trade pathway campuses), 43,000 students and more than 5,000 staff. The CSPD Support Teams (central office) in Parramatta manages all the activities that can be separated from the schools (i.e. payroll, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.



Reporting criteria 3: Modern slavery risks in operations and supply chain

Through the ACAN Program, CSPD continues to focus activities with suppliers of labour and the operational risk associated with the following supply chain spend categories:

Cleaning and security services

The cleaning and security sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply cleaning services. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

Facility management and property maintenance, building and construction

The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies.

Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to facility management, property management and building and construction services. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

Uniforms and PPE

The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking.

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply CSPD uniform requirements. CSPD ensures that the suppliers are aware of their obligations to meet Modern Slavery requirements and actively manage their risks through a detailed understanding of their supply chains and how their products and labour are sourced.

Supply chain risk

The table below identifies the supply chain categories that have the highest level of risk for Modern Slavery. CSPD has active suppliers in these categories and is focused on working with the highest priority suppliers to more effectively manage and mitigate modern slavery risks.

CSPD High Risk Spend Categories

CSPD High Risk Spend Categories for calendar year 2023 was \$133.7M with 1142 suppliers from a total of 3960 suppliers.

The split between high risk and low risk for spend was 50.8% and 49.2% respectively and the number of suppliers was 28.8% high risk and 71.2% low risk.



Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	Numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia and internationally have been documented. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites. According to the US Department of Labor, forced labour and child labour is used in the production of many construction materials such as timber from Cambodia, Vietnam, Brazil, Peru, India and Russia.	36	32.2%	\$84.7M
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	The cleaning and security sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. Opaque sub-contracting arrangements are also common. Training is limited even in the security sector which has been under scrutiny for several years about rorting of interstate licencing systems and associations with criminal enterprises. Jobs in this sector are low paid (often cash in hand), have high rates of staff turnover with staff often moved between multiple work sites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.	98	3.2%	\$8.3M
Events and event management	Promotional products, venues, bar and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables.	High risk of modern slavery is present in three key areas: venues; related goods and services (including food, tableware, furniture etc); and labour force. Venues such as hotels, conference centres, restaurants, clubs are high risk of modern slavery due to the use of short-term labour hire, on-site catering, cleaning and security services. Goods such as promotional products (pens, pads, event bags, branded novelty items), food and beverage, tableware and other venue or event consumables (floral products) are high risk due to their country of origin and or sourcing of raw materials. Exploitation of event and venue staff (particularly through labour hire companies) such as bar staff, table servers, kitchen hands is endemic in the hospitality and catering sector. The use of temporary migrants, international students, travellers and other low skilled or short-term labour is widespread.	48	0.6%	\$1.6M

Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	The labour force used in facilities management generally consists of low skilled, low paid and temporary workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and their rights.	457	7.1	\$18.6M
Food and catering services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit and vegetables), wine grapes, beverages, general catering for conferences, launches, events etc and hospitality services.	The agricultural industry often relies on complex labour hire services, employing large numbers of seasonal workers and vulnerable migrant workers. This leads to a high potential for deceptive recruitment, human trafficking and debt bondage, as well as the use of excessive deductions and 'cashback payments' to employers, recruiters and agents. Hospitality workers are among the highest risk for forced overtime, underpayment and workplace harassment. Exploitation of migrant workers, international students and young, vulnerable workers has been widely documented. Poor working conditions experienced by workers in this sector were recently highlighted through the exposure of systemic underpayments of wages by restaurant groups. Some states in Australia have adopted labour-hire licensing to regulate and monitor labour-hire contractors. Labour-hire in agriculture is a precarious and casualised type of work where vulnerability is high. Workers do not have direct relationships with employers, regular employment or job security.	247	1.4%	\$3.6M

Spend category	Sub-categories	Justification	No. of suppliers 2023	% of 2023 spend	Spend
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	Large quantities of office supplies and furniture are imported into Australia from high risk countries such as China, Vietnam and Indonesia. Products are also produced in industry sectors that are high risk of modern slavery such as manufacturing, forestry, metal and plastic production and printing. The US Department of Labor has identified several office supplies at risk of being produced by child or forced labour in Malaysia and China. In 2019 Wesfarmers identified a high risk of modern slavery associated with Officeworks products made in China. Risk included excessive overtime and lack of freedom of association.	130	0.2%	\$0.6M
ICT hardware		According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.	21	3.7%	\$9.6M
Labour hire	Wide range of traditional low-skilled / low paid work	Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including: <ul style="list-style-type: none"> • focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour • recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers • deceptive and opaque practices trapping workers into exploitative situations or modern slavery • demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour • coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice 	9	1.5%	\$3.9M

Spend category	Sub-categories	Justification	Number of suppliers 2023	% of 2023 spend	Spend
Uniforms and PPE	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking. According to the Global Slavery Index 2018, garments are the second highest risk product for use of modern slavery in supply chains. The 2018 Know the Chain Report found that 65% of companies in the apparel and footwear sector scored below 50% in addressing risk of forced labour in supply chains. Apparel factory workers are also at high risk of forced overtime, often unpaid, particularly in countries such as Vietnam, Bangladesh and Honduras. Use of complex subcontracting in supply chains heightens these and other risk factors.	66	0.6%	\$1.7M
Waste management services	Recycling, processing, hazardous transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.	30	0.4%	\$1.0M

Reporting criteria 4:

Actions taken to assess and address risk

Actions taken in 2023

CSPD followed the Australian Catholic Anti-Slavery Network (ACAN) Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

1. Identification of suppliers in high-risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high-risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with Sedex membership
 - suppliers willing to join Sedex
 - suppliers not required by CSPD to join Sedex
3. Suppliers were assisted to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
4. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

In 2023, CSPD made inroads with supplier engagement and participation in risk management activities, summarised:

- renewed the ACAN modern slavery risk management program for 2023 - 2026. Collaborated with other Catholic dioceses, social services and school systems.
- continued on boarding suppliers to Sedex via ACAN's pre-assessment survey. There were 174 ACAN Supplier Surveys completed and 7 suppliers joined Sedex.
- four suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- staff and suppliers participated in 10 ACAN modern slavery capacity building webinars





Supplier engagement

CSPD has been a member of Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

CSPD uses the ACAN Risk taxonomy to select high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of CSPD, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

CSPD uses Sedex to:

1. Manage the risk of modern slavery with existing suppliers
2. Validate inherent risk against actual risk
3. Screen new suppliers as part of tenders and supplier on-boarding processes
4. Gain visibility further upstream in the supply chains
5. Monitor and report on progress in the profile of suppliers

Modern slavery action plan and road map

CSPD's modern slavery action plan and road map for 2024 and beyond are summarised under the heading "Action plan 2024-26". The action plans and road map focus on the following key areas:





2023 Modern slavery risk management initiatives

In 2023, CSPD continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. These efforts include:

1. Sharing resources and experience through team building;
2. Offering tailored webinars to suppliers of goods and services to member entities.
3. Provision of templates for policy and other documentation. These include the supplier code of conduct and modern slavery contract clauses;
4. Risk assessment;
5. Action planning; and
6. Completion of Modern Slavery Statements.

This is the fourth Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the CSPD performed in 2023.

Modern slavery working group

The current Modern Slavery Working Group draws representation from Learning, Communications, Wellbeing, People and Culture, Mission and Finance (Procurement). The Working Group has joint executive sponsorship from the Director Mission and Director Finance and Infrastructure. The Modern Slavery Liaison Officer is the Manager Procurement and Contracts who reports into the Director Finance and Infrastructure.

Modern slavery policy, procedures and guidelines

CSPD are currently reviewing our requirements for a Modern Slavery Policy and Procedure. The Working Group is reviewing the scope and content required and will finalise these documents once the work is complete.

Modern slavery contract clauses

CSPD ensures all contracts including Purchase Order have embedded clauses that address Modern Slavery obligations. These clauses are included in all new contracts and renewals.

Examples of the clauses are as follows:

Purchase Order MODERN SLAVERY Supply of Goods

The Contractor warrants to the CSPD that to the extent that the Services include the supply of any goods, no part of any good that will be supplied has been or will be manufactured overseas or in Australia by contractors who engage in forced labour, illegal child labour, human trafficking or any other practice that would be considered "modern slavery" (as defined in the Modern Slavery Act 2018 (Cth) (Modern Slavery Act)).

Good and Services Contract MODERN SLAVERY

The Supplier must ensure that it and its Personnel comply with all applicable laws including the Modern Slavery Act 2018 (NSW) and the Modern Slavery Act 2018 (Cth) as well as their respective regulations and codes in force from time to time (Modern Slavery Laws).

The Supplier represents and warrants that, as at the date of this Agreement:

- a. it has investigated its labour practices, to satisfy itself that there is no modern slavery or human trafficking used anywhere in its business, supply chain, or by any of its personnel; and
- b. it and its Personnel:
 - i. have not been convicted of any offence involving slavery or human trafficking; or
 - ii. to the best of its knowledge, have not been, or are not, the subject of any formal complaint, investigation, inquiry or enforcement proceedings by any person or regulatory body in connection with slavery or human trafficking; and
 - iii. in the course of supplying the services or otherwise in connection with this Agreement will be paid no less than the minimum amount required by law and will receive all benefits required by law.

The Supplier must ensure that each member of its supply chain (including any member of its Personnel) implement anti-slavery and human trafficking due diligence procedures relating to its/their respective supply chains.

The Supplier must give the Customer all information requested by the Customer to report on, or comply with, any Modern Slavery Laws in force from time to time, or any direction of a governmental agency relating to anti-slavery or human trafficking, promptly after a request from the Customer to do.

The Supplier warrants:

- a. that it, and to the best of its knowledge and belief having made reasonable enquiries, its supply chain, have not been convicted of any offence involving of Modern Slavery Laws; and
- b. that it and its supply chain will conduct business in a manner so as to reduce the risk of such modern slavery in its operations and supply chains.

The Supplier must immediately notify the Customer if it becomes aware of any actual, potential or perceived 'modern slavery' as defined in the Modern Slavery Laws in its operations or supply chain.

Our organisation

Our staff allocation is as follows:

Male	Female	Total
1159	4477	5636

We have 82 schools with a total student population of 45933.

CSPD complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce through a variety of HR policies and procedures including:

-  Employment contracts
-  Child Protection/Safeguarding Policy
-  Code of Conduct
-  Complaints Management Framework/Policy
-  Employee Leave Policy
-  Performance Management Policy; Privacy and Confidentiality Policy
-  Flexible Working Arrangements
-  WHS Framework/Policies
-  Harassment, Bullying and Discrimination Policy
-  Whistle-blower Policy
-  Acceptable Use of Electronic Communication Systems and Devices



Remediation

CSPD intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if CSPD is found to have caused or contributed to modern slavery. Due to the complexity of remediation, CSPD will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, CSPD has access to Domus 8.7 an agency of ACAN to provide remedy to people impacted by modern slavery.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery.

Through Domus 8.7, CSPD will be able to help people impacted by modern slavery, and for grievances in relation to modern slavery mediated through Domus 8.7. Where CSPD is directly linked to modern slavery by a business relationship CSPD is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

CSPD staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

CSPD has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult CSPD to ensure victim-centred remediation processes are implemented to the satisfaction of CSPD.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, CSPD staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.



Reporting criteria 5:

Effectiveness assessment

Modern slavery maturity assessment

This report introduces a shift from the initial Gap Analysis towards a focus on the maturity of our modern slavery risk management approach. As we present our fourth modern slavery statement, it's essential to recognise the need for a reset to aim for continuous improvement.

This transition underscores the importance of assessing our approach to maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

1. **Business process and governance:** Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's program and activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance mechanisms and remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

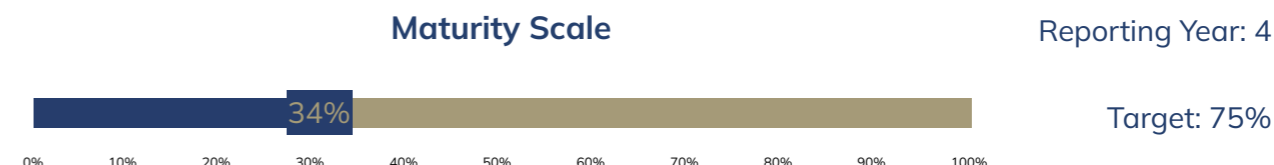
In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterized by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritization of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy- measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Maturity assessment 2023

Catholic Schools Parramatta Diocese - overview



Catholic Schools Parramatta Diocese - 2023 analysis by pillar

Pillar	A. Governance	B. Risk assessment	C. Risk management	D. Effectiveness actions	Maturity score 2023
1. Business process and governance	42%	45%	30%	21%	35%
2. Operations	28%	38%	25%	13%	26%
3. Supply chain	0%	80%	15%	0%	24%
4. Worker engagement	13%	50%	11%	24%	24%
5. Entity's program and activities	85%	35%	50%	41%	53%
6. Grievance mechanisms and remediation	78%	30%	49%	25%	46%
Average	41%	46%	30%	21%	34%

The table below demonstrates the effectiveness of work performed in 2023, showing the first year of standalone activities and results for CSPD in 2023.

	Activity	Catholic Education Diocese of Parramatta
Internal / staff	Hours spent on modern slavery activities	80
	Individual staff completed e-learning	0
	E-learning modules completed	0
External / supplier engagement	Total number of suppliers	3960
	Number of suppliers across high-risk categories	1142
	Number of ACAN Supplier Surveys completed	174
	Supplier staff attending capacity building webinars	12
	Invited to join Sedex	7
	Joined Sedex	7
	Sedex SAQ completed	4
	Social audits	1
	Corrective actions	0
Domus 8.7 external referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

As in the last 2 years, the effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

Processes to review actions	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units who will complete the statement
Risk assessment	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
Engagement and feedback	The Modern Slavery Working Group will engage each Business Unit for the purpose of completing the Statement and provide appropriate feedback regarding review of actions and risk to each
Internal audit	Governance, Risk and Strategy will undertake the normal internal audit of the organisation
Tracking implementation	Regular feedback from the Modern Slavery Working Group will track implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area



Action plan 2024-26

Management systems action plan

Topic	Actions
Commitment	<ul style="list-style-type: none"> Showcase the actions taken to address modern slavery risks across industry networks
Business systems	<ul style="list-style-type: none"> Engage key internal stakeholders to review existing business processes
	<ul style="list-style-type: none"> Review existing business systems against the requirements of modern slavery legislation
	<ul style="list-style-type: none"> Integrate modern slavery risk management into existing business systems
	<ul style="list-style-type: none"> Integrate modern slavery risk management into supplier review processes
Actions taken	<ul style="list-style-type: none"> Ensure elements of modern slavery risk management systems are reflected across the business
	<ul style="list-style-type: none"> Establish goals, targets and KPIs to effectively address modern slavery risks Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations and supply chain
Monitor and report	<ul style="list-style-type: none"> Undertake a review of modern slavery risks in the Education sector
	<ul style="list-style-type: none"> Identify opportunities for leadership on modern slavery data collection and reporting processes
	<ul style="list-style-type: none"> Integrate modern slavery risk findings into monthly management reports
	<ul style="list-style-type: none"> Expand data collection process to include modern slavery data from national and international sources Continuous improvement

Human resources and recruitment action plan

Topic	Actions
Awareness	<ul style="list-style-type: none"> Incorporate modern slavery information into induction programs for all relevant staff
Policies and systems	<ul style="list-style-type: none"> Incorporate modern slavery risk management specific responsibilities into position descriptions for relevant staff
	<ul style="list-style-type: none"> Encourage lowering tolerance approach to modern slavery among all staff and contractors
Training	<ul style="list-style-type: none"> Incorporate modern slavery awareness training into induction programs for all relevant staff
Labour hire and outsourcing	<ul style="list-style-type: none"> Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts
	<ul style="list-style-type: none"> Assess labour hire contractors and outsourcing programs for modern slavery risk.
	<ul style="list-style-type: none"> Regularly review and update hiring and on-boarding processes

Customers and stakeholder action plan

Topic	Actions
Attitude	<ul style="list-style-type: none"> Develop curriculum appropriate to stage around the issue.
Feedback mechanisms	<ul style="list-style-type: none"> Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems
	<ul style="list-style-type: none"> Establish systems and processes to evaluate and take immediate action on feedback received
	<ul style="list-style-type: none"> Examine the option to establish a stand-alone confidential modern slavery hotline for staff and contractors
Worker voice	<ul style="list-style-type: none"> Run pilot project worker voice program for high-risk suppliers
	<ul style="list-style-type: none"> Implement worker voice data collection and reporting system
	<ul style="list-style-type: none"> Review worker voice data collection options for at-risk workers in the supply chain
	<ul style="list-style-type: none"> Develop a comprehensive modern slavery remediation program that is well resourced and supported

Management systems action plan

Topic	Actions
Risk framework	<ul style="list-style-type: none"> Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work
	<ul style="list-style-type: none"> Establish systems and processes to evaluate and take immediate action on identified risks
	<ul style="list-style-type: none"> Include modern slavery risk review into risk management policies and procedures
	<ul style="list-style-type: none"> Incorporate modern slavery risk assessment into existing risk framework
Operational risk	<ul style="list-style-type: none"> Map operations against potential risks of modern slavery or Exploitation
	<ul style="list-style-type: none"> Develop action plan to address risks of modern slavery in internal operations
	<ul style="list-style-type: none"> Enhance internal capacity to identify and manage operational risks
External risk	<ul style="list-style-type: none"> Develop risk management plan to address modern slavery risks among priority suppliers
	<ul style="list-style-type: none"> Undertake modern slavery risk review of priority direct (Tier 1) suppliers
	<ul style="list-style-type: none"> Assign resources to identify, prioritise and manage operational and supply chain risks
	<ul style="list-style-type: none"> Map modern slavery risks and vulnerabilities along extended supply chain
	<ul style="list-style-type: none"> Develop and monitor implementation of corrective action plans
Monitor and report	<ul style="list-style-type: none"> Identify opportunities to monitor and report on modern slavery risks
	<ul style="list-style-type: none"> Develop procedures to effectively report and act where modern slavery risks are identified
	<ul style="list-style-type: none"> Integrate modern slavery risk management into business evaluation and reporting processes
	<ul style="list-style-type: none"> Integrate modern slavery risk reporting with stakeholder feedback mechanisms
	<ul style="list-style-type: none"> Transparently report on modern slavery risks- both internally and externally

Procurement and supply chain action plan

Topic	Actions
Contract management	<ul style="list-style-type: none"> Incorporate performance standards and contract evaluation criteria for high-risk contracts
	<ul style="list-style-type: none"> Conduct desktop review of high-risk suppliers
Screening and traceability	<ul style="list-style-type: none"> Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)
Monitor and corrective action	<ul style="list-style-type: none"> Establish a supplier monitoring program through Sedex
	<ul style="list-style-type: none"> Develop a monitoring system to assess ongoing performance (Sedex)
	<ul style="list-style-type: none"> Develop corrective action plans to address modern slavery risks among high-risk suppliers
	<ul style="list-style-type: none"> Work with suppliers to identify gaps and address barriers to implementation





Reporting criteria 6:

Internal consultation

CSPD has established a Modern Slavery Working group that meets on a regular basis throughout the year to prompt awareness of Modern Slavery and to ensure CSPD obligations that have been identified and captured in action plans are regularly addressed.

CSPD does not have any controlled entities.

Reporting criteria 7:

Any other relevant information

An awareness raising event with staff and parishioners was held to celebrate St Bakhita Feast Day. Bishop Vincent Long OFM Conv, Bishop of Parramatta celebrated a Mass on 19th February 2023 from 2pm to 3:30pm.

St Josephine Bakhita, the patron saint of South Sudan and Sudan, is also patron saint of victims of modern slavery and human trafficking. Her Feast is 8 February, and the parishioners of the Diocese of Parramatta, including many from the Sudanese and South Sudanese Community celebrated with a Memorial Mass at Mary, Queen of the Family Parish in Blacktown.

The Mass was organised by members of the Diocese of Parramatta Modern Slavery Working Group. Along with members of the Sudanese and South Sudanese communities, guests included the Member for Mount Druitt, Mr Edmund Atalla, as well as Dr Valentine Mukuria, Dean of the Australian Catholic University Blacktown Campus, which is named after the saint. Other attendees included representatives from Catholic Schools in the Diocese, universities, social services and the Archdiocese of Sydney.

Moses Opondo, member of the Parramatta Modern Slavery Working Group, shared his heartfelt thanks to the congregation and explained the use of “shukran” meaning ‘thank you’ in Sudanese Arabic. Translations of the Prayers of the Faithful were also printed in local community languages including Nuba, Dinka, Zande, Madi and Arabic.



Appendix:

A letter from Bishop Vincent Long Van Nguyen OFM Conv

Dear sisters and brothers in Christ,

I am pleased that for the fourth year now, the Diocese of Parramatta and its agency, Catholic Schools Parramatta Diocese has focused on tackling the important issue of modern slavery. St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking is an extraordinary inspiration for us at the Diocese of Parramatta. Abducted and sold into slavery at a young age, she overcame extraordinary odds in order to rise and become what Saint Pope John Paul II called “*a shining advocate of genuine emancipation.*”

Her legacy that transformation is possible through suffering is not only a message of hope for our world but a reminder to fight against injustice wherever we see it.

All of us have a part to play in the fight against modern slavery, which unfortunately is becoming an urgent problem. In the last four years, the number of people living in modern slavery in Australia has actually doubled¹ with the rise of migrant workers coming to Australia. Exploiting vulnerable people through wage theft, unsafe working conditions, human trafficking, child labour and forced marriages are a scourge on our society.

This Annual Report will detail our practices and our commitments to ensure we aren't unwittingly part of the problem. I completely support this report and encourage all people within our Diocese to learn more about modern slavery and find ways to be the face of Christ in all our interactions.

St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking,
Pray for Us.

Bishop Vincent Long Van Nguyen OFM Conv
Bishop of Parramatta

¹ <https://www.smh.com.au/world/europe/more-than-40-000-people-are-living-in-modern-slavery-in-australia-20230523-p5daii.html>





Catholic Schools
Parramatta Diocese

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Modern Slavery Statement 2023



CATHOLIC EDUCATION
DIOCESE OF WOLLONGONG



This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese of Wollongong (CEDoW) as defined by the *Modern Slavery Act 2018* (Cth) (the Act) on 16 April 2024.

This Modern Slavery Statement is signed by a responsible member of CEDoW as defined by *the Act*.



Most Rev. Brian Mascord DD
Bishop of the Diocese of Wollongong

Disclosure Note

This Statement has been made on behalf of CEDoW and covers all entities owned or controlled by CEDoW for the reporting period.

CEDoW acknowledges the traditional custodians of the lands upon which our Catholic schools are built; the indigenous people of the Dharawal, Gundungurra and Yuin nations. To this day, our Catholic systemic schools are greatly influenced by the life and culture of Aboriginal communities, and we pay our respect to elders' past, present and emerging.

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About Us

The Diocese of Wollongong is one of eleven Catholic dioceses in the state of New South Wales. The seat of the diocese is situated in the regional city of Wollongong, approximately 100 km south of Sydney, NSW.

CEDoW was established in 1952 and serves Catholic systemic school communities across the four regions of the Illawarra, Macarthur, Southern Highlands and Shoalhaven. Many parishes and schools have much longer histories, with some dating back to the early days of European settlement.

CEDoW, as an agency of the Catholic Church in the Diocese of Wollongong, exists to exercise the evangelising mission of the Church in education by leading and managing the system of Catholic schools on behalf of the Bishop of Wollongong in close collaboration with parents and carers, parish Priests and Principals. The system of Catholic schools has been established by the Bishop of Wollongong to serve the common good of the people of the diocese through the effective coordination of resources, expertise and good will.

Mission

As a system of Catholic schools, we are clear on our mission and mandate. We exist to create vibrant Catholic school communities where every student finds meaning and purpose in their life through experiencing continual growth in faith and improvement in learning. In the past, we have put significant effort into planning where and how our efforts would be focused, typically over a three-to-five-year period, to advance this mission. These strategic plans generally included a significant number of diverse projects and activities.

Sometimes these initiatives were delivered as planned and sometimes, in response to unexpected changes, schools and the Catholic

Education Office (CEO) adjusted course to meet the evolving needs of students, staff and school communities. The value of our previous strategic plans was in their ability to describe where our system was headed, so that everyone understood our shared direction and how they could contribute to delivering the mission.



Brief Statement from our Director of Schools



At Catholic Education Diocese of Wollongong, we recognise that our procurement processes have a significant impact on the lives of countless individuals and communities across the globe. We are committed to working with the Australian Catholic Anti-Slavery Network (ACAN) to eliminate modern slavery practices within our supply chains.

Catholic Social Teaching motivates us to lead with courage and set an example for the many students we serve. We have partnered with the ACAN to identify high-risk areas and educate our key suppliers on the issue of modern slavery and our collective responsibilities in this area. This partnership allows us to utilise ACAN's resources to continually improve our systems and supplier engagement strategies.

As the Director of Schools for Catholic Education Diocese of Wollongong, I fully endorse our Modern Slavery Statement and the ongoing efforts we are making to confront and eliminate modern slavery practices. Our commitment to this cause is a long-term one that will require a substantial investment of time and resources. We understand that modern slavery is not a remote or isolated issue, and our choices as consumers have a significant impact on the lives of people worldwide.

We strongly believe that education and awareness are critical tools in the fight against modern slavery, and we are committed to working with our partners and stakeholders to promote ethical and sustainable practices throughout our supply chains. By raising awareness of this issue and educating our suppliers, we can work together to eliminate modern slavery practices and create a world where human rights are respected and upheld.

As a community of Catholic schools, we have a unique opportunity to lead by example and set a precedent for ethical procurement processes that prioritise human dignity and respect. It is our responsibility to ensure our procurement practices are transparent, responsible, and ethical, and that we are doing our part to eradicate modern slavery.



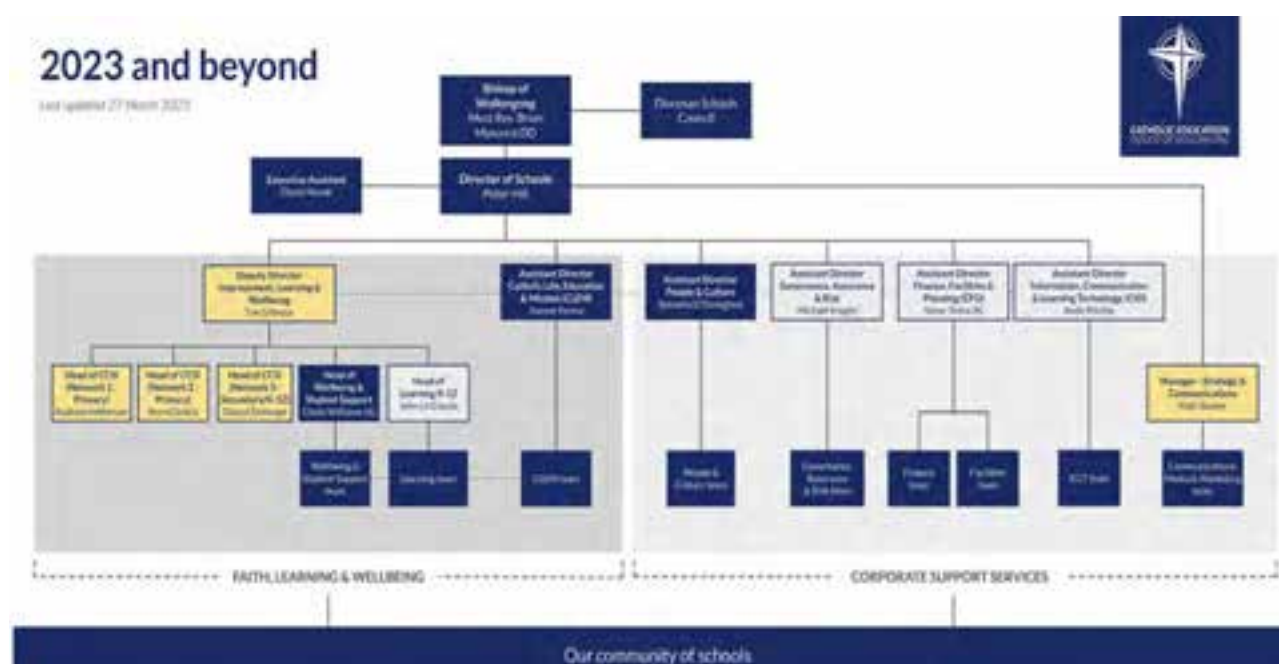
Peter Hill
Director of Schools
Catholic Education Diocese of Wollongong
2 April 2024

Criteria 1 and 2: About Catholic Education Diocese of Wollongong

Our Organisational Structure

CEDoW is a not-for-profit unincorporated organisation operating as an agency of the Diocese of Wollongong. It is the only agency in the diocese required to report on its supply chains under *the Act*. CEDoW consists of 38 schools and 3 CEO (Head Office) sites.

An overview of CEDoW's organisation structure in 2023 is shown below:



Our Governance Structure

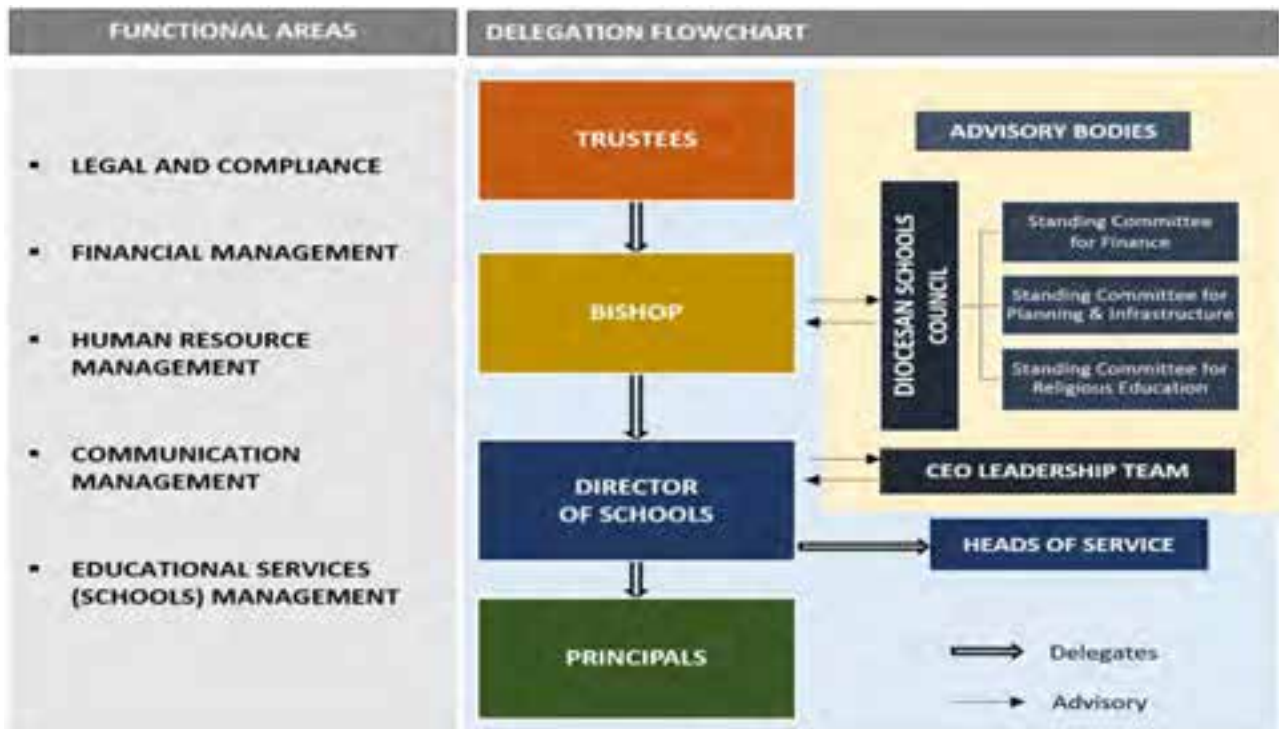
The Director of Schools is delegated by the Bishop of Wollongong, on behalf of the Trustees of the Roman Catholic Church for the Diocese of Wollongong, as the Head of Agency for Catholic Education. The Director of Schools has responsibility for the delivery of Catholic education through the diocesan system of schools. The Bishop of Wollongong has established a Diocesan Schools Council to advise him on matters related to the delivery of Catholic education. The Director of Schools is the Executive Officer of the Council, which is comprised of:

- Clergy and Senior Members from the Office of the Bishop.
- Senior Members from the Catholic Education Office.
- School Principals.
- Parents of children attending Catholic systemic schools.
- Education sector representatives.
- Local community representatives.

The council is assisted by three advisory boards:

- The Standing Committee for Finance.
- The Standing Committee for Planning and Infrastructure.
- The Standing Committee for Religious Education.

This structure and the relationship between the bodies is shown in the image below:



Within the CEO, the Director of Schools has established a Leadership Team and delegates authority to the Deputy Director, Assistant Directors, and school Principals to carry out the various responsibilities associated with the delivery of quality Catholic education to our students. This is performed in accordance with a comprehensive series of policies and supporting documents. The Service Areas themselves are:

- Catholic Life, Education and Mission (CLEM).
- Governance, Assurance and Risk (GAR).
- Finance, Facilities and Planning (FFP).
- Improvement, Learning and Wellbeing (ILW).
- Information, Communication & Learning Technology (ICLT).
- People and Culture (P&C).

CEDoW's Modern Slavery Working Group (MSWG) resides under the FFP service area. The MSWG includes representatives from: Governance, Assurance and Risk; People and Culture; Properties; and Finance. The Modern Slavery Liaison Officer (MSLO) chairs the MSWG with a day-to-day role focused on procurement and compliance.

Our Operations

CEDoW is a learning community called to provide a range of high-quality evangelising, educational, pastoral and corporate services that support and challenge Catholic systemic schools to deliver the best possible outcomes for every student and to contribute to the ongoing faith and pastoral life of the diocese.

CEDoW consists of 29 Catholic parish primary schools, 8 Catholic co-educational secondary schools, 1 K-12 Catholic college and 3 CEO sites. These schools and offices are located in the Illawarra, Macarthur, Southern Highlands and Shoalhaven regions of NSW. As of the August 2023 School Census, the diocese educated some 20,091 students and employed 2,157 teaching and support staff. The Leadership Team and most of the head office departments operate out of the Marian Centre, located at 86-88 Market Street, Wollongong NSW 2500.

Annual turnover for the school system in the reporting period was approximately \$391M. The main source of this income were Commonwealth and State education funding, followed by school fees.

To comply with the requirements of the *Education Act 1990* (NSW), CEDoW entities must undertake market testing for the purchase of any goods and services exceeding \$5k. Purchases or annual service agreements exceeding \$100k require a formal tender process. Supplier service agreements can only be undertaken for a period of three years before further market testing is required. There are some arrangements that may extend to five years, such as uniform, canteen and photocopier agreements, but these are the exceptions. Most purchasing, however, is performed without a written agreement and suppliers are effectively engaged each time a purchase order is raised.

CEDoW also utilises several key related-party Catholic organisations for specific services such as counselling, insurance, industrial relations, ICLT network support and banking.

The graphic below provides some key statistics for the school system during the reporting period:



Our People

At the August 2023 Census, CEDoW employed some 2,157 staff of whom 50 identified themselves as Indigenous. A snapshot of this workforce reveals this total comprised 1,487 Teaching staff and 670 Support staff. Of these, 222 employees are engaged across the 3 CEO offices. Of these staff members, some 78% were female and 22% male employees. Overall, the numbers equated to an FTE of 1,937 employees.

Employment and staff wellbeing are managed by our People and Culture department. There is a suite of policies in place to ensure compliance with current employment legislation.

Recruitment and selection practices are critical in ensuring our Catholic schools are staffed by the most appropriately skilled, knowledgeable, qualified and competent staff. Succession planning is key to ensuring sustainability of the organisation and the recruitment and selection of staff plays an important role in this. All permanent roles must be advertised externally. In addition, any migrant workers must have the appropriate working visa before they are engaged by CEDoW.

The recruitment and selection of staff is based on the core principles of:

- evidence-based and procedurally fair decision-making.
- open and transparent declaration of conflicts of interest.
- student-centred decision making.

All employees are engaged under an individual contract or Enterprise Agreement that guarantees statutory and employee specific entitlements under the *Fair Work Act 2009* (Cth).

Where an employee has issues around their conditions of employment, they can approach their Principal, Head of Service or the CEDoW Employment and Industrial Relations Department. If needed, staff can also utilise the CEDoW [Complaints](#) and [Whistleblowing](#) policies and are protected under these protocols.



Our Supply Chain

CEDoW engaged the services of some 2,700 suppliers during the reporting period, of which 103 were related parties. There were 135 suppliers where purchases exceeded \$100k ex GST for the year and these accounted for some 80% of total expenditure. The services these suppliers provided ranged from minor consumable purchases to multi-million-dollar school construction projects.

Whilst some contracts are managed by the CEO, the school system essentially operates a de-centralised procurement model with most individual purchasing being undertaken directly by the schools. Provided the appropriate market testing process has taken place, schools retain the autonomy to engage any chosen supplier. Suppliers operating within the diocesan boundaries are usually preferred as a way of supporting the local community. In general terms, CEDoW's purchasing is derived from two sources:

- Centralised CEO contracts and purchasing. These are usually high-cost construction projects and IT purchases conducted by the Properties and ICLT departments respectively. Finance also manage utility service agreements, cleaning contracts and key uniform service agreements.
- School contracts and direct purchasing – these are usually single site agreements or acquisitions for an individual school such as for grounds services, general maintenance, waste, educational supplies, photocopying services, security and canteen services.

To secure commercially attractive pricing, schools and Head Office sites are encouraged to use buying groups such as Procurement Australia and approved Government suppliers listed on the *buy.nsw* website. CEDoW's status as a not-for-profit organisation entitles it to request Government contract pricing when seeking a quote for which a Government contract or scheme exists.

CEDoW is looking to centralise more of its purchasing across the 41 sites in the coming years, similar to other Catholic dioceses, for both commercial reasons and to rationalise the number of suppliers being used. The type of goods and services that lend themselves to centralisation include areas such as waste services, furniture, educational resources, photocopying services and facilities maintenance.

Whilst virtually all CEDoW's suppliers are based in Australia, many of these would source their goods from regions overseas that would include countries deemed at high risk of modern slavery practices.



Criteria 3: Slavery risks in operations and supply chain

Operational Risks

As an education provider, the risk of modern slavery practices occurring within CEDoW's directly engaged employee's is essentially zero. All employment is managed centrally through CEDoW's People and Culture department which ensures a fair and consistent approach to engaging staff. For further information on the labour practices employed in the diocese, refer to the section, *Our People* on page 10.

Suppliers with no supply chains, effectively providers of labour related services, such as waste management, school cleaning, facilities management, building and construction are a focus of CEDoW's risk management program.

Many of these sectors typically employ potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers. Some may be engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements.

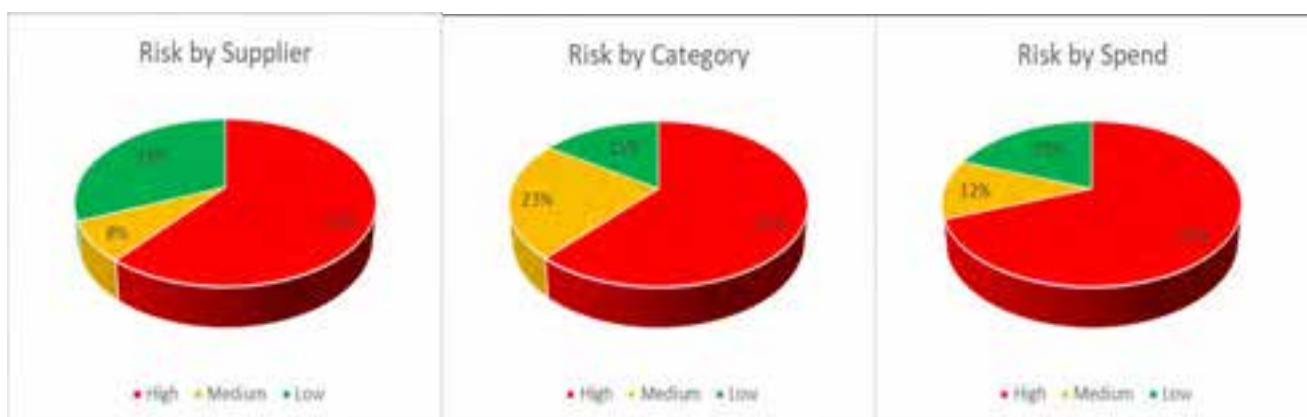
Supply Chain Risks

To identify its high-risk providers, CEDoW has allocated the ACAN risk taxonomy categories to each supplier in its accounts payable system to allow us to produce spend reports by category.

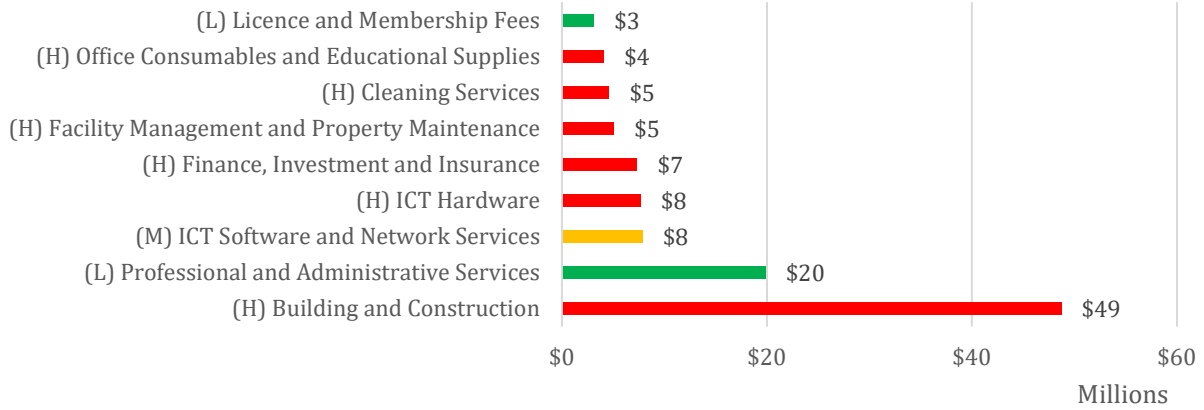
This allocation facilitates the assessment of where the expenditure is going and with whom. The analysis below is based on all 2,700 plus suppliers that CEDoW purchased goods and services from during the reporting period. The total spend by the school system was some \$123M ex GST. This figure excludes any internal payroll-related payments and school fee refund disbursements.

As in previous periods, the results indicate the majority of CEDoW's expenditure was on goods and services considered at high risk of modern slavery practices, such as: building and construction; ICT hardware; insurance; office supplies; event management; and furniture. Equipment and consumables used in a number of these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

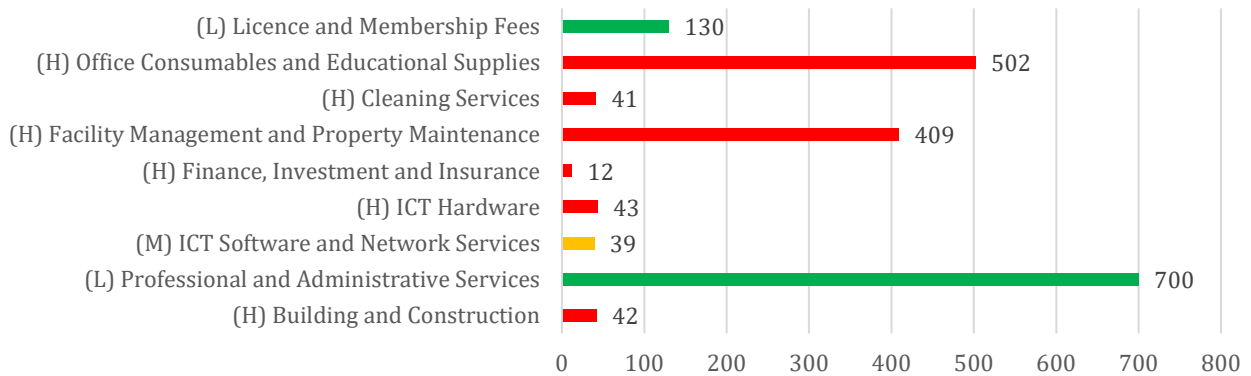
In both the graphs and the tables below, high risk categories are indicated by **red**, medium risk categories by **orange** and low risk categories by **green**. An analysis of the supplier risk levels is shown below:

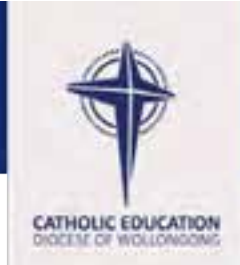


Spend by Key Risk Category



Suppliers by Key Risk Category





Criteria 4: Actions taken to assess and address risk

Actions Taken to Mitigate Risk

CEDoW has undertaken a range of initiatives in both the prior and current reporting period to mitigate the risk of modern slavery practices existing in its supply chains. The key actions are below:

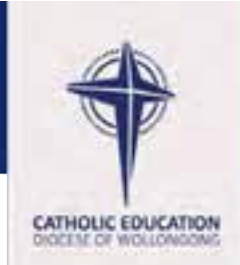
- The ACAN modern slavery contract clauses have previously been embedded in the School agreement and tender invitation templates. For general purchases, a notice is embedded in each Purchase Order indicating CEDoW's expectation the supplier engages their staff under the *Fair Work Act* and their supply chains are free from modern slavery practices.

In this period, selected clauses have also been included in the School Properties Office agreement templates issued to building and construction suppliers. Further, a 2-page addendum with these key clauses was passed to the ICLT department for their suppliers to include in their agreements with CEDoW moving forward.

- CEDoW's strategy is to use *Sedex* (Supplier Ethical Data Exchange) to assess and monitor its high-risk, high-spend suppliers for any modern slavery practices in their supply chains. *Sedex* provides one of the world's leading online platforms for companies to register with in order to manage and improve working conditions in global supply chains by providing practical tools (such as a self-assessment questionnaire and Audits), services and a community network to help companies improve their responsible and sustainable business practices.

To determine which suppliers CEDoW wishes to register with *Sedex*, it provided ACAN with an updated listing of its top 65 high-risk, high-spend providers to extend invitations to. This listing also includes key School Uniform and Canteen operators as the schools are responsible for selecting these suppliers. In addition, CEDoW passed ACAN its full supplier spend report for 2023 to permit ACAN to compile an overall spend of common suppliers across the member base.

- Case Study: CEDoW's cleaning contracts are managed centrally and as this industry is deemed at high-risk of modern slavery practices, the tender process undertaken for each 3 year contract cycle since 2021 includes requirements such as the company having to declare their staff are direct employees and not sub-contractors, confirming those staff are employed under the *Cleaning Services Award (MA000022)* and requesting a current employee's payslip so their rates can be checked against the Award's entitlements.
- CEDoW invited over 100 high and medium risk suppliers with a spend exceeding \$100k ex GST to attend the 5 ACAN supplier webinars conducted during the period. The purpose of these webinars was to assist suppliers gain an understanding of modern slavery in relation to:
 - Business relevance and the Modern Slavery Act.
 - Catholic customer/buyer expectations.
 - How to access ACAN e-learning.
 - *Sedex* supplier membership.



- All CEDoW Staff were invited to undertake the 4 ACAN modern slavery eLearning modules located in *People and Culture's* Learning Management System in Term 4 through the internal *Gateway* newsletter. In addition, the MSLO directly invited the school financial and administrative offers to access these modules as they are actively involved in purchasing for their schools.
- All active suppliers in the accounts payable system have been allocated a modern slavery risk category based on the ACAN Risk Taxonomy. This facilitates supplier reporting in terms of risk levels and spending and identified the candidates for *Sedex* membership.
- To ensure our compliance strategy is consistent with other Catholic reporting entities, CEDoW extended its agreement with ACAN to provide a Modern Slavery Risk Management program for the period July 2023 to June 2026.
- The MSWG met 4 times during the reporting period with a general focus on supplier engagement.
- No reports of potential or actual non-compliance with CEDoW's [Modern Slavery Policy](#) were received by the MSWG from our School or suppliers during the reporting period.
- CEDoW's [2022 Modern Slavery Statement](#) was published on the system website in July.

Our Plans for 2024 and Beyond

CEDoW's commitment to eliminating modern slavery practices within its supply chains is a long-term one that will require a substantial investment of time and resources. The objective is to continually improve our systems and supplier engagement strategies in the coming years.

CEDoW's planned actions in the next reporting period are as follows:

- Continue to encourage key high-risk, high-spend suppliers to register with *Sedex* to assess the risk of modern slavery practices in their supply chains.
- Continue to share approved ACAN resources, especially supplier webinars, with key suppliers to increase their awareness of modern slavery risks in their own supply chains.
- To increase awareness of modern slavery, encourage more staff to undertake the four ACAN modern slavery eLearning modules currently embedded in CEDoW's internal Learning Management System (LMS). Of these, the *Modern Slavery 101* module is now a mandatory part of *People and Culture's* new staff induction days.
- Encourage schools to use the CEDoW contract templates that include the suite of ACAN modern slavery contract clauses rather than using suppliers' agreement documents as they are typically silent on the issue of modern slavery.
- Continue to allocate the ACAN risk categories to all new suppliers in the accounts payable system to be able to generate reports that identify the high-risk, high-spend suppliers.
- Share ACAN's prequalified supplier directory with schools to help direct them towards suppliers that are at low risk of having modern slavery practices in their supply chains.



Remediation Process

A documented remedy pathway is an important requirement of the Modern Slavery Act. CEDoW is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, *the Act* (Guidance for Reporting Entities) and relevant Australian laws. This includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CEDoW is found to have caused or contributed to modern slavery.

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, CEDoW (along with all ACAN members) is a founding partner of Domus 8.7, which is an independent program to provide remedy to people impacted by modern slavery. Domus 8.7 provides the following:

- A vital service and key element of the ACAN Program.
- Addresses a key mandatory reporting requirement of the MSA.
- Provides the support needed for a rapid, coordinated response when victims are identified.
- Develops the internal capability to manage risk and engage staff.
- Establishes a documented process to manage complex humanitarian issues.
- Upholds Catholic Social Teaching.
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

CEDoW's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7, CEDoW can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CEDoW is directly linked to modern slavery by a business relationship, it is committed to working with the entity that caused the harm 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 CEDoW to support victim centred remediation processes are implemented to the satisfaction of CEDoW.

CEDoW is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

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

CEDoW has funded a *Remedy Pathways* module in its Modern Slavery eLearning course that will be available to staff, and other stakeholders.



Criteria 5: Effectiveness Assessment

Measuring effectiveness is assessed by completing the annual ACAN Entity Profile which generates the following reports:

- the Baseline Data metrics that can be compared against the previous period.
- the Maturity Assessment for the period re progress in key modern slavery pillars.

The table below indicates progress was made against the prior period using the Base Line data captured by ACAN around actions taken by staff and suppliers:

Catholic Education Office Diocese of Wollongong	ACTIVITY	2023	2022
INTERNAL / STAFF	Hours spent on modern slavery activities	100	91
	Individual staff completed e-learning	29	2
	E-learning modules completed	135	2
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2700	2621
	Number of suppliers across high-risk categories	1631	1625
	Number of ACAN Supplier Surveys completed	299	57
	Supplier staff attending capacity building webinars	66	37
	Invited to join Sedex	30	19
	Joined Sedex	5	14
	Sedex SAQ completed	3	2
	Social audits	1	0
DOMUS 8.7 EXTERNAL REFERRALS	Corrective actions	0	0
	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

The ACAN Maturity Assessment provides a score card of a CEDoW's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey. The score card will be used by our MSWG to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit. It contains the following features:

- The score card ranges from: 0 to 100



- Achieving a score of 100 - signifying the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence - is an aspirational and long-term goal.
- The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.
- The score card provides for:
 - Holistic Overview: Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader, long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.
 - Contextual Understanding: Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.
 - Flexibility and Adaptability: Organisations are dynamic, and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.
- The maturity scorecard is designed to provide a comprehensive view of CEDoW's efforts across key areas of operation, presented as pillars:
 - 1) Business Process and Governance: Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
 - 2) Operations: Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
 - 3) Supply Chain: Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
 - 4) Worker Engagement: Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
 - 5) Program and Activities: Considers the broader initiatives and engagements we undertake to address modern slavery.
 - 6) Grievance Mechanisms and Remediation: Evaluates the channels available for reporting concerns and the processes for addressing them.
- Maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach:
 - 1) governance
 - 2) risk assessment
 - 3) risk management
 - 4) effectiveness
- The 2023 result for CEDoW falls in the 31% - 50% range indicating an Emerging Practice level.

- Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means our processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

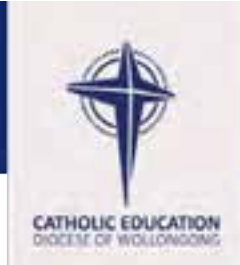
Catholic Education Diocese of Wollongong - Overview



Catholic Education Diocese of Wollongong - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	36%	48%	19%	36%	33%
2. Operations	36%	38%	16%	32%	30%
3. Supply Chain	0%	80%	20%	14%	29%
4. Worker Engagement	4%	61%	16%	24%	26%
5. City's program and activities	60%	15%	0%	23%	25%
6. Grievance Mechanisms and Remediation	72%	30%	49%	25%	44%
Average	35%	45%	20%	26%	31%





Criteria 6: Consultation with entities owned or controlled

CEDoW continues to manage the compliance around modern slavery *centrally* through the MSWG. At this stage, little action is required at school level other than to:

- encourage key staff to undertake the 4 ACAN modern slavery eLearning modules to increase awareness of the issue.
- use the CEO tender and contract templates that include the ACAN modern slavery clauses.
- advise the MSWG where they become aware of a potential breach in CEDoW's [Modern Slavery Policy](#). If this occurs, the school is to follow the [Modern Slavery Non-Compliance Procedure](#).

Criteria 7: Other

- Members of the MSWG are invited to attend the monthly ACAN webinar as well as the supplier webinars conducted by ACAN across the year.
- The MSLO has requested through the Diocese Bishop's Office that its Parishes offer a Mass each year for the patron of modern slavery, St. Josephine Bakhita, on her feast day of 8th February. A notice is also placed in the *Gateway* newsletter each year informing the schools of this day and includes the prayer provided by ACAN.
- In May each year, the MSLO places a reminder in the *Gateway* newsletter for the schools re sourcing Fair Trade products in recognition of World Fairtrade Day.

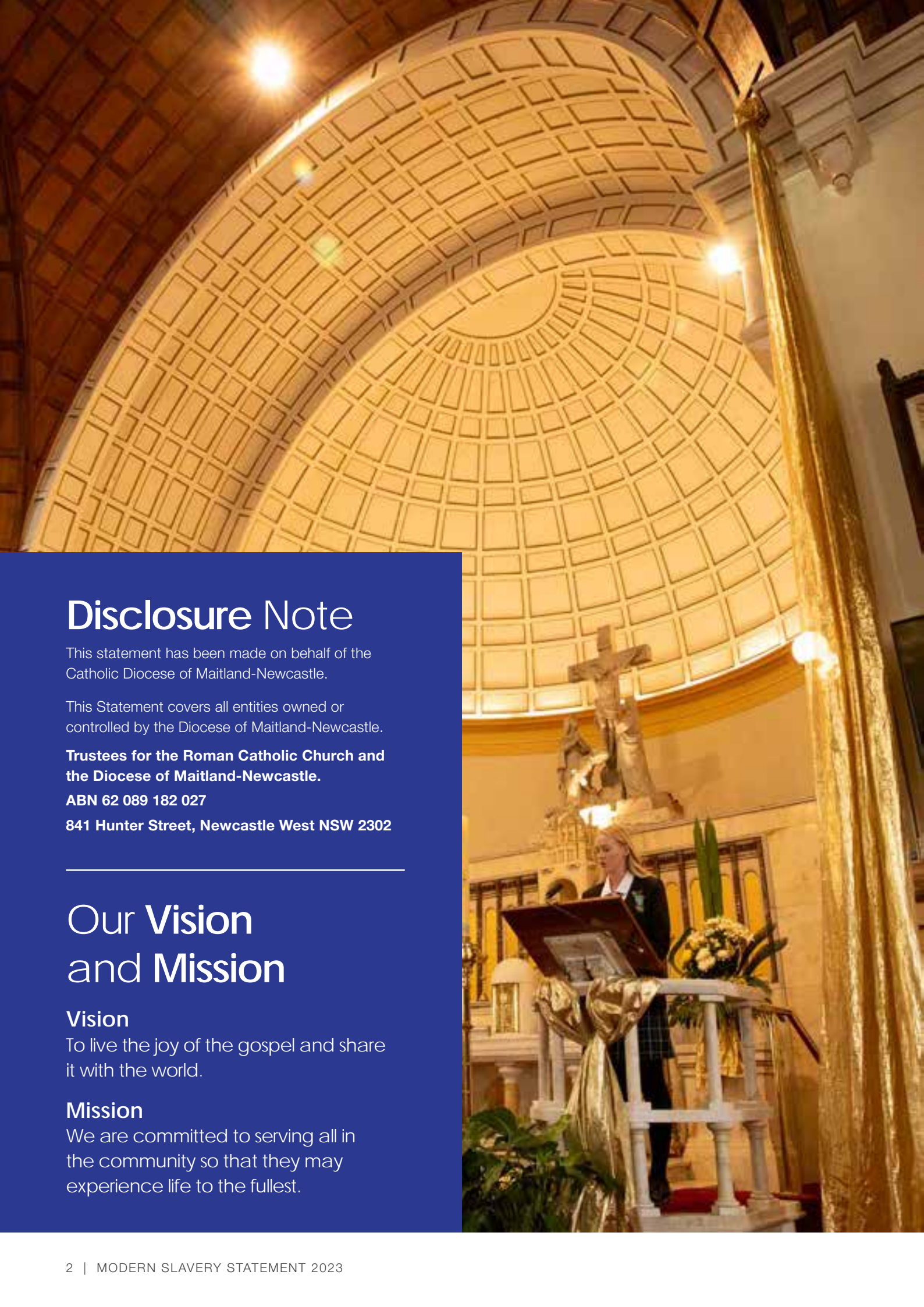


Modern Slavery Statement 2023

1 JANUARY 2023 – 31 DECEMBER 2023



mn.catholic.org.au



Disclosure Note

This statement has been made on behalf of the Catholic Diocese of Maitland-Newcastle.

This Statement covers all entities owned or controlled by the Diocese of Maitland-Newcastle.

Trustees for the Roman Catholic Church and the Diocese of Maitland-Newcastle.

ABN 62 089 182 027

841 Hunter Street, Newcastle West NSW 2302

Our Vision and Mission

Vision

To live the joy of the gospel and share it with the world.

Mission

We are committed to serving all in the community so that they may experience life to the fullest.

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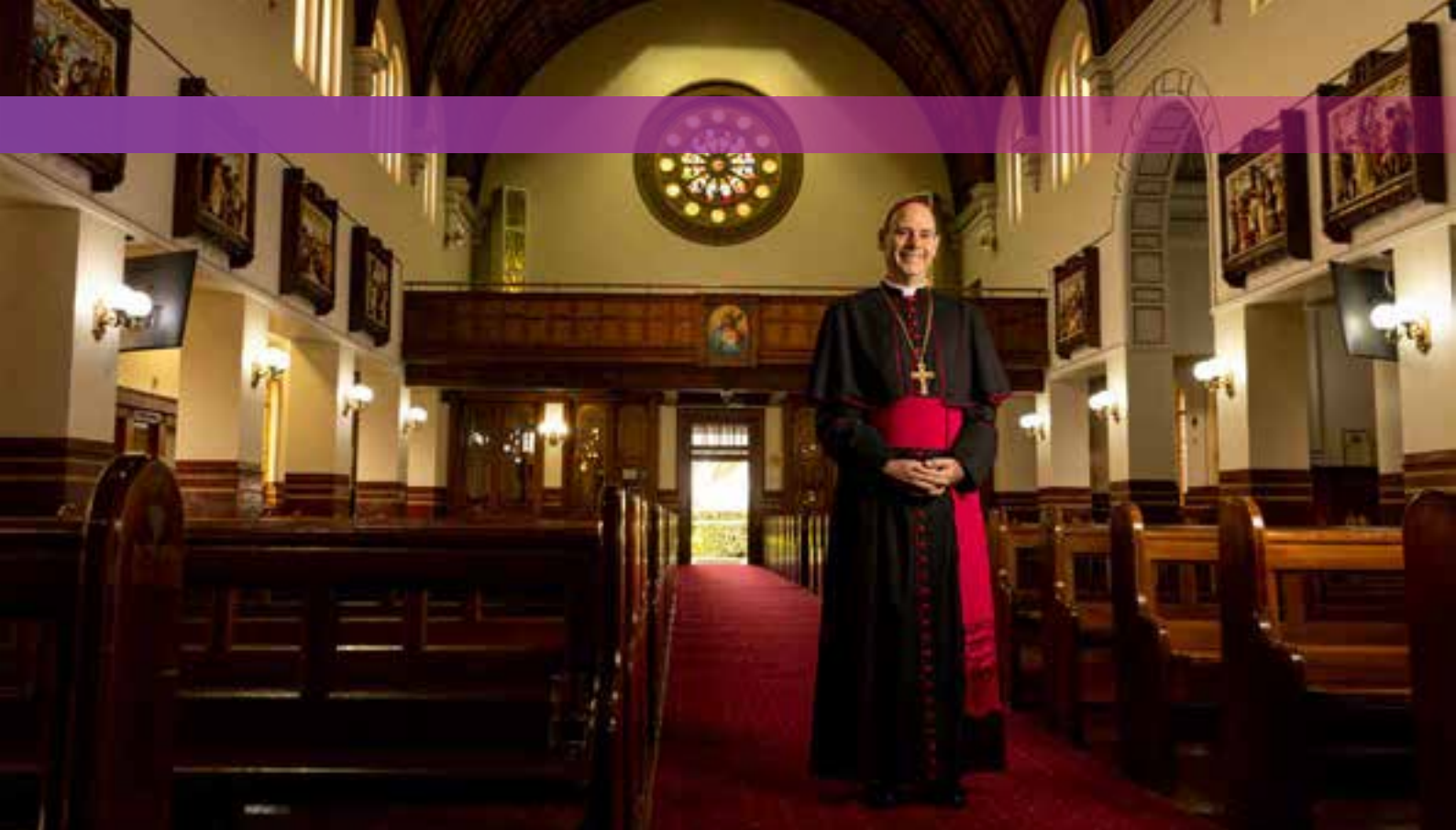
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Statement of commitment

Approval and signature

This is the fourth Modern Slavery Statement for the Catholic Diocese of Maitland-Newcastle describing the progress the diocese and its agencies have made during 2023 towards fulfilling our shared commitment with other Catholic entities and community organisations here and abroad to fulfil a common goal of ending modern slavery.

Globally the number of people experiencing modern slavery is not diminishing. Despite this sad fact, the CDMN is continuing its efforts to mirror the strong Australian government response to modern slavery. The Australian government response to modern slavery is ranked as the second strongest response globally.¹

This does not mean we should pause the pace of our efforts, ending modern slavery is a complex task. Pope Francis reminds us that ending modern slavery demands patience, perseverance and courage from each one of us.

Our Catholic Social Teachings call for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide our Modern Slavery Policy.

As we continue on our journey to fulfill the mission of the church, proclaiming Jesus Christ and the gospel of god's love and mercy we reaffirm the Diocese's

commitment to doing what we can to end modern slavery practice and strive to protect the freedom, dignity and rights of people everywhere.

We expect all our employees, contractors, and suppliers to comply with all aspects of our policy as we act to eliminate modern slavery practices from our operations, business partnerships and supply chain.

This Modern Slavery Statement was approved by the principal governing body of the Diocese of Maitland-Newcastle as defined by the Modern Slavery Act 2018 (Cth) ("the Act"), being the Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle on 21/06/2024.

This Modern Slavery Statement is signed by a responsible member of the Diocese of Maitland-Newcastle as defined by the Act.

Your sincerely in Christ,

Bishop Michael Kennedy,
Diocese of Maitland-Newcastle
June 2024

¹ Walk Free Global Slavery Index as of 31 August 2022

About Us

The Diocese of Maitland-Newcastle represents the Catholic Church in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi. A diocese is simply a community of Christ's faithful – it represents a portion of the people of God in a particular area, which is entrusted to a bishop.

The Diocese of Maitland-Newcastle serves the Hunter and Manning Regions which have a population of more than 147,000 Catholics. Through its parishes, pastoral groups, and its agencies including Catholic Schools, Catholic Development Fund, CatholicCare Social Services, St Nicholas Early Education and OOSH, Hunter Community Housing the Diocese provides pastoral, educational, social welfare, housing and community development services. The Diocese of Maitland-Newcastle employs approximately 5,565 staff across these agencies

The Diocese Head Office is located at:
841 Hunter Street, Newcastle West NSW 2302

The annual consolidated revenue of the Diocese of Maitland Newcastle is: \$569,036,868.



147,000
 Catholics in the region



5,565+
 Employees in our Diocese



38
 Parishes in our Diocese



62
 Clergy



5,256+
 Volunteers

Our services

58 schools with over **20,897+** students

22 St Nicholas OOSH services
 with **5,557+** students enrolled

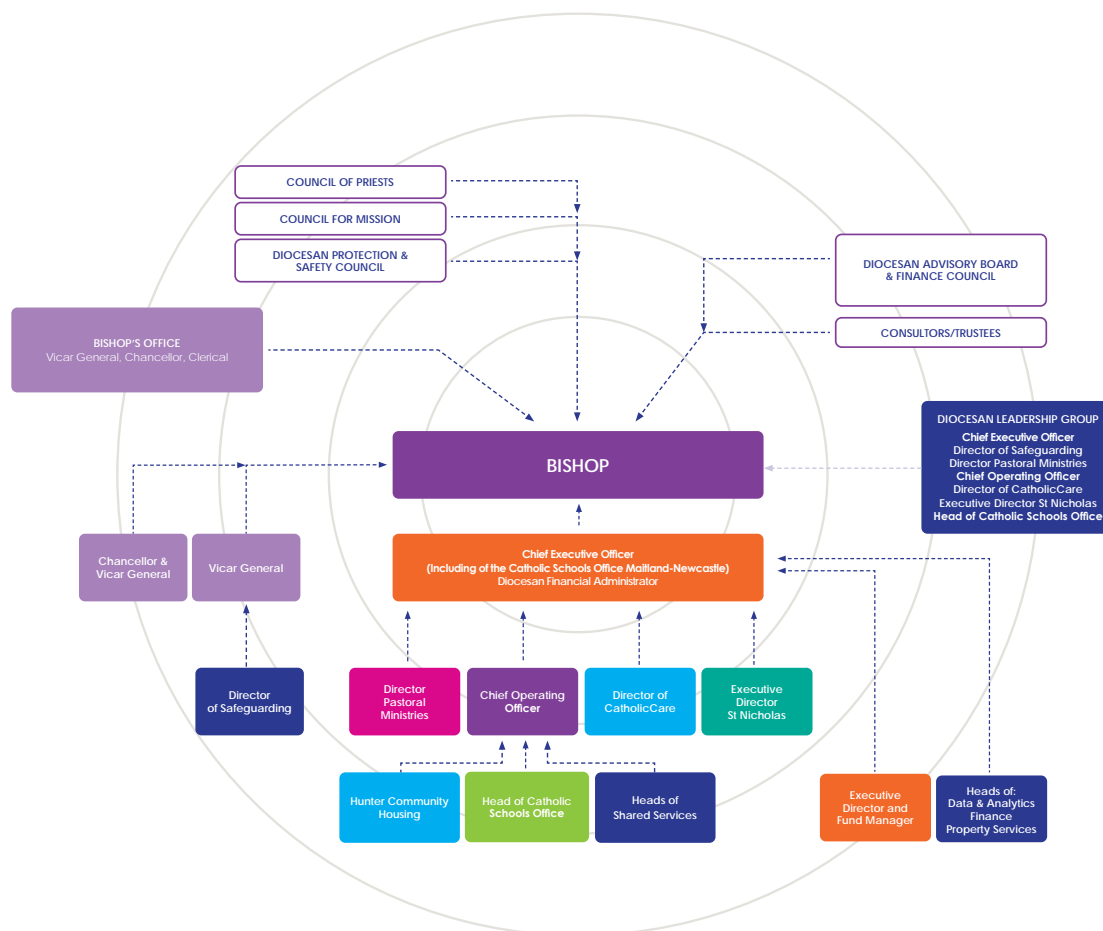
11 St Nicholas Early Education centres
 serving more than **1,776+** children

Training by the Office of Safeguarding
 provided to over **1,328** staff

203+ children and young people in care
 supported through CatholicCare

14,000+ counselling and assessment sessions
 provided by CatholicCare

Organisational overview



Workforce data:

Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas and the Catholic Community Fund	638	652	1,105
CatholicCare	126	92	332
CSO	1,536	3296	3,819
Total	2,300	4,040	5,256

Workforce composition (estimated):

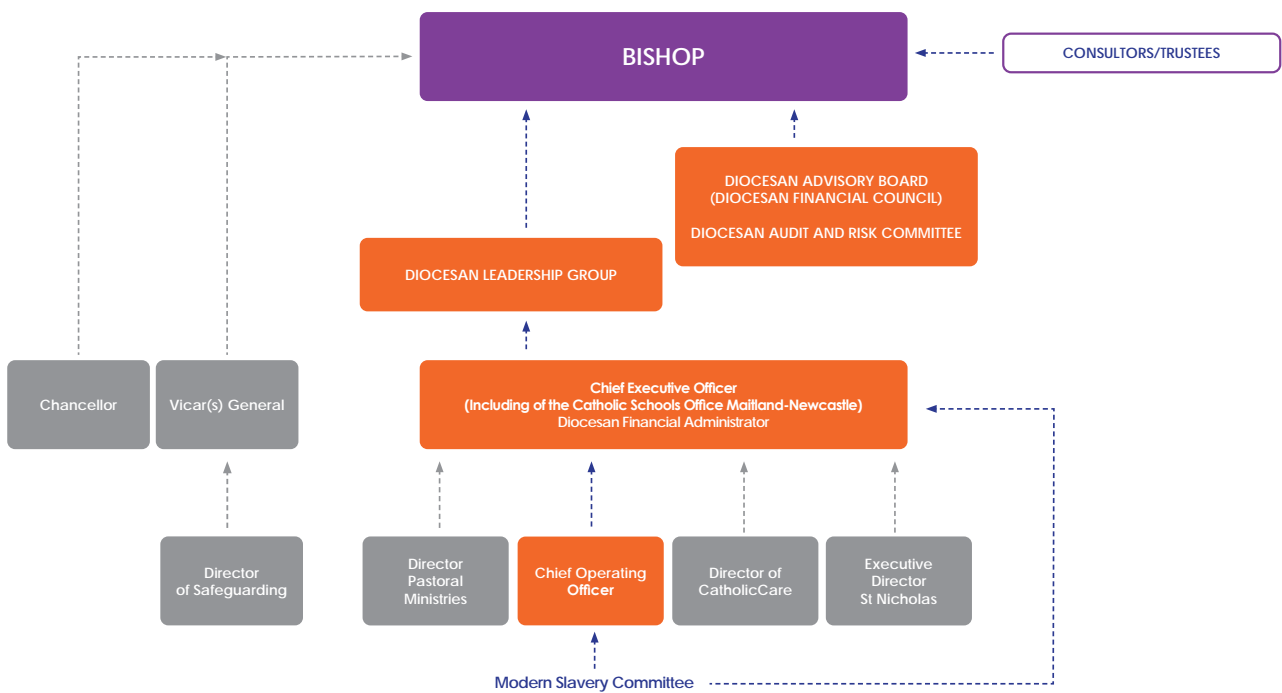
Agency	% female	% male	Other
Diocese including St Nicholas and the Catholic Community Fund	81.1%	18.8%	0.1%
CatholicCare	81.4%	18%	0.6%
CSO	80%	19%	1.0%
Total	80.8%	18.6%	0.56%

Governance framework

Overarching responsibility for compliance with the Modern Slavery Act lies with the Governance Department of the Diocese.

As our program matures, we aim to empower our teams with the right tools and processes to identify and act on modern slavery risks. These teams will be supported through our Modern Slavery Liaison Committee, a committee attended by senior stakeholders from across the Diocese.

The Modern Slavery Liaison Committee acts as an advisory committee to the Diocese of Maitland-Newcastle; it is accountable to the Chief Operating Officer for its performance with progress on operations and activities reported to the Diocesan Leadership Group.



Our operations

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 147,000 Catholics.

We provide pastoral, educational, social welfare, and community development services through various agencies in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, including:

Pastoral Ministries, support the work of our parishes including youth and children’s ministries, faith formation and education, social justice, chaplaincy; and support the missionary outreach of the church in the Diocese.

The **Catholic Schools Office**, educates more than 20,000 students in our 58 schools.

CatholicCare Social Services Hunter-Manning provides care, counselling, clinical and support services along with community food and refugee programs to support children and vulnerable people.

The **Office of Safeguarding**, promotes the safety, well-being of children and vulnerable adults in our Diocese as well as overseeing the safeguarding standards of those in our agencies.

St Nicholas Early Education, providing high quality care and education for children aged up to five years across 11 locations.

St Nicholas OOSH, operates 22 services providing out-of-school-hours care for children aged five to twelve years.

The **Catholic Community Fund**, assists with the management of Diocesan finances and providing retail customers a small range of investment products.

The Diocese of Maitland-Newcastle employs more than 5,560 people and is supported through a central shared services team providing support in the following areas:

Administration Support

Governance

Communications and Marketing

Human Resources

Data and Analytics

Property

Enterprise Portfolio Management Office

Technology Services

Finance and Payroll

Our supply chain

The Diocese of Maitland-Newcastle purchases a wide range of goods and services adhering to relevant legislative requirements and our procurement policy. The goods and services mostly come from building and construction, facilities and property maintenance, furniture and office supplies, ICT hardware, food and beverage, events and entertainment, and waste management sectors.



Operational modern slavery risks

The Diocese of Maitland-Newcastle has taken several steps to identify the Modern Slavery risks in its operations and supply chains. Our operations primarily occur in the context of education, social services, and pastoral ministries; each classified as a low-risk sector.

Our People & Culture (formerly Human Resources) functions, including recruitment, are supported by systems that are compliant with labour, employment, and immigration laws. We have processes in place to ensure our employees are fairly recruited and appropriately remunerated.

The Diocese of Maitland-Newcastle engages an independent and anonymous whistleblower service and has an ongoing internal audit program to monitor the effectiveness of our controls for managing risks.

During 2023 our focus on modern slavery action has included the ongoing implementation of new financial and People & Culture management systems, strengthened governance practice, risk assessment, staff training and supplier engagement.

System improvements including a new onboarding and recruitment module and learning management system for People & Culture, a new procurement module for managing the end to end purchasing process for finance that introduces significant improvements in controls for managing purchase approvals and linking procurement expenditure and budget forecasting.

Governance initiatives across the Diocese of Maitland-Newcastle during 2023 included the continued implementation of new diocesan wide Delegation Framework, Complaints Framework and Complaints Management Service, Policy Management Framework and centralised Delegations and Policy Registers, a revision of the Diocese Risk Management Framework to align with international risk management standards and a new enterprise risk management system for reporting and managing incidents and feedback.

Through the ACAN Program, the Diocese of Maitland-Newcastle continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

Cleaning and security services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries such as China and Vietnam.

Facility management and property maintenance

The labour force used in facilities management generally consists of temporary migrant workers often contracted through labour hire companies.

Labour Hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders,
- international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of
- movement and social isolation from community

Waste management services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Sub-contracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

Supply chain risks

The diversity of our agencies means we procure a variety of goods and services from a wide range of industries. Supplier analysis of more than 1,150 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

High	Building & Construction	Furniture & Office Supplies
	Cleaning & Security Services	ICT hardware
	Events & Entertainment	Uniforms & PPE
	Facility Management & Property Management	Waste Management
	Finance & Investments	Government & Agency Fees
	Food & Catering Services	Professional Services
Medium	Advertising & Marketing	Print / Mail Provider
	Community & Home Care Services	Travel & Accommodation
	Fleet Management, Consumables and Maintenance	Utilities
	ICT software, network services	
Low	Financial Expenses	

Whilst we are of the view that the potential for the Diocese to cause or contribute to the risks of modern slavery to be low, the areas of risks in our supply chain have primarily been identified to include building and construction, facility management and property maintenance, furniture and office supplies and ICT Hardware.





High risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Building & Construction	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone etc.) sub-contracting and labour hire services, demolition, painting, and landscaping.	44.73%
Cleaning & Security Services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc.) PPE, uniforms, and footwear.	1.06%
Events & Entertainment	Promotional products, venues, bar, and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables.	0.33%
Facility Management & Property Management	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	8.40%
Finance & Investments	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit, and bond rating agencies.	3.98%
Food & Catering Services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit, and vegetables), wine grapes, beverages, general catering for conferences, launches, events etc. and hospitality services.	2.18%
Furniture & Office Supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc.), workplace suppliers (cleaning, first aid, bathroom etc.), packaging, boxes etc.	4.86%
ICT hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours, and unpaid overtime.</p>	6.75%
Medical devices and supplies		0.01%
Uniforms & PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g., gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc.).	0.28%
Waste Management	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing.	0.55%



Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Advertising & Marketing	Advertising services, campaigns, branding, media collateral, outsourced business operations.	1.71%
Community & Home Care Services	Allied health services, home nursing, home care and social support.	3.90%
Fleet Management, Consumables and Maintenance	Vehicle, components, consumables, mechanical and crash repairs, 2.21% servicing, waste disposal (e.g., tyres, oil).	2.69%
ICT software, network services	Software and application development, support services, call centres (offshore).	3.99%
Print/ Mail Provider	Printing services, printers, ink, paper, other printing consumables.	0.71%
Travel & Accommodation	Travel booking services, hotels, accommodation. Orphanage trafficking/ voluntourism.	2.49%
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	4.30%



Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Financial Expenses	Other	1.96%
Government & Agency Fees	Other	0.34%
Professional Services	Other	6.24%



Actions taken to manage risk

Our effort for 2023 has been in enhancing organisation understanding of potential modern slavery risks in our operations and supply chain, and organisation commitment to address these risks.

The continued roll out of Tech One platform has meant increased viability and compliance with managing risks, particularly in the vetting of suppliers and is being actively extended and increased by the Property team within the diocese. The appointment of a Procurement Manager will further strengthen the systems and processes in place.

The Diocese of Maitland-Newcastle is an active member of the [Australian Catholic Anti-Slavery Network \(ACAN\)](#). The ACAN network currently comprises of more than 36 Catholic entities nationally including dioceses, schools and universities, and organisations across the finance and investment, health, aged care, and welfare sectors.

The Diocese participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan:

1. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
2. Suppliers in high risk categories were again invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed the survey results and determined the following:
 - suppliers already members of Sedex
 - suppliers willing to join Sedex
 - suppliers classified as not required to join Sedex
3. Suppliers were assisted with the process to join Sedex and provided support to complete the Sedex Self-Assessment Questionnaires (SAQ).
4. ACAN Program Managers then assessed the SAQ results, identified gaps in the supplier's management system such as further training and capacity building areas and the development of risk management strategies.

The ACAN supplier engagement plan identified common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

The ACAN webinar series remains an important part of the supplier engagement plan. The purpose of the ACAN supplier webinar series is to assist suppliers to gain an understanding of modern slavery in relation to:

- business relevance and the Modern Slavery Act
- catholic customer/buyer expectations
- how to access ACAN e-learning
- Sedex supplier membership

For the Diocese 307 suppliers completed the ACAN Supplier Survey, which represents a significant increase from the 2022 figure of 84. It was determined that 65 of the existing suppliers are already on Sedex and 21 suppliers completed the Sedex Self Assessment Questionnaire (SAQ).

Since mid-2021, the ACAN Program has provided the Diocese with membership of Sedex – Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of Sedex, the Diocese benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

Sedex benefits include:

- **Improved transparency:** Sedex provides a secure online platform for businesses to share information on ethical and environmental performance with customers, suppliers, and stakeholders. This helps to build trust and confidence in the business and supply chain.
- **Enhanced risk management:** Sedex provides tools to help businesses identify and manage risks in their supply chain, such as labour rights abuses, environmental violations, and corruption. This can help to reduce the risk of reputational damage, legal liabilities, and supply chain disruptions.
- **Increased efficiency:** Sedex provides templates and tools for suppliers to report ethical and environmental performance, which can help to streamline the reporting process and reduce the administrative burden on businesses.
- **Access to expertise:** Sedex offers training, resources, and guidance on ethical and sustainable practices, which can help businesses to improve performance and meet legal and regulatory obligations.

- **Competitive advantage:** By demonstrating a commitment to ethical and sustainable practices, businesses can enhance their reputation and brand value.

Overall, Sedex benefits the Diocese by providing a platform for collaboration, transparency, and continuous improvement in supply chains, leading to better outcomes and a more sustainable future for all stakeholders.

The ACAN Program supported suppliers to the Diocese with onboarding to Sedex and achieving these objectives:

1. Managing the risk of modern slavery with existing suppliers
2. Validating inherent risk against actual risk
3. Screening new suppliers as part of tenders and supplier on-boarding processes
4. Gaining visibility upstream in relevant supply chains
5. Monitoring and reporting on progress of suppliers
6. Development of an ACAN prequalification register of suppliers

ACAN Program Managers supported Diocesan agencies by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:

1. Designate a role to drive modern slavery engagement
2. Complete the 5 minute ACAN pre-assessment survey
3. Watch or participate in one of three ACAN supplier webinars
4. Download the ACAN supplier PowerPoint presentation and share with staff to raise awareness and ensure an understanding of the Diocese expectations in regard to the supplier-buyer relationship
5. Join Sedex as a Supplier Member, complete a Self-Assessment Questionnaire (SAQ) and connect with the Diocese
6. ACAN to connect suppliers with access to e-learning modules – Modern Slavery 101 and Modern Slavery Risk Management for Suppliers. Encourage suppliers to also retain completion certificates as evidence of modern slavery training

The Diocese intend that Sedex will be used to:

- manage the risk of modern slavery with existing suppliers
- validate inherent risk against actual risk
- screen new suppliers as part of tenders and supplier on-boarding processes
- gain visibility further upstream in the supply chains
- monitor and report on progress in the profile of suppliers

The Diocese sources a diverse range and significant amount of goods and services, ranging from stationery to uniforms, furniture and office supplies, ICT hardware, facilities and maintenance, construction and building equipment.

We have continued our effort to recognize the potential risk of modern slavery in our supply chains for the 2023 reporting period. We continue to analysis supplier expenditure and monitor modern slavery risks. Information collected from our suppliers who participated in the ACAN survey is being used for ongoing engagement with suppliers to use the Sedex platform. Supplier engagement programs are an ongoing part of our 5 year program to continue to develop a deeper understanding of our supply chains.

Modern Slavery contract provisions have been consistently included for all new contract negotiations and supplier engagements. The diversity of our services can potentially expose the Diocese to a wide range of risks, and we are committed to a systematic approach to mitigate risk, particularly in our procurement processes and supplier engagement.

Our Diocesan leadership groups have received on-going Modern Slavery updates. We have rolled out modern slavery training targeting our educational teaching staff with training available to all staff via MNPeople, our recently deployed Human Resources platform.

Steps we have taken to understand, assess and mitigate the risk of modern slavery in our supply chain during this reporting period include:

ACTIONS	
Building staff awareness and sharing information	<p>All new employees are briefed on the Diocese position to Modern Slavery during their induction process along with information regarding the Independent Whistleblower Service.</p> <p>Regular presentations presented at various staff meetings.</p> <p>Modern Slavery intranet page and Policy available to all staff.</p> <p>All ACAN Modern Slavery Modules are available via MNPeople to all staff.</p>
Governance and policy	<p>The modern slavery clause remains a required clause in all new contract negotiations and has been since 2021.</p> <p>New Diocesan Delegation Framework and Delegations Schedule.</p> <p>Revision of Diocesan Risk Management Framework documents.</p> <p>New Diocesan Policy Management Policy, procedures and supporting resources.</p> <p>New Diocesan Complaints Framework and complaints management service.</p> <p>New enterprise risk management system for incident and feedback management and reporting.</p>
Analysis and assessment	<p>Improved systems for monitoring and analysis of expenditure.</p> <p>Annual Internal Audit Program to monitor and review control effectiveness for managing risks and identifying and recommending opportunities for strengthening and improving our systems and processes.</p>
Stakeholder and engagement collaboration	<p>Implementation of ACAN Supplier Engagement Strategy.</p> <p>Modern Slavery questionnaire for all suppliers rolled out and action plan developed to implement recommendations from responses.</p> <p>ACAN modern slavery modules implemented into the new Diocesan learning management system for staff. Available as self-enrolment to staff. Communication campaign to raise awareness of availability of these modules.</p>
Capacity building	<p>Modern Slavery Liaison Officer/s:</p> <ul style="list-style-type: none"> • Joined ACAN/ MSLO monthly teleconferences. • Attended ACAN workshops. • Collaborated with ACAN members.



Through our new learning management system the Diocese of Maitland-Newcastle staff have access to the ACAN Modern Slavery Course which is comprised of the following 5 modules targeting leadership, executives, staff, suppliers and business partners: :

Modern Slavery 101 – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. The vast number of goods linked to modern slavery through harvesting, processing or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors.

Business relevance – provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of relevant modern slavery criminal offences and key reporting requirements of the Modern Slavery Act 2018 (Cth) are included.

Implementing a Modern Slavery Risk Management Program – provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources:

- 1. Commitment** – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities.
- 2. Business State of Play** – understand gaps, develop a modern slavery action plan and monitor progress.
- 3. Supplier Risk** – prioritise suppliers according to risk and spend and conduct supplier due diligence.
- 4. Engage, Educate, Respond** – to ensure staff, contractors and suppliers are trained and educated on modern slavery risks and that documented response mechanisms are in place.

Grievance Mechanisms & Remedy – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*. The module also highlights guidance and resources produced by the UN Global Compact Australia and a case study highlighting the Cleaning Accountability Framework.

Modern Slavery Risk Management for Suppliers – All supplier contracts that issue contain a standard Modern Slavery Clause to assist suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers. Expectations that suppliers will effectively manage modern slavery risks and the potential implications of enhanced supplier due diligence are outlined and examples provided.



Modern slavery action plan

The Diocese of Maitland-Newcastle has continued its modern slavery maturity journey by focusing on management systems, improving governance practice, risk assessment, staff training and supplier engagement.

External factors, such as economic, geopolitical, and environmental influences, have continued to impact our journey in 2023. Particularly challenging has been the escalating cost of living, which has placed pressure on our parish communities and the delivery of services, especially in building, construction, and facilities management. Additionally, the tight labor market has affected the availability of skilled and qualified staff needed to deliver our education and early education services.

Internally, the Diocese of Maitland-Newcastle has implemented several key Diocesan-wide governance frameworks aimed at continuously improving governance practices and aligning agencies. These include new

management systems that have brought significant improvements to processes and controls for managing risk which include:

- onboarding and recruitment
- a learning management system
- an enterprise risk management system
- a centralised Procurement System to support supplier engagement and enhance financial control and monitoring of budget forecasts and expenditure
- The appointment of a Procurement Manager, which will enhance and improve the key risk areas and the associated processes and procedures

In 2024, we intend to continue implementing our 5-year roadmap for modern slavery system improvement, while also strengthening service excellence, quality assurance, and compliance reporting and monitoring activities.

2024 Priorities

PRIORITIES	ACTIVITIES
Governance and Assurance	<ul style="list-style-type: none"> • Enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). • Enhance the quality assurance activities to monitor the effectiveness of risk controls in procurement practice. • Regular monitoring and reporting from feedback systems.
P&C Practices	<ul style="list-style-type: none"> • Promote awareness of modern slavery risks and training opportunities. • Promote the use of Sedex and preferred contractors. • Regular review and hiring and onboarding processes.
Stakeholder dialogue	<ul style="list-style-type: none"> • Continuing engagement with relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains. • Continuing stakeholder dialogue to include the wider organisation to build awareness of modern slavery risks and legislative requirements. • Continue to work with our partners to build engagement and share knowledge re modern slavery.
Procurement	<ul style="list-style-type: none"> • Complete the Sedex self-assessment.

Remediation

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

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, the Diocese of Maitland-Newcastle agencies have access to the expertise and independent advice available through Domus 8.7. Our agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery



Future Actions

As we seek to address the risks of modern slavery in our supply chain and contribute to the global eradication of modern slavery and human trafficking, we anticipate the following key areas of focus beyond 2024:

WORKSTREAM	ACTIVITY
Governance	Our Leadership and Senior Management teams are highly engaged with the issue, specified targets and KPIs for managing modern slavery risk are set, and the Diocese performance in implementing our Modern Slavery program is tracked and reported on.
Commitment	Our Leadership and Senior Management teams drive our program and are engaged with its implementation.
Business Systems	Managing modern slavery risk is reflected in all parts of our business systems, policy, strategy, and supply chain.
Action	Goals, targets, KPIs and minimum standards have been set to address modern slavery risks and progress is regularly reported to senior management.
Monitor and Report	Regularly collecting, analysing, and reporting information on modern slavery is an integral part of our continuous improvement system. Information on modern slavery is continuously collected from a wide variety of sources and reported to senior management for actions.
Awareness	Key managers and staff are aware of modern slavery issues, understand our policy and know they are responsible for taking action to address risks.
Policies and Systems	Our modern slavery commitment is included in all position descriptions and key managers/ contractors have specific accountabilities and deliverables to manage associated risk controls. Modern slavery objectives and accountabilities are included in our recruitment processes and procurement practices.
Training	Targeted training and education programs on modern slavery are regularly delivered to Key staff and other stakeholders. Our training and professional development strategy ensures all staff and contractors have the knowledge and skills to implement our modern slavery policy and programs.



WORKSTREAM	ACTIVITY
Labour Hire and Outsourcing	We actively enforce and monitor our modern slavery due diligence requirements with all external recruitment and labour hire agencies.
	We actively work with and support labour hire companies to identify and eliminate modern slavery risks from their operations.
Procurement and Supply Chain	Detailed procurement policies, guidelines, and processes to eliminate modern slavery in our supply chain are in place and staff are trained in their use.
Contract Management	Performance standards and contract evaluation criteria are in place for at-risk contracts and mechanisms are in place to enforce them.
Screening and Traceability	High risk suppliers have been screened based on spend, geographic location, commodity and industry sector and we can trace the source of most goods, services, and materials we use.
	All existing and new suppliers are screened using both our internal audit/ compliance team and third-party auditors to ensure traceability.
Supplier Engagement	We regularly engage with our extended supply chain on the issue and have a range of forums and feedback mechanisms to maintain a dialogue with them.
	Open and transparent communication is maintained with suppliers to help them eliminate modern slavery from their own supply chains.
Monitoring and Corrective Action	Monitoring tools such as internal audits, online questionnaires and supplier forums are used to assess the performance of our suppliers and corrective action plans are jointly developed.
	We work closely with our suppliers to address non-conformance and implement corrective action plans to eliminate modern slavery from their supply chains.
Risk Framework	We include human rights risks as part of reputational risk assessment processes and have the systems in place to address issues as they arise.
	We regularly assess the effectiveness of risk controls and take action to improve controls, as required.



Measuring effectiveness

The Diocese undertook an initial assessment of its approach to Modern Slavery risks in the areas of: management systems; risk management; human resources; customers and stakeholders; and procurement and supply chains.

In 2024 the Diocese will complete the ACAN Entity Profile and generate our first maturity assessment. This signifies a shift from the initial foundation building stage to embedding the modern slavery risk management program across key areas.

The metrics in the table provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions, and helps the Diocese understand the pace of change and set future direction.

The data shows engagement by suppliers of goods and services. The ACAN supplier survey was completed by 307 suppliers. Of those suppliers, 41 suppliers were invited to join Sedex and complete the Sedex Self Assessment Questionnaire (SAQ).

The Diocese now has visibility over the actual risk of 21 suppliers based on the completed Self-Assessment Questionnaire results. The Diocese reports a significant increase in the number of suppliers linked to the Diocese 65 up from 4 in 2022. Suppliers also engaged in capacity building through completing both the Sedex SAQ which provides the supplier with a risk profile and shows areas for improvement, 55 suppliers also attended ACAN supplier webinars¹.

INTERNAL / STAFF	2021	2022	2023
Modern Slavery Working Groups (MSWGs) meetings	5	10	0
ACAN Webinars	2	12	
E-learning modules completed	8	26	
Sedex Individual user accounts	1	1	
Number of staff trained	22	26	
EXTERNAL / SUPPLIER ENGAGEMENT			
Total number of suppliers	*	6431	3602
Suppliers in high-risk procurement categories	*	1400	865
Communication to suppliers on Modern Slavery	*	120	
Number of ACAN Pre-Assessment Surveys completed	*	84	307
Suppliers attending capacity building webinars	*	38	55
Suppliers identified as not requiring to join Sedex	*	4	
Suppliers Invited to join Sedex	*	47	41
Suppliers joining Sedex but not linked to Diocese	*	10	
Suppliers linked to Diocese on Sedex	*	4	65
Suppliers with Sedex SAQ completed & Risk score generated	0	2	21
Cumulative suppliers with high Sedex SAQ risk rate	0	0	
Cumulative suppliers with medium Sedex SAQ risk rate	0	0	
Cumulative suppliers with low Sedex SAQ risk rate	0	2	
E-learning modules completed by suppliers	*	0	
Number of social audits completed	*	0	1
Number of corrective actions from social audits	*	0	0
DOMUS 8.7 EXTERNAL REFERRALS			
Worker voice / grievance mechanism deployed	0	0	
Referrals for advice and assistance	0	0	
Individuals identified or referred for modern slavery assessment	0	0	
Individuals with modern slavery cases remediated	0	0	

Process of **consultation** with entities owned or controlled by the Diocese

The Diocese established a Modern Slavery Liaison Committee to oversee the development and implementation of a 5-year Modern Slavery Action Plan to support our commitment towards ending modern slavery. The Diocese has appointed a Procurement Manger who will oversee and drive the reconstitution of the Modern Slavery Liasion Committee.

The activities within the Action Plan are designed to embed management of modern slavery risks into the operational activities of agencies across the Diocese. The ACAN Modern Slavery training modules have been embedded into the Diocese new learning management system and are available to all staff through the self-enrolment menu. Information to promote awareness of and improve practices to manage modern slavery risks across the Diocese.

Other

¹Appendix List of ACAN Webinars:

2023	ACAN WEBINAR TOPICS	2023	ACAN SUPPLIER AND CAPACITY BUILDING
23 Feb	Working Group Updates		
30 Mar	Working Group Updates	15 Mar	Construction and Capital Works
27 Apr	Working Group Updates		
25 May	Working Group Updates	10 May	Modern Slavery and Sustainability
29 Jun	Working Group Updates		
27 Jul	Working Group Updates	12 Jul	Goods manufactured overseas
31 Aug	Working Group Updates		
28 Sep	Working Group Updates	13 Sep	Principles of grievance mechanisms, worker voice and remediation
26 Oct	Working Group Updates		
30 Nov	Working Group Updates	8 Nov	Labour related services








MODERN SLAVERY STATEMENT 2023

(1 January - 31 December 2023)



Catholic Education

Diocese of Wagga Wagga

DISCLOSURE NOTE

This Statement has been made on behalf of Catholic Education Diocese of Wagga Wagga which is the only agency in the Diocese of Wagga Wagga required to report on its supply chains under the Modern Slavery Act 2018 (Cth). This Statement covers all schools and entities controlled by Catholic Education Diocese of Wagga Wagga.

We acknowledge that Catholic schools and offices in the Diocese of Wagga Wagga are situated on the lands of the Wiradjuri, Yorta Yorta, Walgalu and Ngarigo people, who long before us lived, loved, raised their children and worshipped here. We pay respects to Elders past, present and emerging, and commit to the ongoing journey of reconciliation. We also acknowledge all Aboriginal and Torres Strait Islander families in our communities and acknowledge their physical and spiritual connections to their lands.

ABN: 36 345 537 994 Catholic Education Diocese of Wagga Wagga

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Diocese of Wagga Wagga as defined by the Modern Slavery Act 2018 (Cth (“the Act”)) on 4 June 2024.

This Modern Slavery Statement is signed by a responsible member of the Catholic Education Diocese of Wagga Wagga as defined by the Act.

Catholic Education Diocese of Wagga Wagga

ABN: 36 345 537 994

Address: McAlroy House, 205 Tarcutta Street, Wagga Wagga, NSW 2650

Website: <https://ww.catholic.edu.au/>

Contact email for modern slavery: cedww-modernslavery@ww.catholic.edu.au



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STATEMENT FROM THE BISHOP OF WAGGA WAGGA: MOST REV MARK S. EDWARDS OMI PHD DD

That slavery and forced labour exists in our world today and its extent – an estimated 40 million people are across the globe including up to 15,000 in Australia – is shocking and a serious wrong that we can do something about. The ancients noted that a part of a person died when she or he became a slave and this must still be true today. As we believe that people are made in the image and likeness of God and that in Jesus he died to save them, this is a dehumanising activity that we can't ignore.

Modern slavery is not something that we are directly involved in and can easily be unaware of. Most often our involvement in and (unwitting) support of slavery comes through goods and services purchased overseas.

For this reason, I welcome the Modern Slavery Act with its requirement that we become aware of our supply chains and address modern slavery risks in this. This means that our possible connections with slavery become transparent and that we can take concrete steps to avoid supporting slavery.

I am grateful to Catholic Education, Diocese of Wagga Wagga for the leadership they are providing for us in this area.

In Jesus Christ and Mary Immaculate

M Edwards OMI





STATEMENT FROM THE DIRECTOR OF CATHOLIC EDUCATION: DR ANDREW WATSON

Catholic Education Diocese of Wagga Wagga is a system of Catholic schools that are communities of welcome, faith, service and learning. Inspired by Christ the Teacher, first and foremost our schools are a place to encounter the living God who, in Jesus Christ, reveals his transforming love and truth to students.

CEDWW has a long commitment to giving witness to the principles of Catholic Social Teaching, especially the dignity of the human person. Modern slavery is a grave violation of human dignity that contradicts the fundamental principles of Catholic Social Teaching. Embedded in the belief that every person is created in the image and likeness of God, Catholic Social Teaching emphasises the inherent dignity and worth of every individual, promoting social justice and solidarity. In the context of modern slavery, these principles compel CEDWW to confront and combat the pervasive injustices that persist in various forms.

CEDWW supports initiatives that promote fair labour practices, ethical sourcing, and the protection of human rights. Through partnerships with local communities and organisations, we seek to contribute to the broader societal effort in eradicating modern slavery and building a world where the dignity of every person is upheld.

In alignment with the teachings of Pope Francis and the broader Catholic Church, we affirm our dedication to combating modern slavery, recognising it as an affront to human dignity and a challenge to our shared commitment to justice, compassion, and love.

I am very pleased to present CEDWW's first Modern Slavery Statement, which has been approved by the Catholic Education Council and is endorsed by CEDWW's Executive Team.

As a community, CEDWW is committed to participating with other Catholic organisations in the Australian Catholic Anti-Slavery Network (ACAN).



CRITERIA 1 - ABOUT US

The Catholic Diocese of Wagga Wagga is located within Wiradjuri, Yorta Yorta, Walgalu and Ngarigo country in the Riverina and southwestern district of New South Wales. The Murray and Murrumbidgee Rivers are significant geographical features of the area with the eastern border of the Diocese lying in the mountainous regions of the Great Dividing Range.

Established in 1917, the Diocese of Wagga Wagga has a rich faith tradition; our faith communities are nourished and sustained by the sacramental life of the church administered and accessed through 31 parishes. The Most Reverend Mark Edwards OMI is our Bishop.

Catholic Education, Diocese of Wagga Wagga (CEDWW) comprises 29 schools – 24 primary, 5 secondary and 2 boarding houses. Boarding facilities can be accessed by 3 of our secondary schools. In 2023 CEDWW employed 1,725 people and our schools educated 8,729 students.

We are guided in our work by our strategic direction which in 2024 will address the four strategic priority areas of:

1. Evangelisation and Religious Education
2. Education Services
3. People and Culture
4. Corporate Services

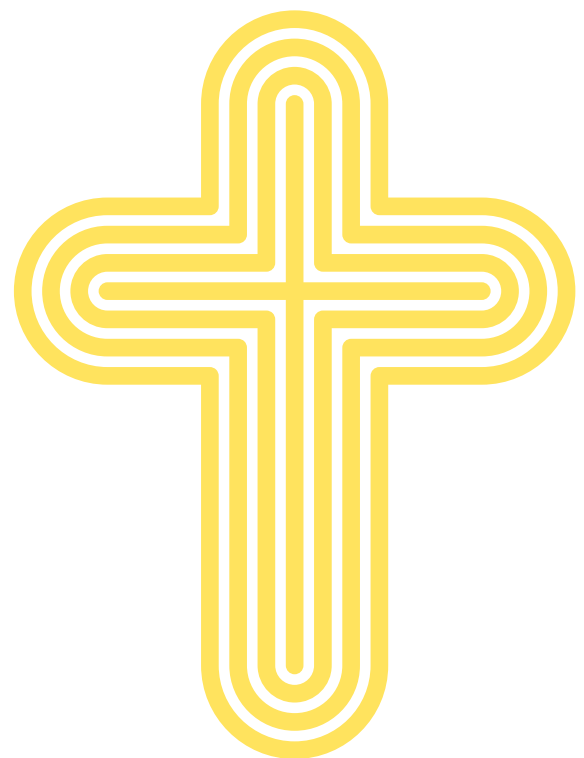
The theme for our system of schools for 2023 was “**Preparing the Good Soil**” drawn from the Parable of the Sower in Matthew’s Gospel. This parable describes to us that when seed fell on good soil, it produced a crop – a hundred, sixty or thirty times what was sown. During 2023 we looked to:

- Enrich the soil through our spirit of welcome
- Reinforce the soil through our spirit of faith
- Enhance the soil through our spirit of service, and
- Improve the soil through our spirit of learning



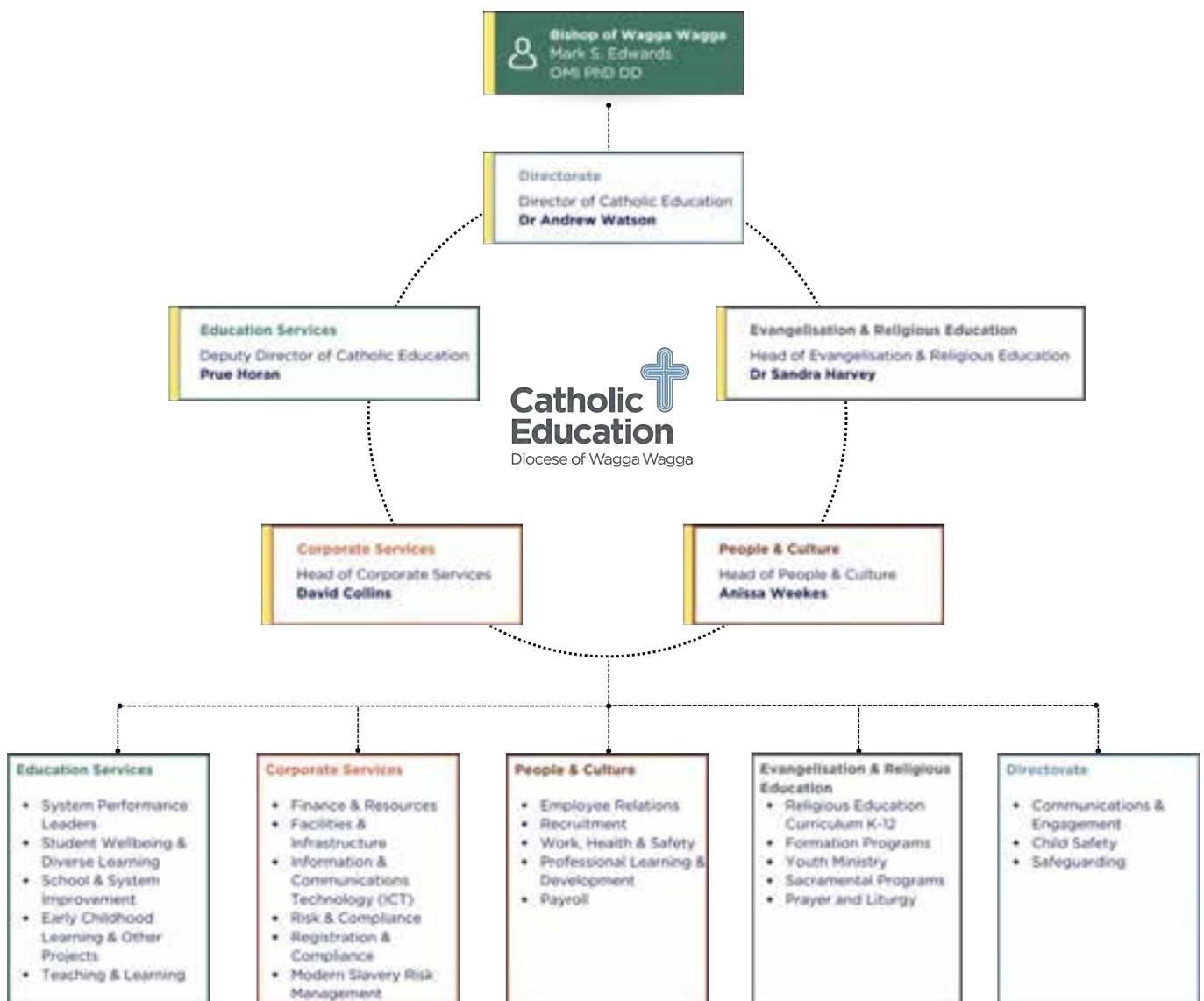
OUR VISION

Inspired by the message and actions of Jesus Christ we nurture excellence as a Community of Learners, so all may flourish in the fullness of their humanity.





CRITERIA 2 - OUR ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAINS



GOVERNANCE

CEDWW is established by the Bishop of Wagga Wagga as the agency to deliver Catholic Education in the Diocese on his behalf. CEDWW works hand in hand with the other agencies of the Diocese in fulfilling the Church's mission. CEDWW, as an agency of The Trustees of the Roman Catholic Church for the Diocese of Wagga Wagga Diocese, is covered under the auspices of the Roman Catholic Church Property Trust Property Act 1936.

CEDWW's primary responsibility is to support and advance Catholic education while complying with legal requirements, with a focus on creating safe professional environments across all schools and workplaces, as well as a commitment to child safety.

In November 2020 The Catholic Education Council (CEC) of the Diocese of Wagga Wagga was established by the Bishop of Wagga Wagga as an advisory body to advise him on education policy of Catholic schools within the Diocese of Wagga Wagga. In addition four permanent committees were established to assist the CEC in this role:

- Catholic Identity and Mission Permanent Committee
- Education and Pastoral Wellbeing Permanent Committee
- People and Culture Permanent Committee
- Finance, Risk, Audit and Compliance Permanent Committee

Membership of the Permanent Committee are made up by people external to CEDWW that have relevant qualification and experience with CEDWW Leadership Team members attending in an ex official capacity.

The Director of Catholic Education is supported by the CEDWW Directorate, working closely with schools to provide high-quality education in alignment with Catholic traditions.

The CEDWW Directorate Senior Management Team consists of:

- Director Catholic Education
- Deputy Director Catholic Education
- Head of People and Culture
- Head of Corporate Services
- Head of Evangelisation and Religious Education

The Director of Catholic Education is assisted in managing CEDWW's Modern Slavery Risk through:

- Appointment of a Modern Slavery Liaison Officer and Deputy Modern Slavery Liaison Officer to act as key contacts between CEDWW and ACAN.
- Formation and introduction of CEDWW Modern Slavery Working Group along with ACAN terms of reference to oversee CEDWW compliance with legislation and implementation of policy and procedures.
- Modern Slavery included as a permanent agenda item in Finance, Risk, Audit and Compliance Permanent Committee quarterly meetings and quarterly reporting.

OPERATIONS

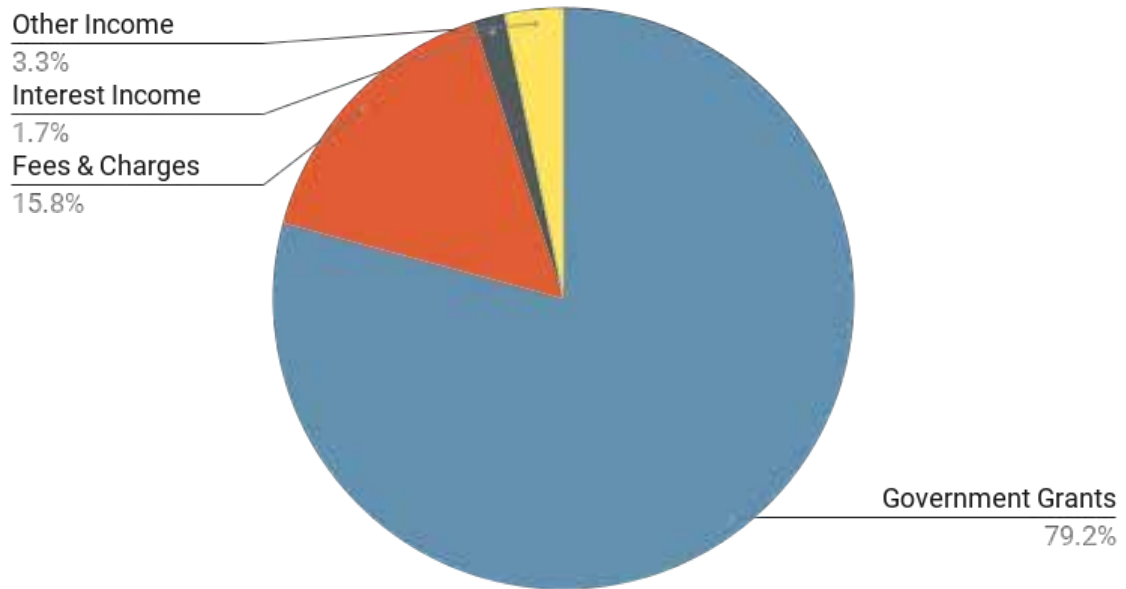
Catholic Education, Diocese of Wagga Wagga (CEDWW) comprises 29 schools – 24 primary, 5 secondary and 2 boarding houses. Boarding facilities can be accessed by 3 of our secondary schools. In 2023 CEDWW employed 1,725 people and our schools educated 8,729 students.

MAP OF THE DIOCESE OF WAGGA WAGGA

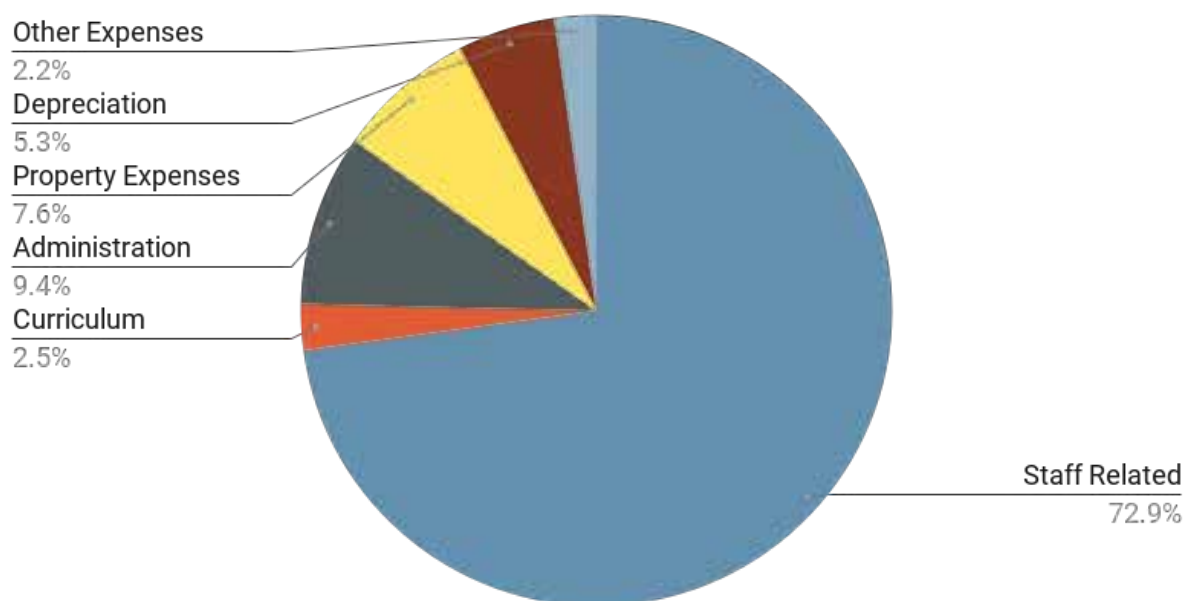


CEDWW REVENUE AND EXPENDITURE

CEDWW REVENUE 2023



CEDWW EXPENDITURE 2023



OUR SUPPLY CHAIN:

CEDWW engaged the services of some 2,316 third party suppliers during the reporting period. These ranged from multi-million dollar school construction projects to minor consumable purchases. The majority of CEDWW's significant suppliers are Australian based. CEDWW preference is to negotiate larger contracts centrally however the geographic spread of our schools means that they have the autonomy to purchase some items directly and engage any suppliers they choose to meet their operational and location needs. These suppliers tend to be smaller service providers or retail operations.

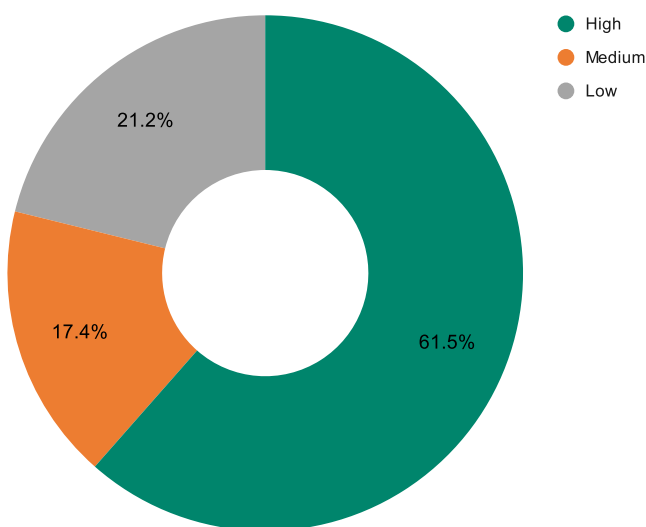
In general terms, CEDWW's purchasing derives from two sources:

- Centralised Catholic Schools Office contracts and purchasing – These are usually multisite agreements or acquisitions for building service contracts, information and communication technology, or utility services across the system or high cost Building and Construction projects at specific sites. During 2023 CEDWW entered into a procurement contract with Woolworths Supermarkets that covers all of our schools, with the exception of 2, as well as cleaning contracts where clusters of location permits; or
- School contracts and purchasing – These are usually single site agreements or acquisitions for an individual School such as for educational supplies and photocopying services.

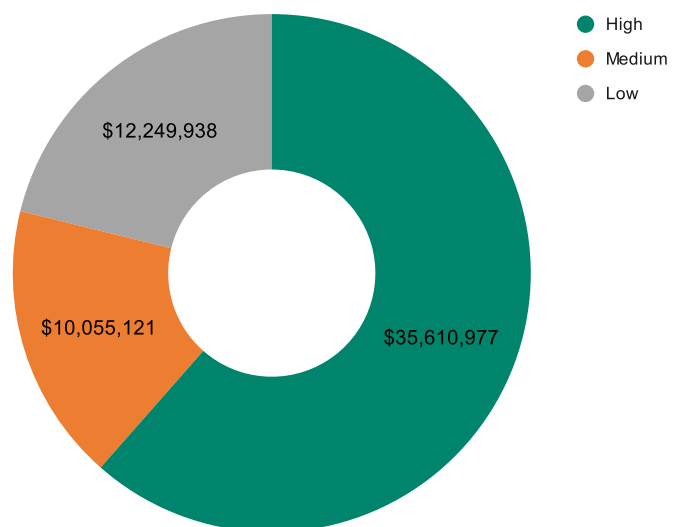
CEDWW is actively seeking opportunities to enter into group purchasing arrangements in other areas such as mechanical services, pest and termite control. In addition to providing a commercial benefit, the consolidation of such services will assist in managing and minimising CEDWW's risk of exposure to modern slavery activities.

In 2023, CEDWW's non-employee related expenditure totalled \$57,916,036. A risk assessment of our 2023 expenditure has identified that over 60% was for goods and services in areas classified as high risk, as represented in the below chart:

CEDWW EXPENDITURE % BY RISK



CEDWW EXPENDITURE \$ SPEND BY RISK



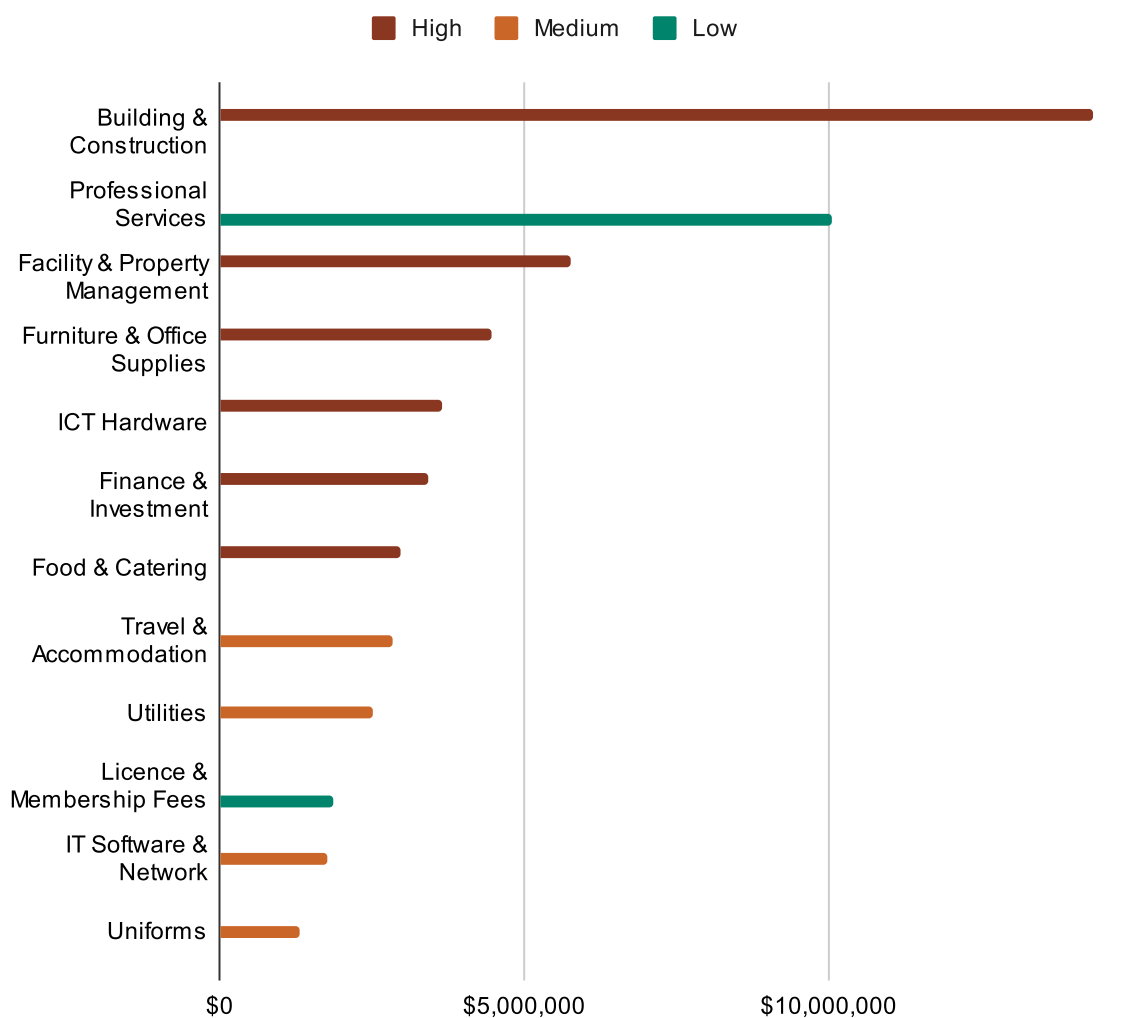


Catholic Education, Diocese of Wagga Wagga is committed to providing an appropriate and timely remedy to people impacted by modern slavery.



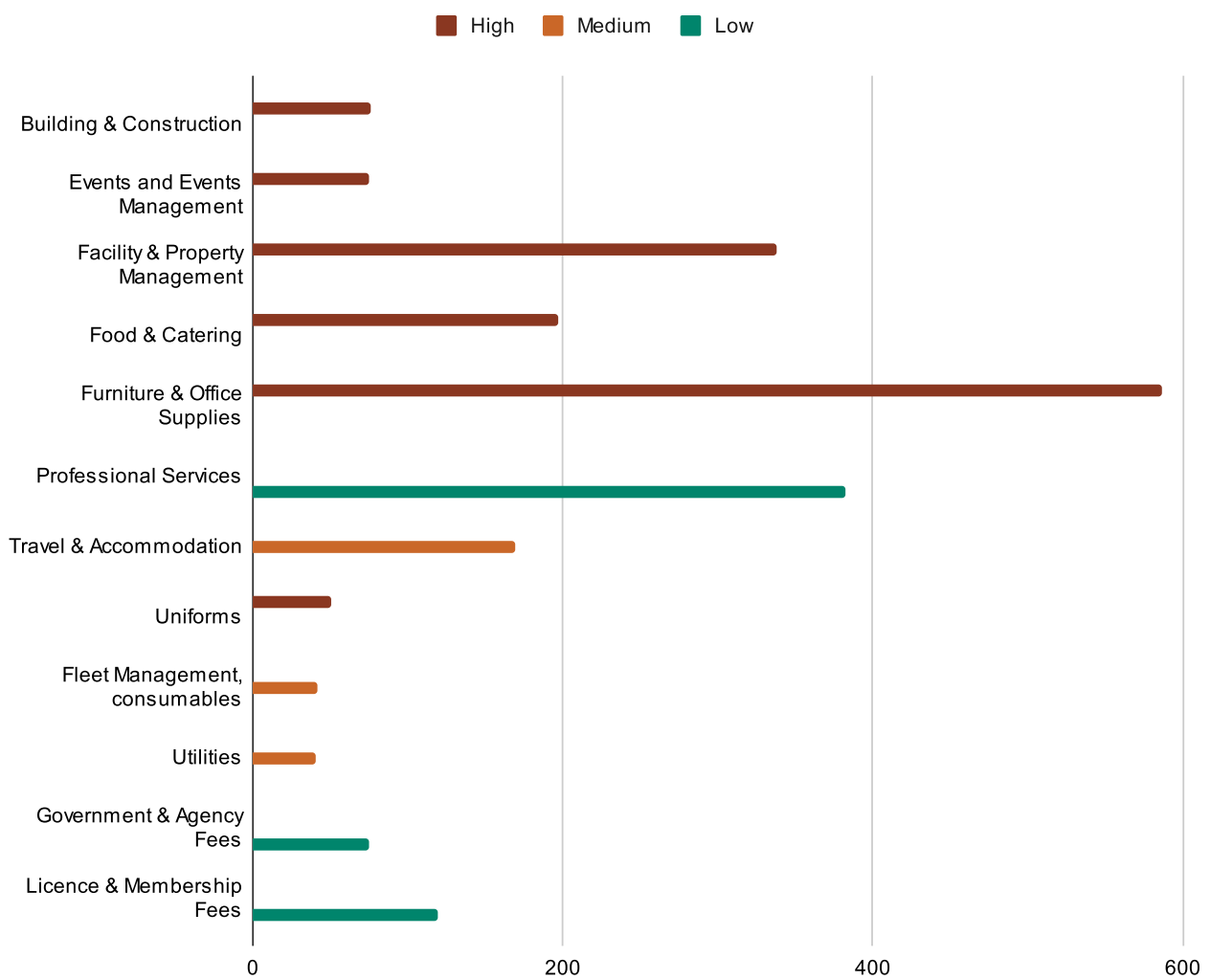
The following charts of our 12 highest expenditure areas and suppliers highlights that high risk industries make up 6 of the top 7 categories. Suppliers within these industries, which are amongst our 12 largest providers, will be our focus during 2024 and beyond.

TOP 12 CATEGORIES OF CEDWW EXPENDITURE





TOP 12 CEDWW EXPENDITURE BY SUPPLIER NUMBER



CRITERIA 3 - MODERN SLAVERY RISKS

CEDWW and ACAN

During 2022, CEDWW became a member of the Australian Catholic Anti-Slavery Network (ACAN) to assist CEDWW in complying with the requirements under the Modern Slavery Act (2018). As a further aid CEDWW commenced the ACAN Modern Slavery Risk Management Program at the time of joining. CEDWW maintained its ACAN membership in 2023.

ACAN has developed a suite of resources that CEDWW utilises as it embarks on the journey to minimise the risk of engaging in any activities that may include or facilitate modern slavery, in particular through our supply chain.

CRITERIA 4 - ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Actions taken to mitigate risk

During the reporting period and since joining ACAN, the following initiatives have been initiated or actioned:

Policy and Procedure:

- Appointment of a Modern Slavery Liaison Officer and Deputy Modern Slavery Liaison Officer to act as key contacts between CEDWW and ACAN.
- Drafting and approval of CEDWW Modern Slavery Policy that clearly sets out CEDWW expectations on all staff, contractors and suppliers with regards to modern slavery practices and compliance with the Modern Slavery Act.
- Formation and introduction of CEDWW Modern Slavery Working Group along with ACAN terms of reference, to oversee CEDWW compliance with legislation and implementation of policy and procedures.
- Review and update of CEDWW Uniform policy to include anti-slavery provisions.
- Review and update of standard CEDWW supplier and services agreement to include anti-slavery provisions.
- Review and updating of CEDWW standard construction contracts to ensure compliance with Modern Slavery Act.
- Modern Slavery included as a permanent agenda item in Finance, Risk, Audit and Compliance Permanent Committee quarterly meetings and quarterly reporting.

Awareness Raising:

- ACAN Modern Slavery presentations provided to:
 - The Bishop of the Diocese of Wagga Wagga
 - Diocese of Wagga Wagga Consultors
 - Diocese of Wagga Wagga Catholic Education Council
 - Finance, Risk, Audit and Compliance Permanent Committee
 - All Catholic Schools Office management and staff
 - All CEDWW school Principals and Finance & Administration staff
- Completion of ACAN Modern Slavery Entity Profile to assist identifying areas that require focus or additional attention.
- Completion of ACAN Modern Slavery Entity Profile.

Supplier Engagement:

- CEDWW joined SEDEX for supplier assessment and supply chain visibility
- Development of CEDWW Modern Slavery Risk Management Plan that includes specific procurement risk assessment tool for completion by individual departments and schools
- Undertook procurement risk analysis exercise across key areas of CEDWW

CEDWW's 2023 Baseline Data:

The following table provides a summary of CEDWW's 2023 Baseline Data illustrating our efforts to mitigate our modern slavery risk.

	ACTIVITY	CEDWW
INTERNAL STAFF	Hours spent on modern slavery activities Individual staff completed e-learning	600
	Individual staff completed e-learning	0
	E-learning modules completed	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2629
	Number of suppliers with visible contact information and ABN	2177
	Number of suppliers across high-risk categories	1406
	Number of ACAN Supplier Surveys completed	179
	Supplier staff attending capacity building webinars	2
	Invited to join SEDEX	1
	Joined SEDEX	0
	SEDEX SAQ completed	0
	Social audits	0
Corrective actions	0	
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Remediation Process

CEDWW is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CEDWW is found to have caused or contributed to modern slavery.

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, CEDWW (along with all ACAN members) is a partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. By partnering with Domus 8.7, CEDWW can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and tracked.

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

Looking ahead to 2024

Having embarked on this journey, CEDWW is committed to providing an appropriate and timely remedy to people impacted by modern slavery. Our continued engagement with ACAN is a key resource for assisting us in meeting our legal and moral obligations.

This may involve providing for, or cooperating in, actions to address people's harm. It may also include addressing the root causes to mitigate future risks, if they are found to have caused or contributed to modern slavery.

Where CEDWW is found to be directly linked to modern slavery through a business relationship, it is committed to working with the entity that caused the harm to ensure remediation and mitigation occurs. Should the appropriate response by the third party not be appropriate, CEDWW will cease all dealings immediately. Remediation obligations are now included in contracts with high risk suppliers, which require notification and consultation with CEDWW to ensure victim-centred remediation processes are introduced.

When allegations of modern slavery come to our attention through whistleblowers or other channels, CEDWW will contact relevant law enforcement agencies, if a person is in immediate danger or Domus 8.7 to begin the remediation process.

Improving on what we do

We will develop and deliver a training program for our staff to increase their understanding and awareness of modern slavery risks within our operations and supply chain.

Educate and support high risk suppliers to understand their obligations under the Modern Slavery Act and our expectations.

Embed due diligence processes when engaging with new and existing suppliers.

Expand our incident management processes to include the ability to capture human rights and modern slavery breaches.

Utilise SEDEX to identify key suppliers and risks across CEDWW.

Engage with our high risk suppliers to assess their modern slavery practises.

Develop and disseminate our supplier Code of Conduct and enhance direct engagement with high risk suppliers.

Continue to bring awareness to modern slavery.

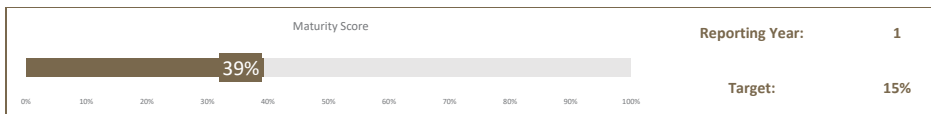




CRITERIA 5 - ASSESSING EFFECTIVENESS

In March 2023 CEDWW completed the ACAN/Vantage Modern Slavery - Gap Analysis survey to obtain an understanding of gaps and maturity level of the organisation. In January and February 2024 CEDWW completed the ACAN 2023 Entity Profile as part of ACAN's Modern Slavery Maturity Assessment process. CEDWW's overall assessment score of 39% is above the benchmark 15% for a Year 1 reporting entity; the assessment has identified areas that will need to be of focus for the year ahead, in particular internal worker engagement and supply chain.

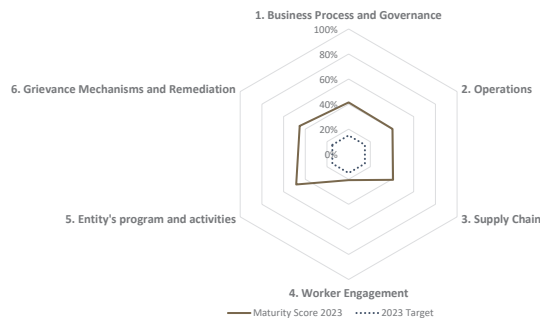
The below tables and charts provide a high level understanding of CEDWW's current level of maturity in managing modern slavery risk. The data shows that CEDWW has surpassed the target level of maturity in all areas with the exception of Worker Engagement Governance, an area that will be of immediate focus for the organisation.



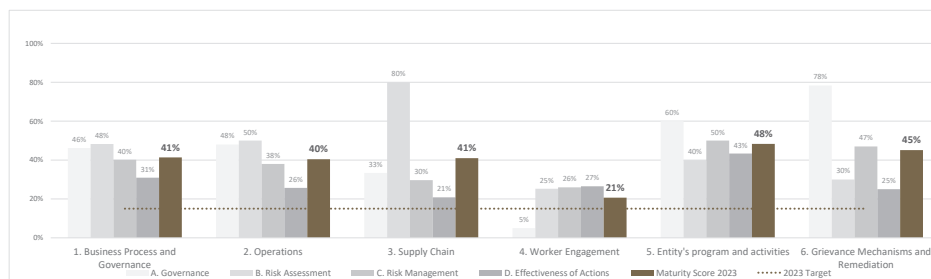
Catholic Education, Diocese of Wagga Wagga - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	46%	48%	40%	31%	41%
2. Operations	48%	50%	38%	26%	40%
3. Supply Chain	33%	80%	30%	21%	41%
4. Worker Engagement	5%	25%	26%	27%	21%
5. Entity's program and activities	60%	40%	50%	43%	48%
6. Grievance Mechanisms and Remediation	78%	30%	47%	25%	45%
Average	45%	46%	38%	29%	39%

Maturity Score 2023 individual scoring by pillar and sub pillar, including averages and total 2023 score



Maturity Score 2023 comparative to target and maximum scoring, by Pillar



Maturity Score 2023: comparative individual scoring by pillar and sub pillar

CRITERIA 6 - CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

CEDWW does not control or own other entities and thus does not report on this.

CRITERIA 7 - ANY OTHER RELEVANT INFORMATION

An example of Modern Slavery awareness posters in Construction Contractors lunchrooms and site offices in our schools undertaking construction works in 2023.



APPENDIX:

Catholic Education Diocese of Wagga Wagga comprises of the following 29 schools:



PRIMARY

- All Saints' Primary School, Tumbarumba
- Henschke Primary School, Wagga Wagga
- Holy Spirit Primary School, Lavington
- Holy Trinity Primary School, Wagga Wagga
- Mater Dei Primary School, Wagga Wagga
- Sacred Heart Primary School, Koorinal
- Sacred Heart Primary School, Tocumwal
- St Anne's Primary School, North Albury
- St Brendan's Primary School, Ganmain
- St Joseph's Primary School, Culcairn
- St Joseph's Primary School, Finley
- St Joseph's Primary School, Jerilderie
- St Joseph's Primary School, Junee
- St Joseph's Primary School, Leeton
- St Joseph's Primary School, Lockhart
- St Joseph's Primary School, Narrandera
- St Joseph's Primary School, Wagga Wagga
- St Mary's Primary School, Corowa
- St Mary's Primary School, Yoogali
- St Michael's Primary School, Coolamon
- St Patrick's Parish School, Albury
- St Patrick's Primary School, Griffith
- St Patrick's Primary School, Holbrook
- St Peter's Primary School, Coleambally


SECONDARY:

- Kildare Catholic College, Wagga Wagga
- Marian Catholic College, Griffith
- Mater Dei Catholic College, Wagga Wagga
- St Francis De Sales Regional College, Leeton
- Xavier High School, North Albury

BOARDING HOUSES:

- Mount Erin Boarding, Wagga Wagga
- St Francis De Sales Regional College Boarding House, Leeton



Catholic 
Education
Diocese of Wagga Wagga

Modern Slavery Statement 2023



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Disclosure Note

This statement has been made on behalf of Catholic Education Diocese of Bathurst. This Statement covers all entities owned or controlled by Catholic Education Diocese of Bathurst.

Covering the reporting period 1 January 2023 to 31 December 2023 this statement focuses solely on work performed by the Catholic Education Diocese of Bathurst.

CEDB Office

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We acknowledge the Wiradjuri, Gamilaraay and Wailwan peoples, the traditional custodians of the lands on which our parishes, schools and offices reside. We also pay our respects to elders past and present.



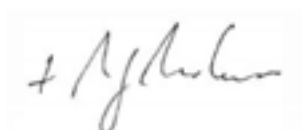


Statement from the Bishop of the Diocese of Bathurst and the Executive Director of Schools

This Modern Slavery Statement and Endorsement was approved by Bishop Michael McKenna, the Bishop of the Diocese of Bathurst, and Responsible Person as defined by the Act, on behalf of the governing body - The Trustees for the Diocese of Bathurst on 18/06/2024.

Those of us who have responsibility for the stewardship of goods need to develop a practical alertness to supply chains that may be compromised by links to modern slavery and human trafficking. Our Diocese and schools are committed to this vigilance and the responsible practices that it leads us to adopt. Pope Francis has written powerfully, on a number of occasions, about the scourge of modern slavery.

“Today, as in the past, slavery is rooted in a notion of the human person which allows him or her to be treated as an object. Whenever sin corrupts the human heart and distances us from our Creator and our neighbours, the latter are no longer regarded as beings of equal dignity, as brothers or sisters sharing a common humanity, but rather as objects. Whether by coercion or deception, or by physical or psychological duress, human persons created in the image and likeness of God are deprived of their freedom, sold and reduced to being the property of others. They are treated as means to an end.” - Pope Francis



Most Rev Michael McKenna
Bishop of Bathurst

This Modern Slavery Statement and Endorsement was approved by Mrs Christina Trimble, the Executive Director of Schools Bathurst Diocese, and Responsible Person as defined by the Act, on behalf of the governing body - Catholic Education Diocese of Bathurst on 18/06/2024.

Action against modern slavery is fundamental to Catholic Social Teaching. As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain our reputation as an ethical organisation which generates confidence in our service to the community.

We acknowledge the impact that commercial activities, including ours, can have on vulnerable people through modern slavery practices.

We have a responsibility to take practical action to manage risk in our operations and supply chains.



Christina Trimble
Executive Director of Schools



About Us

Catholic Education in the Diocese of Bathurst (CEDB) provides a diverse range of educational options, from small primary schools to large secondary schools. More than 10,000 students attend 33 Catholic schools in the diocese, enjoying high educational standards in contemporary, Christ-centred learning environments. In partnership with parents and parishes, our schools nurture a relationship with Jesus, educate for academic excellence and prepare students for lifelong service in a faith-centred community.

Catholic schools are first and foremost religious schools. Our Catholic schools provide a unique opportunity for students to grow, both in relationship with God, and also in knowledge, understanding, wisdom and life skills, in a way that promotes the integration of their faith and their daily lives.

Mission

Excellence in education within a Christ-centred environment in which all flourish.

Vision

An inclusive, innovative system of Catholic schools where lives are transformed through witness to Christ.

Strategic Intent

Faith:

- Formation for the mission of Catholic education
- Religious education inspires and challenges students to seek truth and make meaning
- Engaging and collaborating with parents and parish in the spiritual formation of children and young people.

Learning:

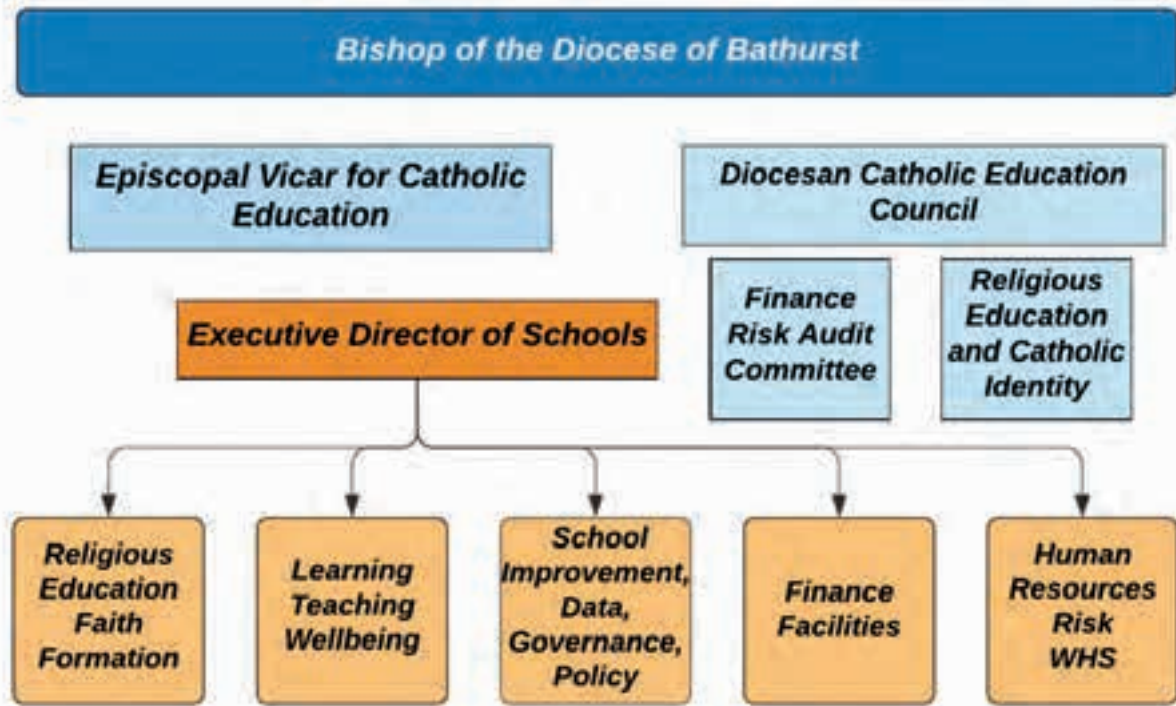
- Learning that engages students as lifelong learners and creative and critical thinkers
- A proactive focus on wellbeing that supports the learning of all students
- Building collaborative expertise of all teachers to continually improve their practice

Stewardship:

- Building leadership capacity for a sustainable future
- The effective use of data to support system priorities and drive system and school improvement
- Systems are streamlined, aligned and effective

Structure, Operations and Supply Chains

Our Organisational Structure



Our Governance Framework

Catholic Education Diocese of Bathurst at all levels of management, are committed to maintaining and enhancing strong governance. Our Governance Risk Structure underpins our vision to provide high quality Catholic Education in the Diocese of Bathurst.

The Leadership Team, who oversee the governance and review of activities in the areas of Faith, Learning and Teaching, Stewardship, and School Improvement, also reviews anti-slavery initiatives.

In relation to modern slavery risk management the Leadership Team:

- reviews policy and procedures
- monitors the effectiveness of the management system and risk framework
- maintains knowledge of risks relevant to modern slavery
- ensures appropriate training is undertaken throughout the system
- requests suppliers use diligence in addressing modern slavery procurement
- share the Self-Assessment Questionnaire results with CEDB, DCEC and FRAC and RECI as required
- reports to the Bishop on the effective management of modern slavery initiatives.

The Modern Slavery Working Group operates across a number of teams but members are mainly located in Human Resources, Risk, WHS, Governance and Finance and Facilities teams



Our People

The staff employed through Catholic Education Diocese of Bathurst come from a wide range of backgrounds, nationalities and experiences. They live in small communities, remote locations, rural areas, and large cities. They range from those newly graduated to those preparing for retirement after a lifetime of service.

The staff headcount is 2000 with these being composed of permanent temporary and casual employees. The staff gender balance is approximately 80% female and 20% male. Staff are employed who are immigrants, disabled, and/or indigenous.

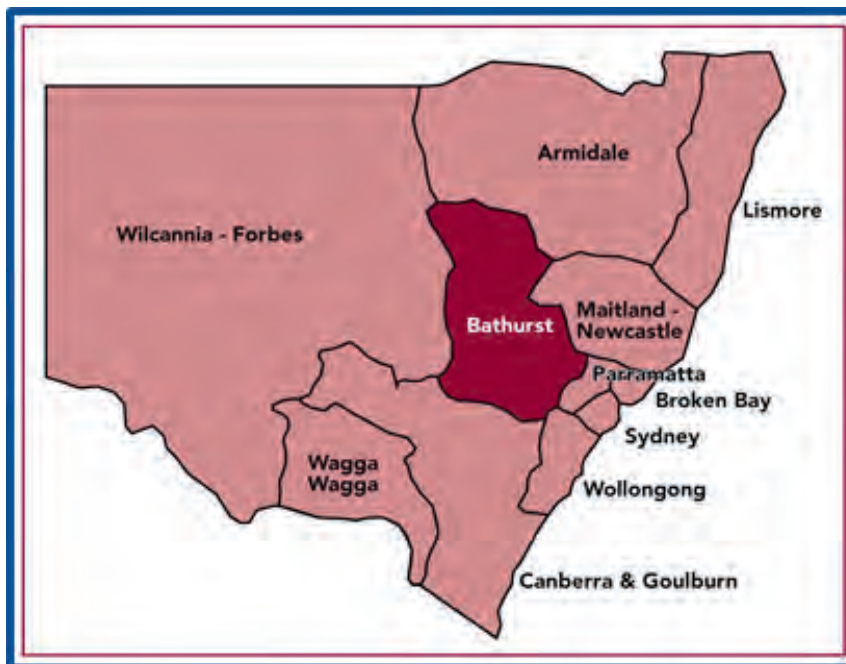
All staff are employed under the current applicable award conditions.

Staff have a number of avenues they can use if they have queries or issues in relation to their employment or conditions. They are encouraged to maintain professional, open and productive relationships with their Principal or Team Leader so issues can be addressed in a positive, timely and fair manner.

These avenues are supported by a range of policies and guidelines which are readily available and regularly reviewed and in line with the regulatory requirements. Staff are encouraged to have union support and work towards resolving issues and improving workplace practices for all employees.

Our Location

The Bathurst Diocese is located in the Central West of New South Wales, Australia, with the head office being in Bathurst. The Diocese covers a large part of the state from Cowra in the South to Coonamble and Baradine in the north, from Eugowra in the west to Lithgow in the east. It includes the three large cities of Bathurst, Orange and Dubbo; regional centres CEDBres such as Cowra, Wellington and Lithgow; and small, rural and isolated communities.



Our Operations

Catholic Education Diocese of Bathurst is engaged in providing high quality Catholic education to students from Kindergarten to Year 12 in the Bathurst Diocese. The Diocese has 33 schools which are either Primary schools - Kindergarten to Year Six; Central Schools - Kindergarten to Year Ten, or Kindergarten to Year Twelve; or Secondary Schools - Year Seven to Year Twelve.

Catholic Education Diocese of Bathurst permanently employs approximately 1800 staff and educates over 10,000 students. The diocese caters for families in 17 parish centres.

Historically the diocese has had a wide variety of arrangements for the supply of goods and services to schools and the two CEDB offices. These arrangements had been developed to address the needs of school communities and often involved local purchasing and arrangements which maintained supplies and employment in the local community.

Our Supply Chain

CEDB has 2813 direct suppliers that provide goods and services to our system of schools with the greatest spend in:

- Building and construction (352 suppliers) representing **24%**
- Professional services (197 suppliers) representing **12.8%**
- Furniture and office supplies (849 suppliers) representing **12.7%**
- Facility management and property maintenance (276 suppliers) representing **9.2%**
- Events and event management (268 suppliers) representing **6.2%**

CEDB suppliers are usually located in Australia. It is not common practice to source goods and services directly from overseas suppliers. However, CEDB’s Australian suppliers may source goods and materials from overseas suppliers.

In the last decade diocesan procurement has become more widespread with the supply of goods and services based on ‘fit for purpose’ procurement and assisting with reducing the procurement burden upon school Principals and school administration staff.

CEDB is integrated into the Catholic Diocese of Bathurst and is a direct employer of teachers, administration staff, and support staff. Some contractors are also engaged and are usually employed in the construction, building or cleaning services sectors.

CEDB works collaboratively with other Catholic agencies such as Bathurst Catholic Chancery, Centacare and Catholic Development Fund.

CEDB has an annual turnover of over \$202 million.





Modern Slavery Risks

CEDB relies upon a range of networks to meet the needs of communities, schools and CEDB offices. It is important to identify risks and take action to mitigate or rectify these risks. CEDB, as a business, is responsible for ensuring that risks are addressed in operations, in supply chains, and throughout the CEDB communities.

CEDB as a business assesses risk in all its activities, but specific focus is placed upon higher-risk activities, operations, supply chains and contractor engagement. These include:

- Sector and industry risks: Specific sectors and industries have higher modern slavery risks because of their characteristics, products and processes
- Product and services risks: Specific products and services have higher modern slavery risks because of the way they are produced, provided or used
- Geographic risks: Specific countries have higher risks of modern slavery, due to poor governance, weak laws, conflict, migration flows and socio-economic conditions
- Entity risks: Some entities have particular modern slavery risks because they have poor governance structures, historically treat workers poorly or have a record of human rights violations

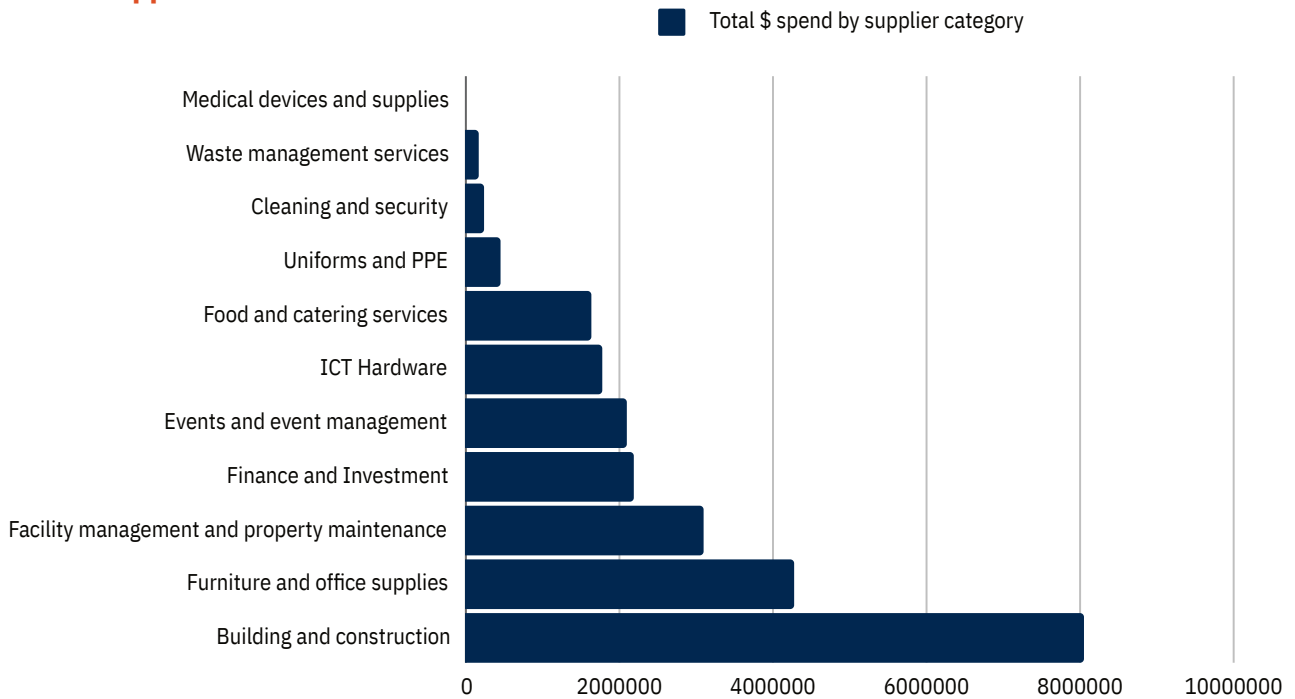
Although assessing risk is a useful tool, modern slavery risks can also occur in areas that seem low risk. Continually reviewing risks to identify changes is a vital component to addressing and eradicating Modern Slavery.

Our Suppliers

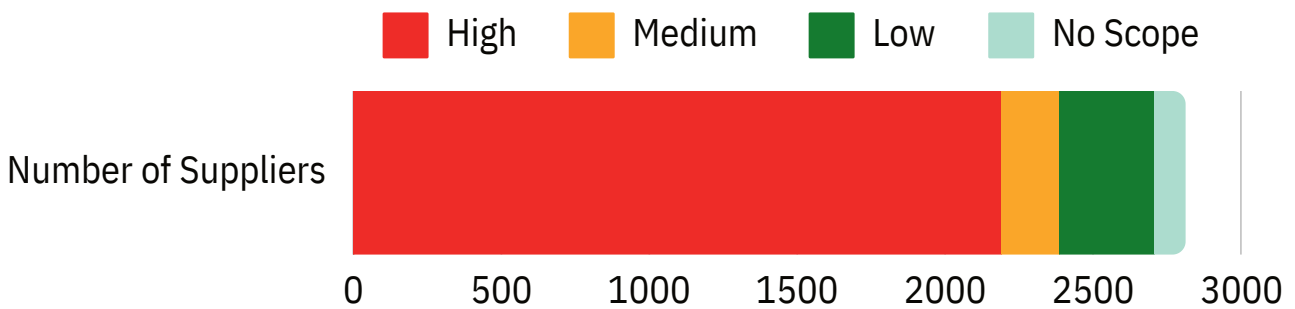
Supplier Category	No of Suppliers
Furniture and office supplies	849
Building and construction	352
Food and catering services	289
Facility management and property maintenance	276
Events and event management	268
Professional services	197
License / membership fees	115
Uniforms and PPE	96
Travel and accommodation	65
Advertising & Marketing	57
Cleaning and Security	29
Utilities	23
Print / Mail Provider	21
Payroll	19
Waste management services	16
Fleet management, consumables and maintenance	15
ICT Software and network services	14
Government and agency fees	11
Finance and Investment	8
Pastoral	8
ICT Hardware	6
Medical devices and supplies	1



Our Suppliers



Supplier Risk



Actions Taken to Assess and Address Modern Slavery Risks

During the reporting period, the designated CEDB (MSLO) participated in the ACAN Program activities, webinars and training sessions.

CEDB participated in the ACAN supplier engagement plan identifying common suppliers shared across multiple Catholic school systems. Through sharing data, CEDB helped reduce duplication of supplier engagement from multiple Catholic school systems.

CEDB supported suppliers by providing consistent information about expectations. The ACAN supplier webinar series assisted suppliers to gain an understanding of modern slavery in relation to:

- Business relevance and the Modern Slavery Act
- Catholic customer/buyer expectations
- How to access ACAN e-learning
- SEDEX supplier membership

CEDB followed the ACAN Program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

- i. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
- ii. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with existing SEDEX membership
 - suppliers willing to join SEDEX
 - suppliers not required by CEDB to join SEDEX
- iii. Suppliers were assisted to join SEDEX and provided support to complete the SEDEX Self-Assessment Questionnaires (SAQ).
- iv. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

The metrics in the table provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions and provides a baseline for CEDB to set future direction.

The ACAN Supplier Survey was completed by 128 suppliers to CEDB. Of those suppliers, 45 suppliers were invited to join SEDEX and complete the SEDEX Self-Assessment Questionnaire.

27 suppliers joined Sedex and connected with the CEDB Sedex account, providing CEDB with access and insights into both SAQ results and social audit reports.



Summary

	ACTIVITY	CEDB 2023
INTERNAL / STAFF	Hours spent on modern slavery activities	120
	Individual staff completed e-learning	0
	E-learning modules completed	0
	Total number of suppliers	3251
	Number of suppliers across high-risk categories	1755
	Number of ACAN Supplier Surveys completed	128
EXTERNAL / SUPPLIER ENGAGEMENT	Supplier staff attending capacity building webinars	11
	Invited to join Sedex	45
	Joined Sedex	27
	Sedex SAQ completed	8
	Social audits	1
	Corrective actions	0
	Contacts made via worker voice / grievance mechanism	0
DOMUS 8.7 EXTERNAL REFERRALS	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

SEDEX

Supplier Ethical Data Exchange platform (SEDEX) is the largest collaborative platform for sharing ethical supply chain data. SEDEX is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

SEDEX provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of SEDEX, CEDB can utilise services and resources aimed at managing supply chain risks, fostering supplier engagement, and promoting ethical and sustainable business practices. SEDEX benefits to CEDB:

- **Enhanced transparency:** SEDEX offers a secure online platform for companies to exchange information regarding their ethical and environmental performance with stakeholders, suppliers, and customers. This fosters trust and confidence throughout the business and its supply chain.
- **Improved risk management:** SEDEX equips businesses with tools to identify and address risks within their supply chains, such as labor rights violations, environmental breaches, and instances of corruption. This proactive approach can mitigate the likelihood of reputational harm, legal ramifications, and supply chain disruptions.
- **Heightened efficiency:** SEDEX provides standardised templates and resources for suppliers to report on their ethical and environmental practices, streamlining the reporting process and alleviating administrative burdens for businesses.

- **Access to expertise:** SEDEX offers training, support materials, and guidance on ethical and sustainable practices, empowering businesses to enhance their performance and comply with legal and regulatory requirements.

Remediation

CEDB is committed to ensuring it provides appropriate and timely responses to people impacted by modern slavery. This includes actions to address harm to people and root causes to mitigate future risks if CEDB is found to have caused or contributed to modern slavery.

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, CEDB, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery.

By partnering with Domus 8.7 CEDB can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Assessing Effectiveness

In 2023, CEDB transitioned from undertaking an annual Gap Analysis exercise towards a focus on assessing the maturity of our modern slavery risk management approach.

This transition underscores the importance of assessing CEDB’s embedding of risk management controls. The maturity assessment provides a comprehensive view of our efforts across different key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity’s Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing issues

In line with best practice and reporting requirements, CEDB measures the maturity across governance, risk assessment, risk management, and effectiveness measures. This evaluation helps identify strengths and weaknesses in CEDB’s approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy-measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Maturity Score



2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	37%	39%	31%	33%	40%
2. Operations	40%	50%	26%	20%	34%
3. Supply Chain	0%	80%	8%	14%	26%
4. Worker Engagement	6%	71%	26%	31%	34%
5. Entity's program and activities	65%	25%	50%	36%	44%
6. Grievance Mechanisms and Remediation	70%	60%	46%	33%	52%
Average	36%	58%	31%	28%	38%



2024 Commitment of Actions - Entity Profile

The Entity has committed to the following actions on their 2023 Entity Profile:

Action 1	Adopt a Cleaning contractor framework
Action 2	Engage with all suppliers on minimum modern slavery criteria
Action 3	Open modern slavery e-learning to middle leaders





Consultation with Owned or Controlled Entities

The CEDB actively communicates and consults with Principals and other key school personnel to enhance awareness on Modern Slavery Risks and best practice.

CEDB Schools

- St John's Catholic Primary School, Baradine
- The Assumption Catholic Primary School, Bathurst
- Cathedral Catholic Primary School, Bathurst
- Holy Family Catholic Primary School, Bathurst
- MacKillop College, Bathurst
- St Philomena's Catholic Primary School, Bathurst
- St Joseph's Catholic Primary School, Blayney
- St Edward's Catholic Primary School, Canowindra
- Sacred Heart Catholic Primary School, Coolah
- St Lawrence's Catholic Primary School, Coonabarabran
- St Brigid's Catholic Primary School, Coonamble
- St Raphael's Catholic School, Cowra
- St Johns College, Dubbo
- St John's Catholic Primary School, Dubbo
- St Laurence's Catholic Primary School, Dubbo
- St Mary's Catholic Primary School, Dubbo
- St Pius X Catholic Primary School, Dubbo
- St Michael's Catholic Primary School, Dunedoo
- St Joseph's Catholic Primary School, Eugowra
- St Joseph's Catholic Primary School, Gilgandra
- All Hallows Catholic Primary School, Gulgong
- La Salle Academy, Lithgow
- St Patrick's Catholic Primary School, Lithgow
- St Joseph's Catholic Primary School, Manildra
- St Joseph's Catholic Primary School, Molong
- St Matthews Catholic School, Mudgee
- St Joseph's Catholic School, Oberon
- Catherine McAuley Catholic Primary School, Orange
- James Sheahan Catholic High School, Orange
- St Mary's Catholic Primary School, Orange
- St Joseph's Catholic Primary School, Portland
- St Mary's Catholic School, Wellington
- St Columba's Catholic Primary School, Yeoval



CEDB Office

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DIOCESE OF
LISMORE
CATHOLIC SCHOOLS LIMITED

Modern Slavery Statement

1 January – 31 December 2023



Disclosure Note

This statement has been made on behalf of the Diocese of Lismore Catholic Schools Limited (DLCSL). This Statement covers all entities owned or controlled by DLCSL.

ABN 93 638 070 836

Modern Slavery Statement 2023 Approval



The DLCSL Board remains steadfast in its resolve to combat Modern Slavery. We continue to work, within our evolving governance model, to achieve elimination of serious exploitation in our supply chains.

The Board understands that ending Modern Slavery requires sustained effort, and that ongoing and targeted diligence is a key to achieving this important goal.

A handwritten signature in black ink, appearing to be 'J. Hannaford', written over a white background.

The Hon John Hannaford AM
DLCSL Board Chair

Our involvement in the Australian Catholic Anti-Slavery Network (ACAN) guides our modern slavery risk management program, which is targeted to risks to people in supply chains and operations.

DLCSL's ongoing participation in ACAN, and the measures described in this statement, are positive initiatives that will lead to real and meaningful outcomes as we work to address Modern Slavery in our supply chain.

I am committed to leading our community of schools in taking these fundamental steps towards achieving our Catholic values of care, dignity and respect for all.



A handwritten signature in black ink, appearing to be 'A. Spencer', written over a white background.

Mr Adam Spencer
Director of Catholic Schools/Chief Executive Officer

The Modern Slavery Statement was approved by the principal governing body of the Diocese of Lismore Catholic Schools Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 24 June 2024. This Modern Slavery Statement is signed by a responsible member of the Diocese of Catholic Schools Limited as defined by the Act.

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About Diocese of Lismore Catholic Schools

About us

In July 2020, Diocese of Lismore Catholic Schools Limited (DLCSL) was established, and this signalled the largest organisational change in Catholic education in the Diocese of Lismore since the establishment of the systemic model in the 1970s to assist parish schools with the delivery of curriculum and catechetical programs, administration and compliance. This model complemented the highly decentralised parish-based approach to the governance and operation of schools.

The establishment of DLCSL has been a long and complex journey. The transition towards a governance and operational model has been substantial but much of it has been behind the scenes in building the foundations that DLCSL needs to be successful. There are still significant elements that need to be resolved, and this has brought us to a new phase in our governance model, identifying our Strategic Directions and outlining the priorities for our organisation over a four (4) year period (2021-2024). This strategy will support the organisation in making the operational changes required to address Modern Slavery in our supply chain.

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south, and west to the foothills of the Great Dividing Range. DLCSL operating through the Catholic Schools Office (CSO) provides a range of services to support approximately 2,600 staff in 45 vibrant and dynamic school communities that serve more than 18,000 students (August 2023).

Under the pastoral leadership of the Bishop of Lismore, the Most Reverend Greg Homeming OCD, we work together to support schools to provide faith-filled, inclusive and caring environments that allow young people to grow in their faith and better understand the mission of Jesus Christ. This is achieved through Religious Education, faith formation, liturgical celebrations, sacramental programs, pastoral care and support.

The Diocese of Lismore's Mission is, "[e]nabling our students to achieve the fullness of life". Our vision is to "[a]ccompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community."

Genuine partnerships with parents, Parish Priests, Principals and school communities actively support our Catholic schools in educating students. Our Catholic schools offer rich, deep and varied learning experiences to our students so they may achieve a fullness of life.

The CSO assists schools to build teaching and leadership capabilities in communities of professional educators who share responsibility for school improvement and for achieving the best outcomes for our students.

These values and our partnerships not only support our Catholic schools in educating students but will support the Diocese's commitment to identify modern slavery practices and mitigate modern slavery risk.

Diocese of Lismore Catholic Schools Limited (DLCSL) is an ACNC registered charity:

Location: Head Office, 3 Dawson Street, Lismore NSW 2480.

Phone: 02 6622 0422

Website: <https://www.lism.catholic.edu.au>

Email: admin@dlcsl.catholic.edu.au

2023 Modern Slavery Risk Management Initiatives

To support an awareness of Modern Slavery Risk throughout our organisation the following initiatives and/or actions were identified and carried out during 2023.

- Shared supplier spend data.
- Identified suppliers who joined Sedex and completed Self-Assessment Questionnaires.
- Provided quarterly reports to the DLCSL Board Audit and Risk Committee on Modern Slavery.
- Staff participation in ACAN webinars.
- Finalised the roll out of Technology One across remaining schools.

Our Plans for 2024

To further our commitment to eliminating modern slavery in our supply chains and meeting our legislative requirements, DLCSL has identified the following priorities:

- Roll out ACAN modern slavery training modules to key staff (i.e. Working Group members, Business Partners, Managers and Leads). Particular attention is to be given to staff members outside the CSO, responsible for purchasing decisions in Diocesan schools.
- Incorporate modern slavery reporting requirements in relation to the categorisation of supplier spend into existing procurement policies and procedures. Actions taken to include the categorisation of all existing suppliers and the inclusion of a categorisation mechanism in the on-boarding of new suppliers.
- Increase utilisation of Sedex to develop a preferred supplier listing. Audit to be taken of existing suppliers registered with Sedex accompanied by a top down approach based on 2023 spend of unregistered suppliers, informing them of the mutual benefit of registering with this platform.

Our Organisational Structure

Trustees of the Roman Catholic Church for the Diocese of Lismore was formed on 5 May 1887, initially as the Diocese of Grafton, and changed to the current name in 1900.

On 16 December 2019, Diocese of Lismore Catholic School Limited (DLCSL) was created by a resolution of the Trustees. The Catholic Schools Office (CSO) is the operational arm of DLCSL and assumed control from 1 July 2020.



Our Governance Framework



In recent years there has been ever-increasing compliance and legal requirements from Governments and regulatory bodies to ensure the delivery of high-quality education in a safe environment for students and those who work in our schools. These complex regulations have placed significant burdens on individual Parishes under the previous governance model.

Progressing the Mission of Catholic education in the Diocese of Lismore is embodied in its Mission and Vision Statement, "enabling students to achieve the fullness of life" (John 10:10) through supporting our schools to accompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community".

DLCSL is a not-for-profit public company limited by guarantee, established by the Diocesan Trustees to govern, administer and conduct Catholic schools within the Diocese of Lismore in the spirit of our Mission. DLCSL has responsibility for all governance issues in schools including compliance and regulatory matters. The Diocesan Trustees have appointed a Board of Directors who take responsibility for the implementation of the new governance structure for delivering Catholic education, in accordance with the Constitution of DLCSL.

The DLCSL Board has approved a number of key roles, teams and committees to assist the work of the Board in fulfilling its responsibilities and assist in the transition to the new model of governance. This will further enhance DLCSL's ability to manage and mitigate a number of risks as an enterprise regarding modern slavery.

The DLCSL Board has responsibility for the governance of the business and subsequently has established six (6) Committees to ensure that the Board has effective mechanisms to deal with specific issues that require specialised areas of expertise.

1. Mission and Culture Committee
2. Education Committee
3. Finance Committee
4. Audit and Risk Committee
5. Nomination and Employment Relations Committee
6. Diocesan Schools Planning Committee

Our Operations

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south and west to the foothills of the Great Dividing Range.

The Diocese of Lismore Catholic Schools Limited (DLCSL) provides a range of services to support approximately 2,500 staff in 45 vibrant and dynamic school communities that serve approximately 18,000 students. Annual revenue \$379M with employee related expenses of \$306M.

The 45 systemic schools (34 primary and 11 secondary) exist as their own entities and are registered with ACNC as a charity.

The schools are:

- | | |
|--|--|
| St Joseph's Primary School Alstonville | St Finbarr's Primary School Byron Bay, |
| St Francis Xavier Primary School Ballina | St Mary's Primary School Casino |
| Xavier Catholic College Ballina | St Mary's Catholic College Casino, |
| St James' Primary School Banora Point, | St Augustine's Primary School Coffs Harbour, |
| St Joseph's College Banora Point, | St John Paul College Coffs Harbour, |
| St Mary's Primary School Bellingen, | St Joseph's Primary School Coraki, |
| St Mary's Primary School Bowraville, | Mount St John Primary School Dorrigo, |

St Mary's Primary School Grafton,
 McAuley Catholic College Grafton,
 St Joseph's Primary School South Grafton,
 St Joseph's Primary School Kempsey,
 St Paul's College Kempsey,
 St Anthony's Primary School Kingscliff,
 St Brigid's Primary School Kyogle,
 St Joseph's Primary School Laurieton,
 St Carthage's Primary School Lismore,
 St John's College Lismore,
 Our Lady Help of Christians Primary School
 South Lismore,
 St Patrick's Primary School Macksville,
 St Joseph's Primary School Maclean,
 St John's Primary School Mullumbimby,
 Mount St Patrick Primary School
 Murwillumbah,
 Mount St Patrick College Murwillumbah,

St Joseph's Primary School South
 Murwillumbah,
 St Agnes' Primary School Port Macquarie,
 St Joseph's Primary School Port Macquarie,
 St Peter's Primary School Port Macquarie,
 MacKillop College Port Macquarie,
 Newman Senior Technical College
 Port Macquarie,
 St Joseph's Regional College Port Macquarie,
 St Ambrose Catholic Primary School
 Pottsville,
 Mary Help of Christians Primary School
 Sawtell,
 Holy Family Catholic Primary School
 Skennars Head,
 St Joseph's Primary School Tweed Heads,
 St Joseph's Primary School Wauchope,
 St Joseph's Primary School Woodburn,
 St Francis Xavier Primary School Woolgoolga,
 St James' Primary School Yamba.



Our Supply Chain

Like many other large organisations, we recognise that modern slavery is pervasive across all sectors and, therefore, may exist somewhere in our supply chain and operations. We manage multiple education facilities in a large range of demographics, with dedicated funding from a variety of sources. As such, procurement has been dispersed and siloed. This has resulted in a large number of suppliers, many with low spend, who are engaged within a variety of ways.

Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty and lacks transparency. At this stage, the lack of visibility beyond tier one of suppliers is the biggest risk to DLCSL of modern slavery. Mitigating this risk is

an evolving process as we better understand our suppliers and supply chain in respect to modern slavery. Further, more staff are aware of the issue of modern slavery, it is expected that the risks will become better understood and targeted.

The DLCSL supply chain includes products and services (including labour) that contribute to and enable the DLCSL to deliver quality education to students. In 2023, procurement services completed the complex task of mapping and analysing our supplier spend. The legacy system presents some data quality issues which has been mitigated with the rollout of the Technology One which will provide greater categorisation and a deeper granular view of spend profiles.

Key information includes supplier names, geographic location and categorised spend. Supply chain data will now be used as a tool to not only identify modern slavery risks, but to also drive better procurement outcomes.

To further enhance and extend the accuracy of spend data, Technology One will assist over time by making extraction of data and categorisation of spend simpler.

Criteria 3: *Modern Slavery Risks*

Operational Risks

The work to date to introduce a governance and operational model across DLCSL has been substantial and a change management program is being rolled out as a phased approach over a four (4) year period to 2024. A four (4) year Strategic Plan has been developed and a dedicated Transformation Team are working with staff across DLCSL in implementing strategic initiatives at an operational level as part of a change management and process improvement program. These operational changes will be instrumental in addressing modern slavery risks in our supply chain.

We continue as an organisation to roll-out our Risk Management Framework and work to embed the framework is ongoing. Elements of modern slavery risk continue to be identified and a program of control improvement is ongoing.

Our People



DLCSL employs approximately 2600 people across all entities who perform a range of roles with the primary purpose of education within the Diocese. The vast majority are employed on a continuing basis with a very low percentage of contingent workforce.

Our workforce has a gender balance of 74% female and 26% male.

DLCSL has a range of policies and procedures in place to cover industrial and whistleblower legislative requirements. Policies and procedures are subject to a cyclical review, with internal review processes involving collaboration with a range of stakeholders.

Human Resources also works with Catholic Employment Relations and the Independent Education Union to ensure that enterprise agreements and employment contracts comply with applicable legislation.

High Risk Categories Spend for 2023:

Category	Count of Suppliers	Sum of Total
High	528	\$14,690,785.71
Building and Construction	45	\$2,284,701.98
Cleaning and Security	12	\$457,681.69
Events and Event Management	77	\$806,162.13
Facility Management and Property Maintenance	73	\$3,599,866.16
Finance and Investment	12	\$219,276.13
Food and Catering Services	27	\$470,443.83
Furniture and Office Supplies	202	\$2,038,293.25
ICT Hardware	39	\$3,887,417.07
Labour Hire	12	\$459,073.42
Linen, Laundry and Textile Products	2	\$170,108.73
Medical Devices and Supplies	5	\$127,102.15
Uniforms and PPE	21	\$169,906.77
Waste Management Services	1	\$752.40

Criteria 4:

Actions taken to assess and address risk

The focus for 2023 was the development of a governance framework which includes management of Modern Slavery Risk as an organisation.

The Modern Slavery Roadmap was tabled to the Audit and Risk Committee and the Board with the Board confirming its commitment to the eradication of Modern Slavery Risk.

Development and drafting of a Modern Slavery Policy commenced in 2022, with collaboration and input from a range of stakeholders within the organisation.

The organisation continued to utilise updated agreement templates for goods and services to include clauses on modern slavery and utilises the resources from ACAN for the following actions:

- If DLCSL becomes aware of a possible breach of the Act, and due to the complexity of remediation, we will adopt the Domus 8.7 process of remediation as developed by ACAN. Domus 8.7 covers the need for specialist resources to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery.
- The DLCSL remediation efforts, if required, may need to be enhanced through further policy development, detailed response procedures and engagement with Domus 8.7 and stakeholders. By utilising Domus 8.7, DLCSL can better support people impacted by modern slavery to achieve meaningful outcomes.

The ongoing work as a member of ACAN has enabled greater insight into modern slavery risk in our operations and supply chain. This included:

- Monthly peer meetings;
- Support with mapping suppliers;
- Internal staff training;
- Drafting various procedures, policies and guidelines; and
- MSLO participation in ACAN meetings/workshops throughout the year.
- Continued participation in the ACAN risk management program.

Our Modern Slavery Action Plan initiatives during 2023 have seen some improvement at the completion of 2023.

Modern slavery action plan and road map

High Risk Procurement Categories

Category	Planned Actions	Progress
Management systems	ARC reports Quarterly Dashboard report from Functional Risk Register	Audit and Risk Committee quarterly reporting regime established
	Develop Modern Slavery Risk Register	Progressing
	Dashboard Risk Reports	Progressing
	Leader article	Ongoing
	Integration with Risk Registers and control improvement plans	Ongoing
	Risk Management Framework	Framework developed Implementation underway
Risk Management	Functional Risk Register development	Progressing
Human Resources and Recruitment	Introduce Modern Slavery Risk into Induction Program	ACAN training being reviewed to determine fitness for purpose
Procurement and Supply Chain	Review procurement policy	Progressing

Criteria 5:

Effectiveness Assessment

Effectiveness

An analysis of our Sedex Supplier engagement by High Risk Categories for 2023:

Category	Count of Suppliers	Count of Supplier Survey	Count of Sedex
High	528	96	23
Building and Construction	45	9	4
Cleaning and Security	12	4	2
Events and Event Management	77	11	1
Facility Management and Property Maintenance	73	4	5
Finance and Investment	12	6	-
Food and Catering Services	27	3	-
Furniture and Office Supplies	202	48	8
ICT Hardware	39	6	1
Labour Hire	12	-	-
Linen, Laundry and Textile Products	2	-	1
Medical Devices and Supplies	5	2	-
Uniforms and PPE	21	3	1
Waste Management Services	1	-	-

This data provides the baseline as we move forward into 2024 and beyond, as 2023 was the first year that the DLCSL actively participated in Sedex and Supplier Self Assessments with our suppliers.

As our organisation matures in its approach to a centralised management of our Supply Chain, we will focus on increasing our engagement in this area.

Our Plans Beyond 2024

DLCSL will plan and implement actions and initiatives to ensure that it continues in its progress towards the eradication of modern slavery from any of its activities.

- Reduction in the number of suppliers through a centralised strategic procurement model incorporating the use of preferred supplier panels;
- Implementation of supplier categorisation to improve reporting on supplier spend, with a focus on ACAN advised ‘High Risk’ categories;

- Target suppliers with high risk categories for modern slavery – construction, cleaning and uniform supply and invite these suppliers to join Sedex and complete the Self-Assessment Questionnaire (SAQ).

While there is extensive work being done to understand and value the respect for human rights, this area is still maturing.

Certain processes within our supply chain, as well as ongoing participation in ACAN will provide us with a mechanism to help track the effectiveness of our actions. For example, where a supplier may have been subject to an ethical audit, and detailed action plans have been put in place to address findings, we will work with the supplier to ensure that the action plans identified are implemented in a timely manner.

We will undertake monitoring of our supply chain at progressive stages, followed by a future audit to ensure that our actions are effective, sustainable and permanent. This provides us with the assurance that our actions will support improved working conditions for the employees involved and validates the effectiveness of our actions on the ground.

The development, drafting and inclusion of a modern slavery clause in all contracts for the supply of goods and services to DLCSL has ensured that DLCSL is not only complying with ACAN requirements, but is also addressing supply chain risks in accordance with the adopted Risk Management Framework. The modern slavery clause is drafted in a manner that places the onus on the provider of goods and services to ensure that risks related to modern slavery in the practices of operations and supply chains used in the provision of goods and services are identified, assessed and addressed.

The modern slavery clause further places a contractual requirement on the provider of goods and services to address or remove any practices that are identified in relation to the performance of the agreement or contract, including addressing practices of other entities in its supply chain.

Recent negotiations relating to the drafting of contracts and the inclusion of the modern slavery clause has been met favourably by solicitors representing providers. A mutual understanding of the risks related to modern slavery, and of the underlying reasoning for the inclusion of such a clause enables DLCSL to be assured that appropriate practices are utilised in the procurement process.

These activities will lead to development of metrics which can be used to gauge the efficiency moving forward.

Our progress regarding modern slavery will be a key task for the DLCSL Board Finance, Audit & Risk Committee, and it will support our strategic initiatives in monitoring the supply chain.

As we build capability and resources, we will conduct forums on supplier engagement, risk and assurance activities which will provide a dialogue on the consistency of practice and shared learnings. We will continue to explore further mechanisms via our membership in ACAN to assess the effectiveness of actions we undertake to address modern slavery.

Criteria 6:

Consultation with Owned or Controlled Entities

No entities owned or controlled by DLCSL.

Criteria 7:

Any Other Relevant Information

Nil.



2023 MODERN SLAVERY STATEMENT



Catholic
Schools
NSW



Acknowledgement of Country

CSNSW **acknowledges** the First Nations traditional custodians of the many lands upon which our schools and offices are located.

CSNSW **acknowledges and pays respect** to our Elders past, present and emerging and acknowledges that Aboriginal people have, for thousands of years, walked upon and cared for the lands on which we are located.

CSNSW **recognises and celebrates** the diversity of Aboriginal peoples across NSW and acknowledges their enduring culture which keeps them connected to the lands, waterways and the skies.

CSNSW **acknowledges** the deep spiritual attachment and relationship of Aboriginal and Torres Strait Islander people to this country.

CSNSW **commits** itself to the ongoing journey of reconciliation and ensuring that the young people in our schools achieve their full learning potential, are empowered to shape their own futures, and are supported to embrace their culture and identity as *Australia's First Nations peoples*.

ARTWORK: Lakkari Pitt | PHOTO: Wollongong Diocese

STATEMENT, APPROVAL AND SIGNATURE

From the Chairman

Catholic Schools New South Wales (CSNSW) has as its mission ‘advanc[ing] God’s Mission through... leadership and service to Catholic education’. Its commitment to eradicating modern slavery is a deep and considered response to the mission spoken of by Pope Benedict XVI, in an address in 2011, as ‘lead[ing] all men and women to the true freedom of children of God against every form of slavery’.

“ Pope Francis has taken up this call with the theme chosen for the Jubilee Year in 2025: “Pilgrims of Hope”. The Holy Father wrote that 2025 will be “a year in which to give shape to the biblical theme of liberation” by “opening paths capable of liberating people, cities, nations and peoples from every form of slavery and degradation”. CSNSW draws inspiration from this and hopes that by taking concrete steps to raise awareness about modern slavery which ‘disfigures dignity’, ‘limits freedom’, and enforces inequality, it too can open paths. In this way, CSNSW will not be complicit in modern slavery, as those who, says Pope Francis, close their eyes and ears and do nothing.

By voluntarily opting into the reporting requirements of the *Modern Slavery Act 2018* (Cth) and de-risking its supply chains, CSNSW demonstrates the transparency and leadership required by Catholic education reporting entities to address modern slavery.

This is CSNSW’s fourth Modern Slavery Statement under the Australian reporting regime. It outlines the systems we have in place to address the specific risks of modern slavery in our operations and supply chain. CSNSW will not accept modern slavery, forced labour, bonded labour and/or human trafficking within our operations or supply chain. We have improved and continue to improve. Our commitment to address and prevent any modern slavery in connection with our operations and supply chain is set out in further detail in our Modern Slavery Statement.

Principal Governing Body Approval

This Modern Slavery Statement was approved by the Board, which is the principal governing body of Catholic Schools NSW as defined by the Modern Slavery Act 2018 (Cth) (‘the Act’) on 1 May 2024.

This Modern Slavery Statement is signed by the Chairman as the responsible member of Catholic Schools NSW as defined by the Act.



Mark Dorney KMG (Ob)



CSNSW Christmas Staff Celebration 2023

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CRITERIA 1: About CSNSW

CSNSW was established as a company limited by guarantee and began operations in 2017 following the 2016 review of its precursor body, the Catholic Education Commission of NSW (**CECNSW**). CSNSW is also regulated by the Australian Charities and Not-for-profits Commission as a registered charity under *the Australian Charities and Not-for-profits Commission Act 2012 (Cth)* (**ACNC Act**).

The aim and mission of Catholic Schools NSW Ltd is to support the Bishops of NSW in bringing to life the Church's evangelising mission.

To achieve this, Catholic schools work to improve the education and faith outcomes of students by creating communities of faith and learning. This task means joining the "work of education with the explicit proclamation of the Gospel" (Evangelii Gaudium, no. 134), and by doing so, helping students to be good citizens in society and prepare them for their eternal life with God.

CSNSW recognises that modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Specific practices that constitute modern slavery can include:



Our Mission

To advance God's Mission through our leadership of and service to Catholic education.

Our Values

Service

Our role of leadership and service is founded in the Gospels. Our service to those in Catholic education contributes to achieving excellence and equity.

Accountability

We demonstrate fidelity to our mission through professionalism in our work, effective stewardship, transparency and holding ourselves and others accountable for outcomes.

Integrity

We act ethically, justly, and honestly. We demonstrate that we value the dignity and worth of each individual by listening, speaking and acting respectfully towards everyone.

Collegiality

We value the principle of subsidiarity and work in close collaboration with others for the common good.

CRITERIA 2:

Our Structure, Operations and Supply Chain

Structure and Operations

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia. Our members are the eleven diocesan Bishops of New South Wales. CSNSW derives its authority and mandate from the Catholic Bishops of NSW. The company Constitution and 'Canonical Mandates' from the Bishops of NSW outline the functions and authority of CSNSW.

CSNSW was established, amongst other things, to strike a proper balance between the twin principles of subsidiarity and solidarity in support of the common good, and to better meet the contemporary requirements of governments, students, and their parents, including in respect of compliance. CSNSW operates within a federation of systemic schools' offices and non-systemic, RI/MPJP, Catholic schools. School proprietors and their delegates operate the schools.

As of 31 December 2023, CSNSW's workforce consisted mainly of full-time employees. Further details are set out below.

In 2023, CSNSW relocated its head office to Angel Place, 123 Pitt St, Sydney.

CSNSW's annual consolidated revenue for 2023 was reported at \$38,848,521. This figure excludes revenue from its subsidiary company, Catholic Employment Relations Limited (**CERL**).

Board of Directors

The 2023 CSNSW Board had ten directors, including the Chair. The directors bring a wide range of skills to their positions and provide informed decision-making. Stephen Sedgwick AO stepped down as Chair of the CSNSW Board on 31 December 2023, and Mark Dorney KMG (Ob) assumed the role from 1 January 2024.

To assist in the execution of its role, the Board has seven committees with regular schedules, one *ad hoc* committee, and one panel. Each of these have their own charters:

- Audit and Risk (**ARC**)
- Capital Projects Evaluation Panel (**CPEP**)
- Catholic Education 2030 Committee (commenced November 2023)
- Compliance and Resourcing (**CRC**)
- Education Effectiveness (**EEC**)
- Executive (**ExCo**)
- Governance, Human Resources and Remuneration (**GHRRC**)
- Inter Diocesan and Accreditation Committee (**IDRAC**) (commenced July 2023)
- Political and Communications ad hoc (**PCC**)



Board of Directors

The Board and committee composition for 2023 is set out below:



Mr Stephen Sedgwick AO
(Chair)



Professor Anne Cummins



The Most Rev Danny Meagher



Mr David Robinson



Mr Julian Widdup



Mr Michael Lee



Mrs Moira Najdecki



Dr Toni Downes



Mr Vince Graham AM



Mr Mark Dorney
(Joined August 2023)



Management Team

The Management Team is responsible for:

- leading the work programme of the Company as agreed to by the Board;
- monitoring and providing expert policy advice on education policy issues such as funding, curriculum, school and system regulation, including teacher accreditation;
- leading the CSSA Trial HSC Examinations programme;
- acting as the recipient of Commonwealth and State Government recurrent funding for diocesan schools and capital-targeted funding to both diocesan and RI/MPJP schools;
- ensuring Commonwealth and programme-specific State Government funding and associated legislative compliance requirements are met;
- reporting against a range of efficiency and effectiveness indicators relating to the provision of Catholic education;
- providing sporting pathways opportunities for students & staff in NSW Catholic schools through CSNSW Sport;
- managing the distribution of approved capital grants to Catholic diocesan and Member RI/MPJP Schools through its role as the Catholic Block Grant Authority (CBGA); and
- encouraging and fostering greater collaboration at different levels among all Christ's faithful who share in the apostolate of Catholic education.





Culture, Leadership and Governance

CSNSW is committed to continuously developing a compliance culture, and maintaining and promoting that culture.

The Board and management provide leadership and continuously demonstrate commitment to our compliance culture by:

- establishing compliance objectives in line with operational and strategic objectives;
- ensuring that the compliance activities are integrated into all business processes;
- communicating the importance of compliance and making sure that all staff, as well as the management team and the Board, are aware of the compliance requirements associated with their role;
- ensuring our governance and compliance systems are subject to continuous improvement
- leading by example in upholding the importance of compliance as a core value of our organisation;
- ensuring that non-compliance is identified and investigated and that improvements are implemented; and
- ensuring that there is a robust and accessible system for the raising of compliance concerns and that raising compliance concerns is encouraged as essential to improving compliance performance.

CSNSW's governance, risk and compliance software system, is integrated into its governance framework by:

- ensuring that our governance structures and processes meet the highest standards of compliance and operate with integrity;
- effectively implementing a range of key programmes to support compliance; and
- establishing and implementing a range of compliance tools to support compliance operations.

Our Risk Management Framework

CSNSW is committed to ensuring that risk management is a core capability and an integral part of its activities. The Board has overall oversight and accountability for the risk management framework and views effective risk management as key to achieving its strategic and operational objectives.

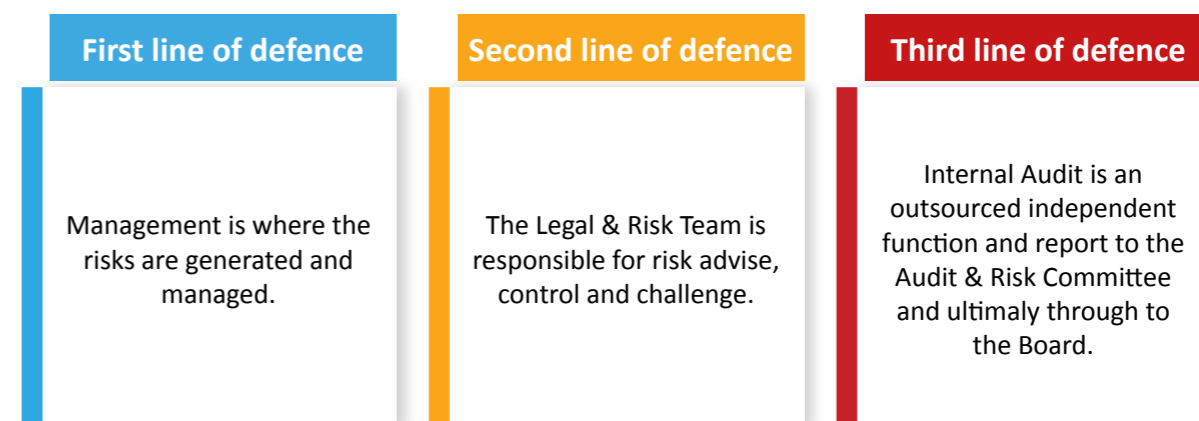
CSNSW has a low-risk tolerance for supplier risk. The risk framework supports the achievement of CSNSW's objectives by taking a systematic, consistent and pragmatic approach to identifying, analysing, mitigating and reporting risk.

The management team and the Modern Slavery Liason Officer lead the day-to-day responsibility and execution of actions such as engaging with new suppliers and ensuring adherence to our policies and procedures.

Risks arise at every level of our organisation, from implementing high-level strategies to the physical security and safety of our working environment. It is the responsibility of all at CSNSW to be aware of risk, apply risk management practices in their area of work and ensure that management is aware of risks, including emerging risks or potential or actual risk events.

A 'Three Lines of Defence' model has been adopted by CSNSW to manage risks actively.

The approach within which CSNSW identifies, monitors, and reports risk is set out below:



Our Operations and Supply Chain

Our procurement arrangements vary from one-off purchases with non-contracted suppliers to large value strategic partnerships governed by formal agreements. During 2023, the number of suppliers categorised as high and medium risk increased temporarily as a result of the office relocation (see details under Project Angel). The supplier number and spend category are expected to return to a much lower risk category in subsequent years now that Project Angel has been completed.

Most of CSNSW's direct suppliers provide professional services such as research and consulting services, data management, and IT software services, which are not identified as associated with a high risk of modern slavery.

CSNSW's direct suppliers are mostly located in Australia (a region generally considered to be at lower risk of modern slavery) and range from small businesses, other Catholic entities and global multi-nationals. We recognise, however, that our suppliers' supply chains may extend outside of Australia. We also recognise that modern slavery is still present in Australia and as such, is a consideration when engaging with our suppliers.

REPORTING CRITERIA 3: Modern Slavery Risk in Operations and Supply Chain

Operational Risks

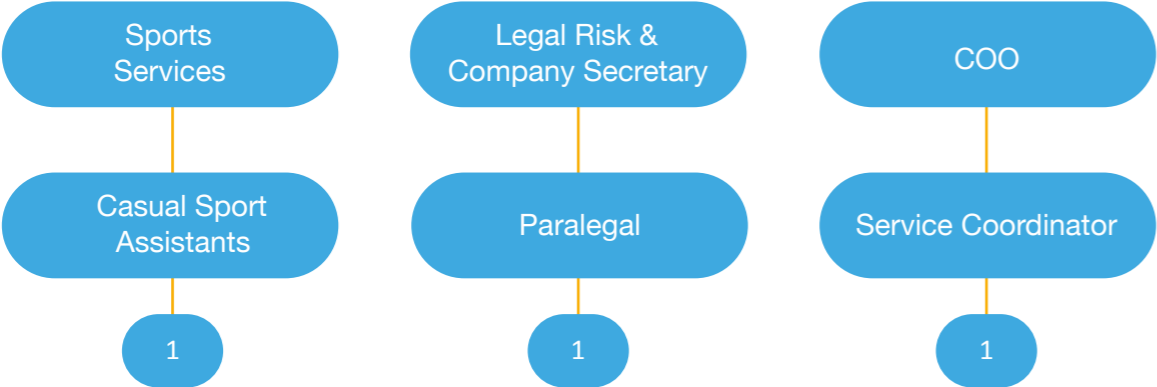
Our People

A breakdown of employees by employment type and Directorate is set out below:

Employee Breakdown

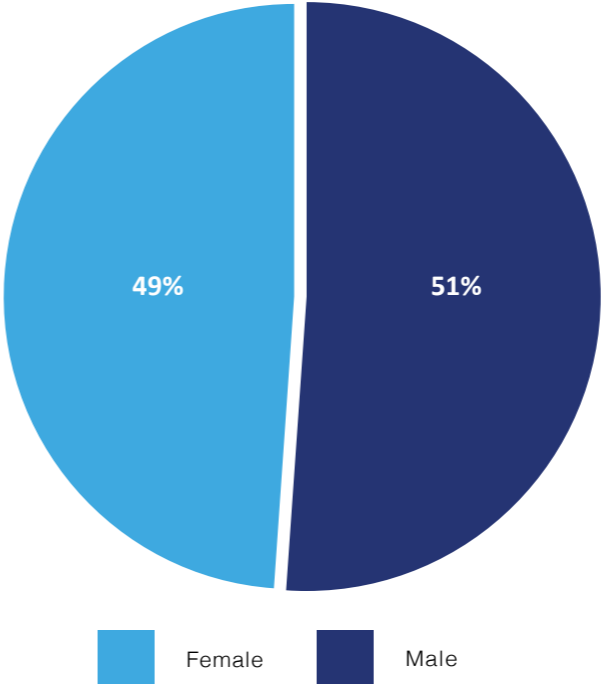
Directorate	FTE Incl Director	FT	PT
Education Policy	18	18	0.0
Capital Planning & Resources	4.5	4	0.5
Resources & Stewardship	4.5	4	0.5
Legal, Risk & CoSec	7.2	6	1.2
Public Affairs	3.0	3	
Chief Operating Officer	26.56	24	2.56
Sport	6.0	6	
CEO Office	8.6	8	0.6
Total FTE	78.36	73	5.36

From time to time, Directorates utilise casual resourcing to accommodate busy periods of work. CSNSW employs three (3) casuals on modest hours as below:



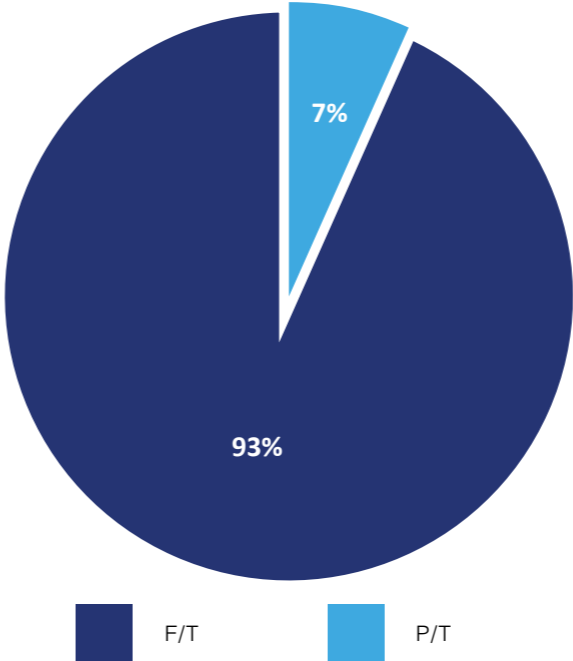
A breakdown of employee type by gender is described in the below graphs:

Gender Profile



A breakdown of employment type is set out in the graph below:

Employment Type





CSNSW employs a Human Resources Manager to ensure compliance with labour, employment and immigration laws through a variety of HR Policies and Procedures. CSNSW also receives expert Employment Relations, Human Resources, Industrial and Legal Advice from CERL.

Our policies play a crucial role in serving as guidelines and procedures that govern various aspects of employee behaviour and management. These policies provide a framework for consistent decision-making, ensuring the fair treatment of employees that aligns with CSNSW's organisational goals.

Some of the Policies and Procedures which outline CSNSW's expectations include:



CSNSW uses these policies and procedures to improve awareness, identification and reporting mechanisms to help manage our modern slavery risks. All employees are required to comply with our policies and procedures, including the Code of Conduct.

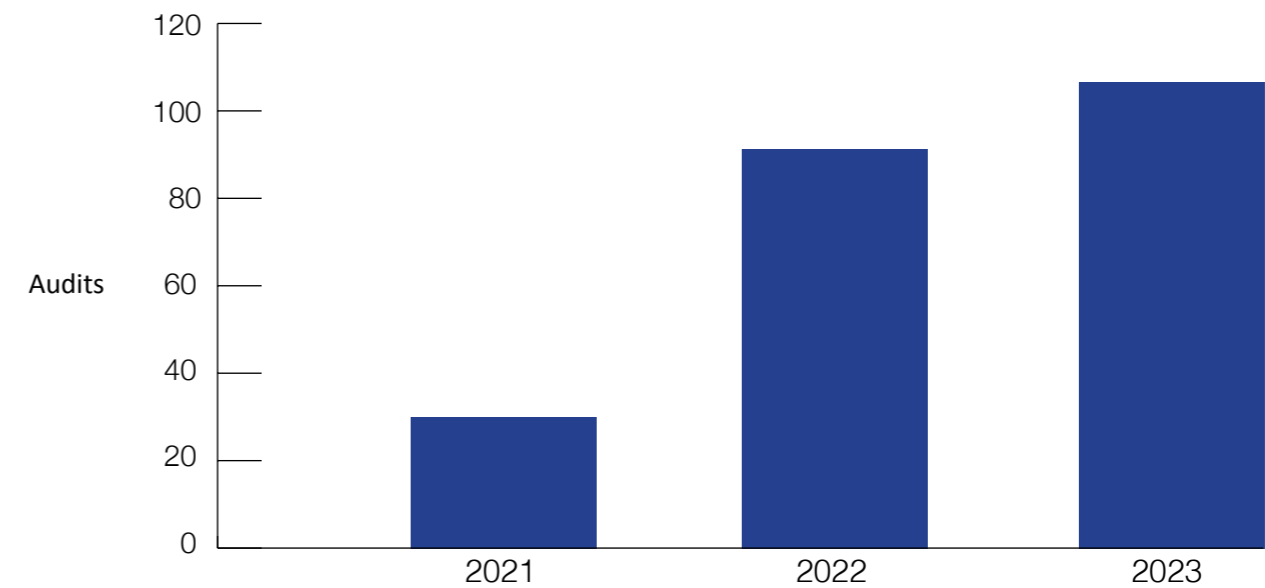
Due Diligence in CSNSW's Supply Chain

CSNSW's risk of encountering modern slavery practices in our operations is low. However, we have due diligence processes to assist management with identifying the risk of modern slavery.

All suppliers continue to be assessed with no reportable concerns to date.





We have continued our desktop audits with new suppliers and revisited some prior year audits. The numbers are depicted below.

Modern Slavery Desktop Audits



Supply Chain Risks

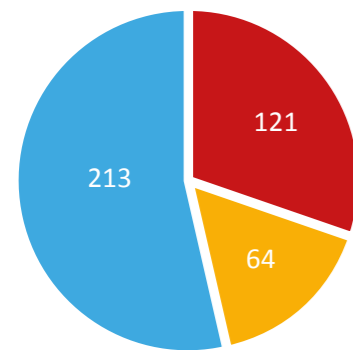
We analysed our supplier risks using the ACAN category risk taxonomy. The key modern slavery indicators are as follows:

- 
Industry sector
 Specific industry sectors deemed as high risk in international and national guidance documentation.
- 
Commodity/product
 Specific products and commodities deemed as 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.
- 
Geographic location
 Based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- 
Workforce profile
 In undertaking our supplier analysis, we 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).

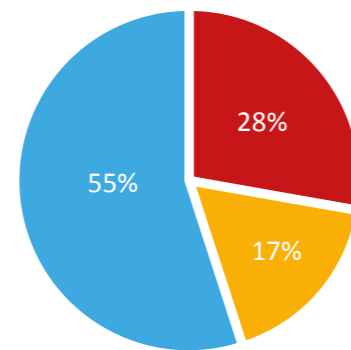
Our suppliers are predominately from low risk industries (professional services).

Analysis of our supply chain

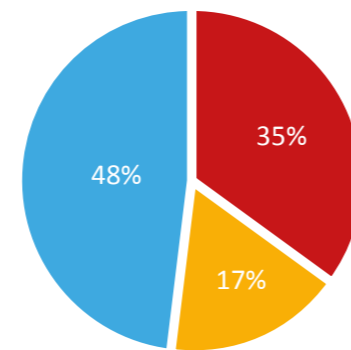
Supplier numbers according to risk category is depicted below-



Supplier spend according to risk category is depicted below-



Supplier category by number of transactions is depicted below-



■ Low ■ Medium ■ High

REPORTING CRITERIA 4:

Actions taken to Assess and Address Risk

Our Methodology

Our approach to Modern Slavery compliance begins with understanding our legal obligations, implementing policies and procedures, and developing reporting structures and oversight to ensure compliance.

Action Taken

We continue to participate in the Australian Catholic Anti-Slavery Network's (ACAN) Modern Slavery Risk Management Program (ACAN Program). CSNSW provides supplier data to the ACAN Program team which enables identification of common suppliers, supplier risk assessment, analysis, due diligence and informs CSNSW of any relevant supplier engagement strategy and outcomes.

Supplier engagement actions include:

- communicating on modern slavery risk management expectations and the ACAN Program;
- completing the ACAN supplier survey;
- risk assessments according to the ACAN Modern Slavery Risk Taxonomy;
- requesting to join Sedex and complete Sedex self-assessment questionnaire (SAQ);
- monitoring, auditing and corrective actions by ACAN and escalation of key issues
- deployment of ACAN worker voice surveys and grievance mechanisms;
- collaborating with ACAN via Domus 8.7 to ensure appropriate remedies for impacted workers; and
- qualifying for the ACAN pre-qualified Supplier Directory.

Supplier Risk Identification

As in previous years, CSNSW's procurement expenditure continues to be on suppliers of professional services such as insurance, financial systems, software, accounting and audit. CSNSW takes the approach of separating operations into high and low-risk categories, and prioritising any high-risk categories.

In 2023, we continued with our supplier risk identification process, depicted below:

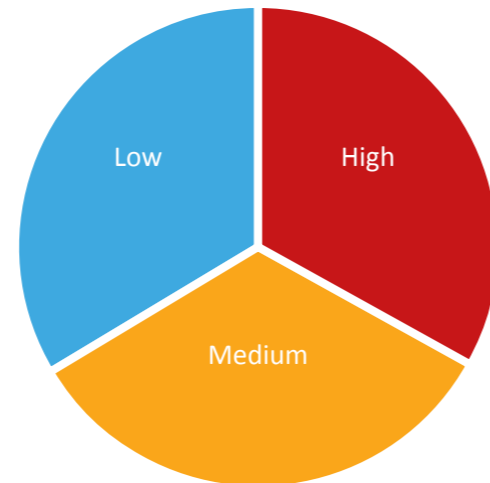
For all new suppliers with a spend greater than \$10,000

A supplier audit register created in our governance, risk & compliance software system, to allow for greater oversight in the audit process and more streamlined reporting.

Category risk identification via a risk category taxonomy developed by the Australian Catholic Anti Slavery Network (ACAN)



The purpose of using the modern slavery category risk taxonomy is to assist CSNSW in identifying and understanding the different types and levels of risk associated with modern slavery within our operations and supply chain. This taxonomy typically includes categories or classifications that reflect the diverse nature of modern slavery risks, considering factors such as industry, geography, commodity and specific workforce vulnerabilities. By using the modern slavery category risk taxonomy, CSNSW can conduct more targeted risk assessments. Examples of the industry sector ratings by the risk categories is depicted below-



Low risk categories include professional services, government and agency fees, membership fees etc

Medium risk categories include printing services, printers, marketing, ICT software and network services, travel and accommodation etc

High risk categories include events and event management, building and construction, food and catering, furniture and office supplies etc

Since 2019, management has been conducting risk assessments of our suppliers with expenditure data over \$10,000 against modern slavery indicators (such as the location and industry of the supplier). Based on the risk assessment findings, the suppliers are then identified as one of the procurement categories with a potential high risk of modern slavery.

- The deep-dive risk assessment involves educating our suppliers about modern slavery risks, and writing to medium or high-risk suppliers that do not file their own Modern Slavery Statement and formally asking them a number of targeted questions.

Addressing High and Medium Risk Suppliers

Where a supplier is identified as medium or high-risk, CSNSW undertakes a due diligence process and desktop audit with details entered into its supplier register. CSNSW aims to understand how and if modern slavery risks are being managed by the supplier, which includes any or all of the following actions:



Project Carlo

Project Carlo is a major IT project that commenced in 2023.

The purpose of Project Carlo is to consolidate and uplift CSNSW’s digital service ecosystem to improve stakeholder experience, operations, cyber-security, and technology platforms.

This project is the first phase of a prioritised roadmap and is now defined as a multiyear programme to be delivered through three phases: 1-Enhance, 2-Consolidate, and 3-Expand.

The project will determine, design, and define foundational elements of a new digital services ecosystem that will be used across multiple bespoke CSNSW applications (e.g. the PPSD Tool), and CSNSW’s website(s).

Integral to Project Carlo is the consideration of modern slavery risks during every phase including the appointment of suppliers. As part of that process all suppliers are provided with CSNSW’s Model Supplier Code of Conduct, a Modern Slavery due diligence checklist and CSNSW’s Modern Slavery Policy. Any entity without their own Modern Slavery Statement undergoes a due diligence process depicted above.

During Project Carlo in 2024, we expect our supplier spending to temporarily increase due to ICT software and services (medium risk).

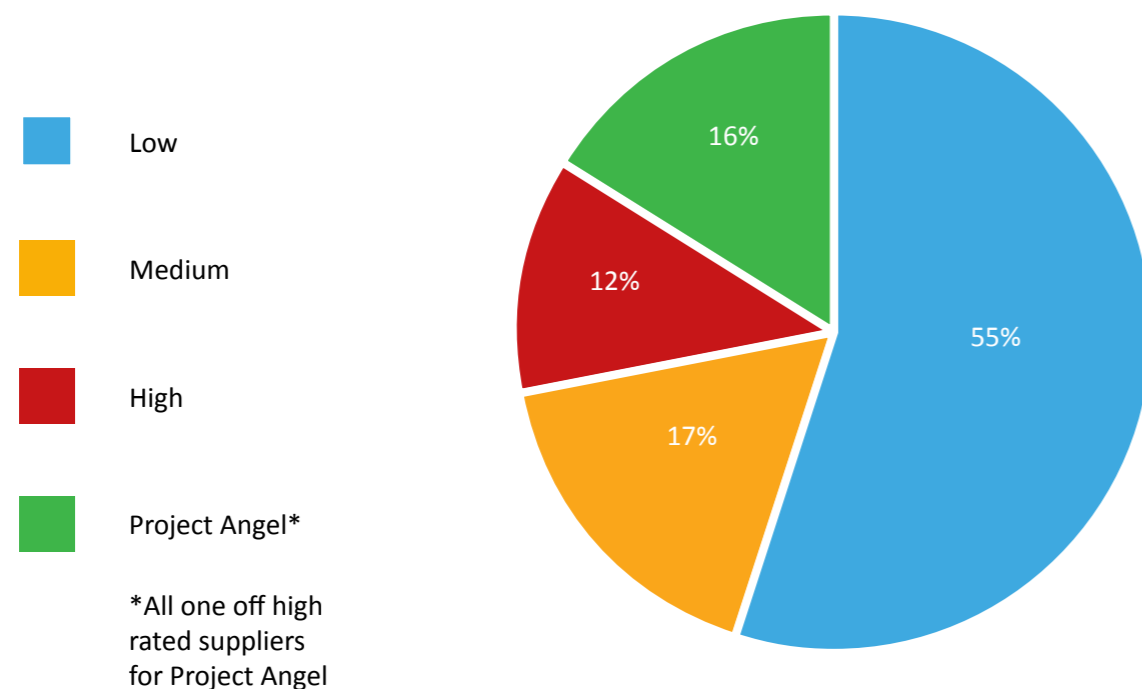
Completion of Project Angel

In 2022, Project Angel was examined in CSNSW’s Modern Slavery report. In 2023, CSNSW signed a ten year lease to relocate premises from Polding Centre to the current premises in Angel Place. A ‘Project Angel’ taskforce was formed to coordinate this large logistical operation.

CSNSW engaged Chester Group to oversee most aspects of the fit-out and move, which was completed in August 2023. Chester Group and related suppliers underwent desktop audits and a due diligence process, including the insertion of Modern Slavery clauses into relevant contracts.

The number of suppliers categorised as high and medium risk increased temporarily due to Project Angel. It is expected that the supplier number and spend category will return to a lower risk category in subsequent years now that Project Angel has been completed.

The temporary impact of Project Angel in our supply chain is featured below:



Contract Management

We continue to use CompliSpace for our contract management. The system allows CSNSW to record, manage and capture compliance tasks and risks, including linking the relevant contract to our supplier audits.

Ongoing Supplier Engagement

During 2023, we carried out 98 desktop audits. The process also provided an opportunity for CSNSW to educate our suppliers about modern slavery risks, which included:

- providing context for our requests pursuant to the Modern Slavery Act 2018 (Cth);
- giving background details to the suppliers on the definition of modern slavery situations;
- providing information about modern slavery produced by the Commonwealth Government in its *Guidance for Reporting Entities*;
- providing the Global Slavery Index 2018, Extract – ‘Top 105’ countries at risk of modern slavery; and
- formally asking them targeted questions.

CSNSW found no evidence of modern slavery risks associated directly with its operations or supply chains.

Anti-Slavery Clauses in Contracts

CSNSW’s in-house legal team reviews new supplier agreements internally and ensures, wherever possible, that an Anti-Slavery clause is included in the new agreements (especially for high-risk suppliers).

To date, CSNSW has not received any reports of suppliers experiencing or becoming aware of any modern slavery practices.

Model Supplier Code of conduct

CSNSW’s Model Supplier Code of Conduct outlines our expectations regarding our suppliers. In addition to any specific obligations under contracts or agreements with CSNSW, suppliers must:

- Not knowingly cause or contribute to modern slavery in any form.
- Actively take measures to identify, assess, address, and eliminate modern slavery from operations.
- Undertake due diligence of suppliers and subcontractors to ensure that any risks, or people and workers impacted by modern slavery in suppliers’ supply chains, or any parts of the suppliers’ businesses, are identified, assessed, remedied, eliminated and monitored.
- Comply with all applicable local and national laws, statutes, acts, rules, codes, standards, guidelines and regulations of the jurisdictions in which the supplier is conducting business.
- Comply with all applicable State, Australian and international anti-slavery and human trafficking laws, statutes, regulations and codes.



Modern Slavery Action Plan

CSNSW has a Modern Slavery Action Plan maintained on CompliSpace, and details are reported to the Board.

During 2023, CSNSW carried out work from its Modern Slavery Action plan.

A summary of some of the completed actions include:

Area	Completed Action
Governance	Ensured that relevant employees were assigned to manage modern slavery risks and actively used the tools and templates developed to manage risk.
Ongoing Action	Developed a Modern Slavery Action Plan within CompliSpace to track compliance and add action plan items.
Awareness	<ul style="list-style-type: none"> All new employees were allocated three training modules to complete within two months of their start date. A staff meeting, which all employees attended, was held to celebrate the feast day of St. Josephine Bakhita (the patron saint of victims of Modern Slavery and human trafficking) on 8 February 2024. A prayer and reflection was held in her honour. The Head of Mission, Identity and Civics attended an event hosted by the NSW Anti-Slavery Commissioner on 30 November 2023 for the International Day for the Abolition of Slavery.
Feedback Mechanisms	Stand-alone confidential Modern Slavery hotline in place via the Whistleblower hotline.
Policies and Procedures	Included general clauses on Modern Slavery in appropriate contracts, including all high-risk supplier contracts following review by the CSNSW in-house Legal Team.
Governance	Modern Slavery Policy approved and included a Board commitment statement. Allocated a triennial policy review date.
Commitment	<p>Promotion by CSNSW within the Education sector to raise awareness of Modern Slavery. Some highlights included:</p> <ul style="list-style-type: none"> ACAN was provided with a booth and a speaking opportunity at the education law symposium in 2023, attended by 320 education staff. Continued providing information via relevant updates in Scholaris, weekly e-Bulletin to schools, and via a Legal Hotline for legal assistance and support for our schools and Diocesan Catholic Schools Offices sent to approximately 970 education staff.
Commitment	CSNSW is committed to raising awareness of modern slavery amongst school staff with a specific focus on students at risk or who have experienced forced marriage. This would be informed and guided by the State Manager of Well-being who provided ACAN with detailed recommendations for internal capacity-building via a phased approach to staff training.
Identifying External Risks	Undertook modern slavery risk review of priority direct suppliers.



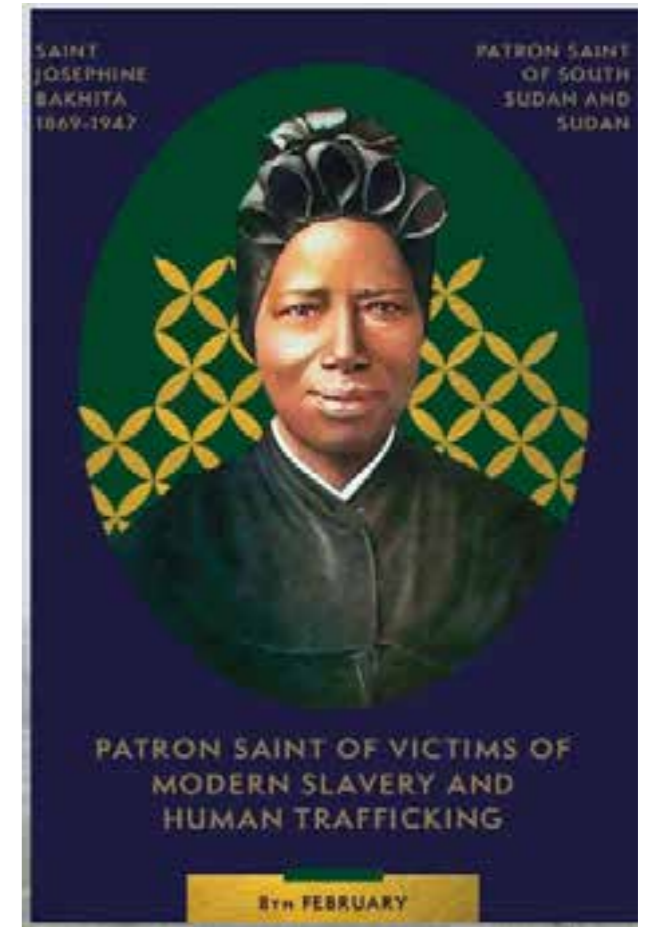
Training

CSNSW recognises modern slavery is a complex global issue and has mandatory training to provide all CSNSW employees with a practical understanding of what modern slavery means at a global level. Existing employees have completed three modules on Modern Slavery. All new employees are assigned the training as part of their induction programme and are required to complete it within two months of commencing employment.

Completion of the training forms part of the annual performance review process.

Future training opportunities will be integrated into all staff training days and on an ad hoc basis.

CSNSW also celebrates the feast day of St. Josephine Bakhita (the patron saint of victims of Modern Slavery and human trafficking) on or around 8 February to raise awareness as we continue to pray for the victims of human trafficking that they may be brought to freedom and rebuild their lives after the traumatic experiences they have suffered.



Board Commitment

The Board is committed to the ongoing efforts to rid the world of modern slavery and remains vehemently opposed to modern slavery in all its forms, from slavery and servitude to forced or compulsory labour and human trafficking.

The Board approves CSNSW's annual Modern Slavery Statement.

Ongoing Participation in the Australian Catholic Ant-Slavery Network (ACAN)

ACAN supports CSNSW and other Catholic entities in identifying and managing modern slavery risks in their operations and supply chains. It also assists CSNSW in reporting on these actions through the preparation of an annual Modern Slavery Statement.

Remediation

As a participant in the ACAN network, CSNSW can access Domus 8.7, an independent programme that provides remedies to people impacted by modern slavery. By partnering with Domus 8.7, CSNSW can help people impacted by modern slavery achieve meaningful outcomes, improve our risk management response and supply chain resilience, and prevent future harm. Additional information about Domus 8.7 can be found at www.acan.org.au/domus87

Our Future Plans

Despite the risk of Modern Slavery being low, each year CSNSW will publish the actions it completed and include a summary of its future plans, such as:

- The integration of modern slavery risk considerations in all steps during Project Carlo.
- Ongoing engagement and monitoring of existing suppliers (including inclusion of contract reviews where required).
- Only selecting suppliers that meet our criteria and commit to our zero tolerance for any form of modern slavery.
- Continued participation in ACAN.
- Adherence to CSNSW's Modern Slavery Policy.
- Partaking in future e-learning modules supplied by ACAN for all employees or other training opportunities.



REPORTING CRITERIA 5: Effectiveness Assessment

CSNSW is committed to approaching its modern slavery obligations with a mindset of continuous improvement and seeking opportunities to better its practices and procedures over time.

CSNSW completed a Modern Slavery Maturity Assessment as part of the ACAN Program. This assessment introduces a shift from the initial Gap Analysis that CSNSW undertook in prior years, towards focusing on the maturity of our modern slavery risk management approach. The assessment measured maturity across governance, risk assessment, risk management, and effectiveness measures in line with best practice and reporting requirements.

This transition underscores the importance of assessing CSNSW's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide CSNSW with a comprehensive view of our efforts across different key areas of operation:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's Programme and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

This evaluation helps identify strengths and weaknesses in our approach across four areas:

1. **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
2. **Risk assessment:** identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
3. **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.
4. **Effectiveness:** measures the impact of our anti-slavery efforts and what holds CSNSW accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.





The objective of the assessment is to identify focus areas for action in 2024 and beyond and guide the conversations on priorities and resources, allowing for different focus on plans to address areas of improvement or to further advance more mature aspects of the modern slavery risk management programme.

CSNSW scored above the Australian corporate average and will use the recommendations for future action plan items.

Modern Slavery Summary of Key Activities

	Activity	Catholic schools NSW
Internal / Staff	Hours spent on modern slavery activities	400
	Individual staff completed e-learning	79
	E-learning modules completed	<ul style="list-style-type: none"> Modern Slavery 101 Modern Slavery Business Relevance Modern Slavery Grievance Mechanisms & Remedy
External / Supplier Engagement	Number of suppliers with visible contact information and ABN	6
	Number of suppliers across high-risk categories	152
	Number of ACAN Supplier Surveys completed	6
	Invited to join Sedex	4
	Joined Sedex	1
	Sedex SAQ completed	1
	Social audits	1
Corrective Actions	Nil Detected	
External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Ongoing Action

ACAN's recommended actions arising from the assessment provide a strategic framework aimed at enhancing the management of modern slavery risks of our Maturity Assessment and further exploring elements of governance, risk assessment, risk management, and the effectiveness of actions.

The following actions continue:

- CSNSW appointed a Modern Slavery Liaison Officer (**MSLO**) who reports to the Board.
- considering the potential for Modern Slavery in the indirect supply chain;
- monitoring of compliance tasks via Complispace Assurance, CSNSW's governance and risk management system by the creation of 'Tasks' allocated to relevant employees for completion by specified dates;
- assigned training for all new employees as part of their induction programme;
- the review of all contracts and agreements before final signatures are obtained by CSNSW's in-house legal team, the continued roll-out of Modern Slavery clauses in direct contracts on a risk-based approach; and
- ongoing engagement and monitoring of suppliers, including CSNSW's Model Supplier Code of Conduct.

REPORTING CRITERIA 6: Process of Consultation with Entities Owned or Controlled

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

REPORTING CRITERIA 7: Other Relevant Information

No other relevant information is reported.



**Catholic
Schools
NSW**

**Level 7, 123 Pitt Street, Sydney NSW 2000 | ABN 46 619
593 369 | ACN 619 593 369**



ARCHDIOCESE
OF BRISBANE

MODERN SLAVERY STATEMENT

2023

The Corporation of the Trustees of the
Roman Catholic Archdiocese of Brisbane

Disclosure

This statement has been made on behalf of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane. This statement covers all entities owned or controlled by The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane.

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Brisbane.

We also acknowledge Elders, past, present and emerging and pay tribute to those who have contributed to the social, economic, cultural, political, and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

ABN 25 328 758 007 Archdiocese of Brisbane
227 Elizabeth Street, Brisbane Qld 4000

ABN 49 991 006 857 Brisbane Catholic Education

ABN 25 328 758 007 Archdiocesan Development Fund

ABN 35 020 644 975 Centacare

ABN 51 626 296 801 Centacare Administration Services

ABN 24 547 377 893 Xavier Children's Support Network





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Journeying in dignity

Human trafficking disfigures dignity. Exploitation and subjugation limit freedom and turn people into objects to use and discard. And the system of trafficking profits from the injustice and wickedness that oblige millions of people to live in conditions of vulnerability.

**Preventing the 'shameful scourge'
Never tire of seeking pathways for transforming our societies and preventing the shameful scourge that is human trafficking.**

Walking together against trafficking May Saint Bakhita pray with us and for us. I heartily bless all of you who work against trafficking, and every person you meet on this journey for dignity."

Pope Francis 8 th February 2023
<https://www.cbcew.org.uk/pope-human-trafficking-disfigures-dignity/>





A message from the Archbishop of Brisbane, Mark Coleridge

The patron saint of victims of modern slavery and human trafficking, St Josephine Bakhita, echoes the Lord Jesus himself in urging us to “love everyone...and be compassionate”. In the Archdiocese of Brisbane we are strongly committed to compassion for the victims of modern slavery both in Australia and beyond. We also know that compassion must become action not only to free those bound by slavery but also to prevent it happening in the first place.

A realistic and effective pathway is an important requirement of the Modern Slavery Act. Through the Australian Catholic Anti-Slavery Network (ACAN) Program, our agencies have access to the expertise and independent advice available through Domus 8.7. The agencies and parishes of the Archdiocese can make referrals for people impacted by modern slavery to secure support, advice and guidance on how to respond to concerns. This right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains; and it ensures that future incidents are prevented.

The efforts of our agencies through 2023 have been outstanding, and the increased engagement by our employees, volunteers and Councils to end the scourge of modern slavery has been very encouraging. The work to eradicate modern slavery from our operations and supply chains has become embedded in the culture and governance structures of the Archdiocese and its agencies; and this good work must continue.

As Archbishop of Brisbane and sole trustee of *The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane* as defined by the Modern Slavery Act 2018, I gladly approve and endorse the 2023 Modern Slavery Statement for the Archdiocese. May St Josephine Bakhita guide us all into the freedom of God.

As always in the Lord,

A handwritten signature in black ink, appearing to read 'Mark Coleridge'. The signature is fluid and cursive, with a prominent initial 'M'.

†**Mark Coleridge**
Archbishop of Brisbane

Reporting Criteria 1 and 2: The Roman Catholic Archdiocese of Brisbane

About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. Our footprint covers 77,000 square kilometres from the Queensland/New South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices situated throughout the Archdiocese with central administration based in Brisbane. Together we provide:



240 MASS
CENTRES
SERVING
OVER **684,000**
CATHOLICS



146 SCHOOLS
EDUCATING
OVER **76,827**
STUDENTS
EACH YEAR

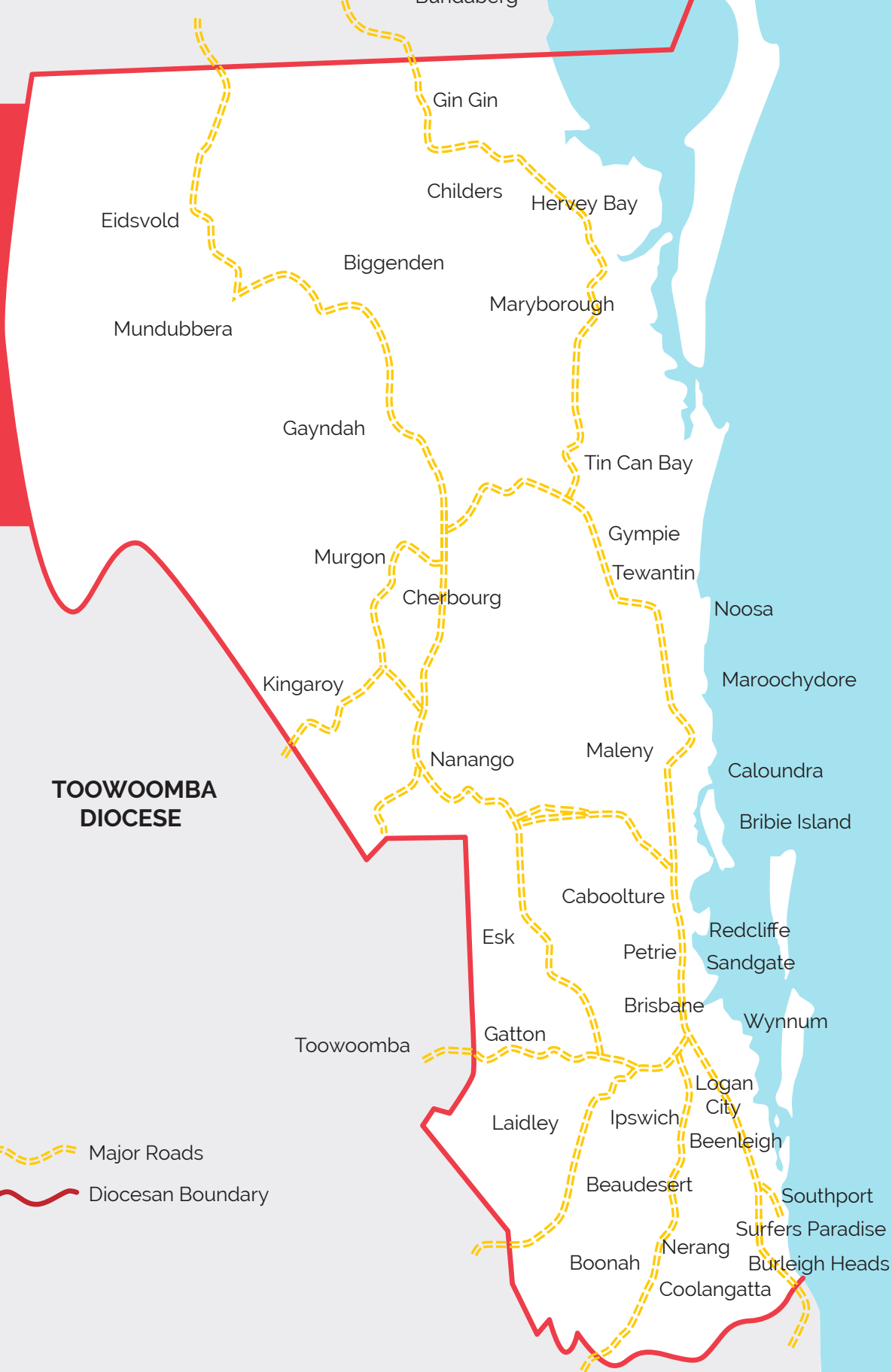


211
CENTACARE
SITES
SUPPORTING
OVER **66,000**
PEOPLE EVERY
YEAR



40 OFFICES
EMPLOYING
OVER **16,000**
PEOPLE



ROCKHAMPTON DIOCESE



TOOWOOMBA DIOCESE

LISMORE DIOCESE

NEW SOUTH WALES

-  Major Roads
-  Diocesan Boundary

The Archdiocese is led by Archbishop Mark Coleridge and Auxiliary Bishop Tim Norton and Vicar for Administration Fr Peter Dillon. Archbishop Coleridge has committed the Archdiocese to support Pope Francis' calls for a missionary church and says, "Everything must be seen in a missionary key and informed by a missionary spirituality."

The Archdiocese's vision statement is, 'On a journey led by the Spirit.' There are four dimensions to this vision:

1. We are on a journey of faith into the future
2. We do not see the way ahead clearly
3. The Holy Spirit leads us on the way
4. Together we discern what paths the Spirit is opening before us.

Our Charter

Archbishop Coleridge has taken to heart the 2013 Papal Exhortation *Evangelii Gaudium* (The Joy of the Gospel) and has adopted it as the charter for the Archdiocese. Like the universal church, the Archdiocese of Brisbane is in communion with the Bishop of Rome.

We are Catholics who:

- Embrace the person and vision of Jesus
- Build communion with God and others
- Engage in Christ's Mission in our world

These three dimensions are integral to our life as Church and remind us that our faith is anchored in Jesus Christ, who draws us into communion with God and one another and sends us forth in mission to live, share and proclaim the good news of the Gospel in our everyday lives.

Further to this foundational framework which arose out of an Archdiocesan Synod in 2003, and as we seek to plan the kind of future that Christ wants, we note the words of Pope Francis on the Parish:

"The parish is not an outdated institution; precisely because it possesses great flexibility, it can assume quite different contours depending on the openness and missionary creativity of the pastor and the

community. While certainly not the only institution with evangelises, if the parish proves capable of self-renewal and constant adaptivity, it continues to be the Church living in the midst of the homes of her sons and daughters. The parish is the presence of the Church in a given territory, an environment for hearing God's word, for growth in Christian life, for dialogue, proclamation, charitable outreach, worship and celebration. In all its activities the parish encourages and trains its members to be evangelisers." (*Evangelii Gaudium* 2013)

The Archdiocese of Brisbane will leverage the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society.

2023 modern slavery risk management initiatives

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety, excessive working hours, unpaid work, below minimum wages, forced labour, child labour and limited or no freedom of association.

In 2023 the Archdiocese was hindered in implementing initiatives raised in our "Action Plan" from the 2022 Modern Slavery Statement due to a number of key departures across the organisation. The actions achieved in 2022 are summarised below and will be discussed in more detail within this Statement:

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex initiated in October 2023.
2. Brisbane Catholic Education's Procurement has developed process, tools and templates to enhance due diligence checks and the management of modern slavery risks within our supply chain.
3. A category management approach commenced in 2023 by Brisbane Catholic Education with the initial step categorising vendors. 2024–25 will see the same approach rolled out to the rest of the Archdiocese.

4. Brisbane Catholic Education initiated a project to implement the supplier management module into its source to contract management platform. Scoping for the project was completed and a plan finalised for implementation of risk assessments, due diligence and performance management processes by mid-2023. This project has been delayed due to scope creep and complexity.
5. The Cleaning Accountability Framework (CAF) was investigated to identify opportunities to improve due diligence checks during BCE cleaning tenders. However, CAF was not a fit-for-purpose tool for the education sector. BCE have:
 - Adapted some elements of CAF e.g., cost estimation transparency.
 - Created its own Cleaning Toolkit for schools to use to perform due diligence checks during tenders.
6. In late 2023, Brisbane Catholic Education formed the Modern Slavery and Laudato Si' Reference Group which will:
 - Inform and advise the Archdiocese's Modern Slavery Working Group (MSWG) on modern slavery related issues and BCE's role in managing and mitigating modern slavery risks.
 - Provide strategic direction, motivation, empowerment and leadership to ensure that every parish, school and agency of the Archdiocese understands the call to ecological conversion enunciated in Laudato Si' and responds wholeheartedly to transform their personal and institutional operations and practices to develop an integral ecology profile.

Our plans for 2024 and beyond

To further our commitment to eliminating modern slavery in our supply chains and meet our legislative requirements, the Archdiocese has significant plans for the coming years. These are summarised below and will be discussed in more detail within this Statement.

1. Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) as well as, in alignment to the ACAN 2024 program of work.
2. Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure.
3. Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability across the Archdiocese, including the Brisbane Catholic Education Modern Slavery Working Group.
4. Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.
5. Ensure cleaning, uniforms, waste management, print, ICT, furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.



6. Develop a modern slavery communications strategy across the Archdiocese, including parishes.
7. Implement a phased training program for staff with purchasing (buying and approving) responsibilities.
8. Promote awareness of modern slavery internally and raise the modern slavery profile on Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.
9. Establishing RFQ/RFP mandatory pre-qualification questionnaires.
10. Refresh the Archdiocesan and Brisbane Catholic Education Supplier Codes of Conduct.

Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Family Relationship Services, Pastoral Ministries, Centacare Administration Services, Catholic Early EdCare, and Xavier Children’s Support Network

The support offices of the Archdiocese include:

- The Episcopal Office and Clergy Support
- The Financial Administrator’s Office
- Legal, Governance and Risk (including Safeguarding, Work Health and Safety and Archdiocesan Archives)
- Archdiocesan Services
- Evangelisation Brisbane

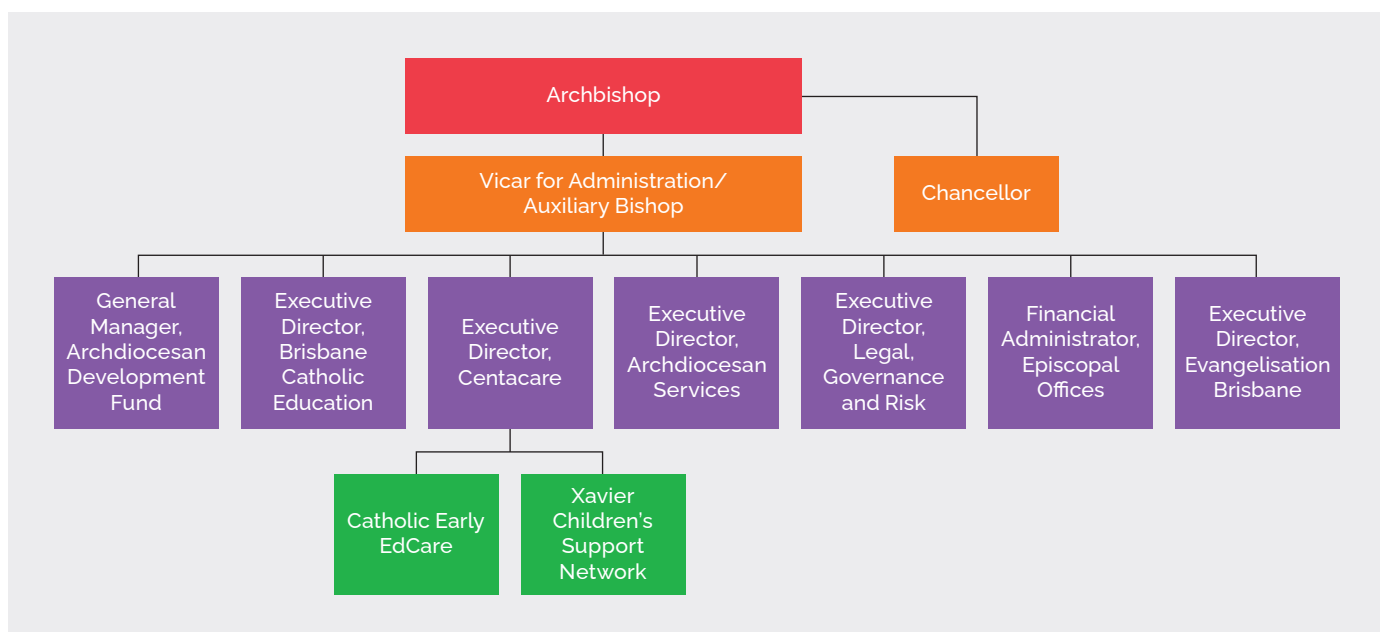


Figure 1: Archdiocese of Brisbane organisation structure

Our governance framework

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is the legal entity for all parishes and agencies of the Archdiocese. The Archbishop of Brisbane is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer Figure 2). To assist in his role as Trustee, the Archbishop delegates certain responsibilities to the Executive Directors/General Managers of the agencies outlined below. The Executive Directors/General Managers' roles are to ensure that the civil law responsibilities associated with financial accountability, legislative compliance, risk management and people management are met. The Archbishop, Auxiliary Bishop, Vicar for Administration, the Executive Directors/General Manager and the Financial Administrator form the Executive Forum. The Executive Forum meets regularly and has responsibility for matters of operational significance, including modern slavery.

In 2022 a significant review of the governance framework was undertaken to further strengthen the ability of the Archdiocese to meet its financial accountabilities and legislative compliance. As a result of this review, a new delegations policy was established which sets out the authority delegated by the Archbishop down to the Archdiocesan Council, Agency Councils, and Executive Directors, and the circumstances under which authorities and responsibilities may be sub-delegated.

Delegations of authority within the Archdiocese are intended to achieve five main objectives:

1. to ensure the efficiency and effectiveness of the organisation's administrative processes;
2. to ensure that the appropriate officers have been provided with the level of authority necessary to discharge their responsibilities;
3. to ensure that delegated authority is exercised by the most appropriate and best-informed individuals within the organisation;
4. to ensure decisions are made in accordance with relevant Canon law, common law and legislation; and
5. to ensure internal controls are effective.

Delegations are a key element in effective governance and management of the Archdiocese and provide formal authority to particular employees to commit the organisation and/or incur liabilities for the organisation.

Following the completion of the Governance review in late 2022, the implementation of the delegations processes resulted in improved governance and reporting of the budget and procurement processes across the Archdiocese.

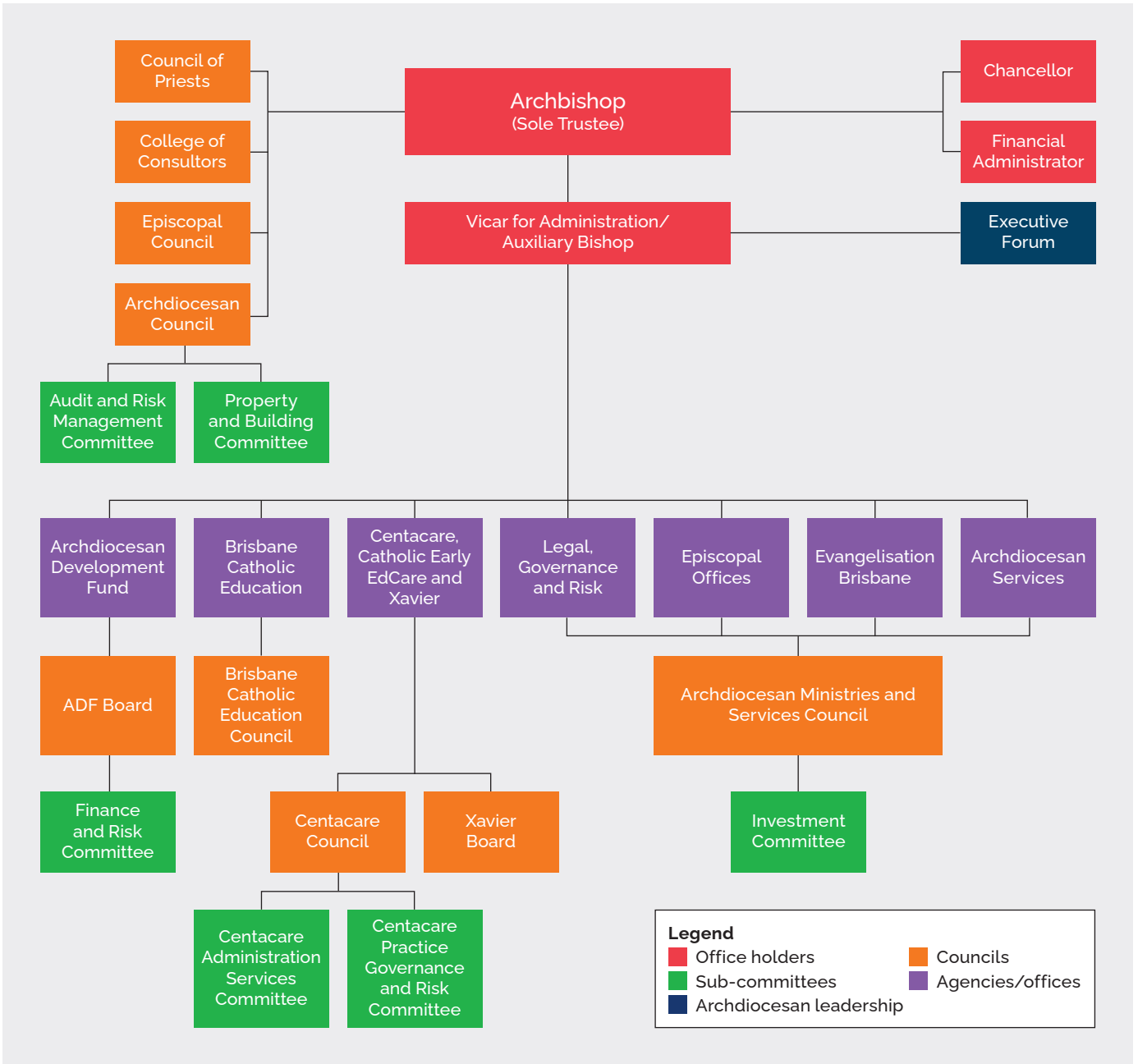


Figure 2: Archdiocese of Brisbane governance framework

Our operations

The Archdiocese contributes to the wellbeing of many communities across south-east Queensland in diverse and sometimes, surprising ways.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in education and social services, being there to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 16,000 Queenslanders. The activities undertaken by our entities are outlined below.

Parishes of the Archdiocese

Our 94 parishes support the religious and spiritual needs of their communities through masses, baptisms, weddings, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

The Archdiocesan Development Fund

The Archdiocesan Development Fund provides financing for Catholic entities across Australia to support them in the delivery of the Church's mission.

Brisbane Catholic Education

In the Archdiocese, the Archbishop has responsibility for Catholic education. The Archbishop has delegated authority for the delivery of services, programs and resources in Catholic schools to the Executive Director of Brisbane Catholic Education. The Archbishop and the Executive Director are supported by the Catholic Education Council, the members of which are appointed by the Archbishop. Figure 2 describes this relationship as part of the Archdiocese of Brisbane's governance framework.

Brisbane Catholic Education is a learning community, which includes Archdiocesan and Parish schools and the staff of the Brisbane Catholic Education Office. With 146 schools, Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students.

Brisbane Catholic Education schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through partnerships with parents, governments and the community, Brisbane Catholic Education schools provide social responsibility, self-discipline and Christian values for all students, and nurture and support the community in their faith journey.

In compliance with the Australian Education Act, Brisbane Catholic Education receives funding from the Federal and State Governments to provide these quality learning outcomes for all students.



Centacare – including Centacare Administration Services, Catholic Early EdCare and Xavier Children’s Network

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, Early EdCare and family and relationship care, Centacare teams walk alongside people on life’s journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1950s Centacare’s leadership has always been guided by the organisation’s Catholic faith. The traditions early leaders established and their faith, continue to guide those working in Centacare today. Referencing the Catholic Social Teachings is one important way people in Centacare continue to understand how our Catholic faith guides our work in communities across South East Queensland.

Centacare provides early education and care services through Catholic Early EdCare and high intensity support for children with disability through Xavier Children’s Support Network. Teams from all across Centacare often come together to provide the holistic support an individual or family needs to thrive. You can see Centacare’s full organisation chart in Appendix B. A number of Archdiocesan Services support Centacare’s mission.

Episcopal Office

The Episcopal Office encompasses the offices of the Archbishop and Auxiliary Bishops as well as the office supporting clergy.

Financial Administrator’s Office

The Financial Administrator’s Office oversees the financial management and administration of the Archdiocese in accordance with the requirements of Canon Law and the instructions of the Archbishop. In collaboration with the Archbishop, Vicar for Administration and the Archdiocesan Council, the Financial Administrator facilitates the implementation of the Archbishop’s financial policies and strategic plans within the Archdiocese whilst ensuring the ongoing financial stability of the Archdiocese.

Legal, Governance and Risk

The main functions of the Office of Legal, Governance and Risk are as follows:

- **Legal** – The Archdiocese’s legal function provides pragmatic, strategic and outcome-focused legal advice across all of its Agencies and Parishes.
- **Governance & Risk** – The Archdiocese’s governance and risk function provides an advisory and strategic function to the Archbishop and the greater Archdiocese of Brisbane to enable the Archbishop to perform his governance and risk responsibilities.
- **Safeguarding** – The Office for Safeguarding Services supports the Archdiocese in safeguarding those who engage in Archdiocesan activities, ministries and services.
- **STOPline Service** – Administers the independent STOPline service disclosures. The service receives information and reports about serious misconduct by Archdiocesan workers (clergy, religious, employees and volunteers) including abuse complaints and incidents.

- **Workplace Health & Safety** – The Work Health & Safety Team are a shared service that works with all Agencies within the Archdiocese of Brisbane, to reduce risk to achieve optimal safety for our employees, clients, volunteers and visitors. Through the provision of our services and coordination of the Safety Management System, we assist Agencies and Parishes to have mechanisms and systems in place to assist in fulfilling legislative obligations in relation to Work Health & Safety and Workers' Compensation and Rehabilitation.
- **Bequests** – Where an Archdiocesan Agency or Parish is bequeathed a gift in a will the Office of Legal, Governance & Risk will manage the gift on behalf of the Agency or Parish.
- **Archives** – The Archdiocesan Archives houses a rich history of items of historical significance from the earliest days of settlement in the township of Brisbane dating back more than 150 years. The Archdiocesan Archivists collect, assesses, preserves and conserves archival materials, records and artefacts in accordance with Canon Law.

Archdiocesan Services

Archdiocesan Services provides services and support to parishes and other Archdiocesan agencies in the following areas:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Nudgee Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

Evangelisation Brisbane

The mission of Evangelisation Brisbane is to work with, inspire and empower parishes and communities to encounter Jesus and live the joy of the Gospel.

Evangelisation Brisbane has a vision to see the Catholic Church become a home for every generation. We envisage a Church:

- that welcomes and engages children in such a way that they love to attend and ask their parents to take them
- where teenagers find purpose and meaning as they encounter truth, beauty and goodness
- where young adults not only continue to practise their faith, but develop it and are empowered to lead and minister
- where adults do not merely attend, but continue to deepen their faith and become missionary disciples
- where families find such welcome, love and support that Church becomes an extension of their family
- that reaches beyond its own walls in working towards justice and peace in our world and building relationships with other Christian traditions, other religious traditions and with government
- where every person is loved, welcomed, and transformed as they encounter Jesus and encounter those who walk in his footsteps.

Evangelisation Brisbane provides services and support to parishes, communities and other Archdiocesan agencies in the following areas:

- Ministry to Children and Families
- Ministry to Youth and Young Adults
- Ministry to Adults
- Strategic Planning and Pastoral Planning
- Inclusion
 - Multicultural Pastoral Care
 - Refugee Sponsorship
 - Reconciliation with First Nations Peoples
 - Laudato Si' Ecological Spirituality
 - Ecumenical and interfaith dialogue
 - Justice and Peace
- Vocational Discernment: calling people forward for seminary formation
- Santa Teresa Spirituality Centre

Our agencies



ABN 35 020 644 975



1,626
EMPLOYEES



155
VOLUNTEERS



ABN 51 626 296 801



1,558
EMPLOYEES



134
LONG DAY
CARE CENTRES,
KINDERGARTENS
AND OUTSIDE
SCHOOL HOURS
CARE SERVICES

Income

To 30 June 2023, Centacare received income of \$244.4 million of which \$68.3 million was from government funding of aged care and family and relationship services payments. In addition, there was \$161.6 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$14.5 million.

\$68.3M in government funding

\$161.6M in fee income

\$14.5M in other income

27,749 children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

10,673 older Queenslanders accessed services to help them to live well in their home and community.

17,004 people affected by domestic and family violence were provided early intervention and crisis response services.

1,993 people with disability accessed services to help them live the life they choose.

9,482 people received home maintenance and modification support to help maintain their independence.

2,036,386 hours of support were provided to older people and people with disability.



ABN 24 547 377 893



70

EMPLOYEES
(51 FTEs)

Income

To 30 June 2023, Xavier Childrens' Support Network received income of \$6.5 million of which \$5.8m was NDIS income, \$0.2 million of investment revenue, \$0.1 million of aged care income and \$2.0 million in other income (including \$0.4 million from the sale of non-current assets).

\$5.8M in NDIS income

\$0.1M in investment revenue

\$0.2M in aged care income

\$0.4M in other income



**Brisbane
Catholic
Education**

teaching · challenging · transforming

ABN 49 991 006 857



13,637

EMPLOYEES
(8,671 FTEs)



8,139

TEACHERS
(5,617 FTEs)



76,827

STUDENTS

146 SCHOOLS

107 PRIMARY SCHOOLS

28 SECONDARY SCHOOLS

11 PREP TO GRADE 12
SCHOOLS

12.8% of students in the Archdiocese attend
a Brisbane Catholic Education school

59.9% of students identify as Catholic

3.3% of students identify as Aboriginal
or Torres Strait Islander

32 different religious faiths amongst
students

Income

In 2023 Brisbane Catholic Education received an income of \$1,491 million of which \$1,454 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

\$1,154M in Australian and Queensland
Government grants

\$274.8M in school fees and levies

\$63M in other income

Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



206
EMPLOYEES



9
VOLUNTEERS



94
PARISHES, 19
OF WHICH ARE
RELIGIOUS ORDER
PARISHES



84
PARISH PRIESTS OR
ADMINISTRATORS

27 Priests in the Overseas Priests Program

684,423 Catholics in the Archdiocese

41,770 attending Sunday Mass per week
(measured through Parish census in
May 2023)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Procurement
- Communication and Engagement
- Clergy Office
- Episcopal Office
- Financial Administrators Office
- Work Health Safety
- Archdiocesan Archives
- Safeguarding
- Legal, Governance and Risk

Evangelisation Brisbane

ABN 25 328 758 007



49
EMPLOYEES



8
VOLUNTEERS

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office

Archdiocesan operations

In 2023, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$95.8 million. This was represented by an internal distribution of \$22 million from the ADF, fees, rent and investment income of \$23.7 million, sales of \$5.0 million and other income of \$44.7 million.

The Archdiocese operates within the state of Queensland and has no offices in any other state or country.



**ARCHDIOCESAN
DEVELOPMENT
FUND**

ABN 25 328 758 007



17

EMPLOYEES



1,115

MEMBERS

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals.

Income

In 2023 the ADF generated \$124.6 million through the provision of internal church treasury service to Catholic entities. Loan income of \$68.8 million and investment income of \$55.8 million (net of amortisation).

Our people

The Archdiocese and its agencies have standards of conduct for employees and volunteers to maintain a safe and healthy environment. Our commitment to these standards requires that we conduct background checks for all persons who might engage in direct and regular involvement with children, young people and/or vulnerable adults.

The Archdiocese's People and Culture department has a Justice, Equity, Diversity and Inclusion (JEDI) group who consult with employees on issues concerning gender equality, diversity and inclusion in the workplace. The group meet regularly to identify and discuss workplace issues and undertake related activities.

The Executive Directors/General Manager provide annual certifications to ensure they comply with all legal requirements in the engagement and employment of employees and that they meet their obligations under Australian employment legislation. These certifications are presented to the various governance councils of the Archdiocese and our external auditors.

The Archdiocese established the Stopleveler whistleblower service in 2015. It provides employees, volunteers and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocese and our agencies continue to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, as required.

Our supply chain

Brisbane Catholic Education engaged with approximately 8,000 unique suppliers during the 2023 reporting period. Quantitative analysis showed that approximately 12% of suppliers made 80% of spend and invoice volume, with the majority of suppliers based in Australia, though the majority of products are manufactured overseas.

Brisbane Catholic Education procurement operates under a de-centralised model, with a push to bring more contracts under a centralised contract lifecycle management system. This enables well rounded

contract and supplier management (especially, risk and performance) at a system-level, with key focus on categories that support strong commercial focus, risk management, RAP commitments, Modern Slavery mitigation, promotes Catholic Social Teaching, especially, those contained in the Laudato Si' Action Plan.

The range of goods and services acquired through procurement activities range from consumables, ICT equipment, motor vehicles, building and construction materials, uniforms, cleaning services and office and school equipment. Across the Archdiocese, there continues to be a high degree of independence within schools, parishes and services to work with local suppliers, which provide support and employment to local communities. As risks are identified, they are assessed and appropriate engagement and risk assessments undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, several categories have been identified as high risk and will be the focus for 2024. These are ICT, building and construction, cleaning and security, uniforms, waste management, furniture and office supplies. Additional categories will be added as further risk assessments are undertaken.

During 2023, Brisbane Catholic Education piloted its Cleaning Services and Uniform Toolkits to ensure procurement activities (sourcing, contracting and supplier management) undertaken at school-level are transparent, structured and well governed, and reduce systemic risks, in particular, modern slavery and ecological risks. As a result of the pilot, feedback from schools was taken on-board, and was focussed on education, ease of use and fit for purpose of these toolkits. During 2024 and beyond, these toolkits will be rolled out in conjunction with a procurement literacy program to improve procurement skills and capability at school-level.

Beyond 2024, Brisbane Catholic Education will consider establishing its own cleaning services panel to drive supply chain transparency, on-board accredited Cleaning Accountability Framework (CAF) suppliers and ensure Brisbane Catholic Education can affect direct modern slavery compliance requirements.

Additionally, Brisbane Catholic Education is targeting on-boarding the top 100 suppliers in high-risk

categories onto the Sedex platform, ensuring SAQs are completed to 100% and that mandating these suppliers connect to Brisbane Catholic Education on the Sedex platform to ensure visibility of supply chain can increase our supply chain risk management efforts.

In the Archdiocese there is no centralised contracts system in place. Contracts can be short or medium term and responsibility for contracts lies at varying levels of the organisation including archdiocesan offices, schools, parishes and service centres.

Complex, higher value contracts are managed by senior agency offices (i.e. construction, design, consulting, internet and electricity). In Brisbane Catholic Education contracts are managed through a contract management system that enables management of key deliverables and KPIs within contracts including management of modern slavery risks. COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2023. Vendor engagement and education will continue to be a focus in 2024 and beyond.

The following table summarises the Archdiocese vendor analysis for the 2023 financial year.

	2023 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	7,590	350	72%	\$10,182,633	\$150,083
Archdiocesan Services	818	102	87%	\$13,092,789	\$50,876
Archdiocesan Development Fund	40	40	100%	\$756,087	\$78
Centacare – PBI	1,928	186	76%	\$2,778,719	\$30,111
Centacare Administration Services	1,772	126	83%	\$1,645,287	\$20,059
Xavier	26	26	100%	\$141,161	\$10,791
Parishes (*Spend > \$10,000)	104	104	100%	\$538,219	\$23,837
	12,278	934	74%		

Table 1: Archdiocesan entities revenue and vendors

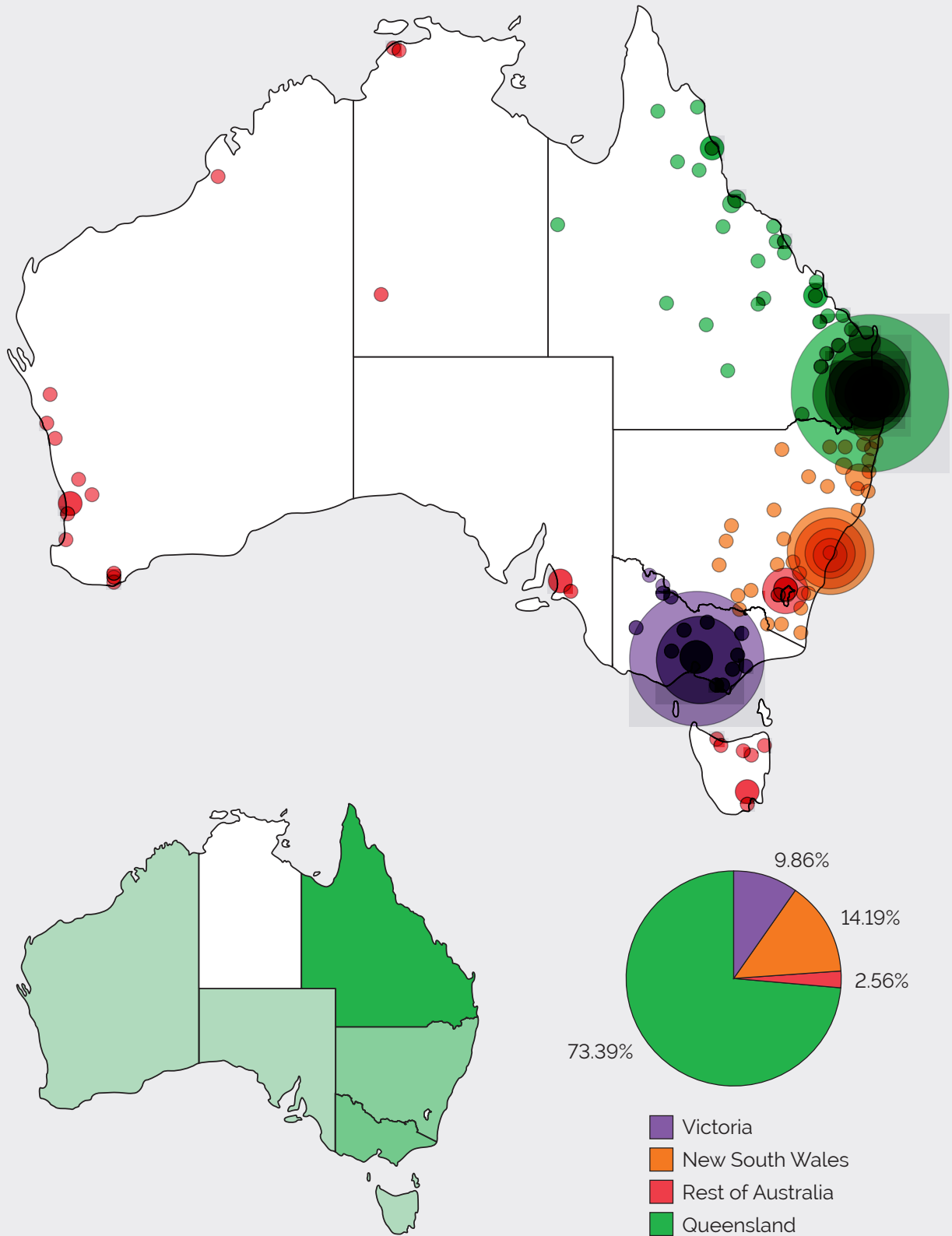
The percentage of the total spend analysis has increased from 68% in 2022 to 74% in 2023. Analysis of the Archdiocese's financial data shows the major spend categories are:

- Professional Services – 17%
- Finance and Investment – 12%
- ICT Hardware – 11%

- ICT Software and network services – 9%
- Facility Management, consumables and maintenance – 7%
- Building and construction – 6%
- Furniture and office supplies – 6%

For a detailed breakdown of each agency's spend by category refer to Appendix D.

The BCE Procurement team have further analysed the available spend data in terms of supplier location, which would indicate the majority of BCE's suppliers are located (or have a head office located) in Australia:



Reporting Criteria 3:

Modern slavery risks in operations and supply chains

Our operations

The Archdiocese has implemented a number of steps since the inception of the Modern Slavery Act 2018 to identify modern slavery risks in our operations, especially through the Covid 19 years.

The implementation of sound recruitment processes to ensure that all employees are engaged in a fair and equitable manner has been a key driver in providing us with confidence that the residual risk of modern slavery in our staffing is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other potential human rights issues that could arise in our operations include equality, fair pay, discrimination and safety. While these are not necessarily indicators of modern slavery risk, the Archdiocese acknowledges they are potential labour rights issues which could impact our reputation.

The key modern slavery risks identified in the Archdiocese are with our tier one suppliers not complying with Australian workplace laws, specifically those related to health and safety,

excessive working hours, unpaid work, below legal minimum wages, forced labour, child labour and limited or no freedom of association.

There are three factors which, if they exist in our tier one supplier's business's, can increase the risk of modern slavery.

- i. Where Archdiocesan suppliers outsource activities, meaning we do not have a clear line of sight of who is supplying the end product. This also includes where our suppliers use sub-contractors.
- ii. The risk of unfair working conditions when people are employed through third party labour hire companies for unskilled and semi-skilled labour or where our suppliers utilise sub-contractors to provide cleaning services, construction labour, or groundskeeping services at lower than award levels.
- iii. Where countries are associated with increased risks of modern slavery. In table two we have identified some of the countries and risks relevant to our supply chain.

Country	Risk	Example of product/service sourced
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	ICT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics

Table 2: Source country risks

The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will assist in managing these risks and will be focusing on developing these relationships further in the coming years with our larger suppliers. The Archdiocese does acknowledge there may also be heightened risk of modern slavery among tier two suppliers and those further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices.

Since 2020, the Archdiocese Modern Slavery Working Group (MSWG) has been analysing our external engagements for modern slavery risks. The group, which comprises members from all Archdiocesan agencies, initially extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure in excess of \$100,000. This work will be extended in 2024-25 and continues to use the Australian Catholic Anti-Slavery Network's (ACAN) risk taxonomy.

Where a modern slavery risk is identified, further due diligence this collaboration with the vendor is undertaken to mitigate any ongoing risks and this will be assisted in the expanded use of Sedex in 2024. The Archdiocese seeks to maintain relationships with vendors where possible in order to further educate and raise awareness of modern slavery within our supply chain.

In 2023, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 350 suppliers from Brisbane Catholic Education (accounting for 73% of their annual spend), 186 suppliers from Centacare (accounting for 76% of their annual spend) and 102 suppliers from Archdiocesan Operations (accounting for 87% of their annual spend). Figure three below outlines all of the key categories identified in the risk analysis and the Archdiocese consolidated spend for each category in 2023.

Archdiocese Of Brisbane Consolidated Summary of Vendor Assessed Expenditure

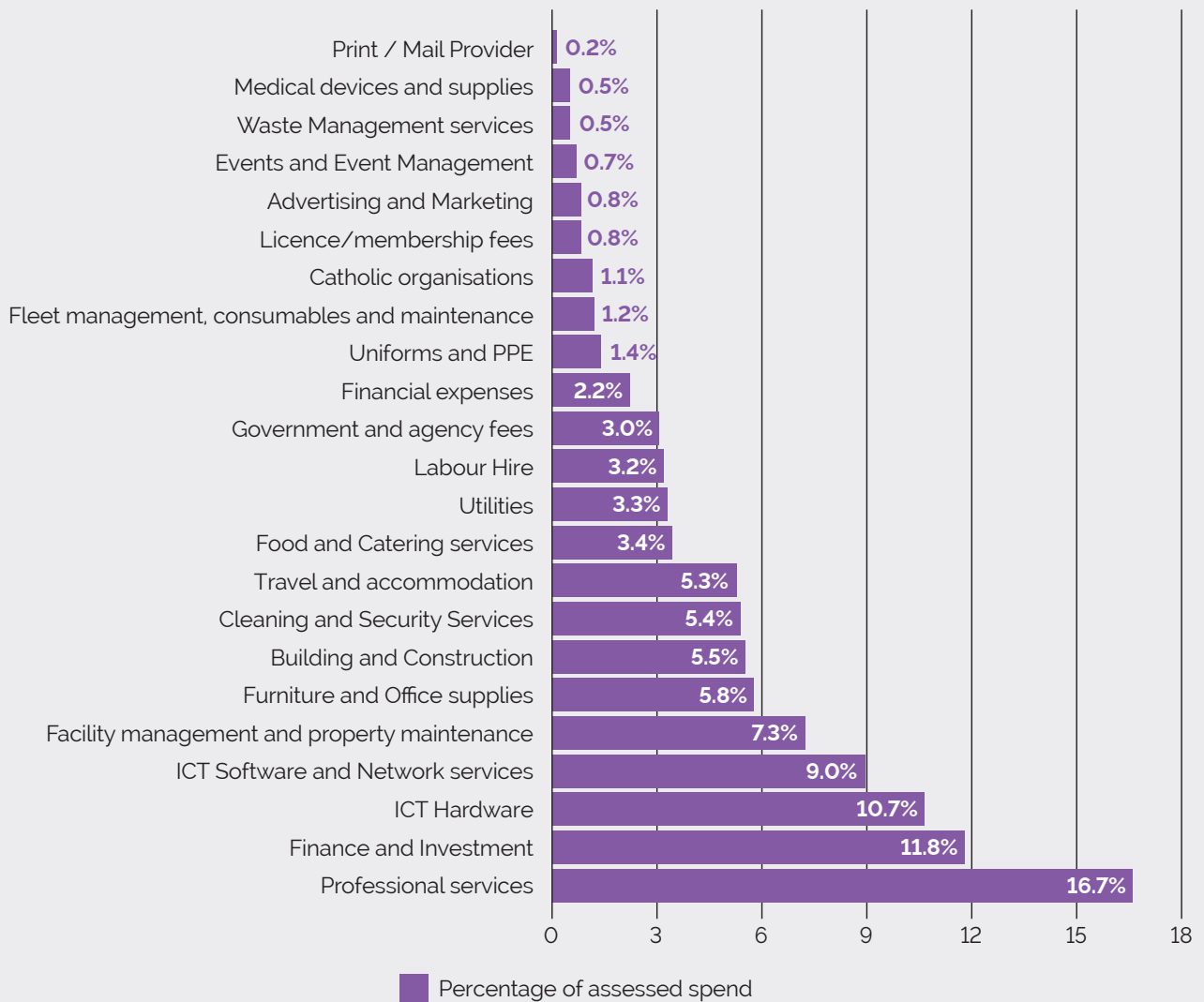


Figure 3: 2023 Consolidated spend profile of the Archdiocese of Brisbane

As we expand our analysis of consolidated Archdiocesan spend, we continue to identify that building and construction, information and communications technology, facilities management, furniture and office supplies, and cleaning and security services are key risks within the Archdiocese’s supply chain. In 2023 there was a marked fall in the overall spend of building and construction, facilities management as more detailed analysis of our vendor network was undertaken. Other sectors remained relatively constant.

For a detailed breakdown of each entity’ spend by category refer to Appendix D.



Supply chain risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 22 high level procurement categories

identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers.

High Risk Categories	No. of Suppliers	Annual Spend 2023
Finance and Investment (please note these figures will not be included on 2023 compendium, these are for risk assessment purposes only)	32	\$35,656,806
ICT Hardware	36	\$34,060,305
Facility management & property maintenance	114	\$21,553,076
Furniture and office supplies	52	\$17,917,104
Building and construction	101	\$16,912,575
Cleaning and security services	53	\$16,774,154
Food and catering services	31	\$10,682,293
Labour Hire	9	\$8,907,799
Uniforms and PPE	13	\$4,527,547
Events and event management	22	\$2,106,070
Medical devices and supplies	18	\$1,693,970
Waste management services	4	\$1,607,440
Total	485	\$172,399,139

Table 3: High Risk Vendor Analysis

The Archdiocese has identified 485 vendors across 12 high risk industry sectors which have been identified for further analysis over the next three years. Our action plan for 2024 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 485 vendors account for more than 50% of the Archdiocese's 2023 annual assessed spend. Where appropriate a number of these vendors will be asked to join Sedex to ensure ongoing review of their modern slavery obligations.

Category	Spend description	Risk	% of expenditure
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	12
ICT Hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime. Software and application development, support services, call centres (offshore).</p>	HIGH	11
ICT Software and network services	Software and application development, support services, call centres (off- shore).	HIGH	9
Facilities Management and Property Maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	HIGH	7
Building and Construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	HIGH	6

Category	Spend description	Risk	% of expenditure
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	6
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	HIGH	6
Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc).	HIGH	2
Other	Categories < 2% requiring further analysis	MEDIUM	17
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk)	MEDIUM	4
Professional Services	Other	LOW	17
Government and Agency Fees	Other	LOW	3
			100

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

Reporting Criteria 4:

Actions taken to assess and address risk

Throughout the 2023 reporting period, the Archdiocese has undertaken an extensive review of our decentralised supply chain to address the modern slavery risks in our operations. Our membership and active participation in ACAN, including monthly webinars, has greatly assisted with this. In addition, the roll out of modern slavery e-learning modules for employees has assisted with ensuring employees are able to identify modern slavery risks and understand their role in eliminating these risks. The participation in the online learning modules in 2023 did not meet our expectations as critical business and staff changes saw a re-focus of service deliverables within Centacare and Brisbane Catholic Education. To ensure a better result in 2024, senior executive will participate in the online training and encourage the participation of relevant staff with procurement responsibilities.

Actions taken during reporting period

1. Designation of a second Modern Slavery Liaison Officer (MSLO) – The MSLO is responsible for coordinating overarching operational activities to identify and mitigate modern slavery risks within the Archdiocese. The MSLO is responsible for promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Program Managers executive to discuss implementation of risk management programs. A second MSLO role was established in 2023 to coordinate the implementation of modern slavery risk management within Brisbane Catholic Education and to collaborate with the other Archdiocesan agencies.

2. Supplier due diligence and performance management – In 2022 Brisbane Catholic Education commenced implementation of the supplier management module within its source to contract management platform (Portt). This new module will enable improved upfront and ongoing assessment and management of supplier modern slavery risk. Implementation was put on hold in 2023 until the completion of the Supplier On-Boarding project was completed.
3. Supplier Code of Conduct – In 2022 a Supplier Code of Conduct was developed which has been shared with suppliers as part of procurement activities. Key tenders and RFQs issued by Brisbane Catholic Education required suppliers to agree to comply with the Supplier Code of Conduct as a condition of contract approval. In 2023 BCE identified additional features to be implemented within the Code of Conduct, a refreshed version will be rolled out to suppliers in 2024.
4. The Archdiocese and Brisbane Catholic Education have adopted some of ACAN's e-learning training modules. These will become available to employees in 2024 through the Brisbane Catholic Education Learning Management System (LMS).

Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies provided the details of 100 vendors to Sedex, one of the world's largest ethical audit platforms dedicated to providing transparency in global supply chains. Subsequently in 2023 the Archdiocese provided approximately 300 vendors details to match to the Sedex platform. Unfortunately, the assessment of the vendor was a manually intensive process which required ACAN support in undertaking the matching of codes.

In 2024 the Archdiocese and its agencies will develop internal capacity to utilise Sedex more efficiently. This will involve improved resource management, establishing mandatory RFQ/RFP pre-qualification self-assessment questionnaires (SAQ) under key vendor categories which will continue through 2025.

In 2024, Brisbane Catholic Education will establish a 3-year Modern Slavery Action Plan (MSAP) that discerns and is connected to the Laudato Si' Action Plan (LSAP) and aligns to ACAN's 2024 program of work.

The Modern Slavery Action Plan will focus on centralising key procurement functions where our suppliers are identified as high-risk across vendor categories. It will also form the cornerstone of our approach to mitigating modern slavery risk and eliminating modern slavery from our supply chains. The plan will also include an education and awareness program for senior leaders and employees who directly engage suppliers for goods and services.

In quarter 3, 2024 Procurement will commence laying the groundwork for Supplier Management aligned with BCE's current source-to-contract process.

All vendors in high risk categories with an annual expenditure in 2023 in excess of \$250,000 will have an increased level of due diligence applied by the Archdiocese to ensure compliance with the requirements of the Modern Slavery Act 2018.

In late 2023 the Laudato Si' Reference Group and the BCE Modern Slavery Reference Group was merged to create a single point for oversight of all actions

regarding the delivery of the Laudato Si' Action Plan and the BCE Modern Slavery Action Plan. This group will support the ongoing development and delivery of actions across the Archdiocese.

In addition, the Parish Toolkit will be rolled out to all 94 Parishes of the Archdiocese and a communication strategy will be implemented internally and through social media by the Archdiocese in 2024.

2023 Case Study: Category Management Framework

In the 2022 reporting period, approximately 90% of contracts operated under supplier terms and conditions that presented challenges to Brisbane Catholic Education. During 2023, Brisbane Catholic Education took proactive measures to address these issues with the implementation of its Category Management Framework, targeting the cleaning and waste management categories to establish a strategic approach. This initiative was designed to span a three-years, focusing on enhancing value and reducing risks within these sectors.

As a result of this initiative, Brisbane Catholic Education successfully transitioned nearly 60% of cleaning contracts to its own terms and conditions. These contracts now incorporate robust modern

slavery clauses, fair contract terms, and the exclusion of high-risk clauses such as auto-renewal and onerous termination provisions. This shift has notably improved oversight of these suppliers and allowed for stronger contract management with a key focus on compliance and accountability.

Furthermore, the adoption of this strategic, category-based approach has enabled Brisbane Catholic Education to expand its contracts under management by approximately 200, totalling 440 contracts. These contracts now extend beyond cleaning and waste management to include print, uniforms, and office supplies, further reinforcing the organisation's commitment to ethical procurement practices.

Action Plan

Action category	Actions for implementation	Status
Business and management systems	Establish a 3-year Brisbane Catholic Education Modern Slavery Action Plan (MSAP), that discerns and is connected to the Archdiocese of Brisbane Laudato Si' Action Plan (LSAP) and aligns to the ACAN 2024 program of work.	To be established in 2024
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment, will be approved by the Executive Director.	To be implemented in 2024
Risk management	Develop RFQ and RFP templates with strong mandatory pre-qualification criteria, in particular, criteria that reduces modern slavery risk exposure and highlights potential modern slavery within the suppliers supply chain.	Implementation progressing Phase 1 (cleaning and uniform categories) through 2024
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	Develop internal capacity to utilise Sedex in 2024
Procurement and supply chain	Establish a supplier on-boarding framework and process that enables the supplier management strategy, driving stronger pre-qualification and compliance for suppliers engaged by Brisbane Catholic Education.	Commence Q3 2024 and into 2025
	Ensure cleaning, uniforms, waste management, print, ICT, and furniture and office supplies contracts which are managed by Brisbane Catholic Education Procurement contain appropriate modern slavery clauses.	A rolling program starting in 2023 and to be completed by 2025
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	Commence Q3 2024 and into 2025
	Ensure all contracts contain appropriate modern slavery clauses.	Completed in 2023
Human resources and recruitment	Develop a modern slavery communications strategy.	Commenced early 2024
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commence Q2 2024
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2024

Customers and stakeholders	Engage key stakeholders on our modern slavery expectations.	Commenced in 2021 and is ongoing
	Establishing RFQ/ RFP mandatory pre-qualification to require suppliers to have active Sedex memberships, complete the Self-Assessment Questionnaire (SAQ) up to 100% and connect to Brisbane Catholic Education as a supplier on Sedex.	Underway in 2024 for cleaning, waste management and uniform categories
	Refresh the Archdiocesan and Brisbane Catholic Education Supplier Code of Conduct and communicate with high risk suppliers via BCE's external website, through RFQ/RFP processes and through on-boarding suppliers to the BCE Buying Platform (especially for catalogue- based suppliers).	Underway in 2024

Table 5: Archdiocese's action plan

Domus 8.7

The Archdiocese of Brisbane is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for or cooperating in, actions to address harms to people and root causes to mitigate future risks, if the Archdiocese is found to have caused or contributed to modern slavery.

We recognise the complexity of remediation, the need for specialist resources and want to ensure the most comprehensive and rights-compatible outcomes for people affected by modern slavery. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery. The Archdiocese's remediation efforts will continue to be enhanced through further policy development, development of detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders.

By partnering with Domus 8.7 the Archdiocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve our risk management and responses.

Domus 8.7 affirms that:

1. Modern slavery remediation is about the victim, first and foremost.
2. Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights, etc.
3. Proper remediation teaches us something about where the risks were not adequately managed, and serves as a feedback mechanism.
4. Remediation is not only about having a whistle blower policy, it is about righting the wrongs/ harms to people.
5. Partnership with Domus 8.7 is not about outsourcing responsibility, it is about improving the ability to respond.

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

When suspicions of modern slavery come to the Archdiocese's attention through whistleblower or other channels, employees are advised to contact relevant law enforcement agencies and or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

What is a 'remedy pathway'

The right to remedy is a basic principle in international human rights law. In reality, people adversely impacted by corporate human rights abuses often struggle to access adequate or effective remedy.

The provision of remedy involves a business implementing actions and processes to investigate and redress impacts on workers involved in their business operations and supply chains, and ensure future impacts on people are prevented.

Key elements of an effective remedy pathway are:

- Victim safety, protection and consent – Ensuring safety and protection of people impacted is the primary focus of remedy. Any work with people impacted is undertaken with their full knowledge and consent.
- Human rights based approach – The fundamental human rights of people impacted are protected and respected at every step along the remedy pathway.
- Independent advice and support – Support is independent and never contingent upon cooperation with law enforcement or other authorities.

Why a remedy pathway is needed

A remedy pathway provides several direct and indirect benefits to businesses:

- Enhances modern slavery risk management programs within operations and supply chain
- Provides assessment, support and guidance in relation to modern slavery concerns
- Develops internal capability to manage risk and engage staff
- Establishes a documented pathway to manage (potentially) complex humanitarian issues

- Addresses a key mandatory reporting requirement of the Modern Slavery Act 2018
- Boosts credibility and reputation as a responsible business
- Enhances standing with regulators, shareholders, customers and community groups

Integrating remedy into systems and processes demonstrates an ongoing commitment to protecting the human rights of people in the operations and supply chains of our operations.

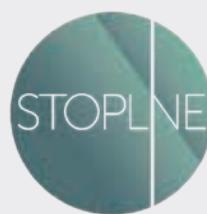
DOMUS 8.7 is an agency of the Catholic Archdiocese of Sydney. Domus 8.7 staff can help workers, businesses or community members to obtain support, advice and guidance on how to respond to suspected or actual situations of modern slavery.

Contact Domus 8.7 on 02 9307 8464 or send a message to <https://www.acan.org.au/contact>

In cases where there is an immediate threat to life and safety, dial 000.

Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stopleveline Whistleblower Hotline is provided for any employee, supplier or customer to anonymously report suspected or actual wrongdoing in our organisation, including that related to modern slavery.



Archbishop Mark presents the Stopleveline and Whistleblower Policy

<https://www.youtube.com/watch?v=W7oXT83XP-s>

Reporting Criteria 5: Effectiveness assessment

In previous years the Archdiocese used the ACAN Gap Analysis which focussed on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders. These assessments provided the internal measurement systems necessary to address modern slavery risk in our journey.

In 2024, ACAN shifted away from the Gap Analysis previously reported towards a focus on the maturity of our modern slavery risk management approach. As we present the fourth modern slavery statement for those involved with ACAN from the start, it's essential to recognise the need for a reset to aim for continuous improvement.

This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.

5. **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

	Activity	Catholic Archdiocese of Brisbane
Internal / Staff	Hours spent on modern slavery activities	967
	Individual staff completed e-learning	383
	E-learning modules completed	433
External / Supplier Engagement	Total number of suppliers	15,487
	Number of suppliers with visible contact information and ABN	8,708
	Number of suppliers across high-risk categories	1,391
	Number of ACAN Supplier Surveys completed	519
	Supplier staff attending capacity building webinars	24
	Invited to join Sedex	77
	Joined Sedex	10
	Sedex SAQ completed	4
	Social audits	1
	Corrective actions	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Table 5: Baseline Measure of the Archdiocese's Effectiveness Assessment

In delivering our fourth Modern Slavery Statement, the above table identifies the internal staff activity for the period, the analysis of our external vendor engagement and referrals to Domus 8.7. This data reflects the commitment and effort by the Archdiocese in addressing the issue of modern slavery.

Reporting Criteria 6:

Process of consultation with entities owned or controlled

The Archdiocese operates a Modern Slavery Working Group (MSWG) with representatives from all agencies. In 2023, the majority of the MSWG representatives moved on from the Corporation, resulting in a restructuring of the Modern Slavery processes. The Archdiocese is in the process of identifying new candidates to join the MSWG for 2024 and beyond.

In late 2023, Brisbane Catholic Education established the Modern Slavery and Laudato Si' Reference Group which will oversee the implementation of BCE's Modern Slavery Action Plan as well as the deliverables under the Laudato Si' Action Plan.

In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of

suppliers. Following an interrupted 2023, we anticipate expanding consultation across the Archdiocese as we embed the goals outlined in this statement for 2024-2025.

The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Risk Management Framework.

The two appointed MSLOs continue to engage with the ACAN monthly webinars. This enables greater collaboration across Catholic identities as well as deepening our understanding of the impact these practices have on our communities. The information shared in this forum is then shared across and within their networks to further embed this conversation at all levels within the agencies and offices.

Reporting Criteria 7:

Any other relevant information

In 2023, Archbishop Mark Coleridge presented the Archdiocese with his priorities for the future, which he called 'With Lamps Ablaze'. These apostolic priorities include:

1. Teaching Prayer
2. Reshaping Parish Communities
3. Bringing Cultural Communities to the centre
4. Responding to abuse and the abused
5. Engaging anew with First Nations peoples
6. Implementing integral ecology
7. Embedding synodal governance

Of these priorities, embedding synodal governance will look at changing our culture, with some potential for structural change.

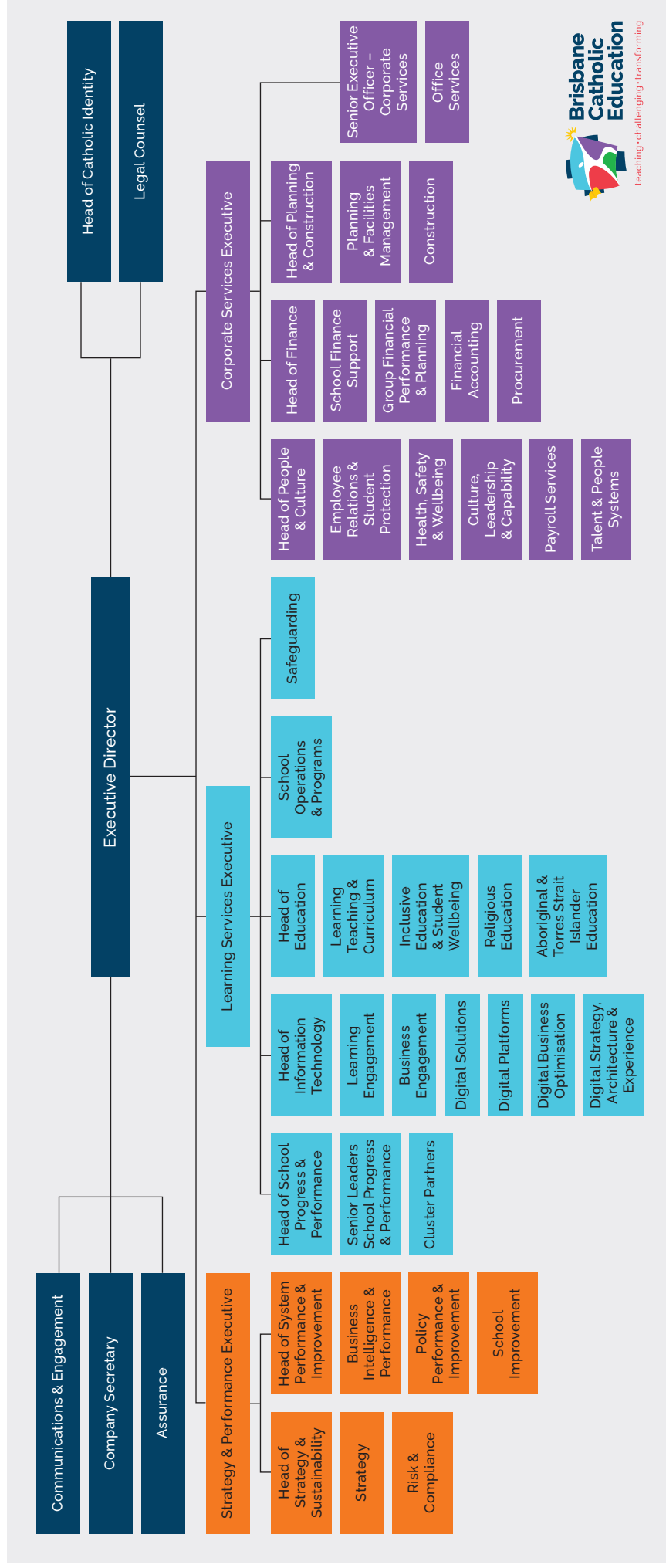
Embedding Synodal Governance

We have begun the long and complex process of moving towards a synodal mode of governance in the Church, but the process is far from complete; and there is much to be done to embed synodal governance more securely at every level in the Archdiocese. This is more a matter of culture than structure, but it does have structural implications, given that many of our structures reflect a mode of governance that is more hierarchical than synodal. In 2024 we will celebrate an Archdiocesan Synod to embed the decisions and decrees of the Plenary Council in the life and mission of the Archdiocese and to set in train a regular rhythm of Archdiocesan Synods.

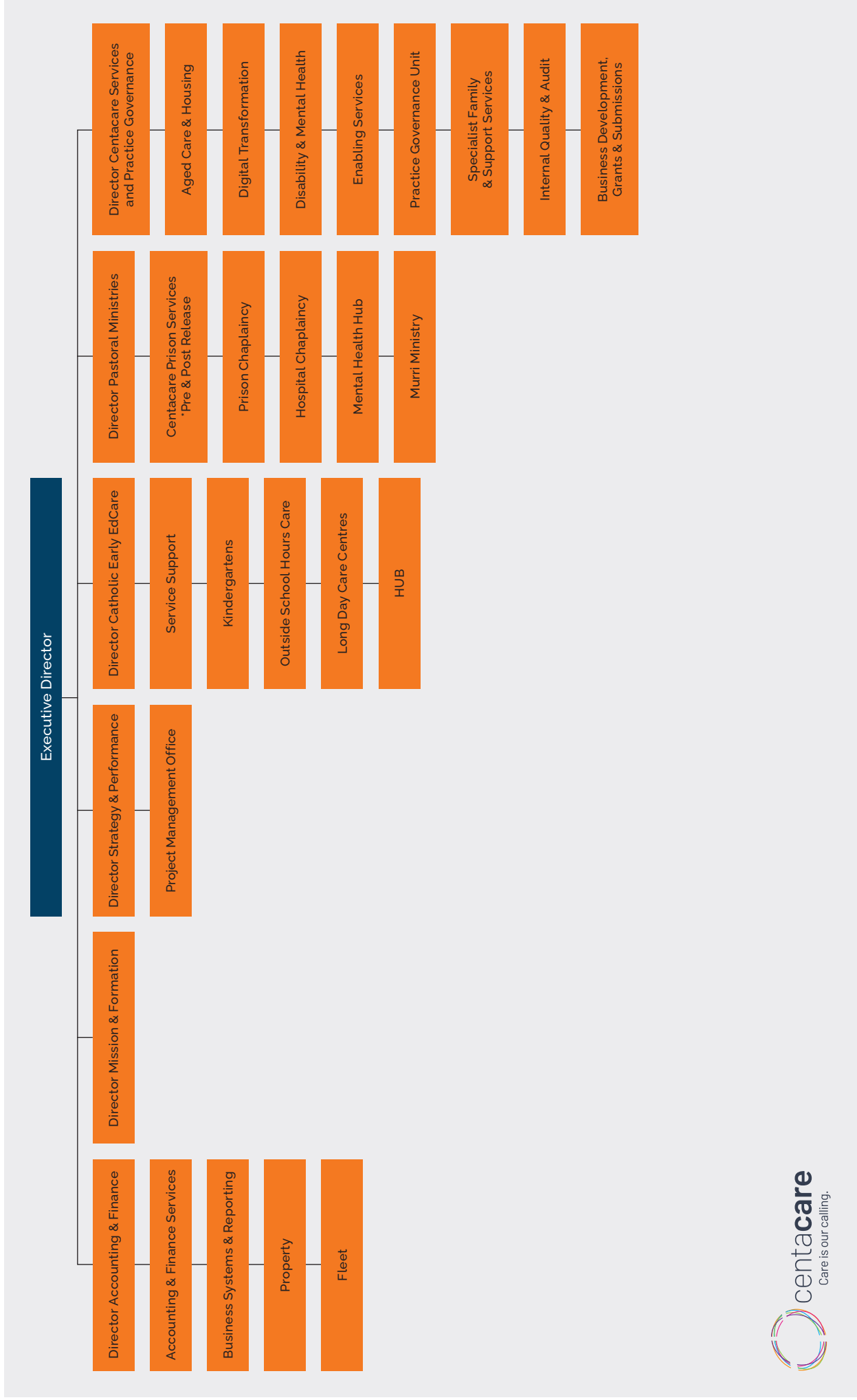
We have also undertaken a thorough review of governance in the Archdiocese, which may see the establishment of an Archdiocesan Council, building upon the current Archdiocesan Finance Council to make it more a Pastoral or Mission Council. Deaneries and parishes too will have to ask how they might move to a more synodal mode of governance. Synodality implies inclusion, and therefore we will have to keep asking how we might at every level include women in the decision-making processes of the Archdiocese. So too synodality requires transparency and accountability, and we will have to keep asking what we need to do make the Archdiocese more transparent and accountable.

Appendices

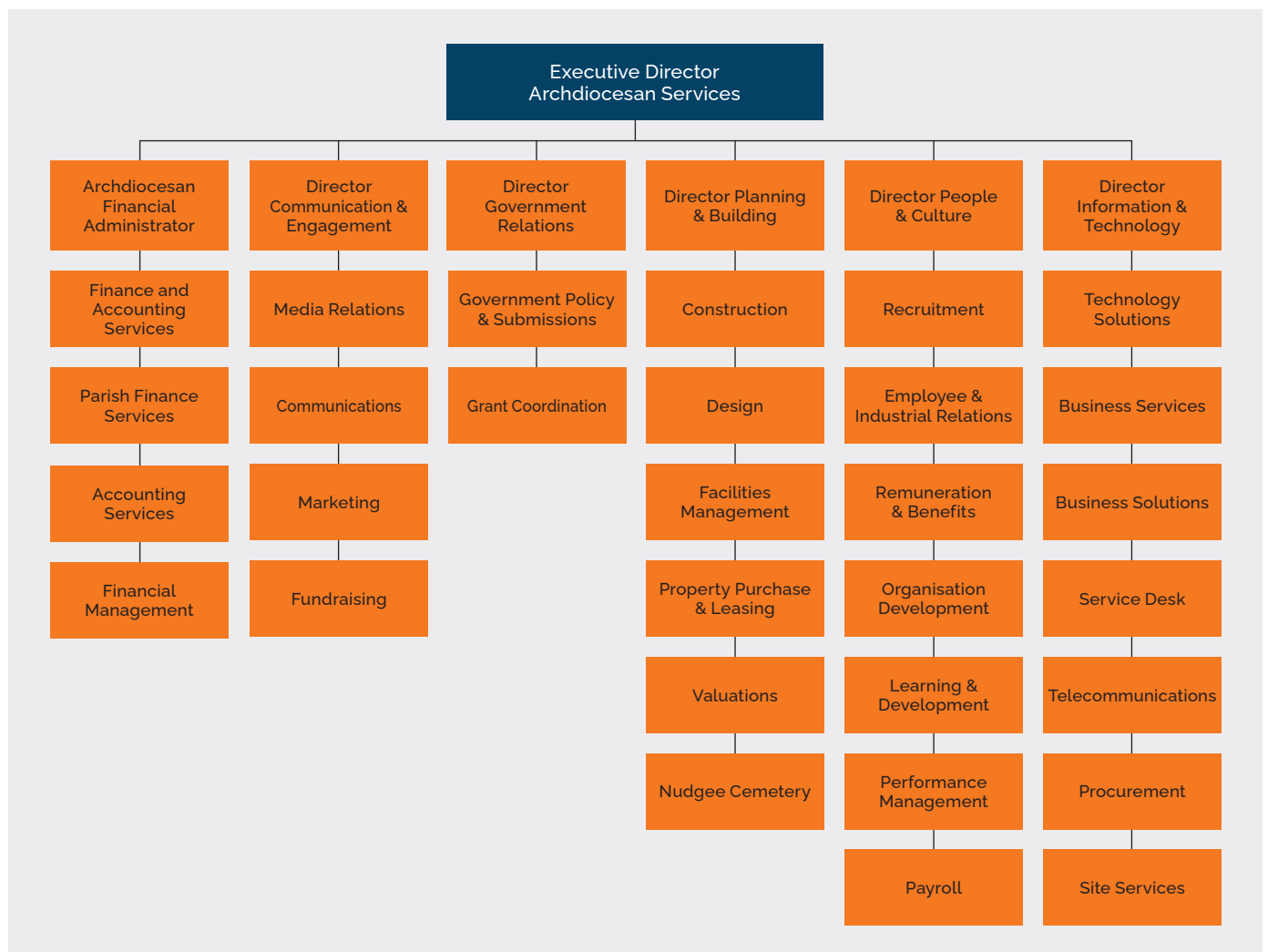
Appendix A: Brisbane Catholic Education organisation chart



Appendix B: Centacare organisation chart

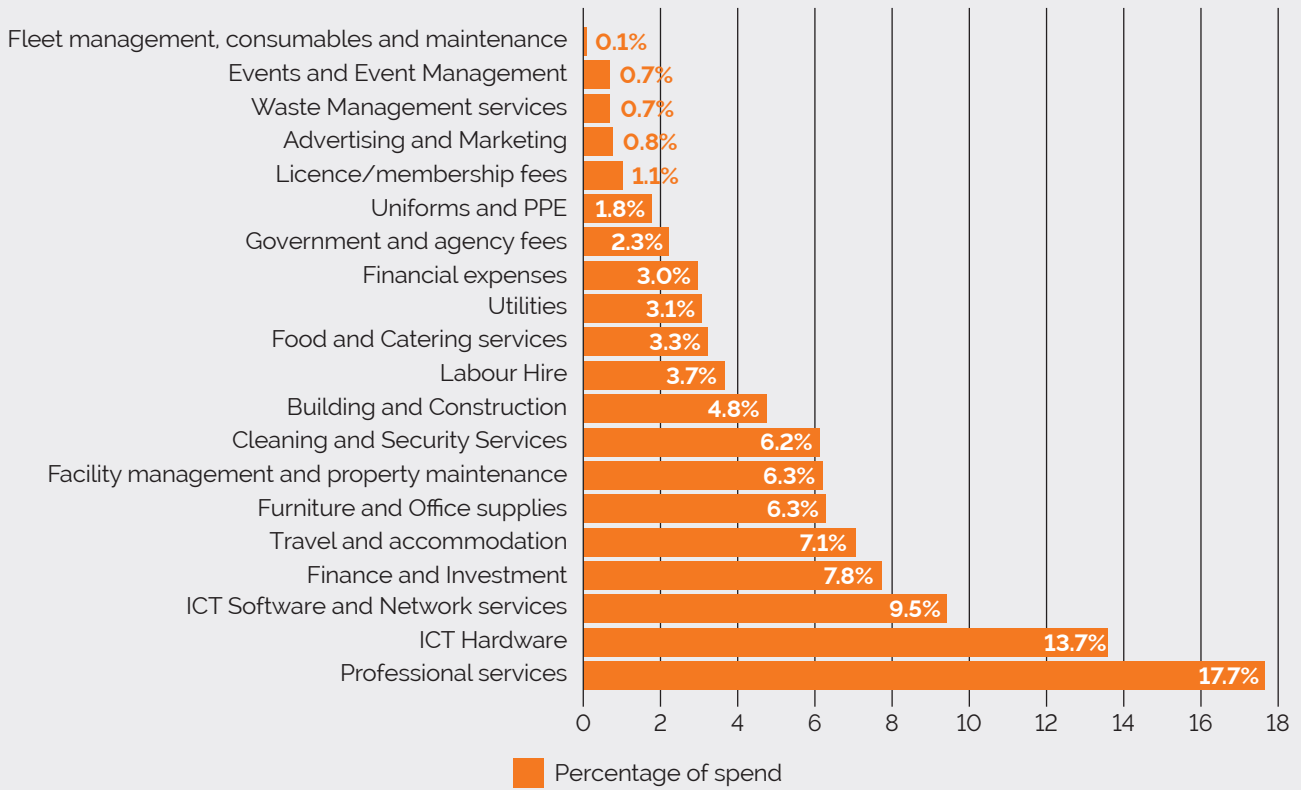


Appendix C: Archdiocesan Services organisation chart

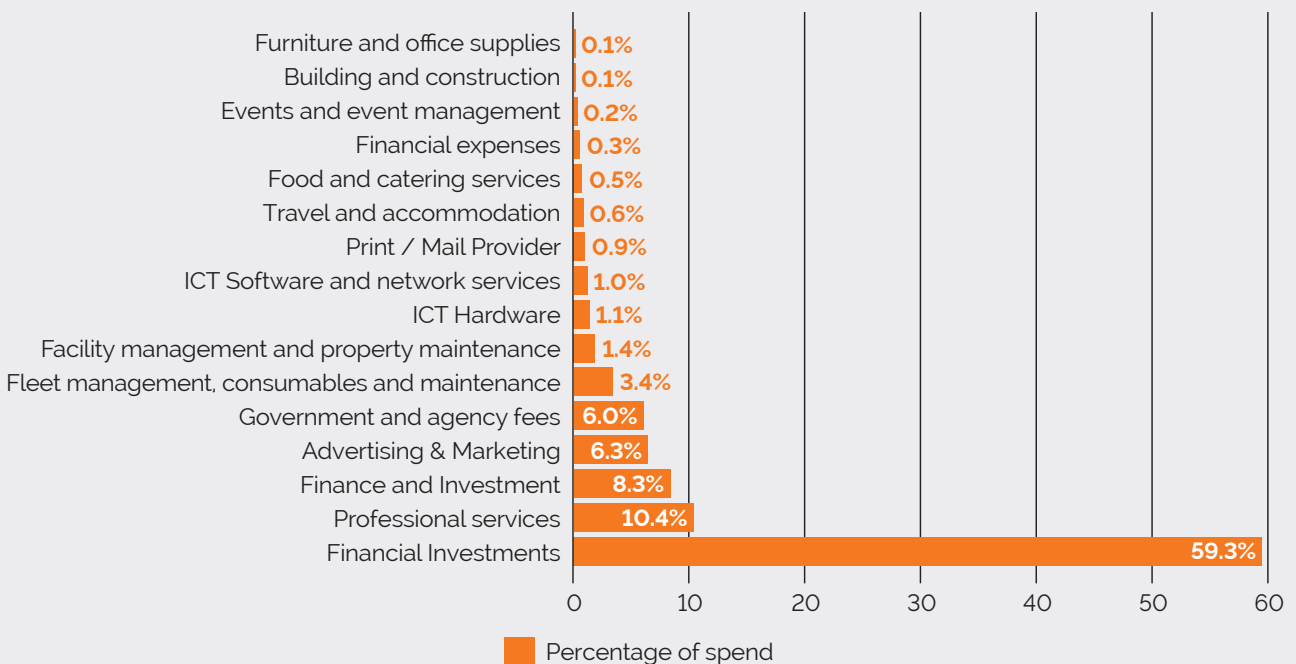


Appendix D: Agency spend by category

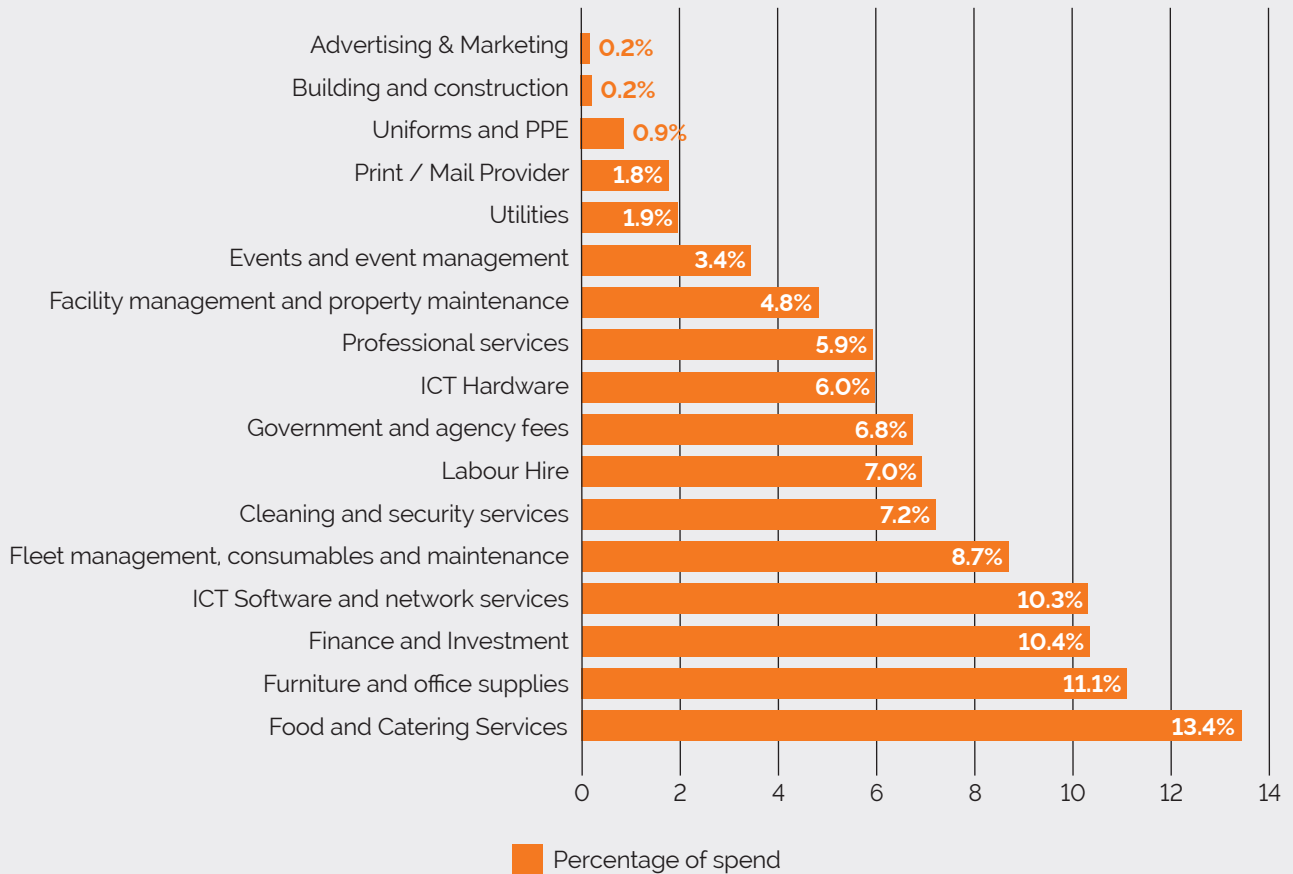
Brisbane Catholic Education – Percentage of Vendor Assessed Spend



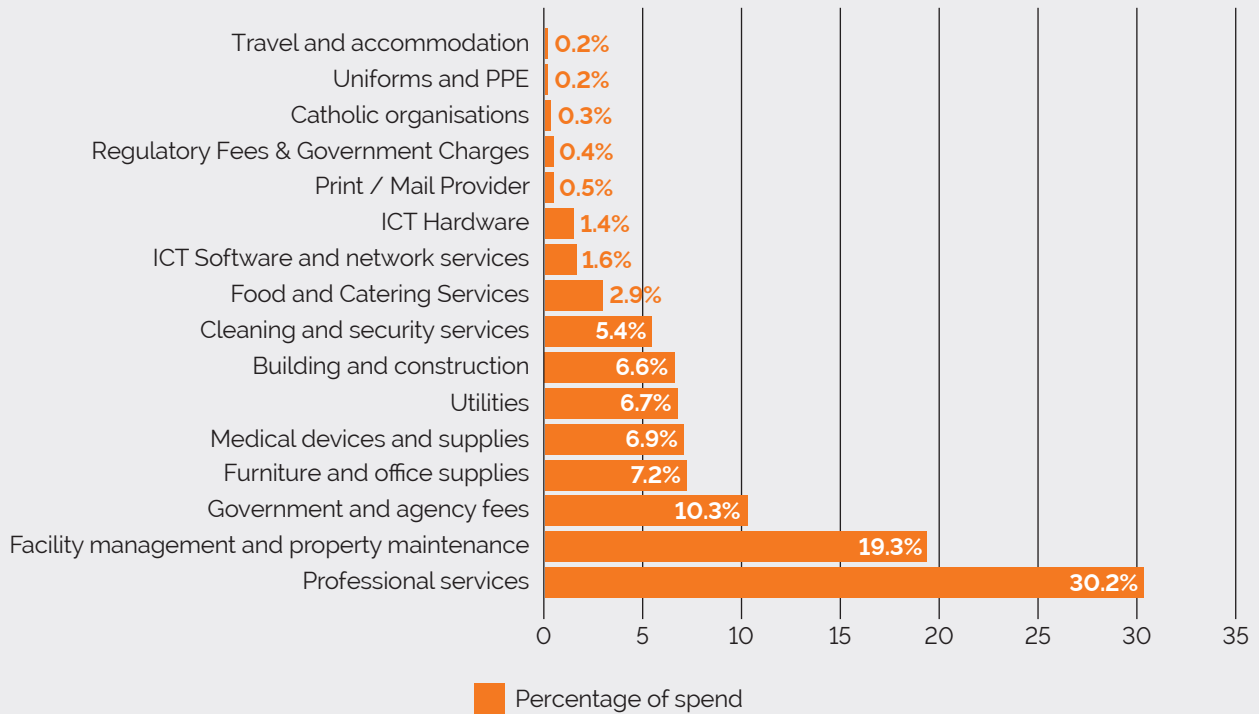
Archdiocesan Development Fund – Percentage of Vendor Assessed Spend



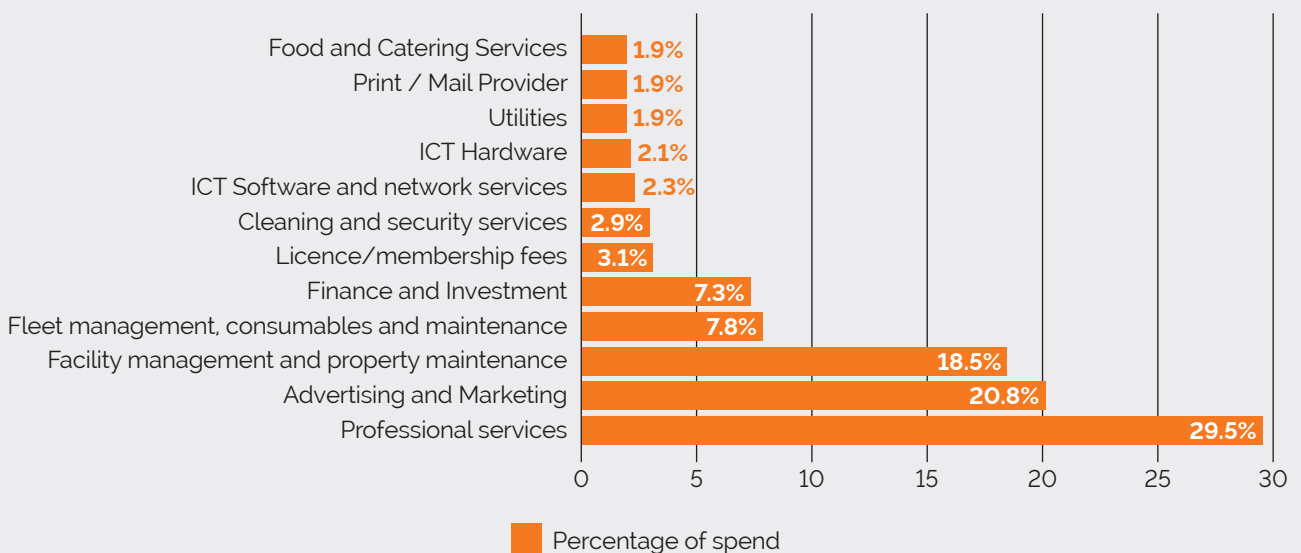
Centacare Administration Services – Percentage of Vendor Assessed Spend



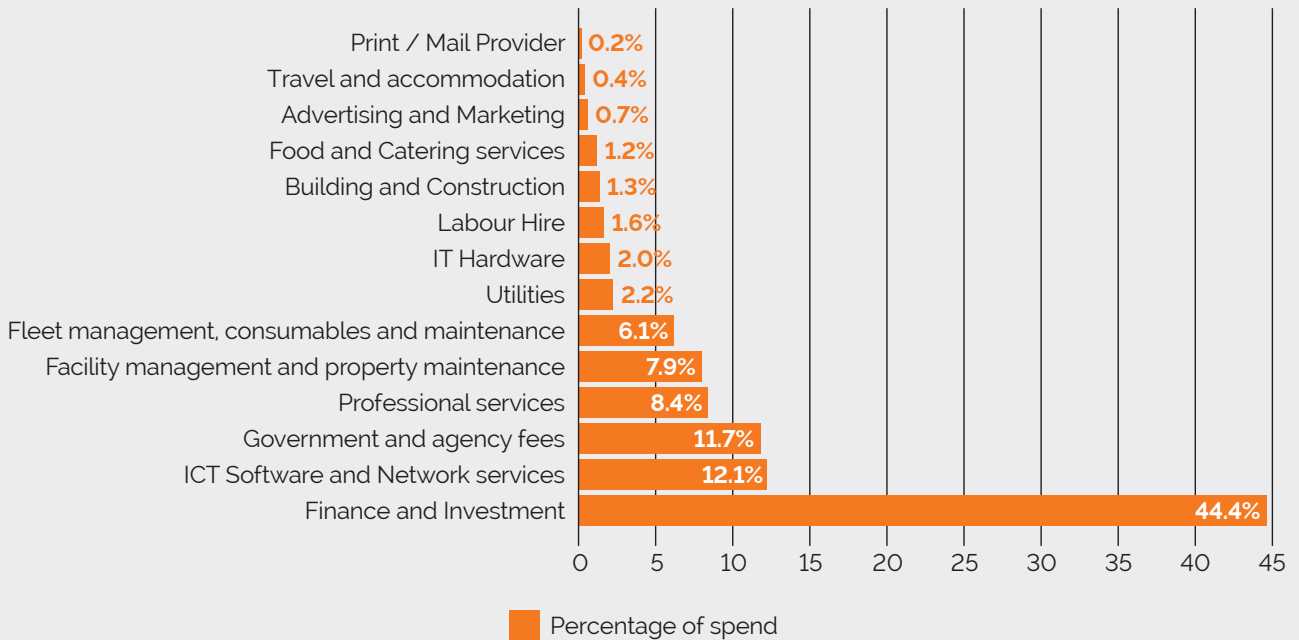
Centacare PBI – Percentage of Vendor Assessed Spend



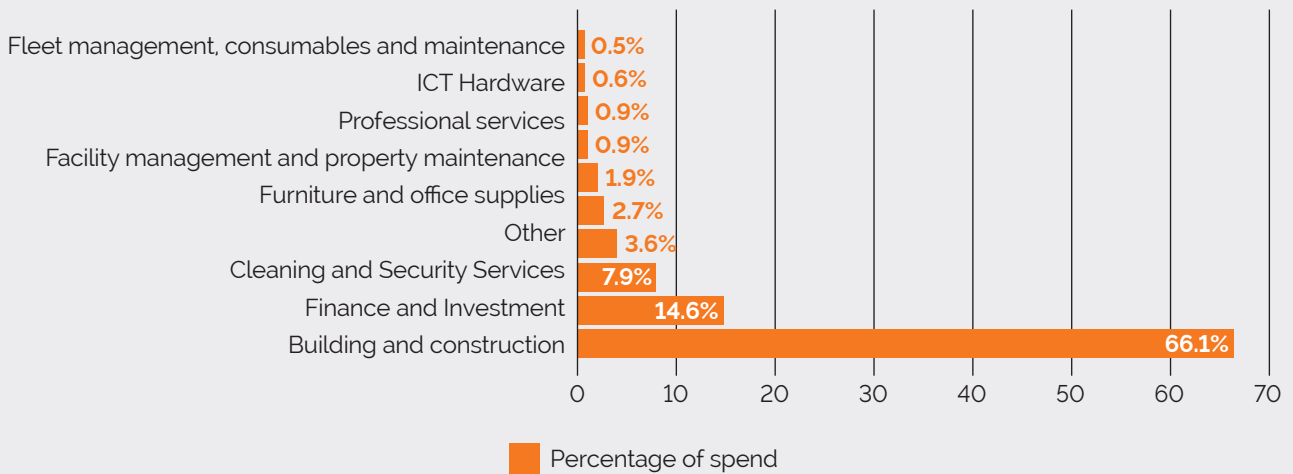
Xavier Children's Support Network – Percentage of Vendor Assessed Spend



Archdiocesan Services – Percentage of Vendor Assessed Spend



Archdiocese of Brisbane – Parishes – Percentage of Vendor Assessed Spend





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- Catholic Archdiocese of Sydney. (2023). What is modern slavery? Australian Catholic Anti-Slavery Network. Retrieved April 5, 2023, from <https://www.acan.org.au/modernslavery>
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- The State of Queensland. (2022, April 21). Eliminating modern slavery in government supply chains. Queensland Government. Retrieved April 5, 2023, from <https://www.forgov.qld.gov.au/finance-and-procurement/procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery>



ARCHDIOCESE
OF BRISBANE



CATHOLIC DIOCESE
OF ROCKHAMPTON

2023 Modern Slavery Statement

1 January 2023 – 31 December 2023



Disclosure Note

This statement has been made on behalf of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*. This statement covers all entities owned and controlled by *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*, including the *Diocesan Offices (ABN: 50 979 741 889)*, *Catholic Education – Diocese of Rockhampton (ABN: 21 528 592 597)*, *CatholicCare Central Queensland (ABN: 90 507 529 241)*, *Stella Maris Seafarers’ Centre (ABN: 94 424 754 630)*, and the *Diocese of Rockhampton Trust Fund (ABN: 64 786 814 301)*. The contact email for modern slavery within the Catholic Diocese of Rockhampton is austriancatholicanti-slaverynetworkacan@rok.catholic.net.au.

Statement from our Bishop



As we reflect upon our commitment to justice, compassion, and the inherent dignity of every human being, I am pleased to present our 2023 Modern Slavery Statement.

In alignment with our faith values and ethical principles, we unequivocally denounce the heinous crime of modern slavery and strive to ensure that our operations, supply chains, and community engagements remain untainted by such practices.

Our efforts to combat modern slavery extend beyond mere compliance with legal requirements. We recognise the profound responsibility we bear as stewards of a just and inclusive society, and thus, we are dedicated to fostering an environment where exploitation and coercion find no refuge.

This statement underscores our commitment to ongoing initiatives to scrutinise and enhance our supply chains, working collaboratively with partners, suppliers, and stakeholders to eradicate any trace of forced labour or human trafficking.



Most Rev. Michael McCarthy
Bishop of Rockhampton
5th June 2024

Principal Governing Body Approval

This Modern Slavery Statement was approved by Bishop Michael McCarthy, the principal governing authority of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*, as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act"), on 5th June 2024.



Most Rev. Michael McCarthy
Bishop of Rockhampton

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About us

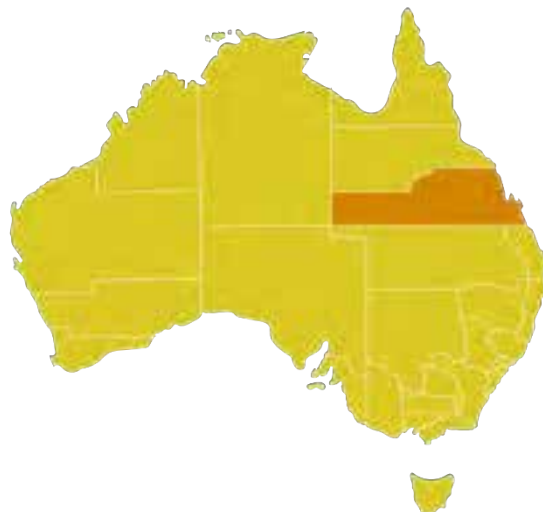
The Roman Catholic Diocese of Rockhampton ('Diocese'), established in 1882, is a suffragan Latin Church diocese located in central Queensland, covering an area of 414,400 square kilometres from Bundaberg in the south to Mackay in the north and west to the Northern Territory border.

'The Roman Catholic Trust Corporation for the Diocese of Rockhampton' ('RCTC') was incorporated by Letters Patent on 8th July 1915 under the now-repealed *Religious Educational and Charitable Institutions Act 1861 (Qld)* but it is still in force by virtue of the *Roman Catholic Church (Incorporation of Church Entities) Act 1994*. The RCTC is the civil legal entity under which the Diocese operates.

Our Vision Statement

The Diocese's Vision Statement is:

As a community of disciples of the Risen Christ, we live out the call of Baptism through personal faith in Jesus, witnessing together to the Good News of the Kingdom, co-responsible for the mission.



Our Values

The values of the Diocese reflect Catholic Social Teaching. These include:

The Dignity of the Human Person

Every human being is created in God's image and likeness and therefore has inherent dignity. No person should have their dignity or freedom compromised.

The Common Good

Every person should have access to the goods and resources of society so that they can live fulfilling lives. The common good is reached when we work together to improve the wellbeing of people in our society and the wider world.

Subsidiarity and Participation

Everyone has the right to participate in decisions that affect their lives.

Solidarity

Everyone belongs to one human family, regardless of their national, religious, ethnic, economic, political and ideological differences. We are called by the principle of solidarity to take the parable of the Good Samaritan to heart (Luke 10:29-37), and to express this in how we interact with others.

Preferential Option for the Poor

Preferential care should be shown to poor and vulnerable people. Jesus taught that God asks each of us what we are doing to help the poor and needy: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." (Matthew 25:40).

Economic Justice

Everyone capable should be involved in economic activity and should be able to provide for themselves and their family.

Stewardship of Creation

We must all respect, care for and share the resources of the earth, which are vital for the common good of all living beings.

Promotion of Peace

Peace is more than just the absence of war. It is a positive movement towards equality and justice between all people, regardless of differences.

2023 Modern Slavery Risk Management Initiatives

Modern slavery working group

A working group made up of representatives from Diocesan Offices & Parishes, Catholic Education – Diocese of Rockhampton ('CEDR') and CatholicCare Central Queensland ('CatholicCare') met regularly to plan the implementation of modern slavery initiatives across the Diocese.

Modern slavery policy

The Diocese published its Modern Slavery Policy, the purpose of which is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains.

Operational gap analysis

A gap analysis was performed in 2019 to provide a baseline for modern slavery risk management in the Diocese. The Diocese conducted further gap analyses in 2021 and 2022 to determine its progress. In 2023, the ACAN maturity assessment replaced the gap analysis and provides a comprehensive view of our efforts across different key areas of operation.

Supplier risk identification and prioritisation

The Diocese has identified those of its suppliers at highest risk of modern slavery across the following three organisational groupings:

- Diocesan Offices & Parishes
- CEDR
- CatholicCare

Supplier engagement / awareness

The Diocese has triaged our suppliers using the ACAN risk taxonomy to determine if they are high/low risk. Through ACAN, the Diocese is a member of Sedex, an online ethical sourcing data exchange. A Supplier Code of Conduct was developed and approved in 2023.

Education

The Diocese's Pastoral Council, Education Council, CatholicCare Council, Finance Council, and Council of Priests have each been given a presentation explaining what modern slavery is and how the Diocese aims to combat it.

Australian Catholic Anti-slavery Network ('ACAN')

The Diocese actively participates in the ACAN Modern Slavery Risk Management Program including the Diocese's Modern Slavery Liaison Officer ('MSLO') participation in monthly webinars to network with other MSLOs and to hear updates about the latest modern slavery resources available to members and suppliers.

Our Plans for 2024

Embedding anti-slavery in organisational governance

The Diocese is still in the process of updating the terms of reference for its various governance bodies to include anti-slavery as a key consideration in organisational decision-making.

Supplier engagement / awareness

The Diocese will triage our suppliers using the ACAN risk taxonomy to determine if they are high/low risk. Through ACAN, the Diocese is a member of Sedex, an online ethical sourcing platform. The Diocese's leading priority for modern slavery risk management in 2024 is supplier engagement.

Ongoing due diligence

Supplier Codes of Conduct and contractual terms and conditions will continue to be communicated with existing and new contractors. In addition, modern slavery risk management will be embedded into existing operational systems and due diligence processes to ensure that suppliers are understanding the Diocese's expectations in regard to modern slavery.

Capability building

Modern slavery risk management training will continue to be delivered to Diocesan personnel at every opportunity to promote organisational awareness.

ACAN Program

The Diocese will continue its membership of ACAN to continue to build on its modern slavery risk management efforts and to take advantage of the services and resources made available by ACAN.

Reporting Criteria 1 & 2: About the Catholic Diocese of Rockhampton

Our Organisational Structure

The RCTC is the legal entity under which the Diocese and all its ministries and parishes operate. The Diocese holds five ABNs as follows:

Diocesan Offices

A number of entities with distinct identities in canon (Catholic Church) law operate under the Diocese, including:

- The Diocesan Offices, based at 170 William Street, Rockhampton QLD 4700, headed by the Bishop of Rockhampton and encompassing ministry activities, administration, and the practise and propagation of the Catholic faith; and
- 30 parishes (communities of the faithful with defined geographic areas within the Catholic Diocese of Rockhampton, whose pastoral care is entrusted to parish priests by the Bishop), each of which conduct their own ministry activities, administration, and practise and propagation of the Catholic faith.
- 'The Haven', a retreat, conference and accommodation facility at Emu Park QLD 4710
- The Rockhampton Clergy Support Foundation, a Deductible Gift Recipient fund established to provide such social welfare, maintenance, necessities of life and relief from poverty as priests may need in infirmity, sickness, incapacity, old age or other necessitous circumstances'; and
- The Diocese of Religious Education Fund, a Deductible Gift Recipient fund established 'to provide religious instruction in government schools in Australia'.

Catholic Education Diocese of Rockhampton

CEDR has its head office at 143 West Street, Rockhampton QLD 4700, and employs approximately 3,600 people. It operates kindergartens, primary and secondary schools and Outside School Hours Care services across the Diocese, as well as providing faith education for adults and children in state schools. CEDR educates approximately 19,200 students in its:

- 31 primary schools
- 8 colleges
- 10 kindergartens, and
- 19 Outside Schools Hours Care services

CatholicCare Central Queensland

CatholicCare has headquarters at 16 Bolsover Street, Rockhampton QLD 4700. It employs approximately 400 people and provides a broad range of services in communities across the Diocese, including aged care and disability support, counselling, and family and community support and education.

Stella Maris Seafarers' Centre

Stella Maris Seafarers' Centre, based in Brisbane Street, Mackay QLD 4740, is a ministry of the Catholic Diocese of Rockhampton whose object is to pursue the following charitable purposes:

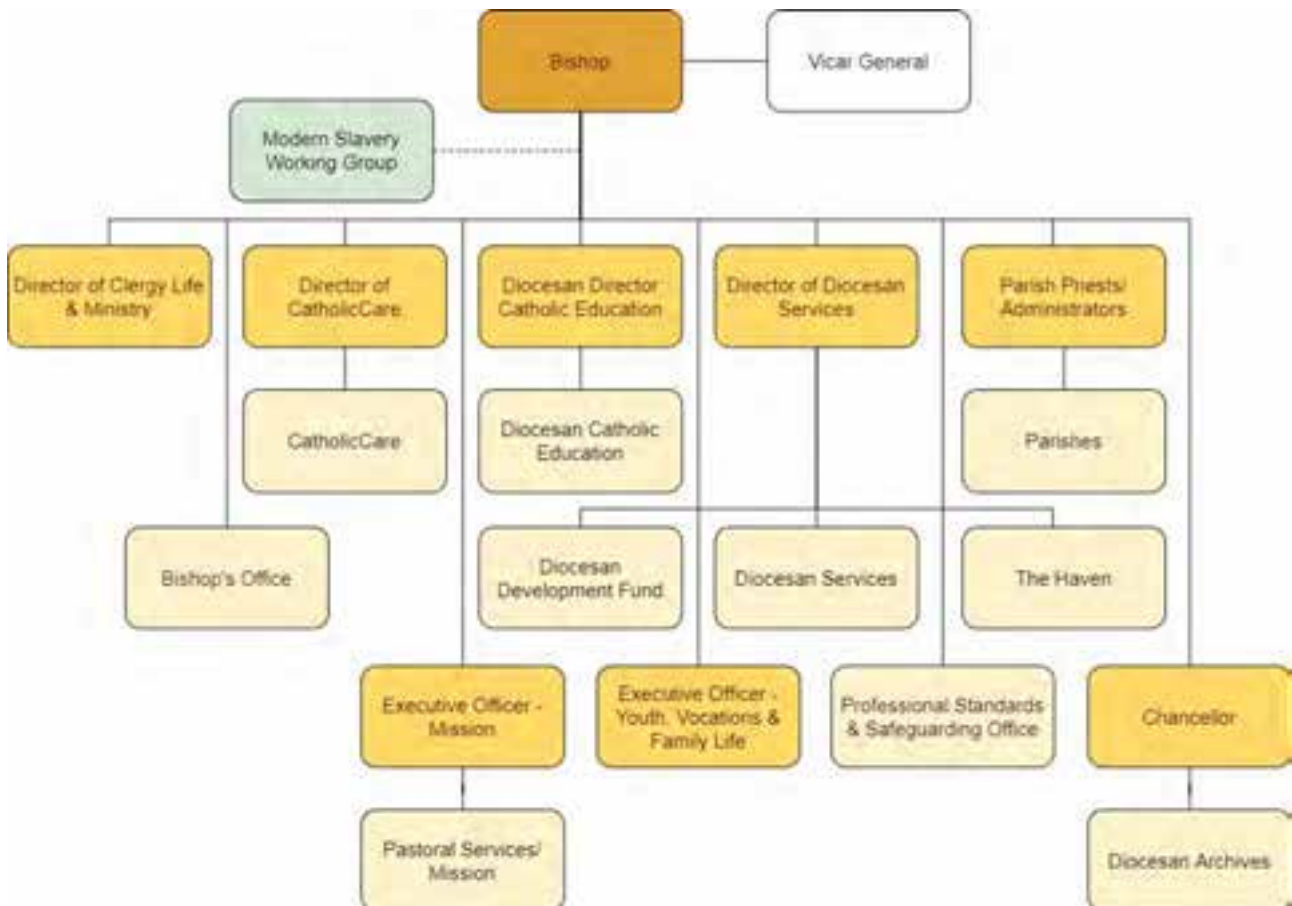
- (a) Provide contact and counselling and crisis counselling for seafarers and their families;
- (b) Provide a visitation service to seafarers, including hospital visits;
- (c) Provide pastoral services and chaplaincy to seafarers;
- (d) Provide stress-relieving recreational activities and services for seafarers;
- (e) Promote the physical, intellectual, emotional, psychological and spiritual development and wellbeing of seafarers, guided by Christian moral principles.

It services the shipping ports of Mackay and Hay Point.

Diocese of Rockhampton Trust Fund

The Diocese of Rockhampton Trust Fund is a public ancillary fund whose object is ‘to provide money, property, or benefits to or for funds, authorities, or institutions referred to and for the purposes (if any) referred to (if any) of the items in the tables in sub-section 7B(4) of the *Income Tax Assessment Act 1936*’.

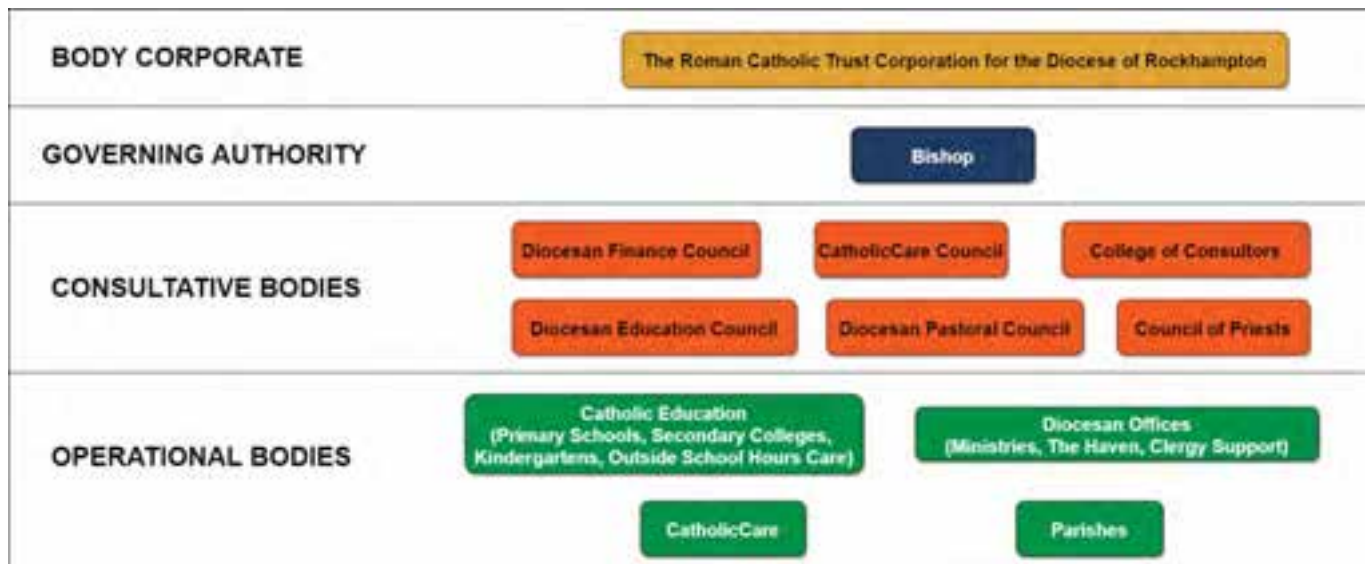
Following is a high-level organisation chart of the Diocese:



Our Governance Framework

The Bishop of Rockhampton is the sole trustee of the RCTC and is also the governing authority of the Diocese under canon law. A requirement of canon law is for the Diocese to have a ‘finance council’ and a ‘council of priests’ to assist and advise the Bishop in the exercise of his governance. The Bishop of Rockhampton also chooses to have an additional three councils to assist him with governance in different areas, namely the:

- Diocesan Pastoral Council
- Diocesan Education Council
- CatholicCare Council



Apart from the Council of Priests and the College of Consultors, the meetings of each other council are chaired by lay persons.

The Bishop delegates certain responsibilities to Diocesan personnel to assist him in discharging his obligations under a Delegations Policy, whereas certain other responsibilities are entrusted to particular roles under canon law, most notably the Vicar General, the Chancellor, the Financial Administrator, and Parish Priests.

The terms of reference of the Diocesan Finance Council include responsibilities in relation to risk management. The Diocesan Financial Administrator is the executive sponsor and Chair of the MSWG.

Our Operations

The Diocese's operations are conducted within its borders, as defined in the *About Us* section above, other than travel by its constituents elsewhere for Church purposes.

The Diocese employs more than 4000 people in total across the organisation. The Diocese's turnover in 2023 was approximately \$496 million. The total procurement spend was approximately \$125.2 million across more than 9500 suppliers. 82% of procurement spend was in the area of CEDR.

Long-term relationships are in place with the majority of suppliers. Other than suppliers, the Diocese has no other business relationships.

The Diocese's operations are described as follows:

Diocesan Offices

Bishop's Office

The Bishop's Office supports the Bishop as the "chief shepherd" (spiritual leader) of the Diocese in his responsibilities of *teaching*, *sanctifying* and *governing*. This involves oversight of the preaching of the Gospel, Catholic education, the administration of the sacraments of the Catholic Church, and canon law matters. The Bishop's Office provides administrative support to the Bishop, and includes the Chancery, Archives, Professional Standards & Safeguarding, Pastoral Services, and Clergy Support.

Diocesan Services

Diocesan Services provides corporate services and advice to the organisation in the areas of finance, human resources, facilities and property, community engagement, information and communications technology, and administration.

Diocesan Development Fund (DDF)

The DDF provides a source of finance and credit for capital expenditure in the works of the Catholic Church and provides funds to support the Bishop of Rockhampton in exercising his duties of governance, teaching and sanctification across the Diocese. The DDF also provides investment services and financial services to diocesan agencies, ministries, parishes and schools.

The DDF Committee, a sub-committee of the Diocesan Finance Council, ensures that the activities of the DDF comply with all relevant laws, regulations and statutes and that those activities maintain the highest standards of ethical and commercial practice. The responsibilities of the Committee include setting and monitoring strategies; monitoring risks of the DDF; approval and recommendation of new loans; review and monitoring of compliance with policies and the review of the annual performance of the DDF.

Catholic Education – Diocese of Rockhampton ('CEDR')

CEDR is a comprehensive educational ministry that embraces and promotes lifelong faith learning. In accordance with canon law:

"Catholic education is an expression of Christ's mission entrusted to the Church to proclaim the Good News of Jesus Christ. Catholic education in the diocese is united around the bishop as leader and teacher. The bishop has responsibility for developing policies regarding Catholic education in the Diocese, regulating it and watching over it." (Canon 804.1)

CEDR educates approximately 19,200 students in its 31 primary schools, 8 colleges, 10 kindergartens, and 19 Outside Schools Hours Care services located across the Diocese.

The Bishop has a Diocesan Education Council to provide advice in establishing the broad direction for Catholic education and faith formation. This Council assists the Bishop in his responsibility for approving policies regarding Catholic religious formation and education in the Diocese. All agencies providing educational services in the Diocese are represented on the Council as well as parents, parish representatives from all regions of the diocese and other individuals.

CatholicCare

From its seven offices across the Diocese, CatholicCare works to encourage and strengthen individuals, couples and families through a broad range of services, which include aged care and disability support, counselling, and family and community support and education. CatholicCare serves all people, without regard to religion, race, age, economic circumstance or ethnic background.

The CatholicCare Council is an advisory body to the Bishop in matters pertaining to the works of CatholicCare. The Council makes recommendations to the Bishop as to the role, development and management of CatholicCare.

Parishes

The Diocese's 30 parishes are its worshipping communities occupying individual geographic regions in the Diocese. The Bishop appoints a parish priest to each parish community to provide pastoral care.

Each parish is required under canon law to have a parish finance council to advise the parish priest/administrator in the governance of the parish.

Our Supply Chain

The Diocese has a decentralised procurement model. The various operations of the Diocese support local businesses wherever feasible. All supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Advertising and marketing
- Building and construction
- Cleaning and security services
- Events and event management
- Facility management and property maintenance
- Finance and investment
- Financial expenses
- Fleet management, consumables and maintenance
- Food and catering services
- Furniture and office supplies
- Government and agency fees
- ICT Hardware
- ICT Software and network services
- Labour Hire
- Licence/membership fees
- Linen, laundry and textile products
- Medical devices and supplies
- Printing
- Professional services
- Travel and accommodation
- Uniforms and PPE
- Utilities
- Waste management services

Reporting Criteria 3: Modern slavery risks in operations and supply chain

The Diocese is a member organisation of the Australian Catholic Anti-Slavery Network ('ACAN'). As part of ACAN, the Diocese's Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group use information and resources provided by ACAN to monitor and address the risks of modern slavery in its own operations and supply chain.

Operational Risks

Our People

The Diocese employs approximately 4127 people. The Directors of CEDR, CatholicCare, Clergy Life & Ministry, and Diocesan Services are responsible for ensuring compliance by the Diocese with labour, employment, immigration, and whistleblower laws to the extent that they are applicable. The Diocese and its two major ministries, CEDR and CatholicCare, each employ professionally qualified persons to manage human resource matters and to ensure compliance with relevant industrial instruments and legislation.

Other than the requirements of canon law for certain ecclesiastical positions to be occupied by persons of a specific gender, all other appointments are based on merit and are not gender specific.

Only a very small percentage of Diocesan personnel do not have permanent residency in Australia. Non-residents are only engaged in instances where particular skills shortages exist in Australia. Where non-residents are employed or contracted, they live in Australia for the duration of their engagement, and they are paid at or higher than minimum rates applicable under Australian law.

The Diocese maintains codes of conduct and policies and procedures to require high standards of behaviour and to ensure procedural fairness.

Supply Chain Risks

The Diocese examined its 2023 supplier expenditure to determine potential modern slavery risks. The following indicators were used:

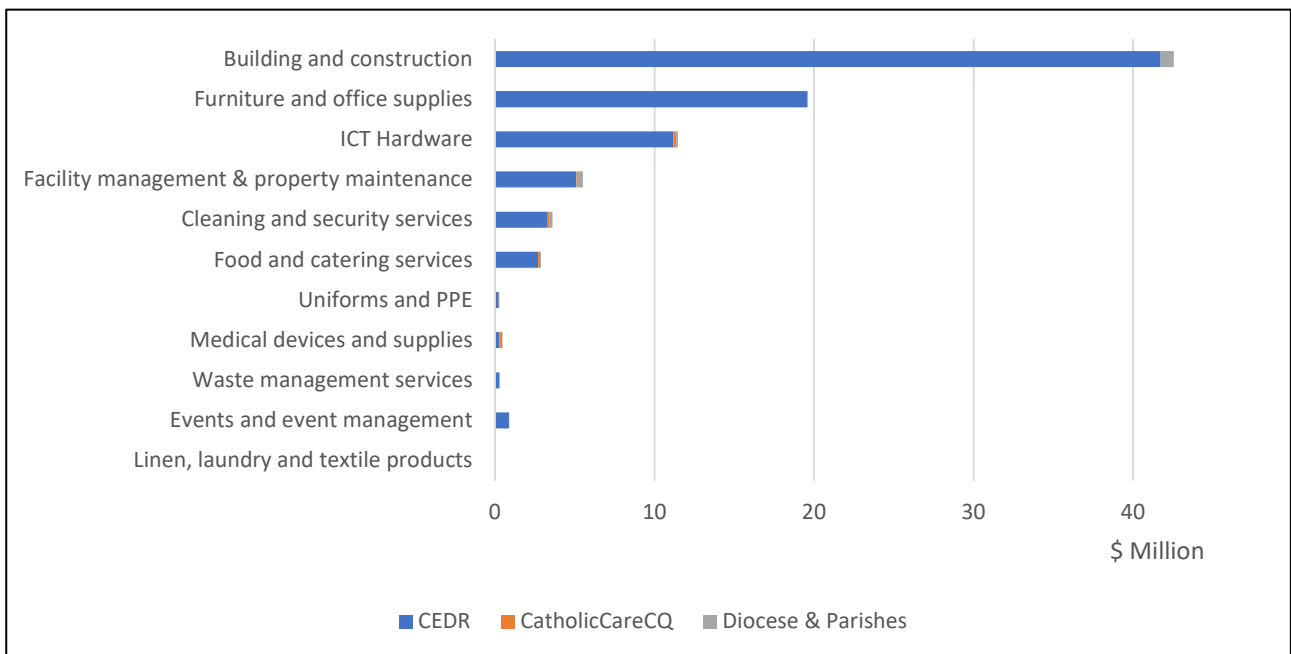
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- **Workforce profile** – In undertaking our supplier analysis we 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).

Based on these indicators, the following high-risk expenditure categories were identified:

- Building and construction
- Cleaning and security services
- Events and event management
- Facility management & property maintenance

- Food and catering services
- Furniture and office supplies
- ICT Hardware
- Linen, laundry and textile products
- Medical devices and supplies
- Uniforms and PPE
- Waste management services

In 2023, the Catholic Diocese of Rockhampton spent approximately \$88 million in high-risk categories. 97% of high-risk expenditure was by CEDR. The highest level of expenditure for CEDR in high-risk categories was in 'Building and construction', 'Furniture and office supplies', and 'ICT Hardware'. The following graph illustrates the level of expenditure in each high-risk category by entity.



Reporting Criteria 4: Actions taken to assess and address modern slavery risks

The Diocese's focus in 2023 was to commence engaging with and educating its suppliers on potential modern slavery risks and where these might exist in its operations and supply chain. The Diocese achieved this through the following initiatives.

ACAN Membership

The Diocese continued its membership of the Australian Catholic Anti-Slavery Network (ACAN) in 2023. One of ACAN's purposes is to share resources and experiences with network members, and to identify and manage modern slavery risks in Catholic supply chains. ACAN also provides a range of tools that can be adapted to meet the needs of each participating entity such as policies, contract templates, codes of conduct, and reporting tools. These help to embed modern slavery risk management in systems and processes and enable ACAN participants to have a consistent approach.

Modern Slavery Working Group

The Diocese's Modern Slavery Working Group included the following representatives in 2023:

- Mr Dean Smith, Director of Diocesan Services & Diocesan Financial Administrator (Chair)
- Mr Mark Effenev, Assistant Director: Administration, Catholic Education Office
- Mrs Amanda Houston, Assistant Director: Business and Strategy, Catholic Education Office
- Mrs Joanne Perry: Compliance and Risk Coordinator, Catholic Education Office
- Ms Samantha Graham, Purchasing & Plan Management Services Coordinator, CatholicCare
- Mr Chris Brosnan, Finance Manager, Diocesan Services
- Ms Holly Tucker, Human Resource Manager, Diocesan Services

The Working Group met three times in 2023 to consider how ACAN tools could best be adapted for deployment in the Diocese and to work on initiatives to engage with the Diocese's suppliers. The group was formed into a permanent committee in 2022 and will continue to provide advice on the management of modern slavery risks and build an awareness of modern slavery throughout the organisation.

ACAN Maturity Assessment

The ACAN Maturity Assessment builds on the identification of progress, previously revealed in the operational gap analysis used in previous Modern Slavery Statements. The transition highlights the importance of assessing the development of the Diocese's approach to managing the risks of modern slavery. The maturity scorecard given in the charts below provides a comprehensive view of the Diocese's efforts across six different areas of operation, presented as pillars:

1. *Business Process and Governance*: Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. *Operations*: Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. *Supply Chain*: Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. *Worker Engagement*: Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. *Entity's Program and Activities*: Looks at the broader initiatives and engagements we undertake to combat modern slavery.

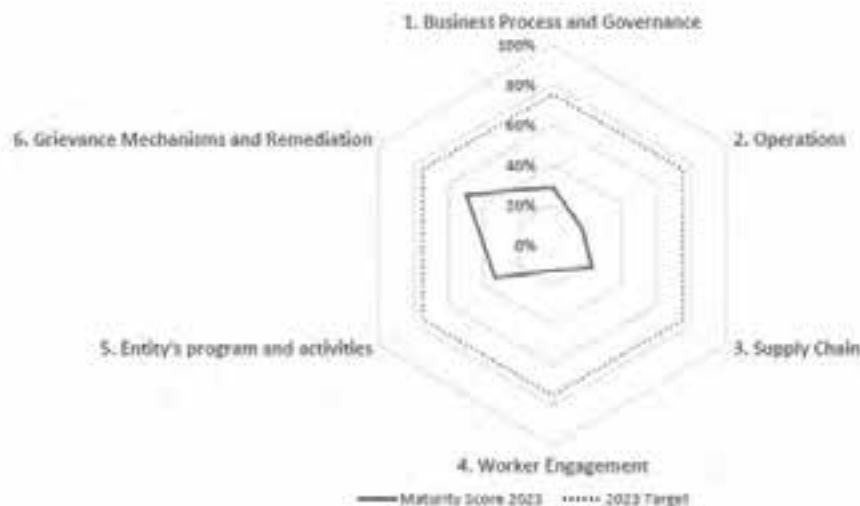
6. *Grievance Mechanisms and Remediation*: Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures. This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance**: sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment**: identifies potential at-risk areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management**: evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances and driving real and measurable impact.
- **Effectiveness**: measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	31%	43%	22%	18%	29%
2. Operations	24%	25%	12%	6%	17%
3. Supply Chain	0%	80%	11%	0%	23%
4. Worker Engagement	0%	9%	20%	22%	13%
5. Entity's program and activities	55%	25%	30%	23%	33%
6. Grievance Mechanisms and Remediation	62%	60%	45%	33%	50%
Average:	29%	40%	23%	17%	27%

Maturity Score 2023 individual scoring by pillar and sub-pillar, including averages and total 2023 score



Supplier risk identification and prioritisation

Organisational supplier spend was examined and the highest risk supplier categories were identified. Efforts will now be directed towards engaging with those suppliers to help them to understand the importance we place on eradicating modern slavery from our supply chains.

Supplier engagement

In 2023, 21 suppliers were invited to join Sedex, 34 completed ACAN surveys, and 24 suppliers attended capacity-building webinars hosted by ACAN.

Education

The Diocese has delivered information sessions to its various governance bodies and some staff gatherings to grow awareness of Modern Slavery among its personnel.

7 staff members (working group members and managers) completed the ACAN *Business Relevance* e-learning module in 2023. The *Business Relevance* module outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. The module also includes a review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

34 staff members completed the ACAN *Modern Slavery 101* module. The *Modern Slavery 101* module provides a comprehensive overview of modern slavery practices, including who is vulnerable, and how and why it occurs.

1 member of the modern slavery working group completed the ACAN *Grievance Mechanisms and Remedy* module and the *Modern Slavery Risk Management for Suppliers* module. The *Grievance Mechanisms and Remedy* module provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights* and *Commonwealth Guidance for Modern Slavery Act Reporting Entities*.

CEDR worked with ACAN to develop an eLearning module about the risk to school cleaners engaged by labour hire service providers. The eLearning video and questions were delivered to over 3,600 employees as part of CEDR's mandatory training schedule.

Remediation

The Diocese is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the *United Nations Guiding Principles on Business and Human Rights*, *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities* and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if the Diocese is found to have caused or contributed to modern slavery.

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, the Diocese is a founding partner of *Domus 8.7* - an independent program to provide remedy to people impacted by modern slavery. The Diocese's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with *Domus 8.7* and other civil society stakeholders. By partnering with *Domus 8.7*, the Diocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels and a person is in immediate danger, staff will contact relevant law enforcement agencies. If staff have concerns or identify any issues and need expert advice, the matter will be referred through *Domus 8.7* for an assessment, investigation, action planning and implementation of a remediation process.

The Diocese has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders. Additional information about *Domus 8.7* and the process applied can be found on www.domus87.org.au.

Modern Slavery Action Plan progress

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
Commitment		
Engage top-level management and set direction	<ul style="list-style-type: none"> Deliver modern slavery awareness presentation to all five Diocesan Councils 	<ul style="list-style-type: none"> Modern slavery awareness presentation delivered to all five Diocesan Councils
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> Develop and promulgate Modern Slavery Policy 	<ul style="list-style-type: none"> Modern Slavery Policy approved
Establish a Modern Slavery Working Group	<ul style="list-style-type: none"> Develop Terms of Reference for Working Group Formally appoint members to Working Group 	<ul style="list-style-type: none"> Working Group Terms of Reference approved Working Group members formally appointed
Modern slavery roles and responsibilities defined	<ul style="list-style-type: none"> Embed modern slavery roles and responsibilities into position descriptions where applicable 	<ul style="list-style-type: none"> Modern slavery roles or responsibilities embedded in relevant position descriptions
Action Plan & Monitoring		
Prepare and implement a modern slavery action plan or strategy to address gaps	<ul style="list-style-type: none"> Develop Action Plan 	<ul style="list-style-type: none"> Working Group meets regularly to develop and monitor strategies for addressing gaps; MSWG invited ACAN to join action planning session.
Monitor progress and ensure continual improvement	<ul style="list-style-type: none"> Hold regular Working Group meetings to monitor progress and propose improvements Complete entity profile annually 	<ul style="list-style-type: none"> Working Group discusses progress and opportunities for improvement Entity profile performed at least annually to produce risk scores for management controls
Supplier Risk		
Prioritise suppliers based on potential risk and spend	<ul style="list-style-type: none"> Analyse supplier data at least annually to determine highest risk 	<ul style="list-style-type: none"> Data is gathered and analysed annually to determine highest risk suppliers

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> Email high-risk suppliers inviting them to complete survey and attend webinar Develop and promulgate Supplier Code of Conduct Embed modern slavery clause(s) in supplier contracts 	<ul style="list-style-type: none"> Letters to be sent to high-risk suppliers, outlining the importance that the Diocese places on the eradication of Modern Slavery Supplier Code of Conduct developed
Engage, Educate & Respond		
Engage and train management, employees and contractors	<ul style="list-style-type: none"> Roll out awareness presentation and e-learning modules to all staff and contractors and volunteers involved in procurement Raise awareness of modern slavery through social media 	<ul style="list-style-type: none"> Diocesan Councils and all staff have received awareness presentation Modern Slavery Policy shared on Diocesan Facebook page and LinkedIn
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> Offer educational resources to high-risk suppliers (e.g., supplier webinars) 	<ul style="list-style-type: none"> 34 suppliers completed surveys providing insight into actual risk; 24 suppliers attended capacity building webinars and 21 were invited to join Sedex.
Establish remedy pathway to respond when slavery practices identified in operations or supply chain	<ul style="list-style-type: none"> Refer to <i>Reporting Criteria 4</i> section above Develop and implement Whistleblower Policy 	<ul style="list-style-type: none"> Refer to <i>Reporting Criteria 4</i> section above Whistleblower Policy yet to be developed
Modern Slavery Statement		
Prepare and submit annual Modern Slavery Statements	<ul style="list-style-type: none"> Submit annual Modern Slavery Statements 	<ul style="list-style-type: none"> This is the Diocese's fourth annual Modern Slavery Statement
Collaborate with ACAN participants	<ul style="list-style-type: none"> Regularly participate in ACAN meetings 	<ul style="list-style-type: none"> MSLO participates in regular ACAN meetings
Publish Modern Slavery Statement on website	<ul style="list-style-type: none"> Publish Modern Slavery Statements on Diocesan website annually 	<ul style="list-style-type: none"> 2022 Modern Slavery Statement published on Diocesan website

Reporting Criteria 5: Effectiveness Assessment

The Diocese also uses the following performance indicators to measure its progress in the eradication of modern slavery:

	ACTIVITY	2021	2022	2023
INTERNAL / STAFF	Hours spent on modern slavery activities	1137	1600	1814
	Individual staff completed eLearning	2349	3000	3629*
	ACAN eLearning modules completed	5	122	42
	MSWG meetings held	5	5	3
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	11083	9252	9543
	Number of suppliers across high-risk categories	n/a		645
	Number of ACAN Supplier Surveys completed	0	0	34
	Supplier staff attending capacity building webinars (suppliers engaged on MS)	3	2	24
	Invited to join Sedex	15	0	21
	Joined Sedex	3	9	0
	Sedex SAQ completed	0	2	2
	Sedex Members Ethical Trade Audit (SMETA) Social audits			1
	Corrective actions	0	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0	0
	Referrals for advice and assistance	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	0	0

*School cleaning video

Reporting Criteria 6: Process of consultation with entities owned or controlled

The Diocese has approached the task of addressing its Modern Slavery risks in collaboration with representatives from each of the entities it owns. The Modern Slavery Working Group has been comprised of representatives from CEDR, CatholicCare and the Diocesan Offices (on behalf of parishes). The entire organisation has therefore had the opportunity to be a part of the Diocese's journey of understanding and addressing modern slavery risks.

Reporting Criteria 7: Other

There is no other relevant information to report.



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Modern Slavery Statement 2023

1 January 2023 - 31 December 2023



Faith in their future

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Bishop's Address



CATHOLIC DIOCESE OF DARWIN



On behalf of the Catholic Education Northern Territory, this year we renew our commitment to helping eradicate modern slavery worldwide.

Although modern slavery is illegal everywhere, millions of people continue to be forced into slavery and subsequently stripped of their human rights and their dignity. People are recruited and maintained in modern slavery due to vulnerabilities, poverty, corruption and systems that create coercive control and abuse.

Modern slavery is also prominent in Australia's history. The effects of colonisation have seen tens of thousands of Aboriginal and Torres Strait Islander peoples stripped of their land and culture, their children forcibly removed from them and culturally insensitive government policy leading to loss of dignity and human rights.

In the words of Pope Francis, "Modern slavery... is a crime against humanity" and the Diocese of Darwin joins the collective effort to educate others and work together to end modern slavery in whatever form it takes (Pope Francis, Ceremony for the signing of the Faith Leaders Universal Declaration against Slavery, 2014).



Yours in Christ,

+ Charles Gauci



+Charles Gauci
Bishop of Darwin & the NT

Disclosure Notice

This statement has been made on behalf of Catholic Education Northern Territory. This Statement covers all entities owned or controlled by Catholic Education Office

ABN 22 616 685 167 - <https://www.ceont.catholic.edu.au/>

17 Beaton Road, Berrimah Darwin NT 0828

Contact email for Modern Slavery enquiries and concerns is whs.support@nt.catholic.edu.au

Approval

This Modern Slavery Statement was approved by the principal governing body of Catholic Education Northern Territory as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 12 June 2024. This modern slavery statement is signed by a responsible member of Catholic Education Northern Territory as defined by the Act.



Paul Greaves

**Director, Catholic Education Northern Territory
Diocese of Darwin**

Criterion 1

About Catholic Education Northern Territory

Catholic Education Northern Territory (CENT) supports and operates eighteen (18) schools based in Darwin urban areas, regionally in Katherine and Alice Springs and in the remote communities of Ltyentye Apurte, Bathurst Island and Wadeye. CENT schools also support and manage 9 Early Learning Centres, 9 After School Care facilities and 4 remote pre-schools. These schools service early learning, Primary, Middle and Secondary students. CENT also supports a Flexi-Learning Centre in Alice Springs partnership with Edmund Rice Education Australia.

The Northern Territory has the highest Aboriginal population in Australia and education in remote communities is an important part of the diversity that is the Northern Territory. CENT educates from Transition to Year 12 and 4812 students including 1483 Indigenous. CENT has 421 Teachers supported by 524 non-teaching and Indigenous Education Workers and 84 Early Learning staff.

CENT education office has 72 staff members providing support to schools in areas of Pastoral Care & Wellbeing, Teaching and Learning, Curriculum, Inclusion Support, Catholic Identity and in the coordination of support services of ICT, HR, Safety, Finance and Infrastructure and Media.

CENT's Vision

Inspired by the Gospel of Jesus Christ, we commit to educational excellence, equity and fullness of life for all.

CENT's Mission

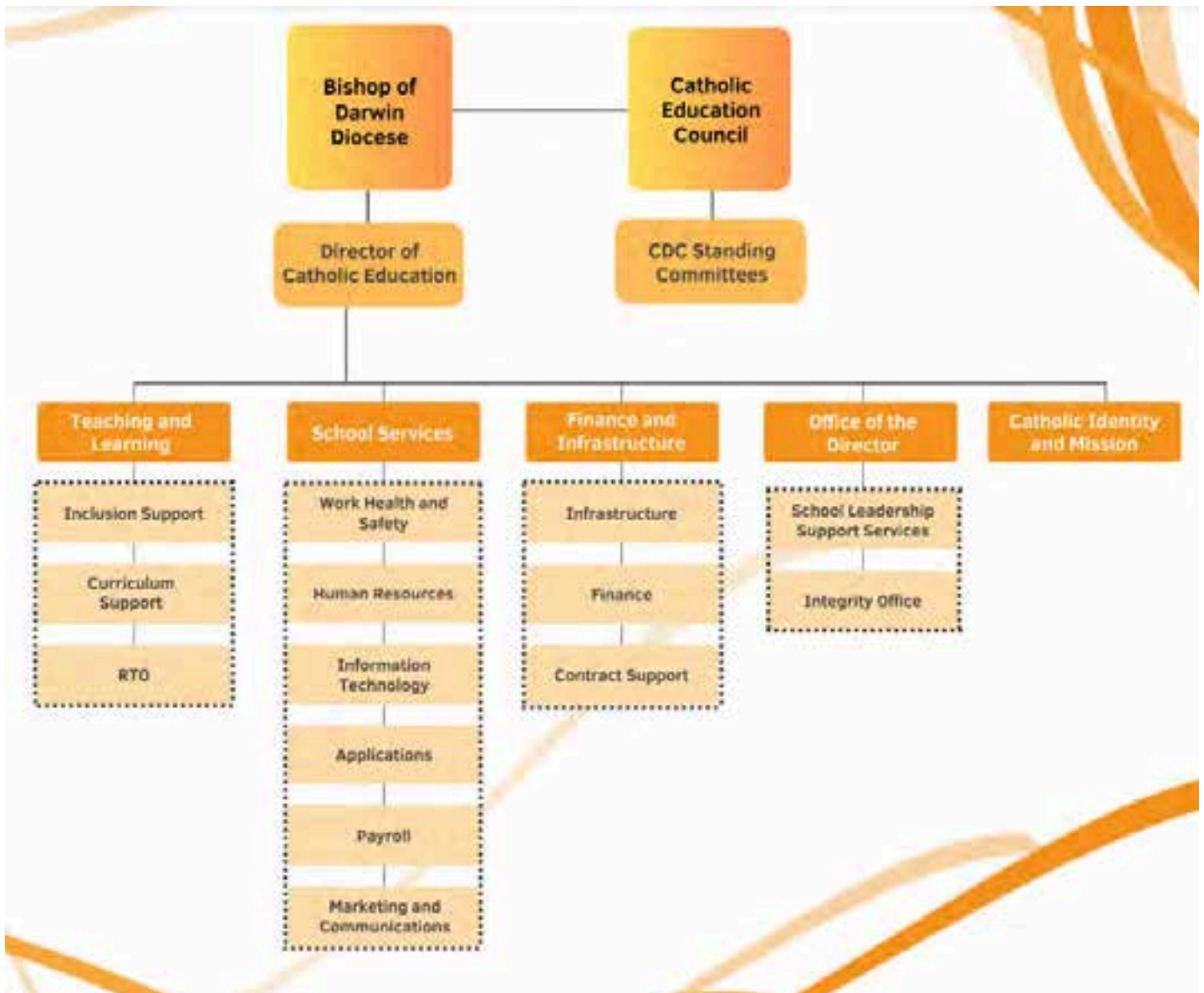
Through servant leadership, we witness Gospel values in a faith community, integrating life and learning in a culture of care, collaboration and excellence.

CENT's Values

Wisdom leads to Justice, which is expressed in Courage, Compassion and Love

Criterion 2

Our Organisational Structure



Governance Framework

The Trustees of the Roman Catholic Church for the Catholic Darwin Diocese is the registered proprietor for schools within CENT. The Bishop of the Diocese of Darwin has canonical authority for the operation of schools within the System, and ultimate responsibility for the delivery of Catholic education within the Diocese.

The Bishop of Darwin Diocese has delegated authority to the Director, Catholic Education (CENT), to assist the Bishop to discharge his canonical duties with respect to Catholic education and the Director of Catholic Education ensures all civil law responsibilities associated with systemic financial accountability, legislative compliance including safety, contract management and people management are adhered to.

In undertaking the Director's duties and fulfilling his responsibilities, the Director consults with the Bishop, and works with the Catholic Education Council in relation to matters of policy and fiscal accountability and educational compliance. The Director provides regular updates to the Bishop on matters of operational significance including Modern Slavery.

The Catholic Education Council (CEC) is established to support and advise the Bishop on his responsibilities for Catholic schools in the Diocese. The Council advises and makes recommendations to the Bishop but does not make decisions. The Council is not an incorporated body. CEC members are selected from key stakeholder groups in the Diocese.

CENT modern slavery governance framework

In July 2023, CENT renewed our commitment to the Australian Catholic Anti-Slavery Network ('ACAN') modern slavery risk management program (ACAN Program) until 2026. The CENT Modern Slavery Statement is included in the ACAN Compendium of Modern Slavery Statements and is published on our website <https://www.ceont.catholic.edu.au/about/policies-and-publications/>.

To facilitate the implementation of the risk management program, a new appointment was made in mid-2023 for a new Workplace Health & Safety Manager to perform the role as the Modern Slavery Liaison Officer ('MSLO') with ACAN. The MSLO works to implement the modern slavery risk management program across CENT operations and supply chains and acts as the primary contact for ACAN.

The Deputy Director School Services sponsors the CENT Modern Slavery Statement to the CENT Board.

CENT Operations

CENT's vision and mission is to provide Catholic Education across the NT for students across 18 schools comprising 4 secondary Colleges, 5 Comprehensive Colleges, 8 Primary Schools and 1 flexible learning centre. Within the system there are also 9 Early Learning Centres, 9 Out of School Hours Care facilities and 4 remote Pre Schools. CENT operations are based on annual revenue of over \$138 Million for 2023.

Our Operations include the management and maintenance of housing facilities in remote locations. CENT also operates a Boarding facility in Darwin and has a number of international students supported through home-stay arrangements.

Travelling to remote communities can be difficult especially in the wet season (October to February) when rivers flood and communities become isolated. Staff travel to and from these communities regularly and often can be delayed when requiring travel by aircraft. In the wet season roads are flooded and impassable and during the dry season dirt roads are accessible only by four-wheel drive vehicles.

The high-level services provided through the Catholic Education Office include, but are not limited to:

- Specialist Education Support
- Financial Administration
- Safety (WHS)
- Human Resources Management
- Master Planning and Facility Maintenance
- ICT Services
- Compliance Reporting
- Advertising and media support
- Vocational Training programs

CENT People

The employee demographic in Darwin and NT in general is culturally diverse and representative of many nationalities across the globe including Africa, Europe, Asia and Oceania. With a strong Aboriginal workforce representative in all schools.

CENT employees are engaged full-time / part-time and causally or on fixed term contracts. Staff turnover can vary from year to year when staff elect to return to interstate of origin at the end of the contract period.

Teaching and school support staff are employed under an Enterprise Bargaining Agreement with Catholic Education Office and school leaders employed on fixed term contractual arrangements.

Award conditions are monitored and updated as regulations change and are implemented within the required timeframes and communicated to all staff through the regular communication channels. Staff have a number of avenues to address queries or issues in relation to their employment or conditions. They are encouraged to maintain professional, open and productive relationships with their supervisor and are encouraged to address issues in a collaborative, collegial manner.

CENT requires all staff to abide by the Sharer's of the Vision and Code of Conduct to ensure that our workplaces are safe and supportive. CENT provides a confidential Employee Assistance Program to support staff wellbeing during times of personal distress and trauma and for work related issues. This service is provided through Catholic Care Counselling Services.

CENT Supply Chain

CENT procures goods and services for the education of students with procurement in areas of:

- Infrastructure, maintenance and capital planning
- ICT and consulting services
- Office supplies including teaching and learning consumables
- Fixtures, fittings and building materials
- Engagement of services through the Indigenous Land Councils
- Education and legal consulting services

CENT operates a "Territory First" supplier engagement policy with secondary suppliers selected from Australia rather than overseas.

Criterion 3: Modern Slavery Risks

Through the ACAN program, CENT continued to focus on suppliers of labour and the operational risk associated with the following labour services procurement:

Cleaning & Security Services

The cleaning and security sectors typically employ temporary migrant workers engaged via subcontracting arrangements with a high rate of noncompliance with workplace rights and entitlements. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high risk countries.

Facility Management & Property Maintenance

The labour force used in facilities management generally consists of temporary migrant workers, often contracted through labour hire companies.

Labour Hire

Labour hire services pose a high risk for worker exploitation and modern slavery for several reasons, including:

- focus on low-skilled, low-paid, seasonal, temporary labour
- recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers
- deceptive and opaque practices trapping workers into exploitative situations
- demanding excessive fees for visas, travel and other work arrangements, leading to debt bondage
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community

Waste Management Services

The waste industry (including recycling) is a dangerous sector for workers with significant WHS risk such as exposure to toxic materials and pathogens, use of heavy machinery and dirty work environment. Modern slavery risks are similar to those faced by cleaners. Subcontracting to small waste management companies is common across the sector as is the use of labour hire. Migrants and low-skilled workers are used in waste collection, handling and material recovery facilities.

High Risk Suppliers

CENT has taken a number of steps to assess Modern Slavery risks in its operations. In the delivery of educational services across the school system, CENT procures goods and services from a range of industries, and engages in a broad range of activities to achieve its strategic objectives.

CENT assessed the risk exposure within CENT's expenditure and identified over 60% of suppliers fall within the high risk category.

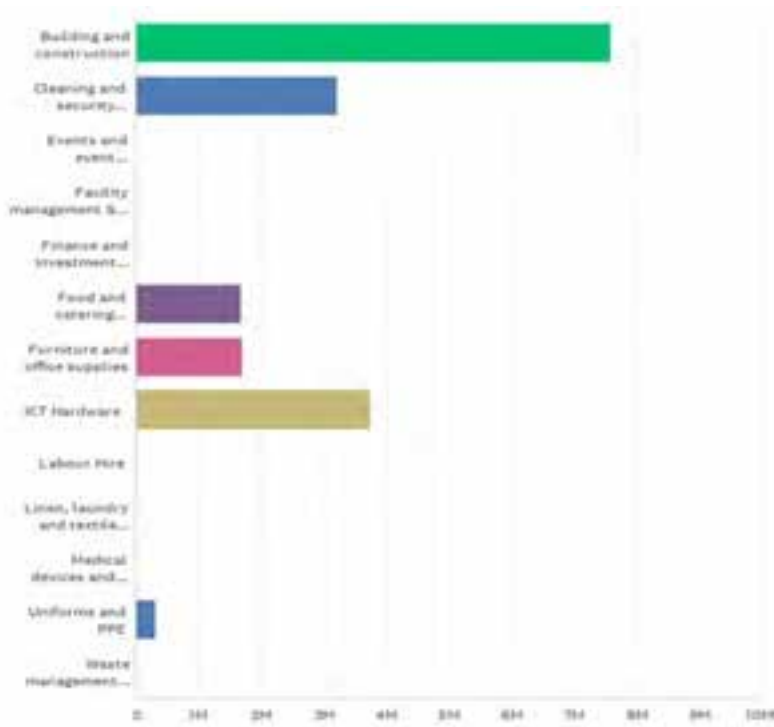
Applying the ACAN risk taxonomy for high risk categories, CENT data for each of these categories for 2023 reporting period was as follows:

Total annual procurement spend, excluding employee related expenses: \$48,876,015

Total number of suppliers: 1498

- Building and construction: \$7,584,193 across 13 suppliers
- Cleaning and security services: \$3,229,734 across 4 suppliers

- Food and catering services: \$1,680,550 across 4 suppliers
- Furniture and office supplies: \$1,715,107 across 6 suppliers
- ICT: \$3,742,071 across 8 suppliers
- Uniforms and PPE: \$326,358 with 1 supplier



Criterion 4: Steps Taken To Address Modern Slavery Risk

During the reporting period, the designated CENT (MSLO) participated in the ACAN Program activities, webinars and training sessions. The MSLO holds the responsibility for coordinating overarching operational activities in the identification and mitigation of modern slavery risks within the CENT. CENT recognises the importance of the MSLO role to lead implementation of the ACAN modern slavery risk management program.

CENT recognise that the ACAN supplier engagement plan identifies common suppliers shared across multiple Catholic School systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic school systems.

CENT appreciates the importance of the supplier engagement plan which includes an invitation to suppliers to CENT to attend ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain an understanding of modern slavery in relation to:

- Business relevance and the Modern Slavery Act
- Catholic customer/buyer expectations
- How to access ACAN e-learning
- SEDEX supplier membership

Whilst CENT planned to engage with SEDEX in 2023 staffing and restructure challenges resulted in a delay in working with suppliers in 2023.

Remediation

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, CENT has access to the expertise and independent advice available through Domus 8.7. CENT can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

Domus 8.7 principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach

Domus 8.7 overview:

- A vital service and key element of the ACAN Program
- Addresses a key mandatory reporting requirement of the MSA
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching

- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Domus 8.7 service profile:

- Guidance and advice for entities who identify slavery
- Coordination with government agencies, victim support organisations and others
- Develop internal capabilities to manage modern slavery risk
- Confidential independent grievance mechanism to report suspected incidents of modern slavery
- Practical and timely support for people impacted by modern slavery

Criterion 5: Effectiveness of Steps Taken

Baseline Data

The following baseline metrics measure the effectiveness of CENT risk management activities and initiatives from year to year:

	Activity	2021	2022	2023
Staff – <i>internal</i>	E-learning modules completed	12	2	577
	Working Group meetings	0	0	0
Supplier engagement – <i>external</i>	Total number of suppliers	n/a	n/a	1498
	Number of suppliers across high risk categories	18	n/a	44
	Suppliers invited to join SEDEX	3	4	4
	Supplier staff attending capacity building webinars	n/a	6	8
	ACAN supplier survey completed	3	14	0

Maturity Assessment

The ACAN Maturity Assessment provides a score card of CENT's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey. The score card will be used by a Working Group (to be established in 2024) to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The score card ranges from: 0 to 100

Achieving a score of 100 - signifying the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence - is an aspirational and long-term goal.

The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.

The score card provides for:

Holistic Overview: Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader,

long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

Contextual Understanding: Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.

Flexibility and Adaptability: Organisations are dynamic and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.

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

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Program and Activities:** Considers the broader initiatives and engagements we undertake to address modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

Maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach:

- 1) governance
- 2) risk assessment
- 3) risk management
- 4) effectiveness

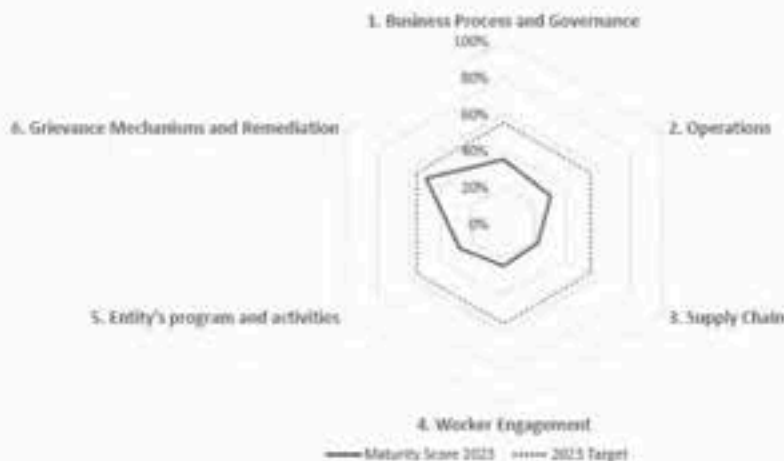
Catholic Education Northern Territory - Overview



Catholic Education Northern Territory - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	30%	46%	29%	34%	35%
2. Operations	36%	15%	37%	31%	30%
3. Supply Chain	0%	80%	7%	0%	22%
4. Worker Engagement	0%	53%	19%	22%	23%
5. Entity's program and activities	50%	5%	30%	26%	28%
6. Grievance Mechanisms and Remediation	55%	60%	48%	34%	49%
Average	29%	41%	28%	24%	31%

Maturity Score 2023 individual scoring by pillar and sub-pillar, including averages and total 2023 score



Maturity Score 2023 comparative to target and maximum scoring, by Pillar

The 2023 result for CENT:

CENT's score falls in the 31% - 50% range indicating an Emerging Practice level. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means our processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

Action Plan

2024

As part of CENT's 2023 review the following actions have been identified for 2024

- Collate supplier details and share with ACAN
- ACAN to identify common suppliers with other Catholic school systems and commence supplier engagement on behalf of CENT
- Modern Slavery Training to all CENT Workers and for Leadership, Finance and Infrastructure Teams
Risk Management Training
- Modern Slavery Working Group to be set up with stakeholders and to meet each term
- Improving supplier engagement and knowledge of Modern Slavery, through improved Procedures and Procurement activities

Towards 2026

Transition to Preferred Supplier and Contractors operating model

- Conduct Preferred Supplier review with Modern Slavery a Key Criteria
- As contractual agreements finalise Schools will align to the Preferred Contractor
- Centralised KPI's and Modern Slavery reviews completed during the contract cycle

Criterion 6: Internal Consultation

CENT will explore opportunities to work with other Diocesan entities on Modern Slavery activities ensuring our work with ACAN is cohesive and coordinated. CENT does not own or control other entities.

With the creation of the ACAN Working Group within CENT there will be the ability to influence all areas of the organisation to establish processes and practices that align strategies to address Modern Slavery risks.

Criterion 7 : Other Information

This is the completed documentation for the CENT Modern Slavery Statement and there is no other relevant information to provide.

Appendix: List of CENT schools

Holy Family Catholic Primary School – Karama
Holy Spirit Catholic Primary School – Wanguri
St Mary's Catholic Primary School – Darwin
St Paul's Catholic Primary School – Nightcliff
O'Loughlin Catholic College – Karama
St John's Catholic College – Darwin
Our Lady of the Sacred Heart Catholic College - Alice Springs
St Joseph's Catholic Flexible Learning Centre Alice Springs
Sacred Heart Catholic Primary School – Palmerston
MacKillop Catholic College – Palmerston
Mother Teresa Catholic Primary School – Palmerston
St Francis of Assisi Catholic Primary School - Humpty Doo
St Joseph's Catholic College – Katherine
Ltyentye Apurte Catholic School - Santa Teresa, Alice Springs
Murrupurtiyanuwu Catholic Primary School - Wurrumiyanga, Bathurst Island
Our Lady of the Sacred Heart Thamarrurr Catholic College - Wadeye, Port Keats
St Francis Xavier Catholic School - Nauiyu, Daly River
Xavier Catholic College - Wurrumiyanga, Bathurst Island



Catholic
Archdiocese
of Adelaide

2023 Modern Slavery Statement

DISCLOSURE

This statement has been produced on behalf of Catholic Church Endowment Society Inc (CCES) ABN 29 608 297 012. This statement covers all entities owned or controlled by CCES, including Catholic Education Office ABN 91893631195 and Centacare Catholic Community Services (formally named Centacare Catholic Family Services) ABN 21578907988.

This Modern Slavery Statement was approved by the principal governing body of the Catholic Church Endowment Society Inc as defined by the Modern Slavery Act 2018 (Cth) (the Act) on 21st June 2024.

This Modern Slavery Statement is signed by Archbishop Patrick O'Regan as the sole Trustee of the Catholic Church Endowment Society Inc, the responsible member as defined by the Act.



Catholic
Archdiocese
of Adelaide



ACKNOWLEDGEMENT OF COUNTRY

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Adelaide.

We also acknowledge Elders, past, present and pay tribute to those who have contributed to the social, economic, cultural, political, and spiritual life of our community.

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

APPROVAL

A message from Archbishop Patrick O'Regan

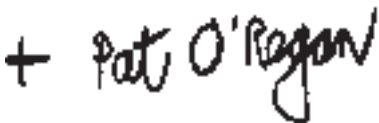
The Archdiocese of Adelaide has been a member of the Australian Catholic Antislavery Network (ACAN) since 2020. This is the Archdiocese first Modern Slavery Statement and reporting year.

The Archdiocese is already committed to the tenets of Catholic social teaching and recognises alignment with our commitment in this space with the dignity of the human person, in particular the worker and the common good.

In 2023, we formed a working group to progress activities leading to reducing modern slavery risks through the Archdiocese which includes examination of our supplier network with the support of ACAN.

We look forward to continuing this important work in 2024.

In Domino,

A handwritten signature in black ink that reads "+ Pat O'Regan". The signature is written in a cursive, slightly slanted style.

+Patrick O'Regan
Archbishop of Adelaide

"Although we try to ignore it, slavery is not something from other times."

- Pope Francis

"There is dignity in work, through work, human beings participate in creation and help realise God's plan on earth."

- Pope Francis

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CRITERIA 1 and 2

About Archdiocese of Adelaide

Mission

Governance Framework

Organisational structure and geographic regions

About the Archdiocese of Adelaide

The Catholic Church in South Australia dates back to 1842. Today the Adelaide Archdiocese is home to 253,870 Catholics, 15.7 per cent of the total population (ABS 2021 Census). The Church employs more than 11,800 South Australians working across the industry sectors of education, health, social services and parishes. The Church also has many volunteers who assist and support their communities. The Adelaide Archdiocese covers an area of 105,000sq km, taking in the city of Adelaide and outer metropolitan areas as well as the regional areas of Yorke Peninsula, Riverland, Barossa Valley, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island, Coorong, South East and Limestone Coast. There are 57 parishes with 125 mass centres, and 22 multicultural communities in the Archdiocese. The rich cultural diversity of the local Church is reflected in 22 migrant communities. In 2023, there were more than 52,000 students attend 89 Catholic schools in the Archdiocese. Through community and social services, more than 20,000 people sought assistance across 34 locations or through outreach services into communities.

Our Hope for the Future

Following local consultations that took place in the lead up to the Plenary Council and responses to the 2021 and 2022 Diocesan Assemblies, the Archdiocese launched a vision and mission for the Church in Adelaide in 2023.

Vision

The Adelaide Catholic Archdiocese strives to be a welcoming Christ-centred community of servant leaders, committed to listening, discerning and growing in the Spirit, as disciples journeying together and as co-creators of the world that God desires.

Mission

As followers of Jesus, loved by God, nurtured and formed in community we are called to be:

- Sharers of faith, hope and love
- Builders of bridges
- Healers of broken relationships
- Agents of transformation in a world that cries out to be made whole

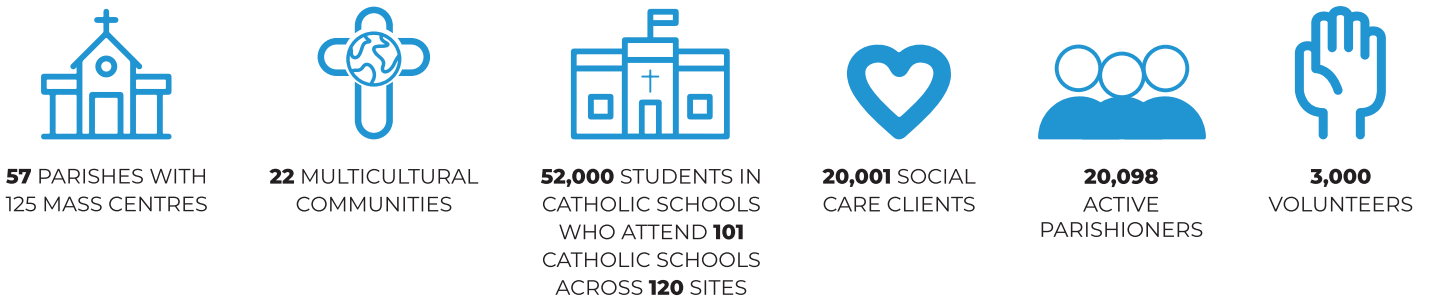
ABOUT

The activities undertaken within the CCES encompass our Catholic schools, parishes, and welfare services delivered through Centacare. The relevant overarching civil entities established within the Archdiocese are the:

- Catholic Church Endowment Society Incorporated
- South Australian Commission for Catholic Schools Incorporated.

For clarity, this 2023 Modern Slavery Statement includes the entire financial spend across Centacare Family Services, the administrative expenditure from the Archdiocese of Adelaide office, as well as the Catholic Education Office. It is anticipated that in the coming years, we will examine the suppliers of both individual parishes and those of our Catholic schools.

Operations (Demonstrated Graphically)



Workforce Profile

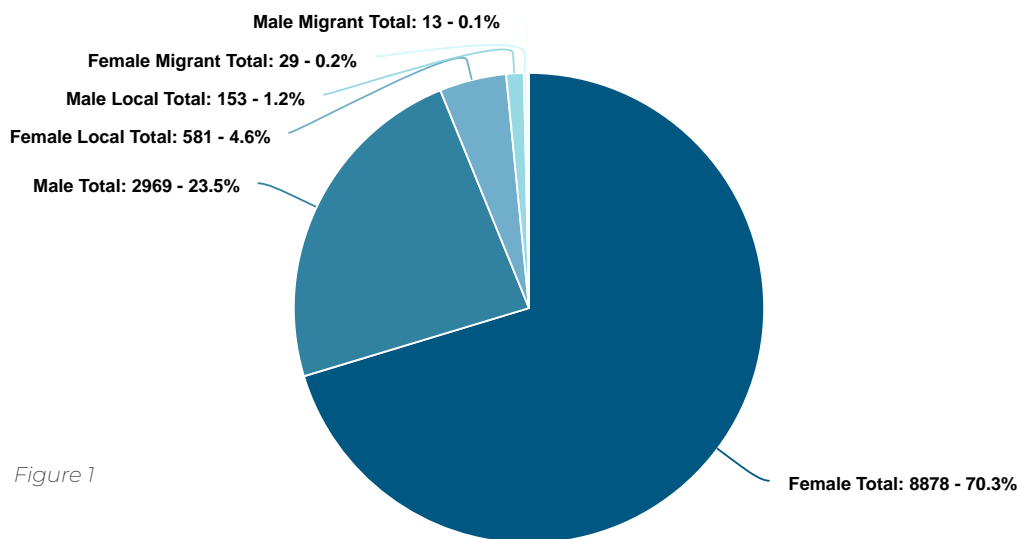


Figure 1

Employees in the Archdiocese total of 11,847 span the industry sectors of education, health, social services and parishes. Not all entities record female and male local and migrant employees (as depicted).

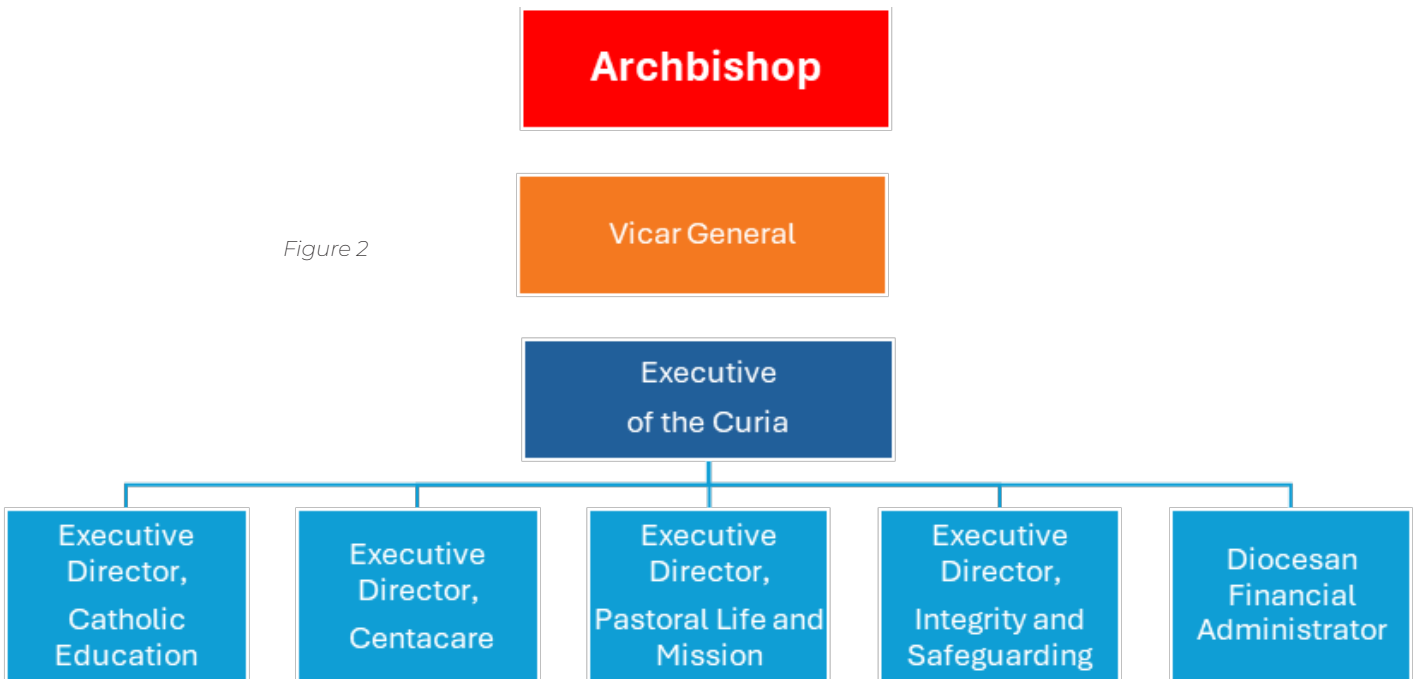
Governance Structure

The Catholic Church Endowment Society Inc. (CCES) is the legal entity for all parishes and agencies of the Archdiocese.

The Archbishop of Adelaide is the Ordinary for the Archdiocese and has canonical authority for the operation of each of the parishes, agencies, schools and services of the Archdiocese.

The Archbishop is at the head of the governance structure (refer Figure 2). To assist in his role the Archbishop delegates certain responsibilities to the Executive Directors of the agencies and services outlined below.

The Executive Directors' roles are to ensure that the civil law responsibilities including financial accountability, legislative compliance, risk management and people management are met. The Executive Directors, Director of Communication, the Vicar General and the Archbishop form the Executive of Curia. The Executive of the Curia meets monthly and has responsibility for matters of operational and mission-related significance, including modern slavery.



The CCES Modern Slavery Working Group is accountable to the Executive of the Curia. The Working Group has appointed a Modern Slavery Liaison Officer, to act as a key contact between CCES and ACAN, with this key contact being the Executive Director, Pastoral Life and Mission. The Executive Director, Pastoral Life and Mission is also the chair of the CCES Modern Slavery Working Group, with membership including representatives from the main business units of CCES that are subject to meeting the modern slavery obligations under the Act.

Risk Management

Catholic Church has adopted a structured approach to risk management within our internal Catholic Safety and Injury Management team.

On behalf of the worksites within the Church, CCES holds a Self-Insurer Registration with ReturnToWorkSA. Being self-insured under this scheme provides financial and personal benefits for Catholic Church employers and workers.

Catholic Safety & Injury Management South Australia (CSaIM SA) is the unit responsible for the implementation and management of the Safety & Injury Management System for the Catholic Church in South Australia.

CRITERIA 3

Modern slavery risks in operations and supply chains

Risks in Operations and Supply Chains

CCES has commenced its supplier chains to address modern slavery risks in 2023.

CCES supplier data has been reviewed against the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labour Organisation (ILO) definitions of modern slavery.

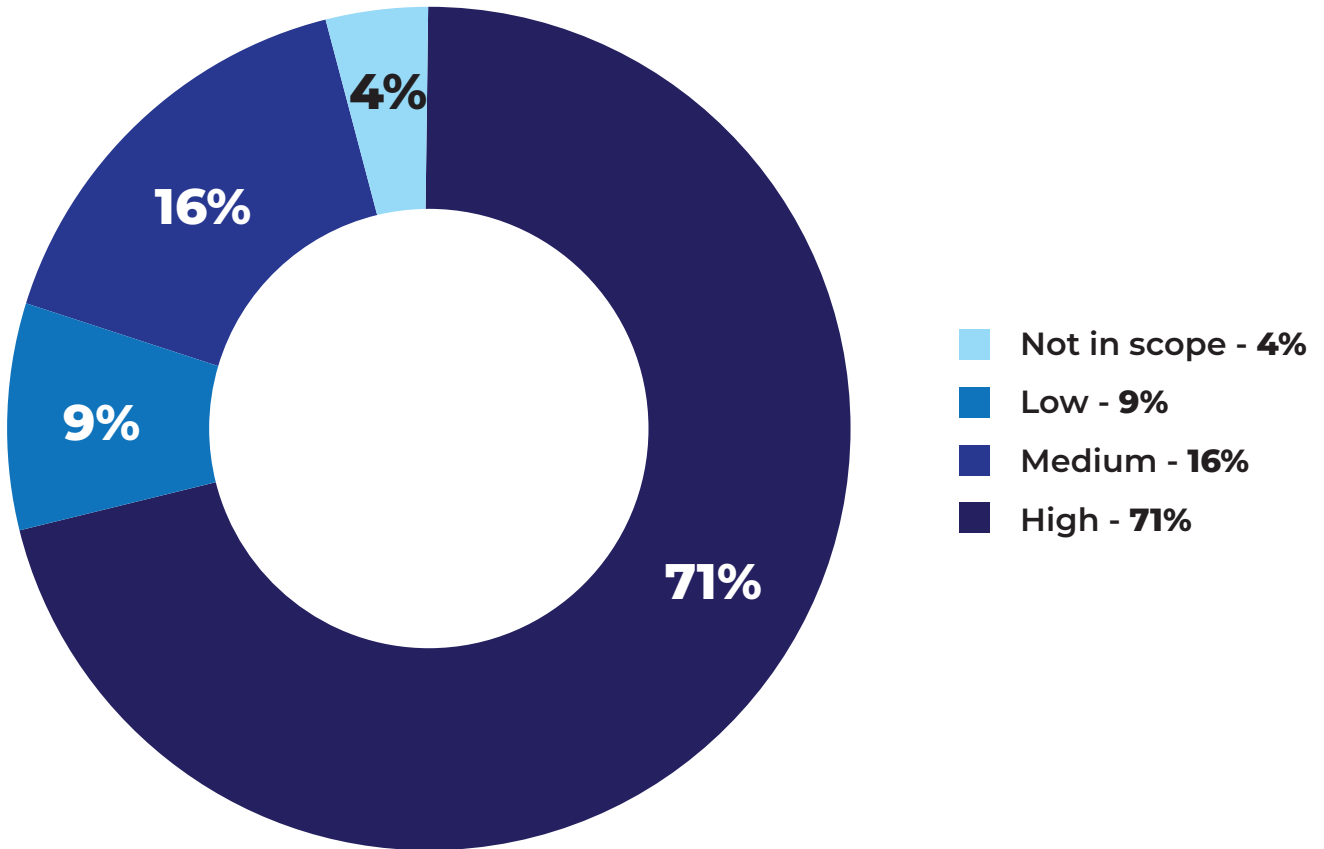
Analysis of inherent heightened risk of modern slavery for CCES suppliers are the categories of building and construction and ICT hardware (laptops, computers and mobile phones).

In order to further assess the risk CCES has committed to asking all suppliers to complete the ACAN supplier survey.

The following table summarises the Archdiocese vendor analysis for the 2023 financial year. **Note: Archdiocesan Services only includes top 50 spend.**

VENDOR ANALYSIS					
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max Spend/ Vendor	Min. Spend/ Vendor
Catholic Education	799	0	0	\$36,457,929	\$50
Archdiocesan Services	50	0	0	\$2,155,019	\$69,014
Centacare	255	0	0	\$1,413,859	\$30

RISK LEVEL SUPPLIERS



The high-risk categories across the Archdiocese of Adelaide, and including Centacare and Catholic Education with the highest spend value (over \$200,000) include:

- ICT Hardware
- Furniture and Office Supplies
- Building and Construction
- Labour Hire
- Events and Event Management
- Cleaning and Security

CRITERIA 4

Actions Taken to Assess and Address Modern Slavery Risks

The metrics in the table below provide a quantitative basis for evaluating actions and provide for a clear, objective measure of whether and to what extent goals are being achieved. The table captures the direct impact of actions and helps CCES understand the pace of change and set future direction.

The data shows engagement by suppliers of goods and services. The ACAN supplier survey was completed by 63 suppliers. Of those suppliers, 12 suppliers were invited to join SEDEX and complete the SEDEX Self Assessment Questionnaire.

The Modern Slavery Working Group consists of:

Sarah Moffatt	Executive Director, Pastoral Life and Mission Archdiocese of Adelaide
James Lloyd	Pastoral Leader, Justice, Healing and Inclusion
Jarden King	Manager, Governance and Quality Assurance, Centacare
John Favretto	Director, Governance, Quality and Assurance Catholic Education SA

	ACTIVITY	Catholic Archdiocese of Adelaide
INTERNAL / STAFF	Hours spent on modern slavery activities	12
	Working Group meetings	3
	Individual staff completed e-learning	0
	E-learning modules completed	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1064
	Number of suppliers with visible contact information and ABN	0
	Number of suppliers across high-risk categories	121
	Number of ACAN Supplier Surveys completed	63
	Supplier staff attending capacity building webinars	2
	Invited to join Sedex	12
	Joined Sedex	0
	Sedex SAQ completed	0
	Social audits	0
	Corrective actions	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

In 2023, the following actions have been undertaken by CCES:

- Joined Modern Slavery Risk Management Program through Australian Catholic Anti Slavery Network (ACAN) and begun participating actively.
- Establishment of a Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education. This working group have met on 3 occasions.
- Drafted Terms of Reference of the Modern Slavery Working Group.
- Established a Modern Slavery Statement.
- Commenced assessment of supplier spend and associated risks.

For 2023 reporting, CCES followed the ACAN program for assessing and addressing the risk of modern slavery through the following supplier engagement plan:

- I. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.
- II. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey. ACAN Program Managers assessed survey results to identify:
 - suppliers with SEDEX membership
 - suppliers willing to join SEDEX
 - suppliers not required by CSPD to join SEDEX
- III. Suppliers were assisted to join SEDEX and provided support to complete the SEDEX Self Assessment Questionnaires (SAQ).
- IV. ACAN Program Managers assessed Supplier SAQ results, identified gaps in the supplier's management system such as further training, capacity building needs and development of risk management strategies.

SEDEX

Supplier Ethical Data Exchange platform (SEDEX) is the largest collaborative platform for sharing ethical supply chain data. SEDEX is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

SEDEX provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain.

As a member of SEDEX, CCES can utilise services and resources aimed at managing supply chain risks, fostering supplier engagement, and promoting ethical and sustainable business practices. SEDEX benefits to CCES:

- Enhanced transparency: SEDEX offers a secure online platform for companies to exchange information regarding their ethical and environmental performance with stakeholders, suppliers, and customers. This fosters trust and confidence throughout the business and its supply chain.

- Improved risk management: SEDEX equips businesses with tools to identify and address risks within their supply chains, such as labor rights violations, environmental breaches, and instances of corruption. This proactive approach can mitigate the likelihood of reputational harm, legal ramifications, and supply chain disruptions.
- Heightened efficiency: SEDEX provides standardized templates and resources for suppliers to report on their ethical and environmental practices, streamlining the reporting process and alleviating administrative burdens for businesses.
- Access to expertise: SEDEX offers training, support materials, and guidance on ethical and sustainable practices, empowering businesses to enhance their performance and comply with legal and regulatory requirements.
- Achieve a competitive edge: Demonstrating a commitment to ethical and sustainable practices enables businesses to bolster their reputation and brand value, thereby gaining a competitive advantage.

Remediation

CCES is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CCES is found to have caused or contributed to modern slavery.

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, CCES, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery.

By partnering with Domus 8.7, CCES can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

CRITERIA 5

Measuring effectiveness
 Demonstrating continuous improvement
 Action Plans

Effectiveness of Steps undertaken

CCES completed the ACAN 2023 Entity Profile as part of ACAN’s Modern Slavery Maturity Assessment process. CCES’s overall assessment score of 33% is above the benchmark 15% for a Year 1 reporting entity; the assessment has identified areas that will need to be of focus for the year ahead, in particular internal worker engagement and supply chains.

The charts below provide a high-level understanding of CCES’s current level of maturity in managing modern slavery risk. The data shows that CCES has surpassed the target level of maturity in all areas except for Worker Engagement Governance, an area that will be of immediate focus for the organisation.

Maturity Assessment 2023

Catholic Archdiocese of Adelaide - Overview



Catholic Archdiocese of Adelaide - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	40%	47%	29%	17%	33%
2. Operations	36%	28%	19%	9%	23%
3. Supply Chain	8%	40%	14%	4%	17%
4. Worker Engagement	2%	60%	22%	29%	28%
5. Entity's program and activities	85%	30%	50%	25%	48%
6. Grievance Mechanisms and Remediation	70%	60%	42%	32%	51%
Average	40%	44%	29%	19%	33%

Maturity Score 2023 notional using top pillar and sub pillar, including average and total 2023 score



Action Plans

The following activities are planned for 2024:

- Finalise the Terms of Reference of the Working Group and Modern Slavery Policy.
- Invite staff to complete the e-learning modules on Modern Slavery
- Introduction of the Modern Slavery Working Group to SEDEX
- Invite high risk suppliers to complete the ACAN supplier survey
- Development of a contract clause for suppliers and as part of prospective new tender process.

CRITERIA 6

Process of Consultation

- The Executive of the Curia determined in October 2023 that it would proceed with producing a Modern Slavery Statement for the 2023 reporting period.
- Establishment of a Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education. This working group have met 3 times.

CRITERIA 7

Other

As part of awareness raising activities in the Archdiocese:

- Each year the Feast of St Josephine Bakhita of South Sudan is held in St Francis Xavier's Cathedral. This important Feast Day Mass for the Patron Saint of victims of modern slavery and human trafficking; organized by the African community.
Link: <https://adelaide.catholic.org.au/our-works-and-community/catholic-multicultural-office/events/the-feast-of-st-josephine-bakhita-2023-1>
- The Archdiocese promotes ethical Easter Egg campaigns through its parishes and communities in the lead up to easter.
- Centacare has established a Diversity, Equity and Inclusion committee that actively promotes the Diversity Council of Australia messaging, inclusive of Modern Slavery information that is to be linked to the internal Centacare Modern Slavery portal page.

APPENDIX A – TIMELINE OF ACTIVITIES

2020	Joined ACAN
October 2023	Commitment from executive of Curia to develop a Modern Slavery Statement
9th August 2023	Modern Slavery Working Group Meeting
14th November 2023	Modern Slavery Working Group Meeting
7th February 2024	Modern Slavery Working Group Meeting
28th February 2024	Online Progress Meeting with ACAN
5th March 2024	Modern Slavery Working Group Meeting
1st May 2024	Online Progress Meeting with ACAN
14th May 2024	Online Progress Meeting with ACAN
29th May 2024	Modern Slavery Working Group Meeting



Modern Slavery Statement

2023

Catholic Education Western Australia Limited

ABN 47 634 504 135

Acknowledgement of Country

Catholic Education Western Australia Limited (CEWA) acknowledges the Traditional Owners of the lands on which we live, learn and work. CEWA acknowledges the continued deep spiritual connection and relationship of Aboriginal people to country and commits to the ongoing journey of reconciliation.

Disclosure Note

This statement has been made on behalf of CEWA. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers CEWA as a single reporting entity.

CEWA Office:
50 Ruislip Street
West Leederville WA 6007

www.cewa.edu.au



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Approval and Signature

Eva Skira AM

*Chair, Catholic Education
Commission of Western
Australia*



The passing of the *Modern Slavery Act 2018* and the establishment of the *National Action Plan to Combat Modern Slavery 2020–2025 (National Action Plan)* are examples of positive steps taken by the Australian Government to counter the prevalence of modern slavery in Australia.

CEWA believes fervently that human rights are inherent and inalienable for all persons regardless of race, gender, nationality, ethnicity, language, religion, or otherwise. While modern slavery continues to be deeply embedded in global communities today, it is a practice that CEWA distinctly rejects. Modern slavery disrupts supply chains, undercuts responsible local businesses and has devastating physical, mental, and emotional consequences for its victims.

As CEWA reflects upon and examines practices across our organisation, we remain committed to ensuring the social, political, and economic equity of humankind. Modern slavery, in any form, is unacceptable across our operations or supply chains. CEWA is committed to working in collaboration with our employees, suppliers, and all other relevant groups to tackle this challenge.

Aligned with the CECWA Strategic Directions 2019–2023 and Quality Catholic Education, CEWA continues to make strides in ensuring that we take positive steps including the promotion of educational opportunities and strengthening procurement management approaches to do our part in making an impactful difference.

I encourage everyone to consider what personal contribution they can make to address modern slavery risks; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change.

It is my hope that CEWA's commitment to this shared goal of modern slavery will be realised through our significant and continuous dedication, ensuring that the human rights of our students, staff, the wider community, and the world are respected and upheld.

On behalf of the Catholic Education Commission of Western Australia, I welcome your participation in this ongoing process.

A handwritten signature in black ink, appearing to read 'E. Skira', followed by a long horizontal line extending to the right.

Eva Skira AM

Chair

Catholic Education Commission of Western Australia

This Modern Slavery Statement was approved by the principal governing body of CEWA as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 3 May 2024. This Modern Slavery Statement is signed by a responsible member of CEWA as defined by the Act.

Approval and Signature

Wayne Bull

*Executive Director,
Catholic Education
Western Australia Limited*



As a significant employer in Western Australia with more than 11,500 employees and as one of the largest education providers, with over 80,000 students enrolled in Catholic education, it is imperative that we continue to use our platform to amplify the human rights of the marginalised and vulnerable people impacted by modern slavery. A complex issue, modern slavery, sadly impacts more than 40,000 people in Australia and despite internationally lauded legislation, is a growing concern in our country.

To counter modern slavery practices, CEWA's focus has been to build collaborative partnerships with groups that align with our vision. By maintaining our membership with Australian Catholic Antislavery Network (ACAN) and over 50 Catholic entities throughout Australia, CEWA is confident that impactful outcomes are being achieved by collectively demanding positive change from national and international supply chains.

CEWA's system-wide Executive Directive – Modern Slavery Prevention is one of the many implemented measures that aims to ensure that the dignity of work, and the rights of workers are upheld, that ethical business processes are applied, and modern slavery risks are addressed, ensuring that CEWA's commercial affiliations remain consistent with legislative and moral expectation.

On 8 February 2019, Pope Francis spoke at the 10th World Day of Prayer and Awareness against Human Trafficking, stating that we must *"mobilise all our resources in combating trafficking and restoring full dignity to those who have been its victims. If we close our eyes and ears, if we do nothing, we will be guilty of complicity."* In slavery-proofing all procurement practices and supply lines of the Vatican, Pope Francis reminds us that whether through consumption of commercial goods produced through slavery, or the making of financial profits through the practice, modern slavery ought to be contended. Pope Francis has modelled the way forward; fortitude in demanding better for those impacted by modern slavery, and reminding all that the cost of goods should never be prioritised over the human rights of individuals, particularly those most vulnerable to modern slavery practices.

Yet, there is still much work to be done in this space. CEWA continues to develop our program of work in areas including governance, procurement and supplier management, legal documentation, facilities management, investment, research, engagement, and education, and more. We are committed to exceeding all obligations in respect to modern slavery prevention and the assurance of a future where all persons are empowered to embrace the irrevocable value of their human dignity.



Wayne Bull

*Executive Director
Catholic Education Western Australia Limited*

Reporting Criterion 1

About Catholic Education Western Australia Limited (CEWA)

Established by the Catholic Bishops of the State of Western Australia, CEWA's purpose is to provide a Catholic education for all families who seek it for their children. Through its Catholic schools, CEWA provides a Christ-centred, child-focused learning environment for students, so that they can become active citizens who contribute to the development of Australian society.

CEWA is the second largest education provider in Western Australia, providing a faith-based education for 15.6% of the State's total school-age population, including 17.2% of all secondary students. In 2023, over 80,000 students were enrolled in 163 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 11,500 staff, making it the State's fourth largest private employer and a significant contributor to the Western Australian economy.

CEWA, through the Catholic Education Commission of Western Australia (CECWA) Strategic Directions 2019–2023, has a particular focus of ensuring the accessibility, affordability, and sustainability of Catholic schools. Quality Catholic Education (QCE), embraced across Catholic schools and offices, ensures CEWA's commitment to practices that reflect Catholic Social Teaching. Receiving a quality Catholic education, care and support enables children to make a positive contribution to society in line with Catholic Social Teaching. CEWA schools and offices support all students, regardless of their individual circumstances, especially the marginalised and disadvantaged, guided by our mission of bringing the Good News of Jesus Christ to all.

Photo: St Joseph's School (Boulder)



Reporting Criterion 2

Our Structure, Operations and Supply Chains

Our Organisational Structure

In 2023, CEWA was the governing body for 149 CEWA schools and provided registration oversight for an additional 10 Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

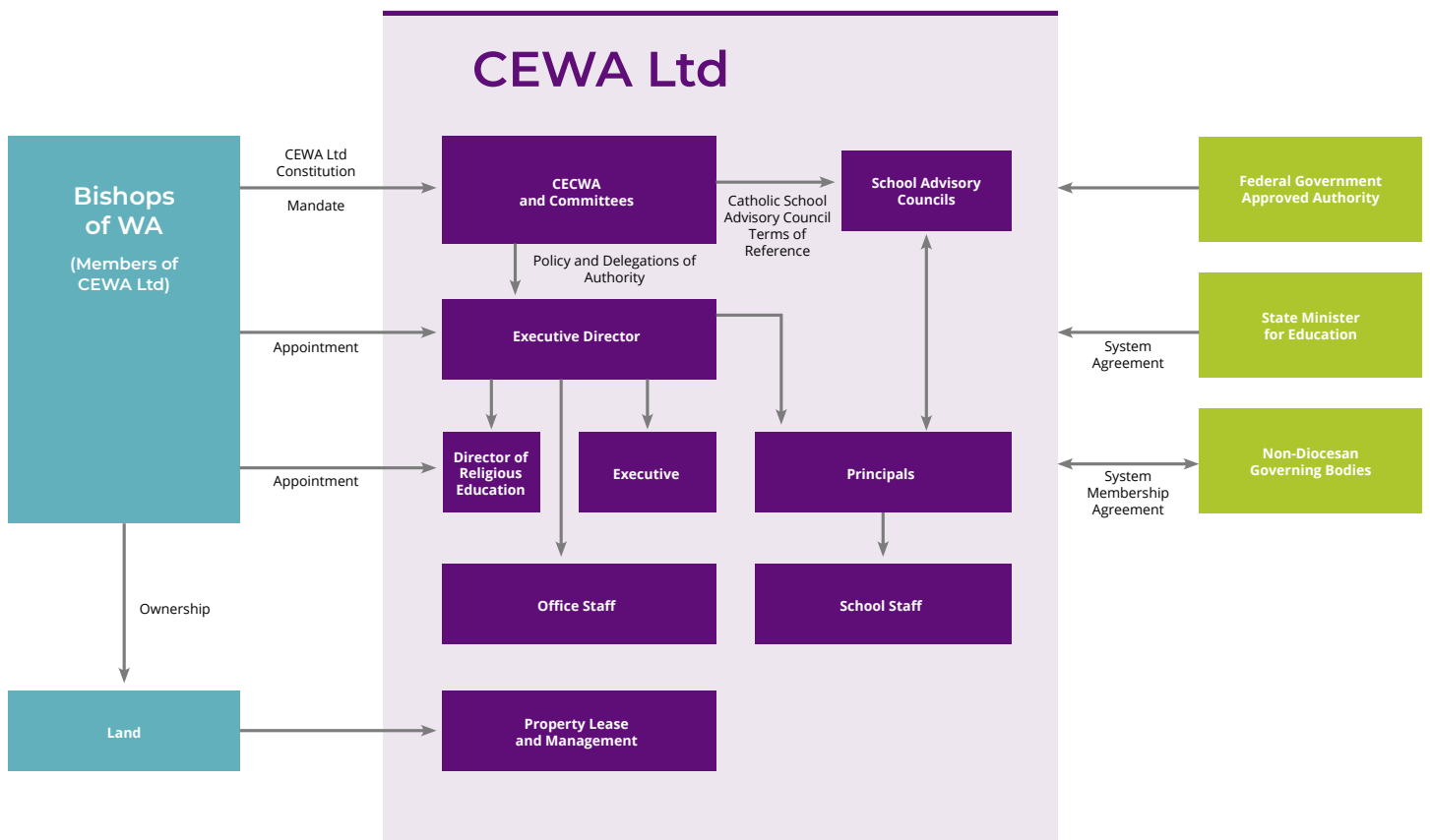
CEWA's annual consolidated revenue in 2023 was: \$1,358,034,942.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA is registered with the Australian Charities and Not-for-profits Commissioner (ACNC).

The Catholic Education Commission of Western Australia (CECWA), as the Board of Directors of CEWA, directs CEWA to develop learning opportunities that fulfil the goals of Catholic schools as outlined in the Bishops' Mandate. CECWA is supported through five committees, established to advance the strategic priorities of CEWA and monitor activities. In 2023, these committees included:

- Aboriginal Community Committee;
- Audit and Risk Committee;
- Finance Committee;
- Formation and Workforce Committee; and
- School Improvement Committee.

CEWA's governance structure is illustrated below:



Reporting Criterion 2: Our Structure, Operations and Supply Chain (continued)

CEWA schools and Catholic schools with governing bodies

In addition to the 149 CEWA schools, the CEWA System includes 10 schools that are governed by six governing bodies other than CEWA. For the purposes of school registration in Western Australia, the 10 schools with governing bodies other than CEWA are included within the Catholic Education System, creating CEWA's responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

CEWA Executive Team

Dr Debra Sayce was the Executive Director of CEWA until 31 December 2023. In 2023, the Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Wayne Bull
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director Leadership and Wellbeing	Dr Tony Curry
Director People and Culture	Paul Andrew <i>(commenced 11 September 2023)</i>
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office and is supported by approximately 332 office staff working across the four Catholic dioceses in Western Australia.



Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of the Australian Securities and Investments Commission (ASIC), ACNC, the Bishops of Western Australia, the Federal and State Governments, and CEWA's students, staff, stakeholders and community.

CEWA is governed by four overarching policies aligned with Quality Catholic Education: Catholic Identity, Education, Community and Stewardship. Supporting the four policies are a suite of Executive Directives. CEWA's Executive Directives articulate CEWA's policy requirements and provide directions to be followed across the System.

Reporting Criterion 2: Our Structure, Operations and Supply Chain (continued)

CEWA has an *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA to operate within the following principles:

1. Catholic Social Teaching calls for the dignity of work, the rights of workers and the advancement of the common good.
2. CEWA does not knowingly use or contribute to modern slavery practices in any form.
3. CEWA actively works to identify and eliminate modern slavery practices from operations, business partnerships and supply chains.
4. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological, or financial) of CEWA community members or of people in its supply chain is unacceptable.
5. CEWA complies with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
6. CEWA's final purchasing decisions are not to be based on price alone. Ethical business processes are an essential part of CEWA's value for money and fit for purpose consideration which includes consideration of a living wage for workers and responsible worker recruitment.
7. CEWA incorporates ethical considerations alongside more traditional financial factors into investment analysis and decision making.
8. CEWA continues to 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 chain.



A risk management framework has been implemented across the system at both enterprise and individual school and office level. CECWA has overall responsibility for the implementation and oversight of the risk management program and is supported by the Audit and Risk Committee. The breadth of risks addressed is wide and includes risks relating to modern slavery.

CECWA is updated on CEWA's progress to address, monitor and review modern slavery risks through the Executive Director's report to CECWA as matters arise.

Reporting Criterion 2: Our Structure, Operations and Supply Chain (continued)



Our Operations

CEWA is responsible for the provision of quality Catholic education throughout the state of Western Australia and is the only recognised non-government school system in the State. As well as playing a pivotal role in supporting a developmentally appropriate and engaging teaching and learning program for children and young people, Catholic schools provide vital faith formation, pastoral care, and wellbeing support to all involved within the System.

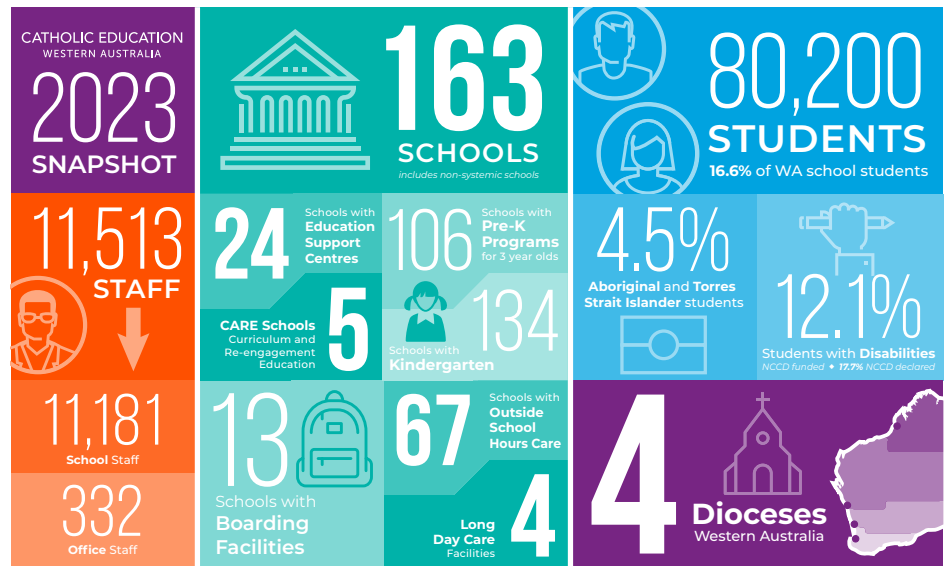


CEWA's wide range of operations include:

- the development of Catechist resources to prepare children not attending Catholic schools to receive the sacraments at the appropriate ages through the Parish Religious Education Program (PREP);
- providing resources, formation training and information to support the work of parish Catechists and Sacrament Coordinators;
- providing outside of hours school care, long day care and vacation care;
- providing flexible and supportive education through our five Curriculum and Re-engagement in Education (CARE) schools to enable young people at risk to continue their education journey in a safe, supportive environment;
- providing access to boarding and residential accommodation to students from families in regional areas so they can access a quality Catholic secondary education;
- providing traineeships, cadetships, and scholarships to facilitate career pathways in the education sector for Aboriginal and Torres Strait Islander people;
- providing educators and support staff – through the Kimberley Calling program – with the experience of learning, living, and serving in the Catholic school communities of the Kimberley, emphasising the abundance of rich personal, professional, cultural, and environmental experiences, and unique opportunities and challenges that working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout CEWA, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

Reporting Criterion 2: Our Structure, Operations and Supply Chain (continued)

An overview of CEWA's reach in 2023 is provided in the figure below.



CEWA schools and offices engage contractors and subcontractors to provide cleaning services, waste management, and conduct routine maintenance tasks.

The development and advancement of CEWA's procurement strategy and approaches will increase due diligence in contractor management. The documentation is anticipated to set out social, environment and ethical expectations of suppliers, including the requirement that forced, involuntary or underage labour is expressly forbidden.

Construction and capital development account for significant spend within CEWA due to new school construction, provision of new facilities and maintenance of existing facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas are also subject to improved due diligence processes within CEWA's *Building Quality Catholic Schools* document.

Our Supply Chains

Across CEWA, purchases are made at system-level and this report is focused on purchases that are driven by management-made decisions. However, Catholic school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases. Through further maturity of system processes because of incorporation, including the appointment of a Contracts and Procurement Manager and the creation of the Procurement Team, it is anticipated that future ethical purchasing decisions will be made by the System, with schools potentially operating through a preferred supplier program.

Reporting Criterion 3

Modern Slavery Risks

In 2023 CEWA procured

\$1.25b

of goods and services

These goods and services were
sourced from approximately

13,400

predominantly Australian suppliers

In 2023, CEWA procured \$1,251,145,590 of goods and services from employees and approximately 13,400 direct suppliers* (predominantly Australian). Services procured included cleaning, catering, building contractor and security and waste service provision, all of which are known to be at increased risk of worker vulnerability, labour exploitation and modern slavery due to the low level of pay and the high prevalence of employment of migrant workers.

CEWA acknowledges that business and procurement activities could cause, contribute to, or be directly linked to modern slavery practices in line with the *United Nations Guiding Principles on Business and Human Rights* and the associated reporting requirements of the *Modern Slavery Act 2018* (Cth). The risks of CEWA causing or contributing to modern slavery practices have been assessed as low, however it has been identified that CEWA's greatest modern slavery risk is through supply chains. CEWA seeks to prevent, mitigate and where possible remediate adverse human rights impacts that are directly linked to operations, products, or services by business relationships, even if CEWA has not directly caused or contributed to those impacts. CEWA recognises that connections exist beyond daily operations and due diligence must necessarily extend to those activities.

CEWA acknowledges that uniform purchasing is a potentially high-risk area, both with regards to cotton growing and garment manufacturing. Throughout 2023, uniform purchasing continued to be managed individually by Catholic schools. However, the development of the procurement system incorporated an overhaul of the supplier onboarding and categorising, to allow for identification of high-risk categories, including uniform suppliers. This will enable CEWA to continue to develop strategies to mitigate supplier risks.

CEWA has identified, through a procurement review, that the CEWA office purchases a wide range of goods and services, including the areas listed below:

- construction services and suppliers;
- cleaning and security;
- electronics;
- furniture;
- stationery;
- food and catering supplies;
- travel and accommodation services; and
- books and printing.

CEWA recognises that the supply chains of our Tier 1 suppliers, and therefore CEWA's own supply chains are interconnected, complex and diverse, and extend beyond Australia. CEWA supply chains are connected with the lives of many people worldwide – and it is acknowledged that slavery is a reality for many of them. It has been identified that CEWA's extended supply chains present the highest risks for modern slavery.

* Figures relate to third-party suppliers to CEWA schools and offices.

Reporting Criterion 3: Modern Slavery Risks (continued)

As communicated in 2021, CEWA is committed to work with the highest risk, highest spend Tier 1 suppliers by providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA will extend that oversight to the extended CEWA supply chain.



As of December 2023 CEWA supported

11,500

teaching and non-teaching jobs

\$2.37bn

GVA contribution in 2021; 17% of total
WA Education & Training sector

Operational Risks

CEWA's people

As of December 2023, CEWA supported 11,500 teaching and non-teaching jobs, 80% of which were female*. In 2021, it was estimated that CEWA's total Gross Value-Added contribution to the WA economy was approximately \$2.37 billion, representing almost 17% of the WA Education and Training sector, per year.

CEWA recognises the need for heightened due diligence across areas that are known to be at high risk of modern slavery, including cleaning contractors, and aims for employment documentation and contractor/subcontractor engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well-documented and communicated policies, Executive Directives, and processes in place to ensure compliance with national and state employment law and legislation throughout the System. The Executive Directive – Employment in Schools is regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly.

CEWA also conducts regular and ongoing training to continually upskill and build capacity in system leaders to ensure appropriate legislation and best employment practices are adhered to. If a case of modern slavery was suspected, it would be fully investigated, and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any CEWA policies.

Research

Recognising that management of modern slavery risks calls for a collaborative, multi-stakeholder approach, CEWA takes an ethical human rights approach to the approval of research applications that provides transparency of disclosure and the integration of decision-making oversight into all operational aspects.

The Executive Director is responsible for two forms of research that are facilitated across CEWA:

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

* These figures include staff in CEWA schools and offices, including casual staff.

Photo: Aranmore Catholic Primary School (Leederville)

Reporting Criterion 3: Modern Slavery Risks (continued)

All research is quality controlled by the Australian Government document National Statement on Ethical Conduct in Human Research 2007 (2018 Update). Each researcher is required to place their research under the scrutiny of a registered Human Research Ethics Committee, which uses the National Statement to assure ethical approaches including the rights, safety, fair treatment and needs of all participants. This is especially important for those from vulnerable populations, such as migrant families, whose families are engaged in high-risk work practices, such as third-party labour hire or who work in high-risk product or service areas, such as cleaning or construction. The CEWA research approval process provides a further layer of scrutiny, which, among other things, considers any issues associated with coercive practices related to modern slavery.

Any research partnerships negotiated with CEWA would take into consideration the good standing, past and existing ethical conduct of the proposed partner, including any connection to the coercive practices of modern slavery by that organisation and any entities known to be linked to them.

Investment Risks

CEWA had approximately \$161 million in investments during the reporting period. CEWA recognises that investment activities also provide a connection to companies and organisations that may have varying commitments to upholding human rights. The activities of these organisations will also have repercussions on the lives and vulnerabilities of people engaged at various stages of their operations and supply chains; as such there is a real ethical, safety and human rights issue. CEWA recognises there is a direct stewardship responsibility that results from this potential risk that requires assessment and management of potential modern slavery risks in investment portfolios.

CEWA is committed to a holistic approach to human rights due diligence across all operations, including CEWA's investment activities. CEWA will work closely with investment advisors to ensure that investment advice and recommendations adequately consider the oversight and due diligence of potential investment opportunities, especially where these opportunities are in sectors known to be at increased risk of labour and human rights abuse. It is intended that proactive inquiry into the modern slavery readiness and the transparency and effectiveness of companies' responses will form the basis of this work.

In line with CEWA's investment approach, which summarises the organisation's approach to investments, CEWA's investment managers are signatories of the United Nations Principles of Responsible Investment and share CEWA's commitment to assessing environmental, social and governance (ESG) concerns (including human rights issues, such as modern slavery) in investment decisions. ESG considerations are integrated into investment decisions and CEWA remains vigilant of these matters to ensure that they are fit for purpose. CEWA's investment managers provided regular reports to CEWA that include their commitment to responsible investing.

CEWA had investments of
\$161m
during the reporting period.

Reporting Criterion 3: Modern Slavery Risks (continued)

The investment manager for the CEWA Long Service Leave Fund (LSL), JBWere, are bound by the Investment Policy Statement (IPS), outlining the key criteria for CEWA's responsible investing activities. This specifically states that the investment managers will seek to avoid direct investment in those companies with a red flag as assessed by Morgan Stanley Capital International (MSCI), for modern slavery / labour rights controversy.

This is defined as a company that is involved in controversies related to labour-management relations, employee health and safety, collective bargaining and unions, discrimination and workforce diversity and management of supply chain employee relations standards.

As detailed in the LSL Fund's December Quarter 2023 Investment Report, from the total 52 Australian and International equity holdings invested in, 66% of these have not been involved in any major recent controversies regarding modern slavery/labour rights; 21% have been involved in recent moderate level controversies; and 13% have been involved in one or more recent severe structural controversies that are ongoing. There are no investments in companies that have been involved in very severe, red flag controversies.

Supply Chain Risks

In 2023, CEWA appointed a provider (Zycus Cognitive Procurement) to implement a procurement system that will increase CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to enable the organisation to work toward the mitigation and eradication of these risks through responsible procurement. CEWA will continue the process of engaging effectively with suppliers in two ways:

- Identifying suppliers in high-risk categories to promote education and information around modern slavery risks through the support of ACAN; and
- Embedding appropriate oversight and documentation into the onboarding of both new and existing suppliers and assessing the risk of modern slavery during formal market assessment activities.

CEWA is continuing the process to analyse supply chains, especially for high-risk products and geographies, particularly in high-risk and high-spend categories.

CEWA's highest risks areas continue to be identified:

- in the construction industry - both in labour hire and sourced materials used;
- in outsourced, labour-intensive and low-skilled work, particularly facilities management including cleaning and security; and
- in supply chains, especially beyond Tier 1 suppliers.

Reporting Criterion 4

Actions Taken to Assess and Address Modern Slavery Risks

Actions taken in 2023

Throughout 2023, CEWA continued its commitment to modern slavery prevention, aligned with both the CECWA Strategic Directions 2019-2023 and Quality Catholic Education (QCE). CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of 50 Catholic entities throughout all states and territories of Australia.

CEWA's governance practices ensured ongoing commitment to modern slavery prevention, through the revision of the Executive Directive – Modern Slavery Prevention and the revision of the training modules. The re-development of the CEWA strategic risk framework, undertaken in 2023, ensured inclusion of modern slavery risks within the system-wide risk framework.

In June 2023, CEWA partnered with Zycus Cognitive Procurement to transform CEWA's procurement practices at CEWA schools and offices. This included an overhaul of the supplier onboarding process to enable the categorisation of suppliers and assessment against key risk criteria that include modern slavery.

The selection of Zycus represented a significant milestone in the establishment of best-practice procurement at CEWA and highlights the commitment to reducing supplier risk across the organisation.

Among other benefits of a centralised procurement system, Zycus will introduce a central database of supplier data, instead of the current practice of individual schools managing their own supplier database. This central database will allow for categorisation of suppliers, as well as identification of high-risk categories, which will enable a system-response to mitigate any modern slavery risks. Contracts will be centrally reviewed before execution, to allow for amendment or deletion of any unacceptable terms and conditions that might pose a modern slavery risk. In addition, as part of Zycus, CEWA will introduce purchase orders across the entire system, which will lead to improved payment times to suppliers and, ultimately, their employees.

Implementation of the procurement system commenced in August 2023, with CEWA offices scheduled to go live in August 2024 followed by a phased rollout to all CEWA schools in the course of 2025.



Our Plans for 2024

For 2024, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- continue to embed the Executive Directive – Modern Slavery Prevention across the CEWA System (schools and offices);
- ensure CEWA operates within its Risk Appetite Statement, eliminating opportunities for modern slavery practices in its supply chain and operations

Reporting Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks (continued)

- continue to strengthen procurement practices by completing the implementation of CEWA's procurement system to assist in the assessment and mitigation of modern slavery risks throughout the supply chain;
- strengthen engagement with suppliers to communicate the expectations relating to the prevention of modern slavery;
- promote the educational opportunities available to the CEWA community on modern slavery, through promoting the online modules on modern slavery prevention offered via ClanEd;
- review and update community and staff engagement initiatives;
- continue the use of Fairtrade staffrooms at all CEWA offices; and
- continue to participate in the ACAN Modern Slavery Risk Management Program.

Our Plans Beyond 2024

To ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention, CEWA maintains the following focus areas:

Focus Area	Intent
Governance	To ensure CEWA's governance framework, practices and documentation clearly support CEWA's commitment to modern slavery prevention and underpin both the requirement in law for CEWA to respond, and the clear alignment of appropriate action with Catholic values. Called to action by Pope Francis' Encyclical <i>Laudato Si'</i> , CEWA will develop a <i>Laudato Si'</i> Action Plan that will include CEWA's commitment to modern slavery prevention as one of the actions under Goal 2: Cry of the Poor.
Procurement and Supplier Management	To increase CEWA's understanding and oversight of its supply chain risks through the phased rollout of the procurement system to CEWA schools.
Legal Documentation	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.
Facilities Management	To increase CEWA's understanding and oversight of the risks of modern slavery in facilities management, and to work to mitigate those risks through responsible procurement.
Investment	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.
Research	To introduce considerations around modern slavery prevention into the approval process for research applications.
Engagement and Education	To continue to educate the CEWA community on modern slavery and how individually and collectively, work can be undertaken for eradication.
Schools Engagement	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.
Capital Development	To increase CEWA's understanding and oversight of the risks of modern slavery in building and construction, and to work to mitigate those risks through responsible procurement.
Human Resources	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.
Communications	To encourage participation in online modules on modern slavery prevention, offered via ClanEd, to enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.
Student Safety and Wellbeing	To ensure staff are aware of and alert to the indicators of forced marriage, and what to do if they suspect a student is at risk of forced marriage.

Reporting Criterion 5

Assessing Effectiveness

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic Social Teaching Principles.

CEWA, through its governance structure, will continue to monitor and improve processes and actions taken to address modern slavery risks on an ongoing basis. CEWA undertakes, and will continue to undertake, the following oversight and review of the effectiveness of the implementation plan:

- Regular reporting through the CEWA Executive Team to CECWA, as appropriate;
- Reviewing community and staff engagement initiatives;
- Continuing to be vigilant to and process concerns or reports, including whistleblower disclosures, relating to modern slavery; and
- Advance procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2023, CEWA received no disclosures, reports or concerns relating to modern slavery.

The table below summarises CEWA's activities relating to staff and supplier engagement in 2023.

2023	Activity	CEWA
Internal / Staff	Hours spent on modern slavery activities	10
	Individual staff completed e-learning	0
	E-learning modules completed	0
External / Supplier Engagement	Total number of suppliers	22,687
	Number of suppliers with visible contact information and ABN	261
	Number of suppliers across high-risk categories	4,878
	Number of ACAN Supplier Surveys completed	484
	Supplier attending capacity building webinars	111
	Invited to join Sedex	96
	Joined Sedex	23
	Sedex SAQ completed	12
	Social audits	6
	Corrective actions	3
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Reporting Criterion 6

CEWA does not own or control any entities.

Consultation with Owned or Controlled Entities

Reporting Criterion 7

No other relevant information.

Any Other Relevant Information

Photo: St Mary's Primary School (Kalgoorlie)



This Modern Slavery Statement 2023 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 3 May 2024, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed



Eva Skira AM

Chair

Catholic Education Commission of Western Australia

Commissioners of Catholic Education Western Australia Limited 2023

Eva Skira	CECWA Chair
Jonathon Woolfrey	CECWA Deputy Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner (<i>commenced 1 November 2023</i>)
Michelle Shafizadeh	Commissioner
Peter Yensch	Commissioner

CEWA Executive Team 2023

Dr Debra Sayce	Executive Director (<i>until 31 December 2023</i>)
Wayne Bull	Deputy Executive Director
Paul Andrew	Director People and Culture (<i>commenced 11 September 2023</i>)
Mandy Connor	Director Teaching and Learning
Dr Tony Curry	Director Leadership and Wellbeing
Rev Mark Powell	Director Religious Education
Dr Glenda Scully	Director Finance, Infrastructure and Digital Technology



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Australian Catholic University

2023 Modern Slavery Statement

1 January – 31 December 2023

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Disclosure note

This statement has been made on behalf of Australian Catholic University.

This statement covers all entities owned or controlled by ACU.

ABN 15 050 192 660

Head office address: 40 Edward Street, North Sydney NSW

www.acu.edu.au

Statement from Vice-Chancellor and President Professor Zlatko Skrbis

ACU is pleased to present its fourth annual Modern Slavery Statement demonstrating continuous improvement and compliance with the *Modern Slavery Act 2018 (Cth)*. This Statement is part of the 2023 Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements and highlights ACU's anti-slavery efforts across the organisation.

As a Catholic university, we are committed to upholding the dignity of every individual and community with any connection to ACU's supply chain and operations. I commend the efforts of ACU's modern slavery working group on their work to address the mandatory reporting criteria and continuously improve ACU's response.

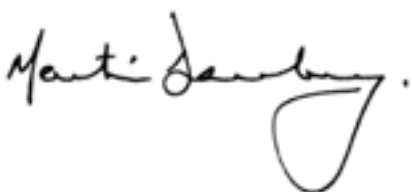
Statement, Approval and Signature from Chancellor The Honourable Martin Daubney AM KC

In an era marked by complex global issues including modern slavery, fostering a culture of integrity, empathy, and global citizenship in students has become paramount. Therefore, ACU's commitment also involves equipping students with the ethical acumen to navigate and lead through the world's social, environmental, and economic challenges.

On behalf of the ACU Senate and Advisory Committee, I approve this report to the Australian Government and renew ACU's commitment to take an active role in eliminating modern slavery from the world.

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 13 June 2024.

This Modern Slavery Statement is signed by a responsible member of Australian Catholic University as defined by the Act.



The Honourable
Martin Daubney AM KC
Chancellor
Signed: 13 June 2024



Professor Zlatko Skrbis
Vice Chancellor and President
Signed: 13 June 2024

Criterion 1: About Australian Catholic University (ACU)

ACU was established in 1990 through incorporation as a public company limited by guarantee, incorporated pursuant to the Corporations Act. ACU is a public university, funded by the Commonwealth Government, and is open to students and staff of all religious beliefs.

ACU has more than 32,000 students and around 2,500 staff, across seven Australian campuses - in Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield, with two leadership centres (in Adelaide and Townsville) and one international campus in Rome. ACU's headquarters are in North Sydney.

ACU is a world-leading research university in our priority areas of education, health, theology and philosophy. Our culture of research excellence is founded on the principles of social justice and attracts global experts, students and collaborators. Refer: [ACU Key statistics/Research excellence](#).

Our research institutes collaborate with strategic partners across Australia and internationally to create real impact in our priority areas. Their research is founded on the principles of social justice and the common good.

ACU's 2023 annual consolidated revenue is \$575,637,000.



ACU mission

Within the Catholic intellectual tradition and acting in Truth and Love, Australian Catholic University is committed to the pursuit of knowledge, the dignity of the human person and the common good.

Mission, identity and values

We are guided by our clear mission, strong sense of identity and firm set of values. All three influence the decisions we make as an institution of higher education and guide our staff and students in their day-to-day lives.

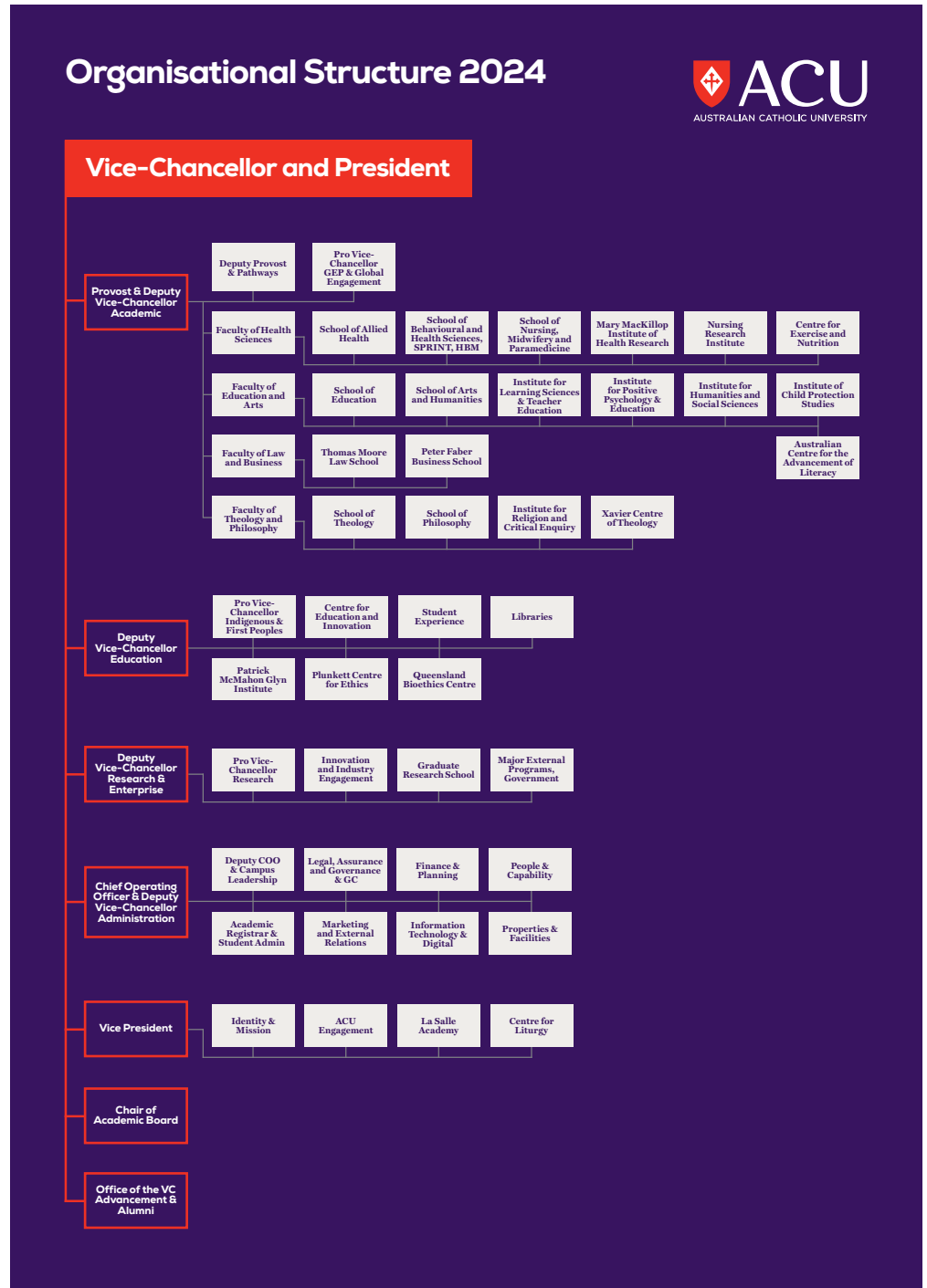
Our mission is at the heart of everything we do at ACU. It guides our approach to learning and teaching, our welcoming and engaging on-campus culture, and our commitment to building a better society by producing graduates willing to invest in this same commitment. In this mission, we engage the Catholic intellectual tradition to bring a distinct perspective to higher education.

Our university is founded on a long history of commitment to our core values of truth, academic excellence and service. But there are other important values that enhance the ACU experience for students and staff – including equity, diversity, accessibility, wellbeing and sustainability.

Criterion 2: ACU's structure, operations and supply chains

Our Structure

This diagram represents ACU's organisational structure at the end of 2023.



Our governance framework

ACU's anti-modern slavery initiatives have been incorporated into the governance structure, requiring the approval of ACU's Audit and Risk Committee and ACU's Senate. Our key leaders and governance bodies are as follows:

CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing body of ACU.

PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee.

CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, represents the university both nationally and internationally, and provides strategic leadership and management.

PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)

The Provost is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties, and providing the operational delivery of ACU's academic programs.

THE VICE-CHANCELLOR'S ADVISORY COMMITTEE AND VICE-CHANCELLOR'S EXECUTIVE BOARD

The Vice-Chancellor's Advisory Committee (VCAC) is an advisory forum with the purpose of advising the Vice-Chancellor and President on key strategic and operational university matters. Strategic matters discussed at VCAC are referred to the Vice-Chancellor's Executive Board (VCEB), the university's key management committee, for ratification.

THE UNIVERSITY CONSULTATIVE COMMITTEE

The University Consultative Committee (UCC) includes leaders from across various ACU leadership groups and is chaired by the Chair of Academic Board. This committee meets twice a year, once virtually and once in person, providing the opportunity for strategic discussion, information sharing and engagement.

VICE PRESIDENT

The Vice President is responsible for Catholic-related operations of the university. This portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement. The Office of the Vice President animates programs and activities that engage, celebrate and support the university community's development in and understanding of the mission, Catholic identity and living traditions.

CHIEF OPERATING OFFICER AND DEPUTY VICE-CHANCELLOR

The Chief Operating Officer is responsible for the Corporate Services Portfolio. This portfolio covers a broad range of areas including properties and facilities, student administration, information technology and finance.

DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees this growth area for ACU and works with researchers to foster ACU's culture of research excellence and maintain our world-leading research outputs.

DEPUTY VICE-CHANCELLOR (EDUCATION)

The Deputy Vice-Chancellor (Education) has responsibility for developing and leading ACU's ethical capacity, including the Catholic intellectual context, and for raising ACU's ethics impact in the University, community and internationally.

SENATE

The Senate is ACU's chief governing authority. Its members' roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU's Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

STATE CHAPTERS

To connect ACU with local communities, we have State Chapters in the Australian Capital Territory, New South Wales, Queensland and Victoria. These chapters report to the Senate and act as advisory bodies but have no direct governance role.

ACADEMIC BOARD

Our Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate, and initiating course reviews.

SENATE AND BOARD ELECTIONS

Elections are held to appoint members to the Senate and Academic Board from the university's academic and student bodies. The Senate also holds elections to appoint a professional staff member.

For a visual representation of the governance structure of ACU, please see the Governance Structure chart below.

ACU's Governance Directorate has a suite of policies and procedures which relate to the conduct, decision making, risk management, internal organisation and management of the university.

ERADICATING MODERN SLAVERY (EMS) WORKING GROUP

ACU's Eradicating Modern Slavery (EMS) Working Group is chaired by the Vice President and Director, Identity and Mission, and comprises members of the ACU senior executive, other key ACU personnel and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. It was established in 2020. Its remit is to look at further eradicating modern slavery and human trafficking risks in ACU's operations, policies, procedures, supply chains, business partnerships and employment and to raise anti-slavery consciousness across the whole University. (More detailed information about its role and objectives can be found under Criterion 4).



Our operations

ACU is a publicly funded teaching and research organisation with four primary faculties (education and arts, health sciences, law and business, and theology and philosophy) and a corporate services division, itself made up of a number of directorates, including: Legal, Assurance and Governance; Properties and Facilities; People and Capability; Finance and Planning; Marketing and External Relations; and Student Administration.

Students are both domestic and international.

ACU operates across seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield - with one international campus in Rome, and leadership centres in Adelaide and Townsville. Our headquarters are in North Sydney.

The following details are provided about ACU:

NB: Some of this information is in a process of change or being updated.

The year the data represents is indicated where applicable.

- Approximately 2,500 staff (FTE) (2023)
- Approximately 32,300 students (2023)
- Approximately 139,000 alumni (2023)
- Approximately 4,200 international students from 96 countries enrolled (2023)
- More than 200 international partners across six continents (2023)
- More than 1,000 ACU students have studied at our Rome Campus (2023)

Our strategic plan

Modern slavery is identified as an important objective in ACU strategic planning and was included in the *ACU Strategic Plan 2020 - 2023*:

- **1. All our endeavours, grounded in mission**
 - 1.8. Strengthen our leadership role in creating and sustaining child-safe organisations and the prevention of harm to children, through education, research and industry partnerships.

- **6. Service, stewardship and sustainability**
 - 6.8. Take bold and decisive action on environmental, social and economic sustainability, and the eradication of modern slavery.

Extensive consultation was undertaken in 2023 to establish an updated strategy, and ACU's *Vision 2033* has since been released in early 2024. *Vision 2033* sets the direction for the next stage of ACU's journey and presents ACU with the opportunity to build a stronger, more agile and resilient ACU.

Criterion 3:

Modern slavery risks in operations and supply chain

ACU has submitted data to the risk assessments platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australasian University Procurement Network (AUPN).

These assessments present an overall picture of risk based on the types of goods and services being procured and the country of origin. Such assessments help ACU to focus our attention on what are generically regarded as high inherent risk activities.

Operational risks

Since key operational activities are performed by Tier 1 suppliers, the potential for operational risk is the risk posed with respect to the provision of services.

These risks are therefore being addressed under supplier risk categorisation and action.

Otherwise, measures to address operational risks are by assessment of the extent to which internal processes and practices are sufficiently updated to reflect necessary requirements. Please refer to ACU's 2023 Modern Slavery Maturity Assessment (under Criterion 5).

ACU's commitment to the principles of eradicating modern slavery is demonstrated by their inclusion for risk assessment, focus and action within ACU's Operational Risk Registers, and by the implementation of mitigating control measures to ensure ACU meets and complies with Australian Federal and State's Anti-Slavery reporting obligations.

PRODUCT AND RISK CATEGORISATION SYSTEMS AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed risk categorisation systems based on various aspects of the supply chain, such as the type of goods or services, and where services are provided or made.

ACU has submitted our data and spend to both ACAN and the AUPN. Further analysis is being undertaken to categorise risk for key areas of spend.

The purpose of the software tools can be broadly described as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- to enable the collation of suppliers' information
- to enable suppliers to provide information directly to the tools via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

Our supply chain

ACU's annual consolidated revenue in 2023 was \$575,637,000, with 76.1 per cent of this revenue derived from government grants.

We have more than 3,500 suppliers of goods and services in our supply chain. However, just over 183 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier spend of approximately \$150 million in 2023, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2023 APPROX. SPEND (\$000S)
Building and construction:	\$29,974
Information technology – equipment and services:	\$21,302
Student placements:	\$17,885
Facilities management:	\$4,332
Consulting services:	\$9,733
Marketing and communication services:	\$9,308
Utilities:	\$3,985
Other office and workplace supplies:	\$3,245
Cleaning:	\$5,278
Student recruitment – international:	\$11,644
Plant and equipment:	\$8,980
Security services:	\$3,559
Insurance premiums:	\$3,137
Travel and accommodation:	\$7,441
Library books, systems and services:	\$7,907

* ACU Annual Report 2023



Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services may be sourced from overseas, as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in the supply chain those areas and geographic locations that at some stage in the overall chain would be regarded as representing some type of modern slavery risk. The university, through our finance division, also engages in investment activities.

ACU uses a spend categorisation system. This system best explains the variety of goods and services procured across ACU to meet our many operational demands.

Therefore, goods and services may be sourced in any of the following categories, which have been simplified and amalgamated for this report:

- architectural design services
- audio visual equipment and services
- building and construction – supplies, fit outs, demolition and services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional and general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening and security
- financial services, including valuation services
- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printer and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables
- library – books, periodical, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, relocation and warehousing
- travel and accommodation – agencies, hotels, airlines, trains and vehicles
- utilities – energy, water, equipment, maintenance and related services
- vehicles – supply, rental, fleet management and cleaning services
- waste management services
- water treatment and sewage services
- workplace health and safety services.

Professional services are generally provided by locally based Tier 1 suppliers. In some cases, these Tier 1 suppliers utilise overseas support staff to conduct some of the more transactional aspects of their service offering. This may include services provided out of countries such as India, China and the Philippines.

Equipment, commodities and clothing are generally be sourced from overseas, mainly China and South-East Asia, once again via Tier 1 suppliers located in Australia.

ACU, through our membership with Supply Nation, is looking to increase sourcing from locally based Indigenous suppliers, who may nevertheless source some of the items from overseas manufacturers.

Modern slavery risks in investments

(refer to Criterion 4 ‘Actions to address modern slavery risks in investments’)

ACU has approximately \$27.2 million in investments, managed through JBWere. The investment sector has very specific benchmarks around ethical investments. There are specific fund managers who only undertake ethical investments; these managers will only invest funds with an organisation where they can obtain complete satisfaction that the organisation is trading ethically and as stated.

However, modern slavery risks in the investment sector could potentially include low visibility across multi-tiered international supply chains, which may involve other high-risk sectors and geographies. In addition to the resulting potential exploitation of victims of modern slavery, identified modern slavery in ACU’s investment providers’ supply chains could lead to reputational risk which could have a negative impact on the organisation.

Modern slavery risks to students

(refer to Criterion 4 ‘Actions to address modern slavery risks to students’)

Students and young people are at a much higher risk of experiencing modern slavery, with international students the most vulnerable, as they are likely to have lower English language skills, fewer nearby family or support networks, and may not be aware of Australian workplace laws.

In 2022, ACU began to consider the risks of modern slavery to international students posed by education recruitment agents in its network overseas. These risks may include unlawful and deceptive recruitment and misleading information by agents, which can lead to debt bondage or increase vulnerability of students to exploitation.

ACU currently has 226 registered international education agents and anticipates that approximately 8,000 international students will be recruited from overseas over the next five years.

We have 30 clauses in our agreements with international student recruitment agents outlining their responsibilities to:

- promote the university in an honest and ethical manner
- provide accurate information on courses, the university and services offered to students
- comply with the ESOS Act 2000 and National Code 2018 with a particular focus on Standard 4 and Standard 6 of The Code
- maintain confidentiality
- act in the best interest of the students.

Any arrangements between students, their families and education agents outside of the above agreements are difficult to monitor in source countries.

Modern slavery risks around apparel/ student uniforms

(refer to Criterion 4 ‘Actions to address modern slavery risks around apparel/student uniforms’)

The clothing industry (including uniforms) is at very high risk for modern slavery practices. ACU purchases uniforms (for student activities related to nursing, allied health and across other faculties - and for adhoc events and promotional purposes) from a preferred uniform supplier, who employs several overseas factories, and so scrutiny and visibility

can be more challenging. This can make it harder to both monitor and address labour practices effectively. Risks are many and include forced labour, child labour, trafficking, underpayment, excessive overtime, insecure labour contracts and lack of worker empowerment. Laws vary across different countries, which means disparities as to how modern slavery risks are handled and addressed.

Our people

ACU has a diverse workforce of staff with different cultural backgrounds, ethnicities, and gender. Our Code of Conduct and our comprehensive suite of policies and procedures reflect our terms and conditions, as well as expected standards of behaviour. All policies and procedures are documented, available on the ACU website and reviewed and updated in accordance with quality review protocols on a scheduled and as needed basis. Included is a policy relating to Protected Disclosures.

Our People Plan 2022 – 2025 was launched in 2022 and sets out a suite of initiatives in support of ACU’s mission and strategic priorities. These include building leadership capability, enhancing health safety and wellbeing and supporting a diverse workforce and culture of inclusiveness.

ACU has an Enterprise Bargaining Agreement (EBA) in place that came into effect in February 2023. The EBA sets out conditions of employment including entitlements and remuneration. Both academic and professional staff are remunerated based on a classification methodology that is transparent and equitable.

IN DEVELOPMENT

When recruiting staff through third party recruitment agencies, ACU uses a preferred supplier panel, selected via a formal open tender process. To ensure the panel in place will continue to comply with our rigorous procurement standards and values, ACU went out to market again in 2023, with the view to appointing a revised supplier panel, commencing early 2024.

A new Staff Learning Hub, in preparation in 2023, has launched for all staff in early 2024. It includes up to date, engaging modules on subjects related but not limited to: health, safety, wellbeing, managing risk at ACU, staff obligations under our Code of Conduct and a modern slavery module to support ACU’s commitment to working for the eradication of modern slavery and human trafficking. The hub also includes a refreshed induction program in line with our commitment to equip commencing staff with the ability to perform their roles safely, effectively, and responsibly from the outset of their employment.

A program of work continues to educate staff around key enterprise agreement and policy requirements. This includes a human resourcing metrics dashboard, to provide visibility and transparency over key workforce data and enable effective decision making.

Further related information may be found in the latest ACU annual report:

[ACU Annual Report 2023](#)

Supply chain risks

SPEND RISK ASSESSMENT

ACU undertakes a number of risk assessments. These assessments are provided in part to ACU from platforms developed by the AUPN. These platforms help to inform ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means. The data upon which the below analysis is based is subject to review and may be regarded as continually evolving – however it forms an excellent basis for developing ongoing planned activities.



Criterion 4:

Actions to assess and address risk

SUMMARY OF ACTIONS TAKEN

Below is a summary of some of the actions taken by ACU to date. Some of these items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN activities and internal working groups (to share knowledge and assess compliance requirements and risk), including ACAN's year four modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
- Collation and submission of spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
- Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
- Discussions with key suppliers in identified high-risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
- Implementation planned of additional reporting and compliance requirements through the use of the ACU Tender Portal.
- A vendor category of 'fair trade' has been created in the vendor master of ACU's purchasing system. This allows certified fair-trade companies to be identified for future purchasing activity.
- The ACU online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

Specifically, the following actions are in progress or planned:

- a) To continue to use toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity, and legislative requirements.
- b) Further engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
- c) To deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- d) To continue to use the detailed maturity assessment to monitor continuous improvement across any impacted areas of ACU.
- e) To develop aspects of the ACU Tender Portal to allow it to be used as a due diligence tool to help educate suppliers and to monitor supplier compliance activity in relation to anti-modern slavery measures.
- f) To continue the engagement with key suppliers in areas of high risk.
- g) To deploy a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.
- h) ACU's membership of the University Procurement Hub (UPH), and increased use of UPH's robust specialised services, which provide the opportunity of source-to-contract cost savings by aggregating spend from participating universities across particular categories. UPH also offers associated benefits such as improved process efficiency, spend visibility and effective spend analysis from richer data and marketing intelligence, with the aim to drive continuous improvement.

ACU's Properties Directorate – Addressing modern slavery risks

Facilities management, a responsibility within ACU's Properties Directorate, is a recognised area of high risk – particularly in relation to cleaning and security. To this end, the Properties Directorate has undertaken a number of measures to mitigate this risk, as follows:

- Ensuring all national tenders have a mandatory Q&A field in relation to this issue with respect to:
 - supply chain management
 - wages, salaries, benefits and sub-contracting.
- Continuing to audit and retain documentation of three levels of supply chain for selected high-risk items; level one is ACU, then the Tier 1 supplier (ie. the engaged service provider), and then the Tier 2 supplier (ie Tier 1's sourcing supplier).
- Annually seeking, for all engaged service contracts, a statutory declaration from the vendor and/or their staff confirming the following for each member of staff engaged to provided services to ACU:
 - their name

- they are a direct employee of the engaged contractor (vendor) with ACU
- they are employed at the specified ACU campus
- they are paid in accordance with the modern industrial award stated in the service agreement
- they receive all their salary benefits, including insurance, superannuation and leave entitlements
- the statement is made under their own free will and without influence.

Where this information is not able to be provided directly by the vendor's personnel, ACU will attempt to verify the information through other validation processes.

In 2023, the UPH (via Accenture), commenced two formal and stringent tender processes, to select both a security services company and a cleaning company to service participating universities, including ACU's seven national campuses. Sustainability and ethical considerations formed part of the evaluation criteria of the two tender documents and a new supplier will be selected in 2024.

Development and expansion of Sedex to monitor, report on and mitigate ACU supplier risk

Sedex is the world's largest online platform for collecting, sharing and auditing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases.

In mid-2021, ACU signed an ACAN agreement to use Sedex and, in late 2021, commenced the supplier onboarding process. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation and connect with ACU. This ongoing onboarding process allows us to build and gain strong visibility and compliance capabilities over our supply chain and its inherent risks. As of the end of 2023, 64 ACU suppliers are on Sedex, with 179 suppliers having completed ACAN's Supplier Survey.

The Sedex tool has a number of useful capabilities, and it is our intention to continue into 2024 and beyond to expand our knowledge and use of these. In late 2023, ACU provided its supplier spend data and contacts to ACAN, for the purposes of confirming correct ACAN taxonomy, and to cross-reference with and build information for ACAN's existing supplier base, in order to facilitate ACAN's assistance in 2024 to coordinate for ACU:

- supplier invites to webinars and pre-assessment questionnaires; and
- further supplier Sedex onboarding.

The Sedex platform/process can be used to:

- easily find existing suppliers within the sector and create relationships with them
- check supplier progress as they complete the steps in the onboarding process
- review each supplier individually and engage with them around improvement
- put higher-risk suppliers into an audit program
- create intuitive data reports and insights
- identify deficiencies for discussion in more detail with the supplier
- pull out specific topics of concern and take a specific issue-based approach.

Sedex representatives continue to offer training to member staff, depending on where they are on their supplier compliance journey, offering assistance and guidance to use the tool effectively.

Across 2023 and moving forward, ACU continues to increase its utilisation of ACAN related services, including supplier base analysis and the resulting further onboarding of suppliers to Sedex.

The use of Sedex complements the similar process also being undertaken through the AUPN tool.

ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which underwent substantial revision in 2014 and again in 2022. In 2022, a clause was introduced stating ACU's commitment to tackling modern slavery practices at every level, including that:

“Staff purchasers of university goods and services are required to take steps to identify and minimise any modern slavery risks and to take into consideration the principles of the **Modern Slavery Act 2018** (Cth), the commitments made by ACU to date towards eradicating modern slavery and human trafficking, and to ensure suppliers to ACU:

- 8.1.14.1. conduct their businesses in a manner that is consistent with the principles of the *Modern Slavery Act*; and
- 8.1.14.2. “take reasonable steps to ensure that there is no modern slavery in the supply chains of their agents, contractors, and/or sub-contractors or any part of their respective businesses or dealings.”

The Procurement Policy sets out how sourcing decisions may be undertaken by ACU staff. The policy is underpinned by procedural and reference materials, which establish minimum requirements for key suppliers.

ACU SOURCING PROCESS – TENDER, MINIMUM SUPPLIER AND NEW SUPPLIER REQUIREMENTS, AND RELATED DOCUMENTATION

We have transitioned to addressing modern slavery as it relates to our new supplier touchpoints upfront – when undertaking tenders and onboarding suppliers, and as existing supplier contracts are extended or renewed – while continuing to review our existing supplier base.

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in our tender and contract template documentation for a number of years. These continue to be upgraded, with input from ACU legal counsel, to reflect more stringent requirements, and have been applied to all procurement activities that utilise ACU's formal sourcing processes.

These have included sourcing in relation to high-risk sectors such as corporate apparel supply. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements. ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place.

To this end, specific and robust anti-modern slavery clauses have been built into ACU's full suite of tender and contract template documentation (which includes tailored documentation for services, goods, contractors, consultants and technology). Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

All suppliers of goods to ACU in tender situations must answer a detailed tender assessment criterion titled 'Commitment to Ethical Sourcing', which requires a supplier's comprehensive written response as to their commitment, policies, processes and actions in relation to sustainability, ethical sourcing and modern slavery. This question is also included in our 'Minimum Requirements For Suppliers of Goods and Services to ACU – In Non-Tender Situations'. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Contract and tender documentation is maintained in SharePoint databases, and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

EMARKETPLACE CATALOGUE

The ACU eMarketplace catalogue displays products from a range of different suppliers which can be selected by staff using ACU's TechOne online system for requisitioning and purchasing. The catalogue is restricted to preferred suppliers and their products. The eMarketplace administrators have started working with the network suppliers to start tagging their catalogue products, in order to track ESG spend moving forward, so suppliers will be able to start tagging their own sustainable and Indigenous source products and their Modern Slavery compliance.

MODERN SLAVERY – STAFF TRAINING

ACU has been using the online training program modules developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in person workshop run by ACAN. ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel.

All staff members involved in purchasing and procurement decision-making are required to undertake, and have undertaken, the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding of the impacts of modern slavery by undertaking the modules.

Directors and managers were advised that while all staff would have the option to elect to complete the training modules (as also communicated in ACU's internal communication, the Staff Bulletin), it is a mandatory requirement for certain staff groups (as follows), including those that make purchasing and procurement decisions as part of their role, including:

1. Group 1. Management levels 5 and 6 including National and State Managers.
2. Group 2. Faculty Finance Managers, Finance Portfolio Management Accountants, Finance Procurement personnel, Properties Facilities Managers at site or state level and Properties Capital Development and Project Managers, if not at Levels 5 or 6.
3. Group 3. Designated purchasing staff within a faculty or directorate as nominated by management level 6 or higher.

At the end of 2023, approximately 330 staff (including directors and managers) had completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'. Two additional modules are expected to be rolled out to relevant staff by end 2024.

ACU's People and Capability Directorate is currently reviewing its processes regarding enrolment into the Modern Slavery training modules, to improve completion rates and outcomes. Moving forward this is expected to include:

- automated enrolment for the target audience
- completion reminder notifications to those enrolled
- expected timelines for completion.



ACU membership of key affiliated associations

ACAN Anti-Modern Slavery Working Group: 10 teleconference meetings and six supplementary webinars were attended by ACU representative(s) in 2023.

AUPN Modern Slavery Working Group Anti-slavery Forum meetings: Nine meetings were held in 2023.

ACU's Eradicating Modern Slavery (EMS) Working Group was established towards the end of 2020. The EMS Working Group comprises members of the ACU senior executive, other key ACU personnel, and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. Three meetings were held in 2023.

The EMS Working Group's objectives are to:

- provide input and advice to the university on issues related to modern slavery
- actively support the development and implementation of ACU's Modern Slavery Action Plan
- help ACU 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 ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- raise awareness across ACU, including among students and professional and academic staff.

Across 2022 and 2023, key focus points for ACU's EMS Working Group have included:

- The redesign, expansion and enhancement of the ACU website's eradicating modern slavery information page.

- Actions to support the successful embedding of modern slavery as an ongoing subject in ACU's Core Curriculum unit UNCC300 (see Criterion 7 for update).
- Providing a forum to facilitate information flow and debate on modern slavery risks across ACU's operations and supply chain.
- Continuing to raise awareness about modern slavery risks (and advise on potential actions to address these) across the university.
- Monitoring and reviewing actions taken to assess and address modern slavery risks and evaluate their effectiveness.

Moving forward into 2024, the Working Group's focusses will include:

- Working with relevant staff to embed anti-slavery principles into ACU's staff induction program, and the organisation's suite of policies and procedures relating to conduct, decision making, risk management, internal organisation and management.
- Reviewing the ACU website to look for opportunities to link in MS references and educational resources, such as case studies.
- A review of the working group's structure, membership and activities - to ensure it is optimised to fulfil its purpose.

ACU's general framework for addressing the potential for modern slavery

ACU has developed a planned response and adopted the following measures to aid the eradication of modern slavery in supply chains.

ACU's five anti-modern slavery (AMS) pillars of support

Throughout its anti-slavery initiatives, ACU will consider and consolidate into its actions five fundamental pillars of support to help eliminate slavery in its supply chains.

For several years, ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the AUPN.

PILLAR 1: A PURCHASING COMMITMENT

A definitive statement on the position of ACU in having sourcing arrangements with suppliers which have identified slavery practices in their supply chains:

- It is ACU's policy not to have supply arrangements with suppliers that have modern slavery practices in the supply chain of the goods or services being provided. New tendering opportunities and contractual arrangements are to specify this requirement. Where it becomes evident an existing supply arrangement has modern slavery practices within the supply chain of a supplier, then to the extent that the supplier is directly responsible for this practice, this will be a cause for immediate termination of the supply arrangement, unless satisfactory remedial action is able to be taken and it can be shown there were mitigating factors to help exonerate the supplier from any deliberate or criminal behaviour. Before any decision to terminate, the supplier will be given the opportunity to address the issues raised.
- Where it becomes evident an existing supply arrangement has modern slavery practices within a supplier's supply chain, then to the extent that the identified practice is linked to the immediate supplier and that the immediate supplier is not directly responsible for this practice, the immediate supplier will be given a timeframe (to be negotiated, but generally no greater than 12 months) to take the actions necessary to eliminate or mitigate the identified modern slavery practices in its supply chain, which can be verified to ACU's satisfaction.
- Where modern slavery practices are understood to exist within global supply chains and are not readily amenable to corrective actions, or where taking such action may severely impact those personnel to whom anti-slavery initiatives are designed to protect, then ACU will collaborate with organisations to help mitigate slavery practices, protect the people concerned, and help bring about positive change to the extent possible given the circumstances.
- This commitment extends to illegal, unethical, unfair and exploitative practices in relation to the engagement of workers in the supply chain, where those practices are able to be established, and the same responses as detailed above shall apply.

A number of the actions required to give effect to the following five pillars of support are joint endeavours being managed either by ACAN or the AUPN, while some are ACU's specific responses.

These actions are detailed under the following anti-modern slavery (AMS) pillars of support.

ACTION: ACU has anti-modern slavery requirements built into all of our template contract and tender documents. These are subject to ongoing review. A comprehensive modern slavery questionnaire must be completed by all new suppliers, through the onboarding process.

PILLAR 2: ONGOING TRAINING AND EDUCATION

To use both sector-based resources and ACU-specific resources to help educate both ACU employees and suppliers about the existence of modern slavery, how it may be identified, what actions they can take to mitigate modern slavery activity, and what ACU's expectations of them are.

ACTION: The following are in progress and in various stages of completion:

- ACU has access to the toolsets created by both ACAN and the AUPN in relation to information about modern slavery, anti-modern slavery activity and legislative requirements.
- ACU has provided information to ACU's national and state-based managers, who have a responsibility for purchasing decisions, about pending activity associated with anti-modern slavery measures.
- ACU has used the online training programs developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN.
- ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel. Two modules have been rolled out and another three will be made available to suitable ACU staff by the end of 2024.
- ACAN has provided an online self-assessment tool to assist participating ACAN entities to assess where additional education and action from different sections may be required. This self-assessment was conducted and results are presented in as a Maturity Assessment (**Refer to Criterion 5**).
- The ACU Tender Portal will continue to be used to provide information to suppliers on modern slavery, anti-modern slavery activity and legal requirements, and to obtain from suppliers a response to their awareness of the issue, and measures they have, or are taking, to address this.

PILLAR 3: A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed a risk categorisation system based on various aspects of the supply chain, such as the type of good or service, and where services are provided or made.

ACTION: ACU will continue to provide data and spend to identify relevant risk categorisations. The supporting software tools will be utilised to further analyse the data, as well as to:

- Describe the product and risk categorisations.
- Allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk.
- Enable the collation of suppliers' information.
- Enable suppliers to provide information directly to the tools via portal access.
- Collate suppliers' actions.
- Enable suppliers to provide a sector-wide response.
- Be a single point of contact for all suppliers, to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

PILLAR 4: REMEDIAL ACTION

Remedies to identify modern slavery practices will take a variety of forms, as summarised below:

- Managing supplier relationships in accordance with Pillar 1: A Purchasing Commitment.
- Using specialist organisations (when selected) to help identify modern slavery practices in existing supply chains, and to advise or assist with remedial action.
- Adopting an appropriate remedy pathway of Domus 8.7 as promoted by ACAN.

ACTION: ACU will implement the above.

PILLAR 5: REPORTING CONSISTENCY

Reporting needs to meet legislative requirements and be consistent with the reporting format of the organisation, or organisations, with which ACU is participating in producing a consolidated report, where that may occur.

ACTION:

- ACU will continue to collaborate with ACAN to submit a consolidated report.
- Key ACU personnel responsible for generating the ACU report have attended ACAN report writing workshops.
- ACU is using guidance and feedback provided by ACAN to create its annual report.



Modern slavery action plan and road map

ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY - IN RESPONSE TO ACU'S MATURITY ASSESSMENT

The roadmap below is based on areas identified through ACU's ongoing Maturity Assessment process (refer Criterion 5) and indicates key areas of activity required to be implemented. It summarises ACU's current position and indicates where additional undertakings are required.

MANAGEMENT SYSTEMS	HUMAN RESOURCES AND RECRUITMENT	PROCUREMENT AND SUPPLY CHAIN	RISK MANAGEMENT	CUSTOMERS AND STAKEHOLDERS
ACU Senate and management commitment to anti-modern slavery (AMS).	Management across ACU is aware of modern slavery. Further involvement through planned training platforms to extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. Need to be reviewed and updated as necessary.	MS risks have been captured in ACU's formal risk management system. The documented risks are to be periodically reviewed and actioned as required under ACU's risk management protocols.	ACU's customers are students and shareholders, who are themselves underpinned by the Sustainability Bond. The mission and values espoused by ACU make AMS initiatives of critical interest and importance to its customer and stakeholder base. ACU will continue to engage with these vital groups to present our activity in this area.
Further integration into business processes is required.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves. Two of a series of five training modules developed with ACAN have been made available to all staff and made mandatory for certain groups including managers and those who make purchasing and procurement decisions. The remaining modules are expected to be rolled out to relevant staff by the end of 2024.	More formalised mechanism to assess MS risks, to be considered for inclusion into sourcing and contracting activities. All new suppliers now required to complete comprehensive MS questionnaire. ACU membership of UPH, increased use of UPH specialised procurement services.	Some aspects of the key supply chain could be susceptible to MS risks, especially in: the construction sector due to the large amount of capital infrastructure underway; critical facilities services, such as cleaning and security; and key commodity supplies such as apparel and computers (including computer recycling and e-waste services). Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of our supply chain.	ACU is keen to openly share our AMS activities through various public fora. This includes this statement, the ACU Tender Portal when that function is developed, the Catholic Archdiocese newsletters and other publicly available media. In doing so, suppliers will not be named, confidential information will not be shared, and the privacy of entities with which ACU has dealings will be respected.
Further action is required to educate suppliers and verify their AMS initiatives.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	ACAN and AUPN tools, in conjunction with other data analysis tools, are to be used to provide updated supplier and spend MS risk assessments, including the use of specialist service providers.	Risks in the extended supply chain are to be monitored via the industry-based tools being made available to ACU from both ACAN and the AUPN.	ACU is to develop a more formalised mechanism to receive feedback about MS issues from inside the university as well as from suppliers.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	AMS initiatives are made known during recruitment and to relevant agencies. Needs review to ensure existing practices are adequate.	Tools being developed to ensure AMS initiatives and requirements are made readily available to all suppliers to ACU, including via ACU eMarketplace's upcoming supplier self-tagging of catalogue products regarding their MS compliance. The above tools will enable supplier MS risks to be monitored and corrective actions taken to address concerns where they arise.	MS risks are reported through the ACU risk management system. Other reporting mechanisms will be considered for development.	ACU needs to consider what methods may be appropriate to allow direct communication with workers in supply chains in order to receive feedback directly and not from management in a candid, private and non-threatening manner.
		A continuing effort to engage with, and provide opportunities to, certified fair-trade organisations.		

Actions to address modern slavery risks in investments

As investors, we have a responsibility to ensure, to the greatest extent possible, that modern slavery does not occur in the companies in which we invest, including in their supply chains where funds are invested via investment managers and self-managed investment portfolios (largely term deposits with banks). The university supports investments

in the charitable, religious and educational works of the Catholic Church as well as ethical and socially responsible investments (SRIs), and ensures investments are only made with entities that have corporate practices that promote environmental stewardship, consumer protection, human rights and employee diversity.

Actions to address modern slavery risks to students

STUDENTS - INTERNATIONAL

In late 2022, ACU Global Engagement committed to reviewing all agreements issued to overseas-based education agents for the recruitment of international students. In 2023, our International Education Agent agreements were updated to contain a comprehensive clause which relates specifically to the university's anti-modern slavery requirements, based on content provided by ACU Procurement to vendors, and in consultation with relevant internal ACU stakeholders, including the Office of the General Counsel.

The agreements continue to have comprehensive references to agents' responsibilities in the promotion of the university, and service provision that complies with the ESOS Act 2000 and The National Code 2018. Procedures are in place to address any potential misbehaviour or inappropriate conduct by agents.

Through direct communication, ACU can empower international students to understand their rights, disclose and seek support, including counselling and legal support, to address any unethical arrangements with recruiters or any exploitation experienced through work, housing or other arrangements post-arrival.

ACU Global Engagement provides information on Australian work rights each intake for commencing international students, based on a collaboration with the Fair Work Ombudsman. International students have equal work rights to all other workers in Australia. To ensure new international students understand this, we have developed and provide them with a short presentation on working rights in Australia, which includes information about minimum wage, maximum working hours, the role of the Ombudsman, and a case study video.

In addition to the ongoing support referenced above, from 2023 commencing students are asked upon arrival to complete ACU's onboarding survey - which contains questions that relate to their experience of the services provided by their education agent, with a focus on meeting TEQSA and National Code requirements in relation to orientation. The working group is meeting in early 2024 to strengthen the existing survey questions. The new survey will go live in late April 2024.

STUDENTS - GENERAL

All students at ACU, including international students, have access to free, confidential counselling services on campus. ACU counsellors are experienced and trained psychologists or social workers who deliver specialised programs in the areas of mental health, emotional wellbeing and enhancing mental resilience. All students can access six free counselling

sessions per year. Each face-to-face session runs for 50 minutes and provides the opportunity to discuss any issues of concern in a supportive environment. Two 30-minute drop-in sessions are also available on campus each day.

In 2022, ACAN program managers delivered training to 12 ACU counsellors on how to identify and respond safely to disclosures of modern slavery, and made a recording of the session as an internal resource that can be viewed by new staff. ACAN program managers also created a new referral resource for counsellors that will help any students who disclose modern slavery indicators to seek further advice and assistance, including legal advice.

ACU students, including international students, have access to two free, confidential 45-minute legal advice sessions with a private law firm that includes access to written advice. ACAN program managers conducted outreach to the law firm in 2022 to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery in 2023.

ACU's Careers and Employability team will undertake fair work training from the Ombudsman each year from 2024, so they are well-prepared to offer fair work support and advice in appointments around assisting students to access correct and current information.

ACU's Safeguarding and Student Safety team assists any student who may be facing difficult times or who may have experienced, observed or heard about sexual behaviour which may be illegal, inappropriate, threatening or concerning (including situations related to modern slavery).

Students can access the service via:

- an online form
- in-person via a Safety Support Officer, a trusted member of staff, an ACU counsellor or directly via the Safeguarding and Student Safety team
- phone via the National Security Centre
- legal services funded by ACU

Support is tailored to the specific situation and need, and may include (but is not limited to):

- access to free counselling and legal advice sessions
- academic adjustments and extensions
- assistance with reporting, including education around options
- assistance with accommodation/housing
- welfare checks.

While prepared to do so, to date the team have not dealt with any matters that relate to modern slavery.



Actions to address modern slavery risks around apparel/student uniforms

ACU recognises the important responsibilities corporate clothing suppliers, and organisations that source products from global factories, have in ensuring human rights are respected, and that responsible operations are undertaken across their supply chain.

ACU's preferred uniform supplier's entire local supply chain has been audited and is accredited by Ethical Clothing Australia, to ensure the fair and proper treatment of every single worker.

The organisation employs several factories internationally for the manufacture of a number of garments. Each of their international manufacturers must meet SA8000

standards for workplace practices, which cover eight main areas important to social accountability in the workforce - including forced labour, working hours, remuneration, and health and safety.

The supplier's manufacturing partners are audited by third parties under the Business Social Compliance Initiative (BSCI) and Sedex supply chain management audits. Staff members make regular overseas trips to oversee production and engage with partners. The supplier's nominated factories and supply chain partners must have successfully passed auditing and must maintain this status as current, prior to receiving orders from the supplier.

Criterion 5: Effectiveness assessment

ACU Modern Slavery Maturity Assessment

To assess the ongoing level of maturity and progress made across all areas of ACU, a self-assessment is performed annually. ACAN has generated a Maturity Assessment from ACU's completed annual Entity Profile.

The ACAN Maturity Assessment provides a score card of an ACU's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey. The score card will be used by our EMS Working Group to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The score card ranges from: 0 to 100.

Achieving a score of 100 – which signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence - is an aspirational and long-term goal.

The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.

The score card provides for:

Holistic overview: Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader, long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

Contextual understanding: Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.

Flexibility and adaptability: Organisations are dynamic and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.



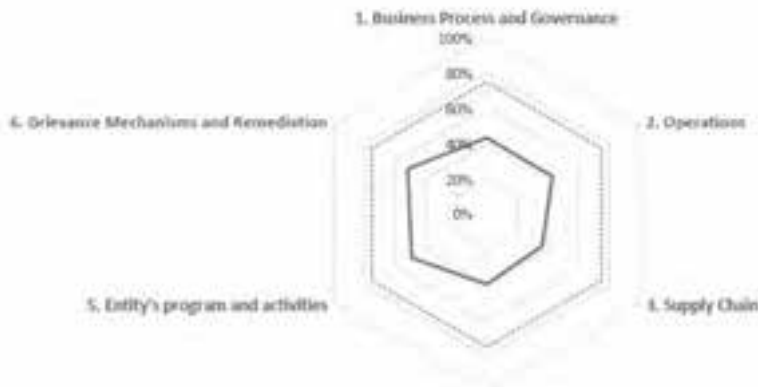
The 2023 result for ACU is as follows:



Australian Catholic University (ACU) - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	49%	54%	35%	35%	44%
2. Operations	45%	55%	37%	36%	43%
3. Supply Chain	13%	80%	31%	21%	36%
4. Worker Engagement	36%	61%	25%	36%	40%
5. Entity's program and activities	85%	25%	50%	36%	49%
6. Grievance Mechanisms and Remediation	63%	60%	48%	36%	52%
Average	45%	56%	38%	33%	44%

Maturity Score 2023 individual scoring by pillar and sub pillar, including averages and total 2023 score



ACU's score falls in the 31% - 50% = **Emerging Practice** (Years 3 - 5) level. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means ACU's processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process, accompanied by adequate staffing and resources.

Baseline data - ACU has introduced the ACAN Baseline Data table in 2023 that can also be used to demonstrate continuous improvement over time, by comparing to previous years.

ACTIVITY	AUSTRALIAN CATHOLIC UNIVERSITY
INTERNAL / STAFF	
Hours spent on modern slavery activities	600
Individual staff completed e-learning	366
E-learning modules completed	692
EXTERNAL / SUPPLIER ENGAGEMENT	
Total number of suppliers	3700
Number of suppliers across high-risk categories	453
Number of ACAN Supplier Surveys completed	82
Supplier staff attending capacity building webinars	126
Invited to join Sedex	12
Joined Sedex	4
Sedex SAQ completed	2
Social audits	2
Corrective actions	3
DOMUS 8.7 EXTERNAL REFERRALS	
Contacts made via worker voice / grievance mechanism	6
Referrals for advice and assistance	0
Individuals identified or referred for modern slavery assessment	0
Individuals with modern slavery cases remediated	0


Measures to assess effectiveness of anti-modern slavery measures – in use or in development

The following measures are either already in use or in development to assess the effectiveness of anti-modern slavery measures and requirements, with respect to both Tier 1 suppliers and other suppliers further along the overall supply chain:

- Inclusion of stipulated contract review meetings and measurement of performance against key performance indicators, in all significant ACU contracts.
- Self-reporting of suppliers against industry sector databases where they exist (eg. Sedex).
- Use of third-party tools to investigate and assess anti modern slavery performance (eg. Sedex).
- Use of ACU reporting tools to receive information about performance (eg. use of the ACU Tender Portal).
- Receipt and assessment of supplier action plans designed to ensure modern slavery practices are avoided within the supply chains of Tier 1 suppliers.
- Establishment of auditing processes to verify compliance and performance by ACU and third-party auditors, including the review of audits initiated by suppliers.

These measures apply to all ACU campuses and operational personnel. The national and state managers are responsible for all of our campuses in Australia.





Criterion 6: **Process of consultation with entities owned or controlled**

ACU does not own or control any other entities and therefore this criterion is not applicable.

Criterion 7: Other relevant information

ACU CORE CURRICULUM AND SESU SCHOLARSHIP PROJECT 'DOMUS LINKS: MODERN ANTI-SLAVERY TRAINING FOR THE FUTURE WORKFORCE'

The Stakeholder Engaged Scholarship Unit (SESU) is ACU Engagement's flagship initiative, established in 2020, to equip the university with a centralised avenue for initiating and activating community-led research. The SESU provides a unique offering to partners of the university to propose, co-design and deliver scholarship and research projects alongside university academics, especially where they will support communities experiencing disadvantage or marginalisation.

In 2023, the SESU completed a two-year project with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney. The Anti-Slavery Taskforce is committed to increasing awareness of modern slavery across professional sectors, especially the education, health and social work sectors. The project entitled, 'Domus Links: Modern Anti-slavery Training for the Future Workforce', introduced the topic of modern slavery to young people before they embark on their professional journeys. This project saw e-learning materials on modern slavery weaved into the ACU undergraduate curriculum. Specifically, teaching materials on modern slavery were designed and integrated into each of the five modules of ACU's UNCC300 unit, a third-year level core curriculum unit on Justice and Change in a Global World.

Following a pilot of the new learning materials with a cohort of 772 students in Semester 2, 2022, the modern slavery curriculum was delivered to a total of 2655 students in 2023 across all ACU campuses, who were enrolled in UNCC300. There were approximately 100 ACU tutors involved in the teaching of these materials.

The e-learning materials equip students with a greater understanding of modern slavery, including the *Modern Slavery Act*. Importantly, students were provided with an understanding of modern slavery as it relates to their personal and professional selves and their community responsibilities. The materials build students' capacity to identify and safely respond to people impacted by severe forms of exploitation and slavery-related crimes; imperative knowledge as they graduate from university as professionals ready to join the workforce in 2024. Specific topics include: defining modern slavery; human rights; the *Modern Slavery Act*; indicators of modern slavery; the interdependence of modern slavery with environmental degradation; modern slavery as both entwined with and a functioning component part of broad, complex crises; fairtrade; supply chains; orphanage trafficking; engaged governance and community empowerment; anti-slavery advocacy.

Students are also exposed to a suite of 15 educational video resources, which were specifically produced for the core curriculum, to provide a range of perspectives on modern slavery and enable students to see how it intersects with many industries. Through the videos, students met nine inspirational people, including a rare opportunity to hear directly from a survivor about his personal experience of modern slavery in the Australian horticulture industry. This

was the very first time that Mr Moe Turaga shared his story on video. Mr Turaga was the face of the Commonwealth Inquiry into Establishing a Modern Slavery Act for Australia, and his story is documented in the Hidden in Plain Sight report. He is an important advocate for change. The other industry experts filmed were from several different organisations. Many are either at the forefront of responding directly to victims of modern slavery or are involved in key advocacy work. Students learnt first-hand through the videos about the following topics: crisis and accommodation support provided at the only trafficking and slavery safe house in Australia; orphanage trafficking and the risks of voluntourism; fairtrade products as an important tool for preventing modern slavery; key investment and financial considerations; sustainability and modern slavery; as well as human rights and the legal perspective. The project also saw us develop a bespoke animation to introduce students to the topic of modern slavery—the first of its kind bespoke animation for the core curriculum. To bring greater public awareness of key issues of modern slavery, the videos have been shared by the Anti-Slavery Taskforce with other organisations in their network and some of the videos have been made publicly available on the ACU website.

ACU intends to maintain this topic of modern slavery as a core part of the teaching materials in the ACU core curriculum.

ACU'S THOMAS MORE LAW SCHOOL PRO BONO WORK

ACU continues to be proud of the pro bono work our law students are doing under the leadership of the Dean of the Thomas More Law School, Professor Patrick Keyzer. The students continue to complete their pro bono placements with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney. To date, the collaboration has contributed around 9,000 hours of review, analysis and ranking. Prior to 2023, 70 ACU law students analysed more than 1,500 modern slavery statements, making it the largest study in the country. In May 2022, the Thomas More Law School and the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce held the third in a series of webinars on the topic of eradicating modern slavery. ACU was represented by four of our final-year law students – Adeline Kassis, Eve Van Rhine, Patrick Beer and Phoebe Straube – who presented the findings of their analysis of dozens of modern slavery statements. In 2023, 50 interns from ACU analysed over 800 statements, equating to around 8,800 pages of written text, at an average of 11 pages per statement (graphics/other visuals not included in page count).

SAINT JOSEPHINE BAKHITA – PATRON SAINT OF ACU BLACKTOWN CAMPUS

As we work to address the injustices inflicted upon the most vulnerable members of our communities, we draw inspiration from Saint Josephine Bakhita - the patron saint of our Saint Josephine Bakhita Campus in Blacktown, and patron saint of modern slavery victims and human trafficking.

FACULTY OF EDUCATION AND ARTS ANTI-SLAVERY INITIATIVES

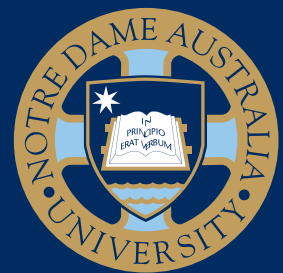
The below represents anti-slavery activities instigated by the Faculty of Education and Arts as regards integration into curriculum, teacher education and research.

ACTIVITY	DESCRIPTION
<p>Integration into curriculum Initial Teacher Education</p>	<p>Anti-slavery awareness is engaged with in the unit TECH209 Textile Industries (TECH209 - Textile Industries (acu.edu.au)) in relation to allegations of the Fashion/Textile industry and regulatory measures.</p> <p>Representative resources are: Get The Latest Ethical Fashion Guide - Baptist World Aid. And concepts like 'True Cost of Fashion' 'The True Cost' - Official Trailer - YouTube and modern slavery in fashion - Unseen (unseenuk.org)</p>
<p>Integration into curriculum Bachelor of International Development Studies; International Development Studies minor sequence</p>	<p>Anti-slavery awareness is engaged with in several units in international development. In particular the unit DVST200 Refugees and Forced Migration looks at the intersection between asylum/human trafficking.</p>
<p>Research</p>	<p>Dr Kristie Flannery's research explores urban women's experiences of migration, labour, and love between slavery and freedom in the early modern Indo-Pacific world. Conducting this research allows better understanding of the dynamics of modern slavery, with education being at the core of changing behaviour.</p>
<p>Supply chain research</p>	<p>As part of its Initial Teacher Education programs, ACU makes payments to schools and organisations in Early Childhood settings to support Professional Experience Placements. The Faculty is working with Finance to update our processes to ensure that we meet requirements for eradicating modern slavery in our procurement supply chain.</p>



**Australian Catholic
University (ACU)**
**Modern Slavery
Statement 2023**





The University of Notre Dame Australia

Modern Slavery Statement 2023

ABN 69 330 643 210



Acknowledgement of Country

The University of Notre Dame Australia respectfully acknowledges the Traditional Custodians of the lands on which our campuses are located. We pay homage to the Elders, past, present, and emerging, of the Whadjuk Noongar people in Fremantle, the Yawuru people in Broome, and the Gadigal people of the Eora Nation in Sydney. These lands were meeting places of teaching, learning, and research for many Indigenous nations, and we are committed to honouring their rich histories and cultures. As an educational institution, we recognise the importance of these lands for Indigenous peoples and acknowledge their enduring connection to country, community, and culture across Australia. We pledge to continue building relationships that respect and celebrate the knowledge and values of Indigenous peoples and communities.

Content warning

This statement addresses the subject of modern slavery, which could trigger sadness, distress, or traumatic memories, especially for individuals who have personally experienced or are closely associated with victim survivors. Should you need to discuss any concerns or if you or someone you know is in danger or feels unsafe, support services include:

- Lifeline (24/7): 13 11 14 for confidential telephone crisis support.
- Mental Health Line (NSW, 24/7): 1800 011 511 for advice and referrals from mental health professionals.
- Mental Health Emergency Response Line (WA): 1300 555 788

To share any concerns about modern slavery activities connected to Notre Dame, please utilise our **Modern Slavery Feedback Form**, or you can reach out directly to our specialised modern slavery team via email at modernslavery@nd.edu.au

If you are experiencing coercion, threats, deception, or violence in your workplace or residence, this may constitute modern slavery, which is strictly illegal in Australia. For free and confidential assistance about support and services available, please contact:

- Domus 8.7: an independent community organisation for confidential advice and support – 02 9307 8464

University Student Counselling Services:
notredame.edu.au/students/support/health-safety-and-wellbeing/counselling.

If you or anyone else is in immediate danger or feel unsafe, please contact Emergency Services by dialling triple zero (000).

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Introduction

This Modern Slavery Statement reflects The University of Notre Dame Australia's (Notre Dame) steadfast adherence to the Modern Slavery Act 2018 (Cth). It underscores our unwavering commitment to eliminating modern slavery risks within our operations and supply chains. At Notre Dame, we recognise the crucial importance of taking meaningful actions to respect human rights and rigorously measure the impact of our efforts. Over the past year, we have continued to refine our strategies and enhance our commitment to ethical practices, progressively mitigating modern slavery risks across our university community.

This document outlines the progress made in 2023, illustrating our efforts to identify, address, and mitigate modern slavery risks. It also charts our vision for the future, setting a roadmap for sustained engagement and deeper commitment in the global efforts to end modern slavery. Through transparent reflection on our actions and challenges, and outlining our future directions, this statement reaffirms Notre Dame's dedication to safeguarding human dignity and advancing social justice, aligned with our foundational Catholic values and educational mission.





Joint statement from the Vice Chancellor and Chancellor

We are proud to present our Modern Slavery Statement for 2023, a year marked by significant achievements and a renewed commitment to future initiatives. At The University of Notre Dame Australia, we oppose all forms of slavery and human trafficking. We are dedicated to a comprehensive understanding, identification, and mitigation of modern slavery risks within our operations and supply chains.

Our commitment extends to raising awareness of critical human rights issues across our university community, including both staff and students. We adhere to a continuous, risk-based strategy aimed at fostering improvements and inspiring innovative solutions. Over the past year, we have achieved significant advancements in refining our processes, enhancing our contractual frameworks, and deepening our engagement with suppliers. Key initiatives this year included the following:

- enhancing the accessibility of our grievance mechanism through the Modern Slavery webpages,
- expanding modern slavery awareness training through targeted supplier communications,
- reinforcing our proactive supplier engagement with comprehensive risk mitigation,
- establishing a Supplier Code of Conduct, and
- broadening our curriculum with specialised programs on modern slavery and human trafficking.

We extend our heartfelt gratitude to our dedicated staff for their unwavering commitment to upholding human rights and efforts to implement actions to address modern slavery. We recognise aspects of the journey which are still ahead and are committed to ending modern slavery and human trafficking. Looking forward, we will continue to focus on enhancing our modern slavery risk management framework to better protect those vulnerable to these egregious violations.

This Modern Slavery Statement was approved by the principal governing body of The University of Notre Dame Australia, as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 13 June 2024.



Professor Francis Campbell
Vice Chancellor



Hon. Chris Ellison
Chancellor



CRITERION 1:

About us

The University of Notre Dame Australia (Notre Dame) is a distinguished national Catholic university that spans the Australian continent, from the west coast city of Fremantle, through the town of Broome in the northwest, to the heart of Sydney on the east coast. As the pioneer Catholic university in Australia, Notre Dame is committed to delivering an unparalleled educational experience, characterised by a commitment to excellence and a deep-rooted belief in enabling each member of our community to achieve their full potential.

We proudly uphold a legacy of 2000 years of Catholic Intellectual Tradition, fostering an environment of open, rigorous enquiry and vibrant discourse. This inclusive tradition welcomes individuals from all faiths and backgrounds, encouraging a rich tapestry of perspectives within our academic community.

With a student body exceeding 12,000 across our three campuses, Notre Dame offers an extensive portfolio of undergraduate and postgraduate programs. Our courses are designed to not only impart knowledge but also to cultivate critical thinking, ethical reasoning, and a commitment to social justice.

The objects of our University

These objects are outlined in the University of Notre Dame Australia Act 1989 (WA), which established Notre Dame, and define our core mission and values:

- To provide university education within a context of Catholic faith and values.
- To uphold an exceptional standard of teaching, scholarship, and research.
- To offer comprehensive training for the professions.
- To ensure pastoral care is available to all students.

These Objects are the bedrock of our identity as a Catholic institution. They have guided our growth from a modest cohort of 50 postgraduate Education students in Fremantle in 1992 to today's thriving academic community. This evolution reflects our unwavering commitment to nurturing a learning environment that is both inclusive and challenging.

CRITERION 2:

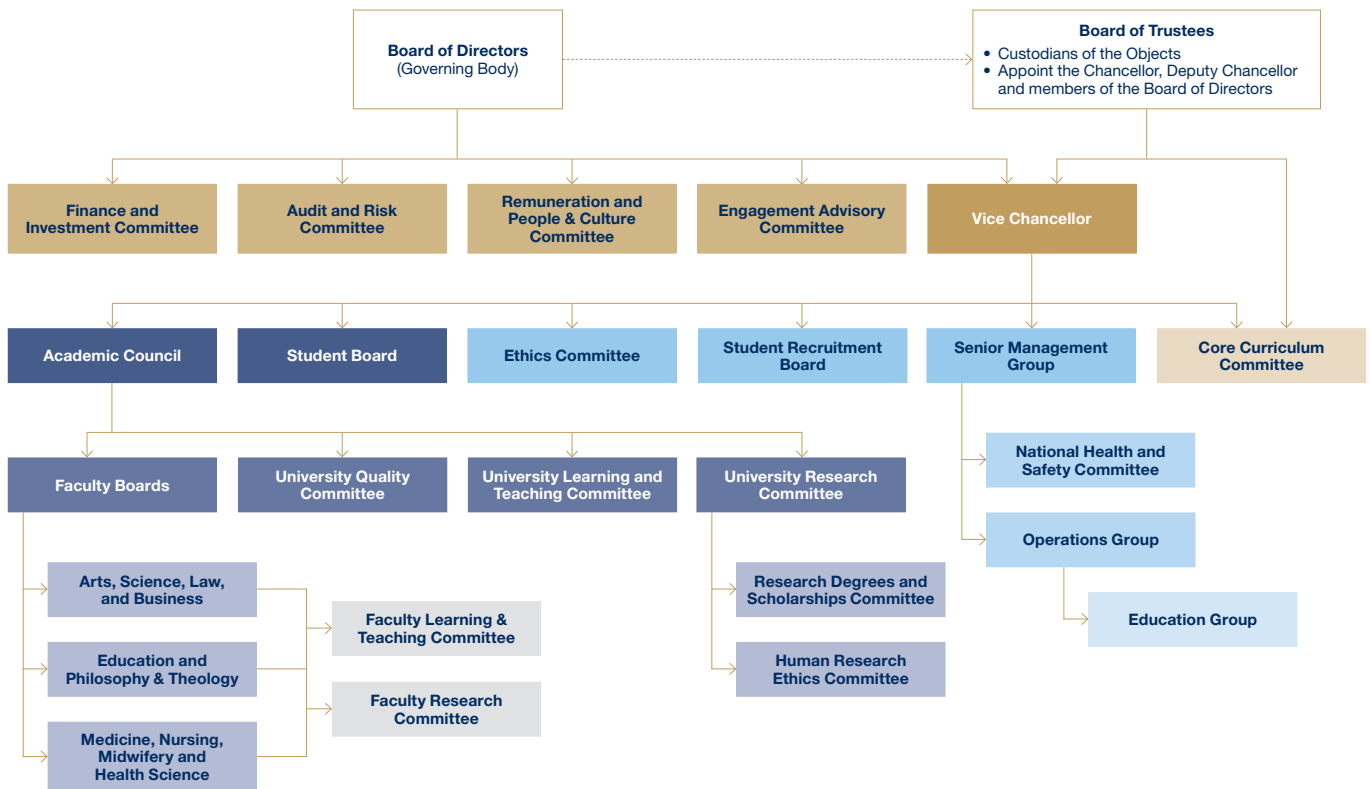
Structure, operations, and supply chains

Governance and organisational structure

The University of Notre Dame Australia operates under a robust governance framework established by its Act of Parliament and Statutes, outlining the roles and functions of its Trustees, Board of Directors, Board of Governors, and Principal Officers.

The Board of Directors, as the governing body, oversees the university’s management, ensuring adherence to our mission and values across all operations.

Figure 1 Organisational Chart of Committees



Our strategic plan

Notre Dame’s strategic plan for 2022 - 2026 underscores our dedication to addressing modern slavery risks, guided by five strategic pillars: Universality, Educating for the Common Good, Integrating Practice and Knowledge, Transformative Research, and Integral Human Development. This strategic approach embeds modern slavery awareness within our core missions, reflecting our commitment to ethical practices and social justice. Through education, research, and community engagement, we aim to equip our students and staff with the knowledge and tools needed to combat modern slavery, fostering a culture of dignity and respect for all individuals.

Operations

Notre Dame stands as a prominent national Catholic university nationally recognised for its extensive array of undergraduate, postgraduate, and Vocational Education and Training (VET) offerings. Spanning across three campuses headquartered in Fremantle, with additional campuses in Broome and Sydney, alongside eight clinical schools distributed throughout New South Wales and Victoria, Notre Dame is committed to impactful scholarship and research that contributes positively to communities locally, nationally, and globally. These efforts are supported by varied contractual relationships with suppliers to secure the goods and services essential for our educational and operational needs. Our procurement practices, whether for ongoing service contracts or one-off purchases, are integral to maintaining the high standard of education and support services Notre Dame is known for.

Notre Dame prides itself on strong connections with industry, especially in fields such as business, health, education, law, medicine, and architecture. These partnerships are pivotal, offering students practical placements that are relevant to their studies and enhancing their readiness for professional careers. Moreover, the university's global partnerships afford students the enriching experience of studying abroad, further broadening their academic and cultural horizons. This collaborative approach, combined with Notre Dame's economic and social contributions, is illustrated by its significant impact on the communities it serves. Notably, in Fremantle, the education provided by Notre Dame generates substantial economic benefits for the local economy, exemplifying the university's commitment to fostering educational excellence and societal improvement.

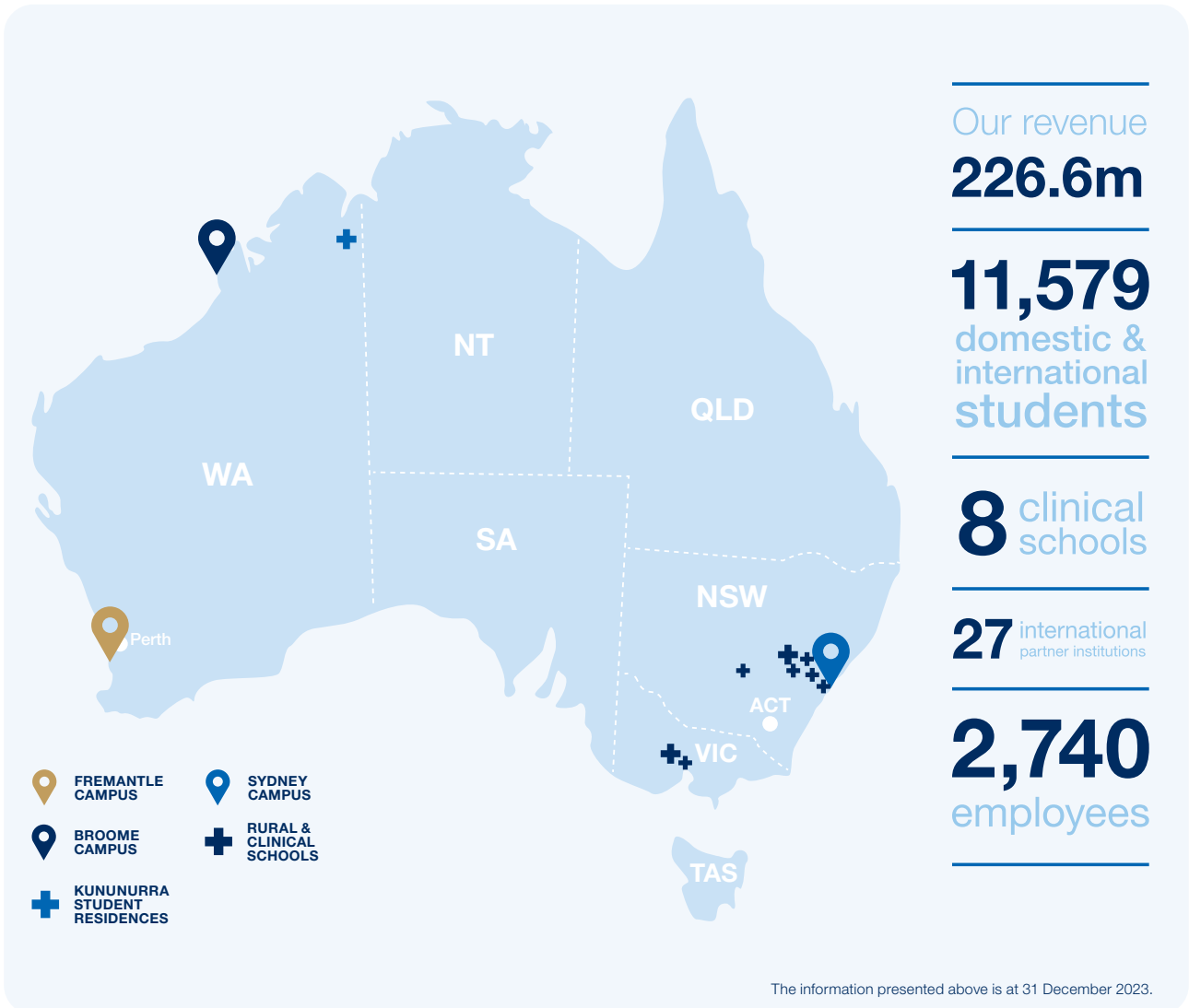


Figure 2 Notre Dame at a glance



Workforce profile

In 2023, Notre Dame employed over 2,740 direct staff across academic, administrative, and support roles, reflecting our commitment to providing high-quality education and support services. Additionally, we engaged 52 labour hire contractors and indirect employees to complement our workforce, ensuring operational efficiency and flexibility.

Policies and procedures

To support our governance and operational standards, Notre Dame has established a suite of policies and procedures that guide ethical behaviour, including but not limited to:

- Employee Code of Conduct & Ethical Behaviour
- Workplace Bullying Policy
- Procurement Policy
- Work, Health and Safety Policy
- Risk Management Policy
- Academic Integrity Policy
- Supplier Code of Conduct
- Travel Policy
- Whistleblower Protection Policy
- Staff Grievance Resolution Policy

These policies are crucial for maintaining our commitment to high standards of governance, compliance, and ethical behaviour, ensuring a positive and safe environment for all members of the Notre Dame community.

Modern Slavery Working Group

The formation of the Modern Slavery Working Group in 2020, comprising members from diverse sectors of the university, has been crucial in spearheading the identification and evaluation of modern slavery risks. This initiative is central to our continuous efforts to refine our procedures and strengthen our modern slavery risk management protocols.

CRITERION 3:

Modern slavery risks

Notre Dame is firmly committed to identifying, assessing, and mitigating the risks of modern slavery within our institution and our supply chain. This commitment is reinforced by our governance framework and policies, signifying our dedication to integrity and accountability in all our operations.

To bolster our efforts against modern slavery, we have implemented a comprehensive supplier onboarding process aimed at identifying and mitigating potential risks associated with modern slavery within our operations and our broader supply chain. In November 2023, we introduced the Supplier Code of Conduct, mandating all our suppliers to adhere to minimum standards concerning human rights, labour standards, environmental stewardship, and anti-corruption practices, thus underlining our strategic approach towards ethical procurement.

Operational and supply chain risks

Our proactive approach includes conducting detailed evaluations to ensure that internal processes and practices align with modern slavery compliance standards. The dedicated risk and assurance team is responsible for overseeing the development and implementation of our risk management approach and internal audit function, ensuring that any identified risks are effectively managed and reported to the Audit and Risk Committee for ongoing monitoring and implementation.

Supply chain insights

We acknowledge the presence of modern slavery risks within our supply chain, particularly in areas influenced by geographical factors and the sourcing of materials and products. The complexity of global supply chains necessitates enhanced visibility, especially concerning secondary supply chain tiers and the source materials for our goods and services.

In partnership with the Australian Catholic Anti-slavery Network (ACAN) and the Australian Universities Procurement Network (AUPN), we have adopted a risk categorisation system tailored to the specific aspects of our supply chain.

The objectives of utilising these tools include:

- Describing the product and risk categorisations accurately.
- Assigning specific suppliers to appropriate product and risk categories, potentially classifying them into primary, secondary, or other tiers of risk.
- Facilitating the collection of comprehensive supplier information.
- Enabling a cohesive sector-wide response to modern slavery risks.

This initiative allows for a detailed analysis aimed at identifying and categorising risks, facilitating the collection of comprehensive supplier information and enabling a unified sector-wide response to modern slavery challenges.



Our suppliers and expenditure

In 2023, Notre Dame engaged with 2,568 suppliers, with a concentrated group of 144 suppliers accounting for the top 79% of our procurement expenditure.

As outlined in Table 1, more than 97% per cent of the University's supply chain spend is with Australian-based companies and companies operating in low-risk countries, as determined by Global Slavery Index*.

COUNTRY	RISK LEVEL*	% SPEND
Australia	Low	97.77%
Switzerland	Low	0.05%
England	Low	0.64%
United Kingdom	Low	0.05%
Hong Kong	Low	0.05%
Italy	Low	0.05%
Japan	Low	0.05%
Netherlands	Low	0.11%
New Zealand	Low	0.11%
Philippines	Medium	0.05%
Singapore	Low	0.11%
Sweden	Low	0.05%
United States of America	Low	0.90%

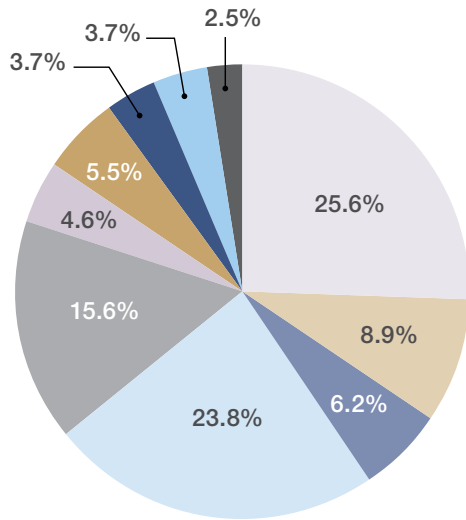
Table 1 Countries of spend (Risk prescribed by Global Slavery Index*)

Our financial records from 2023 indicate that our total revenue amounted to \$226.6 million and our total procurement spend of around \$72 million. Approximately 20% of this expenditure falls into high-risk categories as prescribed by ACAN's Taxonomy as highlighted in Table 2 and Figure 3. These figures offer an insightful glimpse into our procurement activities and emphasise our approach towards responsible sourcing and supply chain management:

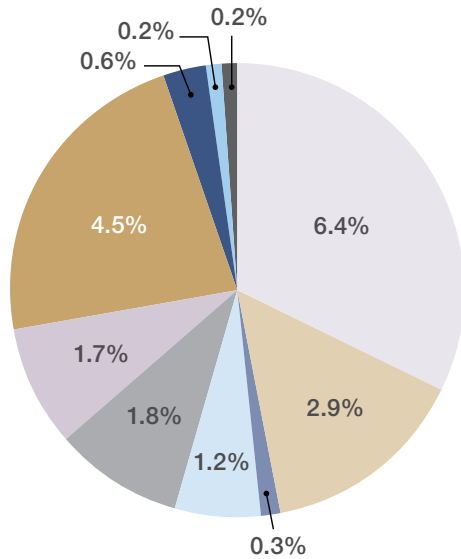
CATEGORY	SUPPLIER COUNT	ANNUAL SPEND
Building and Construction	112	\$4,900,000
Cleaning and Security Services	39	\$2,261,000
Facility management and property maintenance	27	\$193,000
Food and Catering Services	104	\$956,000
Furniture and Office Supplies	68	\$1,400,000
ICT Hardware	20	\$1,289,000
Labour Hire	24	\$3,497,000
Linen, Laundry and Textile Products	16	\$460,000
Medical Devices and Supplies	16	\$191,000
Waste Management Services	11	\$168,000
Total	437	\$15,315,000

Table 2 High risk category spend

No. of suppliers



Percentage of spend



Key

- Building and construction
- Cleaning and security services
- Facility management and property maintenance
- Food and catering services
- Furniture and office supplies
- ICT hardware
- Labour hire
- Linen, laundry and textile products
- Medical devices and supplies
- Waste management services

Figure 3 Disbursement of spend by High-Risk categories

Modern slavery risks to students

Notre Dame remains determined to mitigate modern slavery risks, particularly as they relate to students. The University acknowledges potential risk to students when they engage in paid employment, voluntary work and learning experiences, both here and overseas, as well as in other settings which may foster exploitation. The University's duty of care is to ensure students are informed of the risks and provided with accessible and relevant support services.

In assessing risk across cohorts and student activities, the University identified student employment, placements and internships as areas at greatest risk of modern slavery. International students were again identified as being at higher risk. In recognising the potential risks of modern slavery within our international student recruitment processes, the University has put stringent measures in place. These include specific clauses in our agreements with overseas education recruitment agents to safeguard against deceptive recruitment practices that could lead to debt bondage or exploitation.

Our people

Reflecting the diversity of our staff, Notre Dame is committed to maintaining a workplace governed by our Code of Conduct and a suite of policies that ensure fair practices and set expected standards of behaviour. These documents are publicly accessible and regularly reviewed.

Our university employs a vibrant community of 2,740 staff members, spanning a wide range of roles and responsibilities across our campuses. Notre Dame adopts a thorough approach to recruitment, ensuring that all potential employees, whether recruited directly or via third-party agencies, undergo meticulous verification of their right to work in Australia. This process is supported by using a background check system and the expertise of a migration lawyer to arrange visas for overseas candidates, to prevent any possibility of labour exploitation. In 2023, our investment in contract and agency labour amounted to approximately \$3.5 million, reflecting our reliance on a diverse and flexible workforce to meet the dynamic needs of our academic and operational functions.

However, the diversity of award systems across different sectors and the complexities of the visa framework present ongoing challenges in safeguarding against the risks of modern slavery. These risks are further complicated by the use of recruitment agencies, including those involved in the recruitment of international students, which may unintentionally facilitate conditions conducive to forced labour and other forms of exploitation.

To address these challenges, the University prioritises the engagement of certified service providers, to further reinforce our commitment to ethical employment practices and the wellbeing of our entire community, ensuring Notre Dame remains a benchmark for responsible and conscientious employment standards.



CRITERION 4:

Actions taken

Notre Dame is committed to eliminating modern slavery risks within its operations and supply chains. This commitment is reflected in a series of actions undertaken to address modern slavery risks, ensuring compliance with legislative requirements and fostering an ethical community. Below is a comprehensive overview of these actions, demonstrating our ongoing dedication to this critical issue.

Collaborative initiatives in combating modern slavery

Collaboration with the Australian Catholic Anti-slavery Network (ACAN)

Notre Dame's partnership with ACAN has been crucial in enhancing our capacity to manage modern slavery risks. Through this collaboration, we have conducted a maturity assessment that evaluates the sophistication and effectiveness of our approaches against modern slavery. The insights from this assessment have been pivotal in refining our modern slavery risk management framework and establishing benchmarks for continuous improvement. Additionally, our partnership encompasses shared tools and resources, such as the ACAN Supplier Survey, which aids in conducting deeper risk assessments and fosters informed dialogue with our suppliers.

Furthermore, we have adopted the ACAN Baseline Metrics to benchmark our efforts and track our progress. These metrics provide a comprehensive overview of the significant strides Notre Dame has made over the past year in addressing modern slavery risks, both internally and within our supply chain. They underscore our ongoing dedication to improving our practices and fostering an ethical procurement environment. Further details and analysis of these metrics are presented in the Baseline Metric table in Criterion 5.

Collaboration with the Australian Universities Procurement Network (AUPN)

Our continued partnership with the AUPN contributes significantly to collective efforts within the higher education sector to address modern slavery risks. By collaborating with AUPN, we leverage shared resources, expert insights, and collaborative initiatives aimed at enhancing transparency and improving supply chain practices. This network provides a platform for discussing best practices, exploring new solutions, and collectively enhancing the sector's approach to modern slavery.

Supplier engagement and compliance

Understanding the critical need for proactive dialogue, the University has undertaken a focused initiative to engage directly with suppliers in sectors flagged as high-risk for modern slavery practices, including construction, cleaning, security, and IT hardware. These engagements aimed to foster a mutual commitment to eradicating modern slavery, focusing on developing robust compliance and verification frameworks that align with our stringent anti-modern slavery objectives. Through these discussions, we are not only to assess current practices but also to identify opportunities for improvement and to work collaboratively on implementing effective anti-modern slavery strategies.

Recognising the necessity for a transparent and accountable procurement process, Notre Dame has bolstered our reporting and compliance mechanisms. This includes:

- **Mandatory supplier self-assessments** – As a fundamental part of our tendering and supplier onboarding processes, especially for those within identified high-risk categories, we mandate comprehensive self-assessments focused on modern slavery risks. This initiative ensures a thorough evaluation of operations and practices related to modern slavery, serving as an essential component of our due diligence and risk mitigation efforts.
- **Register of supplier credentials** – To further our commitment to transparency and compliance, we have established a register of all supplier insurances, registrations, and certifications. This register ensures that all our suppliers not only adhere to the required legal and regulatory standards but also meet our specific criteria for combatting modern slavery. The register is regularly reviewed and updated to reflect any changes or updates in our suppliers' status, providing a clear and current overview of their compliance posture.
- **Supplier code of conduct** – The cornerstone of our supplier engagement strategy is the comprehensive Supplier Code of Conduct, which delineates our expectations for ethical behaviour, compliance with anti-modern slavery laws, and the necessity for transparency. This code is a binding agreement for all our suppliers, ensuring that our supply chain upholds our values and commitment to human rights.

Through these initiatives, Notre Dame is pioneering new standards in supplier engagement and compliance, affirming our dedication to effective modern slavery risk management within our operations and supply chain.

Embedding the supplier code of conduct into purchasing terms and conditions

To bolster our commitment to ethical procurement and the eradication of modern slavery, Notre Dame has seamlessly integrated our Supplier Code of Conduct into our purchasing terms and conditions. This initiative ensures that all suppliers are contractually obligated

to comply with our ethical standards, including those related to labour rights, environmental practices, and ethical business conduct. Key components include explicit incorporation, compliance verification, capacity building, continuous improvement clauses, and detailed consequences for non-compliance. Through these comprehensive measures, Notre Dame is setting new standards in supplier engagement and compliance, affirming our dedication to dismantling modern slavery within our operations and supply chain.

Empowering change through academic education

Notre Dame is dedicated to promoting the dignity of the human person and educating the next generation of professionals and leaders in the fight against modern slavery and human trafficking. The University has expanded its academic offerings to include a range of undergraduate and postgraduate programs focused on social justice issues. The undergraduate program in Social Justice provides students with a broad understanding of social issues, including modern slavery and human trafficking. Notre Dame has developed postgraduate programs in Modern Slavery and Human Trafficking that are designed to deepen students' knowledge and skills in this area, preparing them for careers in government, non-profit organisations, or the private sector.

The University's programs are designed to achieve several objectives, including increasing awareness of modern slavery and human trafficking, ethical and legal obligations related to these crimes and the risks associated with supply chains. The programs also aim to develop skills for designing, implementing, and monitoring ethical supply chains, as well as for statutory and public reporting and auditing, assurance and accreditation of supply chains. Additionally, the programs aim to enhance knowledge and skills for better policing of human trafficking. The University has taken additional steps to combat modern slavery and human trafficking, including an increased focus on ethics in the curriculum, with all schools and faculties incorporating ethics education into their courses.

The University has a compulsory undergraduate course on modern slavery for all business students. Moreover, the University steadfastly pursues an educational and awareness-raising agenda concerning modern slavery, with success metrics derived from distinct interactions across our Fremantle and Sydney campuses. These include organising and participating in webinars and in-person events, undertaking research endeavours, producing scholarly publications, and engaging in public discourse via media platforms, with the impact gauged through media exposure metrics.

As a proactive member of the Australian Universities Procurement Network Modern Slavery Advisory Board, Notre Dame is at the forefront of formulating strategies to tackle modern slavery and human trafficking within

supply chains. Additionally, the University is engaged in a nationally funded project under the National Action Plan to Combat Modern Slavery 2020-2025, Grant Program (round 2), focused on evaluating the efficacy of Australia's Modern Slavery Act, thereby continuing our pivotal role in this global fight.

Grievance mechanism

Notre Dame has established an Operational Level Grievance Mechanism to facilitate communication and address concerns related to modern slavery and broader human rights impacts. Promoted through our webpage and through supplier engagements, the Grievance Mechanism strengthens human rights due diligence by offering a direct channel for raising concerns, tracking effectiveness, informing policy improvements, fostering positive stakeholder relationships, demonstrating a commitment to human rights, preventing future occurrences, and enhancing reporting under the Modern Slavery Act.

Furthermore, Notre Dame has operationalised a structured action plan for managing grievances, ensuring each reported case is handled comprehensively. The process involves initial receipt and acknowledgment of the grievance, assessment of its relevance, and appropriate escalation. Thorough investigation and evaluation of allegations by subject experts, including consultations with affected parties, lead to the development of resolutions in collaboration with the complainant. Formal agreements on the resolution, implementation of remediation where necessary, and ongoing monitoring ensure accountability and continuous improvement. This systematic approach underscores Notre Dame's dedication to addressing modern slavery concerns and upholding human rights within its operations.

Remediation

Notre Dame is committed to remediation of any modern slavery impacts within our operations and supply chains. We recognise the inherent dignity of every individual and the importance of decent work in fostering human flourishing. This is underscored by Catholic Social Teaching and clearly outlined in the United Nations Guiding Principles on Business and Human Rights.

Our approach is focused on meaningful action:

- **Direct remediation initiatives** – We implement guidelines to inform our response when modern slavery incidents are identified, ensuring prompt and effective action.
- **Collaborative processes** – Our remediation efforts involve transparent and respectful engagement with affected individuals, suppliers, and NGOs, aiming for practical and sustainable outcomes.
- **Capacity building** – We continually train our staff to effectively recognise and address modern slavery, enhancing their ability to implement appropriate remediation strategies.

- **Ongoing monitoring and reporting** – We maintain transparency by detailing remediation actions and outcomes in our annual Modern Slavery Statement, where such have been identified, providing accountability and insights into the effectiveness of our efforts.

These focused actions underscore our commitment to address modern slavery risk, and we will work with affected individuals to identify appropriate remedial action, which may include financial compensation or other forms of support.

Internal education

All staff at Notre Dame are encouraged to complete the workshops and training facilitated by ACAN. In 2023, 81% of staff in roles identified as key to managing modern slavery risk have completed the Modern Slavery 101 module.

Additionally, we identified groups for whom training will be mandatory in line with their responsibilities and sent out targeted communications for these groups to undertake a further module — Modern Slavery Business Relevance — which provides a business perspective on modern slavery and why it is important to manage modern slavery risk.

The University is also actively reviewing its operations to target additional staff for training whose work may intersect with our key risk areas. This is an ongoing process given the arrival of new staff and structural changes.



CRITERION 5:

Assessing effectiveness

The ACAN Modern Slavery Maturity Assessment has been instrumental in providing a comprehensive scorecard of Notre Dame's capabilities to mitigate the risk of modern slavery within its operations and supply chains. This detailed scorecard, stemming from a self-reported Entity Profile Survey, serves as a guiding tool for our Modern Slavery Working Group to delineate future directions, establish a multi-year action plan, and allocate resources effectively.

The results of the maturity assessment indicate that our modern slavery risk management processes are well-defined, standardised, and integrated into the organisational culture. We are on a journey which has involved project-focused actions and will be moving towards a more standardised and continuous process improvement across the organisation.

To foster further growth, we are committed to developing and implementing targeted initiatives that will address identified weaknesses and build upon our current strengths. This commitment is exemplified by our action planning for 2024, which is designed to promote supplier training and engagement, embed grievance remediation frameworks, and ensure that supplier self-assessments are integral to all onboarding activities.

Our continuous improvement journey

The following roadmap shows our key actions over the last four years:

2020

- Formed Modern Slavery Project Group with staff from Legal, Finance, and Procurement.
- Partnered with ACAN for shared resources and training.
- Conducted a gap analysis with ACAN and benchmarking survey with KPMG.
- Performed risk assessment for first-tier suppliers; reviewed top 200 supplier agreements.
- Released Modern Slavery Statement.
- Joined ACAN workshops to educate key staff and suppliers, focusing on the building and construction industry.
- Revised Procurement Policy and Procedures according to the Modern Slavery Act 2018.
- Initiated development of Modern Slavery and Whistleblower Protection Policies.
- Engaged suppliers with letters against modern slavery practices.
- Updated supplier onboarding to incorporate modern slavery risk assessments.

2021

- Engaged in joint training and resource sharing with ACAN.
- Conducted a second gap analysis to evaluate modern slavery risk management maturity.
- Analysed agreements for modern slavery clauses and risk management.
- Organised ACAN-facilitated workshops and training for essential stakeholders.
- Modified Procurement Policy and Procedures in line with Modern Slavery Act.
- Reviewed and amended agreements to include modern slavery clauses.
- Developed Modern Slavery Side Agreement template.
- Progressed in creating Modern Slavery and Whistleblower Protection Policies.
- Communicated Notre Dame's anti-modern slavery expectations to over 4,000 suppliers.
- Enhanced the supplier onboarding process with a focus on modern slavery risk.

2022

- Integrated modern slavery considerations into existing procurement policies.
- Conducted annual risk reviews that were industry-specific and tailored to the nuances of commodity, geographic location, and labour conditions.
- Escalated training programs, reaching 73% of our employees in key roles for managing modern slavery, to improve awareness and understanding of modern slavery risks.
- Established robust grievance and whistleblower policies, strengthening the infrastructure for addressing grievances and ensuring improved conditions.
- Reinforced our commitment to dismantling modern slavery through targeted educational initiatives and comprehensive supplier engagement programs.
- Proactively worked with suppliers, especially in high-risk sectors, to develop tailored compliance frameworks against modern slavery.

2023

- Advanced collaborative efforts with ACAN and AUPN on modern slavery.
- Created specialised focus groups for policy and procedure enhancement in modern slavery.
- Submitted procurement data for comprehensive risk assessments and benchmarking in collaboration with ACAN and AUPN.
- Expanded educational programs in social justice, including modern slavery.
- Engaged with suppliers in key sectors for compliance frameworks against modern slavery.
- Implemented mandatory self-assessments and established a register of supplier credentials.
- Partnered with CAF-certified cleaning suppliers to address labour rights and slavery risks.
- Established an Operational Level Grievance Mechanism for modern slavery concerns.
- Facilitated internal education efforts via ACAN workshops to increase awareness on modern slavery.

In 2023 we adopted ACAN Baseline Metrics to benchmark our efforts as follows:

2023	ACTIVITY	UNIVERSITY OF NOTRE DAME AUSTRALIA (UNDA)
INTERNAL / STAFF	Hours spent on modern slavery activities	1047
	Individual staff completed e-learning	2382
	E-learning modules completed	4617
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2568
	Number of suppliers with visible contact information and ABN	1933
	Number of suppliers across high-risk categories	437
	Number of ACAN Supplier Surveys completed	118
	Supplier staff attending capacity building webinars	47
	Invited to join Sedex in 2023	6
	Joined Sedex	20
	Sedex SAQ completed	12
	Social audits	5
	Corrective actions	3

CRITERION 6:

Internal consultation

Notre Dame does not own or control any other entities and therefore this criterion is not applicable.

CRITERION 7:

Other relevant information

As the University of Notre Dame Australia progresses into 2024, we are dedicated to deepening our impact on modern slavery prevention and environmental stewardship, guided by the Laudato Si' Action Platform and the ACAN strategic recommendations.

Laudato Si' Action Platform integration

Continuing our commitment to Pope Francis' encyclical, we are actively integrating the Laudato Si' principles into our operations. These principles, which call for action to address the cries of the Earth and the poor, are intricately linked to our anti-modern slavery initiatives. In 2024, we will develop and implement a comprehensive Laudato Si' action plan across all campuses to promote ecological economics, sustainable lifestyles, ecological education, and community resilience.

Promotion of supplier training and engagement

In line with ACAN's guidelines, we will enhance our efforts to train and engage suppliers on both modern slavery risks and ecological sustainability. This dual approach ensures that our supply chains are fortified against potential exploitation while promoting environmental stewardship.

Embedding grievance and remediation framework

To improve our responsiveness to both environmental and modern slavery incidents, we will implement a comprehensive grievance remediation framework. This will provide clear channels for reporting grievances related to modern slavery and environmental harm, ensuring systematic resolution processes that uphold our ethical commitments.

Incorporation of supplier self-assessments in onboarding

Strengthening our supplier onboarding process, we will include mandatory modern slavery and environmental sustainability self-assessments. This initiative ensures that all potential suppliers align with our ethical standards and environmental commitments before engaging with our university.

Strategic framework and alignment

Our initiatives for 2024 are designed to adapt to our operational needs while contributing to broader sector-wide goals. Following ACAN's advice, we select actions from both high and low scoring categories of the maturity assessment to promote a balanced approach that addresses vulnerabilities and builds on strengths. Each initiative will be guided by SMART objectives, ensuring effective integration and measurable outcomes.

Commitment to continuous improvement

Supported by ACAN's resources and guided by the Laudato Si' Action Platform, our strategy includes continuous monitoring and adjustment to ensure effectiveness and sustainability. This support is essential as we navigate the complexities of modern slavery risk management intertwined with ecological stewardship.

By implementing these targeted actions and adhering to both the Laudato Si' principles and ACAN's action planning framework, the University of Notre Dame Australia reaffirms its commitment to creating a just, sustainable, and slavery-free future. This comprehensive approach not only enhances our capacity to manage modern slavery risks but also solidifies our position as a leader in ethical and environmental responsibility within the global community.



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ST VINCENT'S

Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES



4th Modern Slavery Statement

1 January 2023 - 31 December 2023

Disclosure

This is a joint statement made on behalf of St Vincent's and covers the following entities it owns or controls:

St Vincent's Health Australia Ltd
ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

St Vincent's Hospital Sydney Limited
ABN 77 054 038 872

St Vincent's Hospital (Melbourne) Limited
ABN 22 052 110 755

St Vincent's Private Hospitals Ltd
ABN 61 083 645 505

***St Vincent's Private Hospital Sydney**
ABN 99 269 630 262

St Vincent's Care Services Ltd
ABN 50 055 210 378

St Vincent's Healthcare Ltd
ABN 46 095 382 791

St Vincent's Care Services Boondall Ltd
ABN 15 146 972 303

St Vincent's Care Services Carseldine Ltd
ABN 49 094 645 262

St Vincent's Community Health Ltd
ABN 36 054 594 375

*affiliated entity



Reconciliation: Towards excellent health, happiness and equality, 2016
Bianca Beetson, Vicki Couzens and Jeffery Samuels in collaboration with 48 SVHA staff members

Better and
fairer care.
Always.



St Vincent's recognises the Traditional Custodians of the land on which its many sites are located. We pay our respects to Elders past and present and welcome all Aboriginal and/or Torres Strait Islander people to our places of care.

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A message from our Chair

Mr Paul McClintock AO

The Board of St Vincent’s regards our organisation’s anti-slavery endeavours as fundamental to our mission and legacy. We are committed to pursuing the elimination of modern slavery within health and aged care while supporting victims and helping them reclaim their dignity and thrive.

Our fourth St Vincent’s Modern Slavery Statement provides an update on our efforts over the past 12 months. Continuing our journey from the past few years, we have revisited our risk assessment framework, processes, and protocols. Unsurprisingly, given the complexity of the challenges we face in anti-slavery, we have uncovered additional high-risk areas within our operations that we need to investigate in the period ahead.

Navigating supply chain risks with high-risk suppliers that are unwilling to adopt our preferred risk assessment has been challenging. To address this, we have initiated a supplier ‘due diligence program’ to foster direct communication, enhance visibility and transparency, and have offered them a tailored platform to discuss their challenges and mitigate risks. We have begun the rollout of this program with a select group of suppliers with the goal of extending it to all those companies identified by our risk identification framework within the next two to three years.

We advanced our partnership with the Australian Catholic Anti-Slavery Network (ACAN) and established a working group of Catholic healthcare organisations to encourage a collaborative effort in tackling modern slavery

across our supply chains. We have similarly worked closely with the Australian Catholic Religious Against Trafficking Humans (ACRATH), which has been instrumental in advocating for modern slavery legislation in Australia and aiding us in setting up essential protocols for survivor assessment.

Finally, we recognise that our frontline staff are among the select few who interact with the survivors of modern slavery. Prioritising their awareness and training in areas relevant to their roles has been a key focus, and we aim to bolster this effort in the upcoming reporting period. We extend our appreciation to the Anti-slavery Commissioner for NSW for generously providing resources and supporting our initiatives to train our staff, as well as taking the lead in establishing a health sector-specific anti-slavery community of practice.

Our commitment at St Vincent’s to combating modern slavery reflects our core values. In collaboration with our stakeholders, we strive to raise awareness and play our part in eradicating this global problem.

Mr Paul McClintock AO
Board Chair

This Modern Slavery Statement was approved by the principal governing body of St Vincent’s as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) and was approved on 6 June 2024.

This Modern Slavery Statement is signed by a responsible member of St Vincent’s Health Australia Ltd as defined by the Act.

About St Vincent's

The history of Australian health and aged care is long and distinguished. Tracing things back to the start, you'll find a chapter dedicated to five courageous and compassionate women, 'the Sisters of Charity' - the founders of St Vincent's.

Arriving in Australia in 1838 – with a commitment to care for people who were marginalised and disadvantaged – the Sisters of Charity opened the first St Vincent's Hospital in NSW in 1857, followed soon by hospitals in Victoria and Queensland in partnership with governments and the Australian public. From that day, their spirit – human compassion combined with clinical excellence – has been the foundation of all that St Vincent's does.

St Vincent's today is a unique not-for-profit social enterprise with a mix of public and private hospitals, cutting edge clinical research, virtual and home care, aged and palliative services, and community programs.

Our hospitals are major referral centres for rural and regional communities; we provide specialised emergency and trauma services in inner-city Sydney and Melbourne, along with smaller EDs in metropolitan and regional centres; and we are known for our

surgical capacity in all three states providing world-class services in heart transplantation, orthopaedics, neurosurgery, cardiothoracics and cancer care.

Our integrated health innovation precincts in Sydney and Melbourne house globally-renowned medical institutes, all founded by St Vincent's, including the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, the St Vincent's Institute of Medical Research, the Aikenhead Centre for Medical Discovery, the St Vincent's Centre for Applied Medical Research, and the Nursing Research Institute.

Underpinning everything we do is our commitment to serving people and communities who are at-risk of poor health outcomes.

The vision, commitment and inspiration of our founder, Mary Aikenhead, and the Sisters of Charity live on in us and the work we do.

The parent company of the group is St Vincent's Health Australia Ltd ABN 75 073 503 536.

The following are wholly owned subsidiaries of St Vincent's Health Australia Ltd:

- St Vincent's Hospital Sydney Limited
- St Vincent's Hospital (Melbourne) Limited
- St Vincent's Private Hospitals Ltd
- St Vincent's Care Services Ltd
- St Vincent's Community Health Ltd
- St Vincent's Healthcare Ltd

The following are wholly owned subsidiaries of St Vincent's Care Services Ltd:

- St Vincent's Care Services Boondall Ltd
- St Vincent's Care Services Carseldine Ltd

The following is an affiliated hospital:

- St Vincent's Private Hospital Sydney

St Vincent's annual revenue for the financial year 2022-2023 can be noted at the [ACNC Register](#).

Our Mission, Vision and Values

Our Mission

As a Catholic healthcare service, St Vincent's brings God's love to those in need through the healing ministry of Jesus.

Our founders – the Sisters of Charity – gave St Vincent's a mission: to provide care, first and foremost, to the most disadvantaged and marginalised members of our community. We welcome all people to our care.

The courage and compassion of the Sisters has been a hallmark of St Vincent's since we began and has been at the heart of many of our proudest achievements, including opening Australia's first program for treating and studying alcohol dependence, establishing Australia's first methadone clinic, the first needle exchange, first HIV/AIDS ward, first palliative care service and first homeless health residential unit.

Today St Vincent's is a leading provider of services to people experiencing homelessness, people with alcohol and other drug dependence, people living with mental illness, First Nations peoples, and people in correctional facilities, proudly continuing the legacy of the Sisters of Charity.

Our Vision

Our vision at St Vincent's is that every person, whoever and wherever they are, is served with excellent and compassionate care, by a better and fairer health and aged care system.

Our 30,000 exceptional and dedicated staff together lead St Vincent's to deliver three key priorities:



Enhance Impact:

Continuously improve our care, enhancing our positive impacts for patients, people, and our planet.



Connect Care:

Work together, building "One St Vincent's" capabilities and services to create the future of connected health and aged care.



Transform the System:

Work with partners to shape a better and fairer health and aged care system.



Our Values

We deliver person-centred care, inspired by the Sisters of Charity, and underpinned by the values of:



Compassion

Our care is an act of love. We are present to and accompany people as they are, and as they need.



Integrity

Our actions and decisions are transparent and aligned with our values.



Justice

Our pursuit of what is right and just empowers us to speak and act with courage on behalf of those in need.



Excellence

Our services are safe and evidence-based, and we continually seek to improve in everything we do.

Our structure, operations and supply chains

Our Structure

St Vincent's is a group of not-for-profit non-listed entities. St Vincent's Health Australia is a public company limited by guarantee and is registered with the Australian Charities and Not-for-profits Commission.

St Vincent's is governed by a Board of Directors ("Board"). The Board exists to ensure there is effective integration and growth of the mission of Mary Aikenhead Ministries throughout the health and aged care services and to govern the St Vincent's group of companies pursuant to the Australian Charities and Not-for-profits Commission Act 2012 (Cth), canon law, and all other relevant civil legislation. The Board must at all times operate within the Mary Aikenhead Ministries Ethical Framework and the Catholic Health Australia Code of Ethical Standards of Health and Aged Care Services in Australia (2001).

The day-to-day running of St Vincent's is the responsibility of the Executive Leadership Team led by the Group Chief Executive Officer.

Board of Directors

The Board is accountable for its key purpose to The Trustees of Mary Aikenhead Ministries ('TMAM'). Mary Aikenhead Ministries builds on the charm and traditions of the Sisters of Charity and Mary Aikenhead, founder of the Sisters of Charity. The Trustees are the canon law and civil stewards of SVHA. All Directors serve as independent non-Executive Directors and are appointed by TMAM.

Board Committees

All Board Committees operate under their own Charter which is approved by the Board. Committees are permitted to appoint external experts to assist them in their consideration of matters.

The Board is supported by seven standing Committees: Audit & Risk; Finance & Investment; Mission, Ethics & Advocacy; People & Culture; Clinical Governance & Experience; Research & Education; and Aged Care.

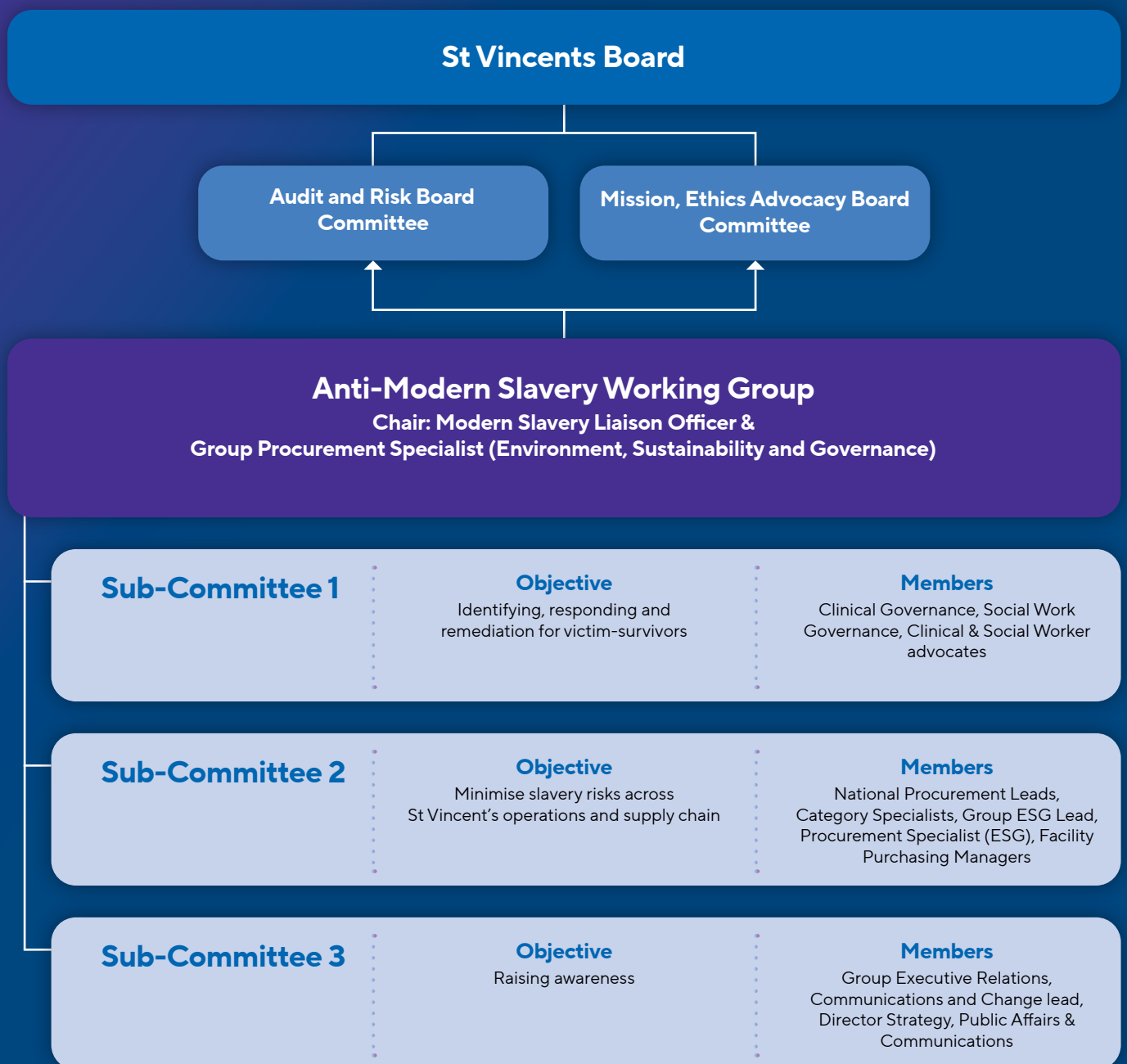
The St Vincent's Modern Slavery governance framework

The Anti-Modern Slavery Working Group (MSWG) at St Vincent's is convened by our Modern Slavery Liaison Officer, a dedicated resource focused on anti-modern slavery efforts across the organisation's operations and supply chain, including the risk framework and mitigation activities.

Due to the alignment with our Mission, MSWG is sponsored by our St Vincent's Group Mission Leader who advocates this work to the organisation's Mission, Ethics and Advocacy Board Committee. The MSWG is also sponsored by our Group Chief Financial Officer for the governance of risks across the supply chain and operations, who then sponsors the Modern Slavery

Report to the Board Audit and Risk Committee, and subsequently to the full St Vincent's Board.

The Anti-Modern Slavery Working Group convenes bimonthly via its sub-committees to effectively manage risks throughout the organisation. The structure of the St Vincent's MSWG is outlined below.



Overview of our divisions



Queensland

Our private hospitals

- St Vincent's Private Hospital Northside
- St Vincent's Private Hospital, Brisbane
- St Vincent's Private Hospital, Toowoomba

Our care services

- St Vincent's Care Bardon
- St Vincent's Care Boondall
- St Vincent's Care Carina
- St Vincent's Care Carseldine
- St Vincent's Care Corinda
- St Vincent's Care Kangaroo Point
- St Vincent's Care Mitchelton
- St Vincent's Care Toowoomba
- St Vincent's Care Southport
- St Vincent's Care Arundel
- St Vincent's Care Maroochydore
- St Vincent's Care Gympie
- St Vincent's Care Douglas (Townsville)



New South Wales

Our public health hospitals and services

- St Vincent's Hospital Sydney
- Sacred Heart Health Service
- St Vincent's Correctional Health Parklea

Our private hospitals

- Mater Hospital, North Sydney
- St Vincent's Private Hospital, Sydney
- St Vincent's Private Community Hospital, Griffith
- St Vincent's Clinic

Our care services

- St Vincent's Care Haberfield
- St Vincent's Care Heathcote
- St Vincent's Care Auburn
- St Vincent's Care Bronte
- St Vincent's Care Edgecliff
- St Vincent's Care Yennora



Victoria

Our public health hospitals and services

- St Vincent's Hospital Melbourne
- St Vincent's on the Park
- Caritas Christi
- St George's Health Service

Our private hospitals

- St Vincent's Private Hospital, East Melbourne
- St Vincent's Private Hospital, Fitzroy
- St Vincent's Private Hospital, Kew
- St Vincent's Private Hospital, Werribee

Our care services

- St Vincent's Care Hawthorn
- St Vincent's Care Kew
- St Vincent's Care Eltham
- St Vincent's Care Werribee
- Berengarra
- Auburn House
- Prague House



National

Our national services

- Hospital in the Home (HITH)
- Residential In-reach Program
- GEM@Home
- Cancer@Home
- Pallcare@Home
- Rehab@Home
- Transition Care Program
- Domiciliary Allied Health
- Community Nursing and Post Acute Care
- Home Care Packages
- Telehealth and telemedicine
- THIS WAY UP
- HealthMonitor
- Commonwealth Home Support Program

Our operations

St Vincent’s is a unique not-for-profit social enterprise that operates two major inner-city health networks in Melbourne and Sydney, 10 private hospitals, 26 aged care facilities – with more than 5,500 hospital and residential aged care beds – and a range of virtual and home care options across NSW, Victoria and Queensland.

We have a team of close to 30,000 dedicated and talented team members and 1,000 volunteers working in their areas of expertise, from regional Queensland to Melbourne’s western suburbs.

Our reach means St Vincent’s has more than one million contacts with patients and residents – including 300,000 admissions, 132,000 Emergency Department presentations, and close to 200,000 in-home care interactions – annually.

Our integrated health innovation precincts in Sydney and Melbourne house globally-renowned medical institutes, all founded by St Vincent’s, including the Victor Chang Cardiac Research Institute, the Garvan Medical Research Institute, the St Vincent’s Institute of Medical Research, the Aikenhead Centre for Medical Discovery, the St Vincent’s Centre for Applied Medical Research, and the Nursing Research Institute. Across our hospitals and co-located institutes, the St Vincent’s research footprint is one of the biggest in Australia with 2,500 researchers and 3,000 annual publications.

Our supply chain

St Vincent’s has a diverse and complex global supply chain. Our largest suppliers operate throughout the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1.28 billion per annum in clinical and non-clinical goods and services from over 4,600 suppliers.

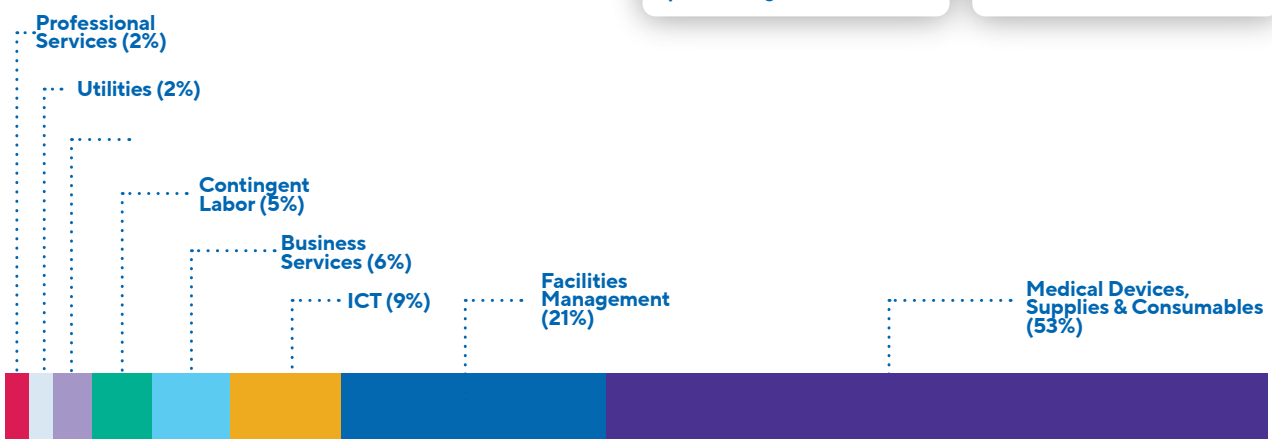
Our clinical supply chain comprises general medical and surgical consumables, drugs and pharmacy, pathology and laboratory, medical devices, medical imaging, surgical equipment and prostheses/implants, wound care dressings, intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, construction, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms and equipment, servicing and repairs, contingent labour, as well as corporate overheads such as office supplies and travel.

A centrally-led procurement team, Group Procurement Services, oversees all St Vincent’s procurement and supply chain activities, including the contractual arrangements which cover clinical and non-clinical categories across the organisation. Group Procurement also manage the catalogue of material goods holding over 120,000 material items. Individual facilities are responsible for supply chain teams to manage the day-to-day purchasing and supply at a local level.

The supply chain is underpinned by over 820 formal commercial contracts.

SVHA Supply Chain

- Over \$1.27b in annual spend
- Over 4,600 suppliers
- Clinical and non-clinical spend categories
- Global supply chain



1 Medical Devices, Supplies & Consumables includes drugs and pharmacy, pathology and laboratory, medical appliances, surgical equipment, medical imaging, prostheses/implants, wound care dressings, intravenous products, airway management, medical gases and robotics.
 2 Facilities Management includes construction, refurbishment and fit outs, cleaning, linen and laundry services, equipment repairs and maintenance.
 3 Business Services include staff-related expenses, travel and accommodation, uniforms, stationery and office supplies, marketing and public relations, courier and freight handling, and document storage.

Criterion 3

Identification of modern slavery risks in our operations and supply chain

In the previous reporting period, we established a comprehensive reporting framework to provide reliable data on our category spending and suppliers. By leveraging this framework we refine our approach for detecting modern slavery risks across our supply chain and operations.

The spend categories linked to the procurement of goods or services from external suppliers are identified as supply chain risks. Operational risks pertain to our internal operations, such as in-house cleaning services. However, in many categories where delivery involves both internal and external resources, a clear distinction is not always applicable.

Breakdown of risks across St Vincent's

A Supply Chain

Eight categories within the spend taxonomy are exclusively associated to external suppliers.



1. Medical devices, supplies and consumables (76%)

Our clinical supply chain constitutes the most significant high-risk category, accounting for over three-quarters of our total supply chain risks. It encompasses a complex array of areas, including various sub-categories such as medical devices and equipment, like surgical instruments; medical supplies, like gloves and personal protective equipment (PPE); and consumables, like drugs and pharmaceuticals. Most of our suppliers are large multinational corporations with extensive global supply chains, including facilities in several high-risk countries



5. ICT hardware and printers (1%)



6. ICT phones and communications (1%)

Our ICT suppliers are large national and global suppliers with their supply chains tracing to South-East Asian countries – such as Malaysia, China, Vietnam, Thailand and India – that are relatively less regulated in relation to modern slavery laws and known for the prevalence of modern slavery practices such as forced labour and debt bondage. Our products also include lithium batteries with potential linkages to mining (cobalt) activities in the Democratic Republic of Congo and refining and subsequent production practices in China.

Breakdown of risks across St Vincent's (cont.)

A Supply Chain

Eight categories within the spend taxonomy are exclusively associated to external suppliers.



2. Property and construction (14%)

Refurbishment and construction fall into a high-risk category within our supply chain, sourced from major national suppliers. The construction industry employs a significant number of temporary migrant workers, often contracted through labour hire companies, leading to a heightened risk of worker exploitation and modern slavery. This is due to factors such as reliance on low-paid, seasonal, and temporary labour; recruitment of vulnerable individuals like new migrants and temporary work visa holders; employment of undocumented workers; deceptive practices that trap workers in exploitative conditions; and coercive control, including threats and the withholding of workers' identity documents, which restricts their freedom of movement and leads to social isolation.



3. Food, beverages and nutritional feeds (4%)

The supply of food and beverages is a high-cost, high-volume operation within our hospitals and residential care businesses. The Australian agricultural and fresh produce sector has repeatedly faced convictions for modern slavery incidents, including forced labour and restrictions on freedom of movement.



4. Utilities (3%)

The energy production, waste management, and recycling sectors also depend on labour hire agencies to provide migrant low-skilled workers and are susceptible to modern slavery practices akin to those in the construction sector.



7. Stationery and office supplies (1%)

In 2023, our company changed its primary supplier of stationery and office supplies. Despite the change, this end of the supply chain continues to be linked to South-East Asian countries where there is a high risk of modern slavery practices.



8. Uniforms (<1%)

The clothing, textile, and apparel industries are known to employ workers under conditions reported as modern slavery, such as forced labour and wage underpayment. Additionally, these sectors are often connected to the procurement of raw materials from high-risk countries in Africa and Asia.

B Operations

Two categories within the spend taxonomy are exclusively managed by internal resources.

 **9. Contingent labour- nursing (50%)**

 **10. Contingent labour- non-nursing (50%)**

Our nursing and allied healthcare staffing depend on specialist labour hire agencies instead of direct recruitment. There is a national shortage of staff in these areas, leading to an increasing demand that is being met by migrant workers from around the world, including those from high-risk regions in South-East Asia, Africa, and the South Pacific.

C Both Operations and Supply Chain

Four spend categories have a combination of internal and external service provision.

 **11. Facilities Management (56%)**

 **12. Cleaning Services and Supplies (23%)**

 **13. Linen and Laundry Services (17%)**

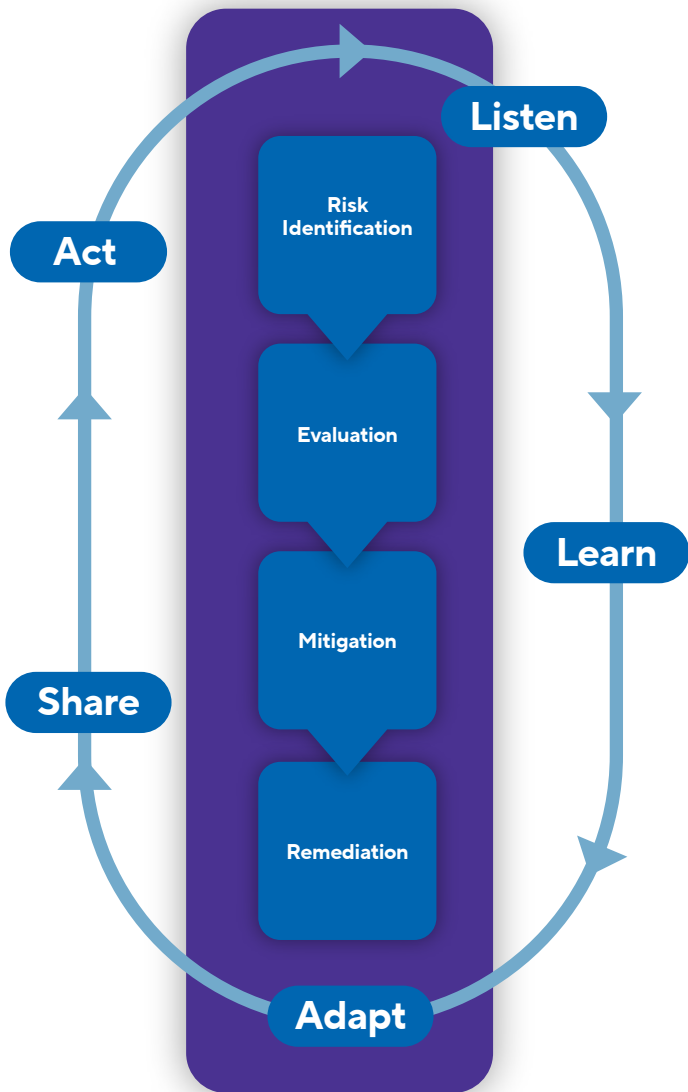
 **14. Kitchen and Housekeeping (5%)**

We manage a diverse array of contracts, encompassing group-level agreements, local facility contracts, preferential contractor arrangements, and services rendered by St Vincent's staff. These include cleaning and security services, laundry, kitchen and catering services, as well as general facilities management services, like electrical and plumbing repairs and maintenance.

In Australia, it is common for suppliers in these sectors to employ temporary migrant workers through sub-contracting or labour-hire arrangements. These arrangements have historically been associated with a high incidence of non-compliance concerning workplace rights and entitlements. Furthermore, the equipment and consumables used in these sectors are predominantly manufactured overseas, especially in high-risk countries such as China, Thailand, and Vietnam.

Continuous Learning Framework

As we further our understanding of potential risks within our supply chains and operations, we recognise the importance of being receptive and adaptable to newly emerging risks. Consequently, we have implemented a continuous learning framework for our modern slavery risk strategy, encompassing risk identification, evaluation, mitigation, and remediation.



Additional risks identified

15. Intersection with Survivors of Modern Slavery and Risks to Frontline Workers:

In our previous statement, we acknowledged the pivotal role healthcare providers play in identifying victim-survivors of modern slavery, who are likely to be encountered within the emergency departments in public hospitals due to the nature of their exploitation. As we continue to enhance our understanding, we have come to realise that our frontline staff – who interact with the victim-survivors of severe exploitation and complex trauma – are also vulnerable and at risk of experiencing trauma themselves.

16. Investments

In 2023, St Vincent’s made approximately \$371 million in various investments, adding a new risk category to our operations. It is vital to assess and mitigate the modern slavery risks linked to these investments. This entails examining:

- the management of these risks;
- the parties responsible for managing these risks, such as external funds or asset managers; and
- if managed by external fund managers, whether they are members of the Investors Against Slavery and Trafficking Asia Pacific (<https://www.iastapac.org/>).

17. Awareness of Whistleblower Policy and Other Grievance Mechanisms

It has been noted that both our direct and indirect workforce, which includes staff, contractors, and the workforce of our suppliers, may lack awareness about the different avenues they have at their disposal to report any misconduct related to modern slavery securely and confidentially.

Modern Slavery Risk Identification Framework for Supply Chain

2022

Revisit Framework

Phase 1

Tier-1 Suppliers

Identify High Risk Categories

Focus on Top-100 Suppliers

Synergise with Catholic Peers

Supplier-centric Approach

2023 - 2025

◀ We are here

Phase 2

Beyond Tier-1 Suppliers

Identify High Risk Categories

Top Suppliers by High-Risk Sub-Categories

Identify High Volume Products

Synergise with Catholic Peers

Geographical Mapping

Product-centric Approach

2025 - 2027

Scheduled

Actions taken to assess and address risk

Supplier risk management platform – Sedex Australia

Over the past three reporting periods, St Vincent’s has endeavoured to bring our high expenditure, high-risk suppliers onto Sedex, a third-party technology platform designed to manage and mitigate modern slavery risks within supply chains and operations. The Australian Catholic Anti-Slavery Network (ACAN) collaborates in the onboarding of high-risk suppliers prevalent in the healthcare sector and leverages the platform’s capabilities to disseminate a shared Supplier Self-Assessment Questionnaire (SAQ) and for them to adopt the Sedex Members Ethical Trade Audit (SMETA) methodology with the objectives to:

- manage modern slavery risks with current suppliers;
- compare inherent risks with actual risks;
- incorporate new suppliers into the screening process as part of tenders and onboarding;
- enhance visibility further up the supply chains; and
- track and report on advancements in the supplier profile.

However, like previous years, our suppliers’ adoption rates with the Sedex platform is limited. We observe the following:

- Most of our top 100 high-risk suppliers are large global suppliers especially those providing medical and clinical supplies, and not willing to join Sedex. They have either commenced their own risk management programs, subscribed to other risk tools, or are not eager to complete the SAQs.
- Sedex methodology requires the suppliers to onboard every facility to be fully compliant. This is an extremely time-consuming and costly process, and some suppliers are evaluating how best to prioritise this.
- The quality of data of the SAQs cannot be relied upon as these are self-declarations and independent evaluation is still required for validation.

We acknowledge and understand these challenges and are trying to mitigate these risks by establishing direct communication with the suppliers under our Due Diligence Program (as outlined in the next section).

Supplier Due Diligence Program for Modern Slavery Risks

We continue to advance the implementation of Phase 1 of our **Modern Slavery Risk Identification Framework for the Supply Chain**, concentrating on the top 100 suppliers across 14 high-risk spending categories. To facilitate this, we have initiated the **Supplier Due Diligence Program for Modern Slavery Risks**. This structured program is designed to build upon the principles of our continuous learning framework and is intended to start a collaborative journey between St Vincent’s and its suppliers, focusing on modern slavery due diligence within our commercial partners’ supply chains and operations from 2023 to 2026.

Aligned with our Risk Identification Framework, our Due Diligence Program underpins this collaboration to ensure a unified approach for obtaining greater traceability in our shared supply chain and visibility to the chain of custody beyond Tier 1 suppliers when they are common among ACAN’s member entities. To support this effort, ACAN has established the **Catholic Health Sector Working Group (HSWG)**, which includes representation from eight national Catholic healthcare entities, uniting to address modern slavery risks in their collective supply chains.

St Vincent’s Supplier Due Diligence Program

Goal for next 3 years (2023-2026)

- Identify risks in a supplier’s operations
- Get better visibility into supply chain
- Identify risks with a supplier’s direct inputs
- Identify high-risk geographical locations
- Identify products impacted
- Demonstrate a supplier’s progress in reducing and eliminating risks

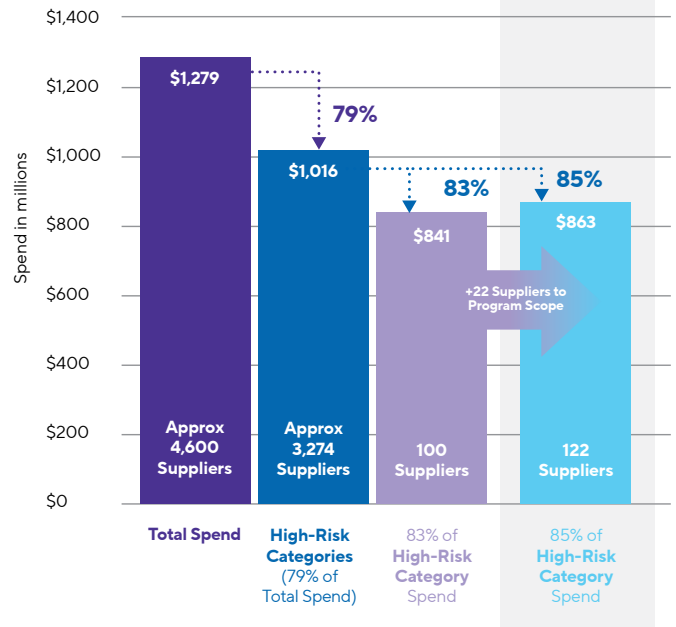
Focus for next 12 months

- Identify a supplier’s priority areas
- Tools used eg: Sedex, Ecovadis
- Efforts beyond surveys and questionnaires
- Grievance processes and incident reports
- Raise awareness
- Collaboration with ACAN HSWG

Progress update for supply chain risk assessment

- Seventy-nine per cent of our expenditure is categorised as high-risk for modern slavery prevalence.
- The top 100 suppliers, ranked by spend, account for 83% of the spend in these high-risk categories.
- Additionally, 22 suppliers in the food and beverage, facilities management, uniforms, and construction sectors have been identified. Despite lower spend, these sectors carry a high potential for modern slavery risks. Combined, these 122 suppliers represent 85% of our high-risk expenditure.
- These 122 suppliers have been incorporated into our Supplier Due Diligence Program.
- A database has been established containing contact details for Supplier Leads responsible for human rights or modern slavery initiatives. Compiling this database presented its own challenges and offered valuable insights into the suppliers' approaches to combating modern slavery, including the diverse structure of their teams, which range from globally-dispersed contacts to a collective of representatives from Risk, Legal, Compliance, Procurement, and Operations backgrounds.
- The database is essential for establishing direct communication with suppliers to advance our due diligence efforts.

SVHA Supply Chain Risk Evaluation



We are collaborating with the ACAN team and Catholic peers within ACAN's HSWG to address the findings from these social audits, assess the effectiveness of corrective actions, and further validate these outcomes through direct engagement via our Supplier Due Diligence Program.

Some other metrics include:

12

social audits completed

20

new SAQs completed.

6

corrective actions taken

15

new suppliers onboarded in Sedex, taking total count to **34**, which are spread across **82** sites and **nine** countries.

64

high-risk suppliers invited to join Sedex.

476

suppliers completed ACAN Risk Assessment Surveys.

Category Spotlight



Category: Construction

As a component of our Due Diligence Program, we collaborated with a supplier specialising in construction and property refurbishment. The supplier was open to partnering with St Vincent's to pinpoint and mitigate modern slavery risks within their operations and supply chain. Over a period of four months of sustained engagement and advisory efforts, the supplier achieved the following advancements:

- Enrolled in Sedex and filled out an SAQ tailored for St Vincent's.
- Identified visa-holding employees as a vulnerable group.
- Modified their internal safety management software to block deceptive recruitment practices, recruitment fees, or retention of personal documents such as passports by labour hire firms.
- Instituted mandatory employment contracts for all direct hires, encompassing part-time, full-time, and casual staff.
- Self-audited internal procedures to guarantee the payment of minimum wages for overtime and shift work.
- Is in the process of deploying the Red Cross Worker Rights Hub Tool to promote awareness during inductions and onboarding at each location.
- Revised tendering conditions for subcontractors to suggest pricing for Australian-made goods where feasible.
- Mandated that all contractors undergo modern slavery awareness training during induction.

We intend to continue this collaborative journey of risk assessment and mitigation during the next reporting cycle, as well as to validate these actions and their effectiveness.



Category: Contingent Labour

As part of the National Action Plan's Commonwealth Grant Award (Round 2 2023-2025), St Vincent's is undertaking a project aimed at migrant healthcare workers to identify gaps and provide training for their recruitment from labour hire agencies.

In this project, we are evaluating the current recruitment processes for migrant staff to identify areas for improvement.

- We have noted varying hiring procedures across hospitals, as well as among different job families, including nursing and non-nursing healthcare staff. We intend to use this data to gather feedback from hiring managers and labour hire agencies to illustrate the current end-to-end recruitment practices for migrant workers.
- The St Vincent's Group Procurement Team has completed a consolidation task, leading to a decrease in the number of recruitment and labour hire agencies actively involved with the organisation.
- In the coming year, we aim to develop training materials for labour hire agencies that will provide guidelines to ensure slavery-free practices, as well as for internal use by our workforce hiring managers.
- For this purpose, we are exploring the IRIS initiative by the United Nations Institute of Migration (IOM), which represents a best-practice model for the ethical recruitment of migrant workers, to determine its applicability in the healthcare sector.
- Additionally, we have begun drafting a Supplier Code of Conduct, which includes specific clauses that set the minimum standards for the recruitment of migrant staff

Category Spotlight (continued)



Category: Office Supplies & Stationery

In September 2023, St Vincent's changed its main office supplies provider. As part of this process, we are reviewing our catalogue of regularly bought items and services. This review is also an opportunity to transition from products sourced from high-risk countries in Southeast Asia to those produced locally, including goods made by First Nations' businesses. This aligns with the St Vincent's Reconciliation Action Plan and its commitment to Aboriginal and Torres Strait Island communities. It contributes to the greater good by fostering long-term economic success for these businesses, their owners, and communities, thereby positively impacting health outcomes.



Category: Cleaning

Risks linked to cleaning are distributed evenly across our supply chain and operations, with some facilities depending on external cleaning specialists and others using labour hire agencies to employ in-house staff under the St Vincent's payroll. To advance our due diligence in this area, we are collaborating with the ACAN team and the Cleaning Accountability Framework (CAF), a national body dedicated to enhancing labour practices in the cleaning sector.

We have identified St Vincent's facilities that are ideal for a pilot accreditation and aim to advance this within the next 12 months. This initiative will enable us to learn best-practice in human rights due diligence, including independent audits for our service contractors, and to extend these practices to other locations and indirect service categories such as laundry, catering, security, and construction.



Operations: Intersection with survivors of modern slavery

An additional component of the National Action Plan's Commonwealth Grant Award is the enhancement of front-line staff skills to improve screening processes for more effective identification of victim-survivors at healthcare facilities.

Over the next 18 months, our objectives include:

- Gathering feedback from staff and experts to perform a gap analysis;
- Developing tailored training materials;
- Supplying the necessary tools and resources for clinicians and social workers;

- Expanding the number of trained advocates; and
- Establishing a peer support network for staff who may be affected by the trauma of working with severely exploited victims.

We are collaborating with ACRATH (Australian Catholic Religious Against Trafficking in Humans) and the Office of NSW Anti-Slavery Commissioner for progressing these efforts.

Training and Raising Awareness

Training and raising awareness are used to educate our staff, other organisations and the broader community. Studies have shown that awareness, education, storytelling, and narratives are highly effective in addressing social issues, and that well-informed individuals are less likely to ignore these issues. Raising awareness can empower affected individuals to speak out. Consumers aware of the issues are also discouraged from purchasing products made with forced labour.

Recognising the need for raising awareness and our commitment to continuous improvement, St Vincent's identified that our staff required comprehensive training to understand how modern slavery occurs within the healthcare sector. To complement our online learning resources, our Modern Slavery Sub-Committee arranged a series of quarterly Modern Slavery Community of Practice sessions. These sessions provided targeted training and education from top experts and government agencies, including:

- A social worker specialising in human trafficking and slavery response, and gender-based violence, particularly forced marriage. Her session focused on identifying and responding to modern slavery (May 2023).
- A lived-experience Practice Lead at the Office of NSW Anti-slavery Commissioner. With her extensive background as a nurse and a survivor of modern slavery, she guided our clinicians in recognising red flags in a trauma-informed manner through case studies (August 2023).
- The Australian Federal Police (AFP) Human Trafficking Team presented the challenges of detecting human trafficking and modern slavery in the health sector (November 2023).

Each training session was attended by over 100 staff members, representing a diverse group of clinicians such as nurses, medical officers, social workers, psychologists, pastoral care workers, speech pathologists, pharmacists, dietitians, peer support workers, occupational therapists, physiotherapists, and administrators.

In May 2023, our enterprise-wide legal team, comprising legal counsel from our national office as well as our hospitals and health networks, Contract Managers, and Risk and Compliance Officers, participated in another training session. The focus was on discussing the potential indicators of modern slavery and related exploitation within our operations and supply chain. The session also addressed the essential reviews needed to ensure our organisational policies, processes, and contractual clauses remain current.



Supplier contracts and contract management platforms

As our understanding of modern slavery and the healthcare sector's unique needs deepen, we are consistently reviewing supplier contracts to strengthen sector-specific controls and ensure compliance. In this effort, we are expanding the use of the Open Windows, our platform for managing contracts with suppliers throughout our supply chain. This is enhancing our oversight of supplier contracts and enables St Vincent's to monitor contractual compliance with auditable trails, providing a centralised repository for all modern slavery-related documentation, reports, and annual statements.

Furthermore, we augment this with another supplier management platform, LinkSafe, that is used for tracking supplier accreditation and compliance. LinkSafe now includes the ACAN Modern Slavery Survey for new supplier onboarding, as well as the annual confirmation from existing suppliers, thereby embedding responsible supplier practices throughout the supplier lifecycle management process.

Our assessment has highlighted the necessity for a Supplier Code of Conduct, which will outline the minimum standards expected by St Vincent's from its suppliers and contractors to align with our stance on human rights. Additionally, we have begun the process of reviewing current contracts with labour hire agencies to establish a suitable commercial framework that ensures fair wages for workers. Both document templates are in the drafting stage, with completion expected in late 2024. We intend to share them with our supplier community by early 2025.

Grievance Mechanism

We urge our employees and partners to voice any concerns or conduct that may be troubling them. It demonstrates our commitment to maintaining a fair and respectful workplace environment for all individuals involved in our organisation. This includes any actions that may undermine our mission and values, or any fraudulent, corrupt, illegal, or unethical behaviour. We offer reliable avenues for those wishing to report such issues. Below are some of the formal and informal channels available:

- FairCall, the St Vincent's whistleblower hotline, is a secure, independently-monitored service dedicated to the anonymous reporting of any suspected theft, financial crime, fraud, or unethical conduct. This service is accessible to current or former employees of St Vincent's, as well as contractors, consultants, suppliers, service providers, and volunteers.
- Ethos is a structured St Vincent's program that empowers staff to speak up if they encounter an issue that undermines patient or staff safety. Ethos utilises graded assertiveness tools like CUSS (Curious, Unsure, Seriously Concerned, Stop) to provide a sequence of questions and statements to facilitate the raising of concerns.
- Have Your Say is the St Vincent's annual engagement survey. It gathers feedback from our staff to enhance our workplace and ensure we focus on what is important to our people.

Additionally, St Vincent's maintains a Grievance Resolution Policy, which we are reviewing to align with our Modern Slavery Policy and the in-draft Supplier Code of Conduct. Once completed, these documents will collectively outline the process for addressing and resolving grievances raised by employees, contractors, consultants, suppliers, service providers, and volunteers.

Remediation

St Vincent's is committed to actively remediating any modern slavery impacts on individuals that are caused by, contributed to, or directly linked to our operations and supply chains. We will engage in transparent, respectful, and collaborative remediation processes to address and rectify any harm done. We expect our suppliers to uphold the same commitment to human dignity and decent work and conditions, ensuring that they prevent harm and contribute to meaningful and effective remedies.

St Vincent's will maintain transparency in any efforts to provide for, or cooperate in, the remediation of modern slavery by including any specific actions and outcomes in our annual Modern Slavery Statement.

St Vincent's also has access to Domus 8.7 to assist with its modern slavery remediation and resolution.

Established as a not-for-profit with ACAN's support, Domus 8.7 offers remediation services and confidential advice to those impacted by modern slavery. It assists in triaging cases and directing victims to specialists, both internal and external, who can offer support, advice, and assistance concerning legal, social, and human rights matters related to modern slavery. Additionally, it works with international organisations to ensure the availability of supply chain remediation and preventive measures.

We have recognised the need to enhance awareness among our staff by providing a confidential and safe environment for them to express their concerns. To this end, we are revamping our communication strategy to introduce a variety of channels, including the use of organisational social media platforms, ensuring easy accessibility for all employees.

Key performance highlights in 2023



Introduced a **Continuous Learning Framework** throughout our enterprise-wide Modern Slavery function to stay open and receptive to embrace newer ways of addressing this global human rights problem.



Continued collaboration with ACAN to establish the **Health Sector Working Group (HSWG)** for unified supply chain investigation of suppliers shared with other Catholic healthcare entities.



Initiated a **Supplier Due Diligence Program** for Modern Slavery to engage with high-risk suppliers and enhance transparency in their supply and custody chains.



Incorporated **22 low-spend, high-risk suppliers** into the top-100 suppliers list of the Due Diligence Program, now accounting for **85% of the total high-risk expenditure**.



Conducted **targeted training sessions** for team members, presented by subject matter experts, with tailored content, enabling our staff to better recognise how indicators of modern slavery may arise in their daily roles.



Received a **Commonwealth Grant** under the **National Action Plan to Combat Modern Slavery 2020-2025 (Round 2)** to improve the screening of modern slavery survivors presenting to healthcare facilities, and the recruitment processes for migrant healthcare workers.



Signed a Memorandum of Understanding (MoU) with the **NSW Anti-slavery Commissioner** to aid our Commonwealth Grant-related work through the exchange of industry best-practice, knowledge and resources.

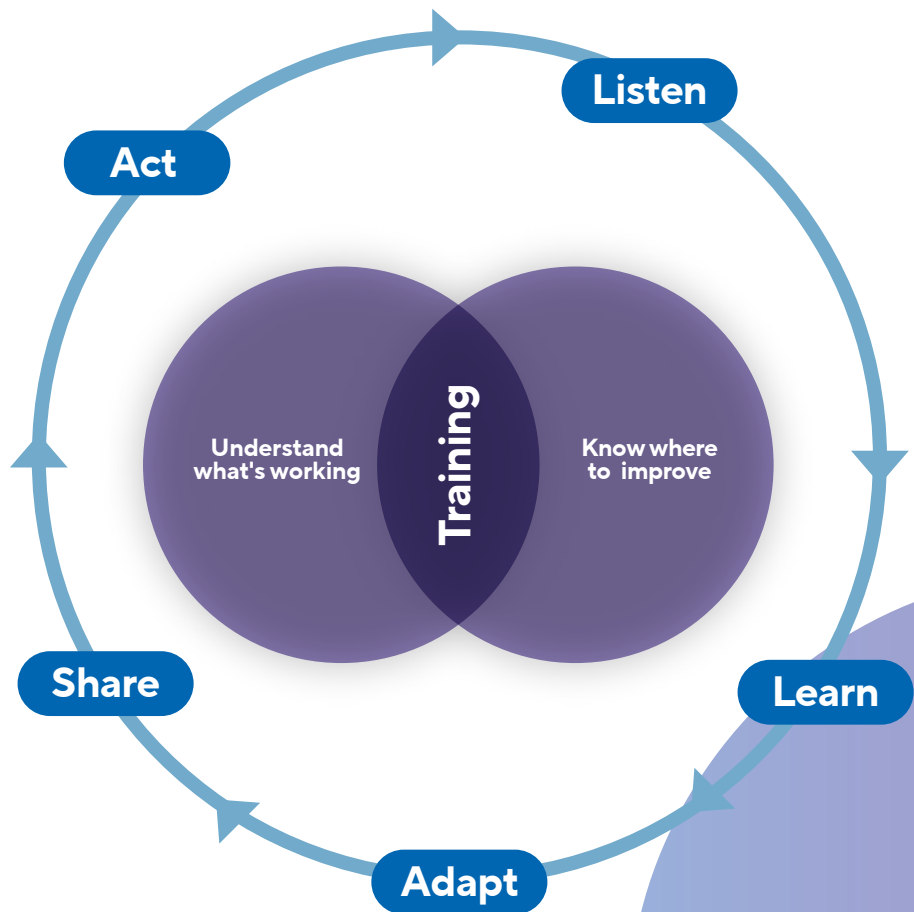


Partnered with ACRATH to build upon our work from 2019 for the screening of modern slavery survivors and the development of training resources.

Effectiveness Assessment

St Vincent's is committed to integrating our continuous learning framework into our current comprehension of the issues and challenges involved in tackling modern slavery within our operational ecosystem.

Utilising this, we have embraced the following framework to persistently identify gaps and pitfalls, as well as to discover innovative methods to enhance our response to these challenges.





In consultation with ACAN, St Vincent's has moved towards a more standardised and continuous process improvement to create a scorecard for evaluating the effectiveness of our actions. This includes the following four pillars:

Pillar 1 – Governance and Compliance

- Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- Considers the broader initiatives and engagements we undertake to address modern slavery.

Pillar 2 – Operations

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

Pillar 3 – Supply Chain

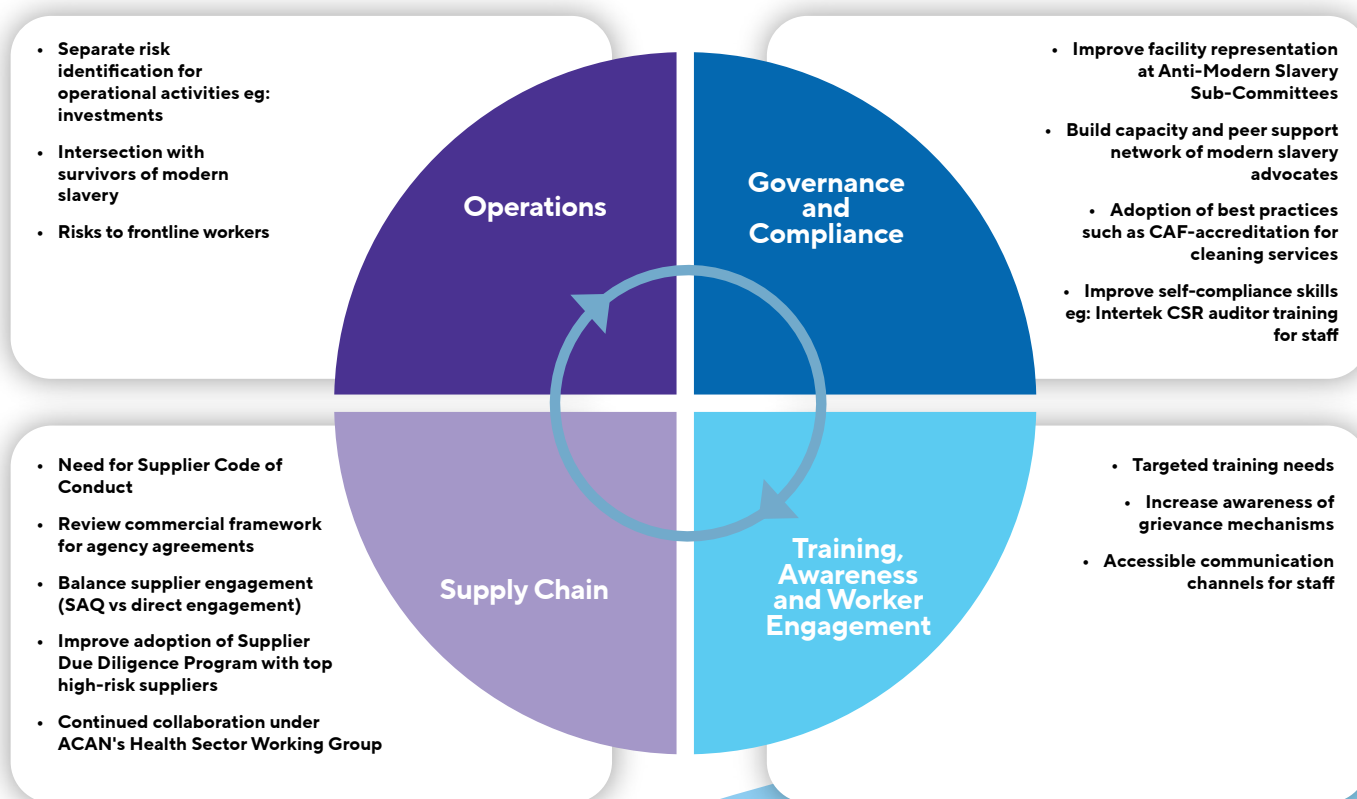
Examines our external partnerships and the mechanisms in place to assess and mitigate risks within supply chain.

Pillar 4 – Training, Awareness and Worker Engagement

- Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- Evaluates the channels available for grievance mechanisms, reporting concerns and the processes for addressing them.

We identify areas for improvement in the section below.

Outcome of effectiveness assessment – needs improvement



Process of consultation with entities owned or controlled

Consultation as between the parent company St Vincent's Health Australia Ltd and its subsidiaries and affiliates in the preparation of this statement has taken place via the Board and ELT (as described in Criterion 2), the Group Procurement team, as well as the Board's Mission Ethics and Advocacy Committee, the Audit and Risk Committee, and the Anti-Modern Slavery Working Groups which comprise staff representing different group entities, facilities and group functions.

Considering these structures, St Vincent's considers it is reasonable and appropriate for the parent company to provide this joint statement on behalf of all reporting entities in the group, including a consolidated description of their actions to address modern slavery risks.

Any other relevant information

Enforceable Undertaking

In December 2023 St Vincent's signed an Enforceable Undertaking (EU) with the Fair Work Ombudsman (FWO). The EU acknowledged that St Vincent's identified and self-reported the underpayment of entitlements to private hospital and aged care team members in NSW and Queensland as a result of incorrectly applying a provision in the relevant enterprise agreement. All employees received their back-pay in full in 2022.

Community Engagement

We have continued to engage with the community to raise awareness of collaborative opportunities within the healthcare sector to combat modern slavery, including:

- Presentation at the National Chartered Institute of Procurement and Supply (CIPS) Conference in May 2023. In partnership with the University of Sydney, St Vincent's Modern Slavery Liaison Officer (MSLO) discussed 'The Australian Healthcare Provider's Perspective on Modern Slavery' and shared insights based on a qualitative review of modern slavery statements from over 160 healthcare entities.
- In September 2023, St Vincent's Chair, Paul McClintock AO, delivered the keynote address at a Catholic Leaders Forum organised by the University of Notre Dame Australia. His speech emphasised the significance of compassionate leadership in fostering remedies and collaboration among Catholic peers to address this global issue.
- Participation in the Freedom Links Project in June-July 2023. St Vincent's Modern Slavery Advocates engaged in the Catholic Archdiocese of Sydney's Freedom Links Project, led by the ACAN team, to conduct an environmental scan focused on identifying and responding to individuals affected by modern slavery within Catholic healthcare services.
- St Vincent's Modern Slavery Advocates and MSLO attended the National Modern Slavery Conference in Melbourne in June 2023.
- St Vincent's provided an update on work related to its Commonwealth Grant project at the National Roundtable on Human Trafficking and Slavery organised by the Federal Attorney General's Department in December 2023.



Better and
fairer care.
Always.



ST VINCENT'S
Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES

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Entrusted to care

Modern Slavery
Statement 2023



ST JOHN OF GOD
Health Care



Contents

Disclosure note

This is a joint modern slavery statement made by St John of God Health Care Inc (ARBN 051 960 911) on behalf of itself and the entities it controls or owns including:

St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379);

St John of God Outreach Services (ACN 064 831 965);

St John of God Foundation Inc (ARBN 066 805 132);

St John of God Midland Health Campus Ltd (ACN 152 874 845);

Dencross Pty Ltd (ACN 086 647 298);

St John of God Berwick Health Campus Ltd (ACN 606 404 915); and

Marillac (ACN 050 463 717) (together, for the purposes of this statement "St John of God Health Care")

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Roadmap



Initial awareness and mobilisation

Engaged with Catholic peer and industry groups
 Undertook due diligence activities

2019

Approach

Conducted risk assessment and gap analysis
 Reviewed ACAN Modern Slavery 101 training program and approved for use with minor adaptations for St John of God Health Care
 Deployed training to steering committee
 Developed policies and processes
 Engaged with high priority Tier 1 suppliers
 Established a working group
 Launched awareness and communication campaign

2020

Extend and involve

Updated Agreement and RFX templates to include modern slavery clauses
 Added modern slavery clauses in new agreements (top tier supplier, ICT and PPE categories)
 Reviewed ACAN Modern Slavery 101 training program and added all available modules to SJGHC Learning and Development platform
 Reviewed and updated Business Maturity Assessment
 Reviewed approach/framework
 Reviewed Change Impact Assessment
 Added the Top 25 Suppliers to the SEDEX platform
 Reviewed policies and procedures
 Extended risk assessment beyond Tier 1 Suppliers
 Reviewed goals, targets and KPIs
 Partner with ACRATH to communicate the impact of Modern Slavery

2021

Effectiveness review and monitoring

Improved Agreement and RFX templates to include modern slavery clauses
 Added modern slavery clauses in new agreements (top tier supplier, ICT and personal protective equipment (PPE) categories)
 Reviewed all ACAN Modern Slavery training program modules and added all available modules to St John of God Health Care learning and development platform
 Reviewed and updated Business Maturity Assessment
 Review approach/framework
 Reviewed Change Impact Assessment
 Invited Top 50 Suppliers to the SEDEX platform
 Reviewed policies and procedures
 Extended taxonomy risk assessment to all suppliers active suppliers
 Reviewed goals, targets and KPIs
 Partnered with ACRATH, CNA, ACAN, Catholic Health and Catholic Missions to communicate the impact and collaborate of modern slavery risks in our supply chains

2022

Operationalisation - continue effectiveness review and monitoring

Enhanced campaign to improve communication and awareness

Refined our supplier engagement and communication approach

Continued to rollout modern slavery training to 89 caregivers at St John of God Health Care

Continued to add Modern Slavery Clauses in new agreements (Top Tier Supplier, across key categories)

Set the Modern Slavery 101 training as compulsory for key procurement and supply chain, facilities management and selected teams, via the learning management platform

Reviewed and updated Business Maturity Assessment

Reviewed approach and framework

Reviewed our modern slavery policies and procedures

Improved supplier engagement across high impact categories

Collaborated and leveraged the knowledge gained from engaging with Australian Catholic Anti-Slavery Network (ACAN), Catholic Negotiating Alliance (CAN) and our health care forum peers to improve visibility of supply chain risks



2023



Operationalisation - improve maturity and effectiveness

Enhanced campaign to improve communication and awareness

Continued to focus on improving maturity level across the following dimensions:

– Supply chain risk management practices

Engage the identified 427 suppliers to review, understand and formulate risk mitigation plans if required

– Worker voice around risk management

Communicate existing mechanisms to empower caregivers within the supply chain to speak up about issues related to modern slavery, labour exploitation, or human rights abuses

– Caregiver engagement effectiveness

Launch internal information campaign informing and equipping our workforce around the risk identification and management framework for modern slavery to empower participation in decision-making processes and workplace initiatives as well as foster meaningful contribution and impact

– Operations risk management practices

Initiate the reassessment of our strategies, processes and measures to assess, mitigate and monitor modern slavery risks

Equip our teams with reports and information to empower decision making and improvement activities

Continue with the existing activities to support maturity and effectiveness improvement

2024

About us



Established in 1895 in Western Australia by the Sisters of St John of God

>17,000

Employ more than 17,000 caregivers throughout Australia and New Zealand



27 facilities, comprising 3,360 hospital beds in Australia and New Zealand

St John of God Health Care is one of the largest Catholic providers of health care services in Australia.

Established in Western Australia in 1895, we are a not-for-profit private health care group and employ more than 17,000 caregivers across Australia and New Zealand.

We operate 27 facilities comprising 3,360 hospital beds in Australia and New Zealand, as well as home nursing, disability services and social outreach programs.

As a not for profit group, we return all surpluses to the communities we serve by updating and expanding our facilities and technology, developing new services, investing in people and providing our social outreach services to those experiencing disadvantage.

Vision

We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.

Mission

To continue the healing mission of Jesus.

Values

Our core Values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort to all.

Compassion

Feeling with others and striving to understand their lives, experiences, discomfort and suffering, with a willingness to reach out in solidarity.

Respect

Treasuring the unique dignity of every person and recognising the sacredness of all creation.

Justice

A balanced and fair relationship with self, neighbour, all of creation and with God.

Excellence

Striving for excellence in the care and services we provide.



Our initiatives in 2023

Partnership with other Catholic health care providers

We continued our partnership with the Australian Catholic Anti-Slavery Network (ACAN) to leverage their strength and expertise across Australia's largest network of Catholic hospitals and aged care service providers.

As part of our continued partnership with Australian Catholic Religious Against Trafficking in Humans (ACRATH), we participated in a series of Formation events to improve awareness of modern slavery.

We continued as a member of the Catholic Negotiating Alliance (CNA) Joint Procurement Network (JPN) to increase our collaborative engagement with suppliers.

Supplier surveys and risk management

As part of ACAN and CNA, we engaged our top 2,249 suppliers to understand their procurement and sourcing practices. This data informs risk assessment and vendor management.

We received comprehensive feedback from 427 providers through the engagement process with 37 providers joining the Supplier Ethical Data Exchange (Sedex) platform to collaborate on understanding modern slavery risks in the supply chain. There were three providers who elected not to join the platform.

In 2023, our suppliers undertook a total of five Sedex Members Ethical Trade Audit (SMETA), which identified one instance of non-conformance. The SMETA standard serves as a comprehensive framework for assessing a company's performance across key areas, including labour rights, health and safety, environmental practices, and business ethics.

Audits are an integral part of our supplier risk management program to monitor for and act on indicators of modern slavery. Audits provide an initial window into the real-world operations of suppliers, offering a preliminary but revealing view into their business practices. Audits can help us to understand how a supplier operates beyond what is promised or presented in formal documents and agreements by systematically evaluating and collecting evidence directly at the source. They also lay the groundwork for ongoing engagement and accountability.

Outcomes and findings related to non-compliances, worker interviews, document reviews, assessment of recruitment practices and subcontracting establish a baseline for measuring improvements and guiding future actions. Whilst we recognise the limitations of auditing, it can help to detect practices that may lead to or cover up labour abuse and modern slavery, serving as both a preventive measure and a means of discovery.

Contract management

We progressed with executing variations to contracts, including the new anti-slavery clauses for 91 suppliers. We continue to include the new anti-slavery provisions in new contracts through sourcing events and contract variations on existing contracts.

We continued to review our templates to ensure that the modern slavery provisions are up to date. We also continued to monitor the PPE and ICT category suppliers to ensure more detailed management of the supply chain risk.

In addition, we are varying the contract terms to include clauses addressing modern slavery risks across our top tier ICT with an annual spend of \$36 million and PPE with a yearly spend of \$5.9 million.

Risk assessment and framework

As in 2022, independent of ACAN, we reviewed our supply chain risks to use it as a basis for discussion with our vendors. As a result, we have put actions in place across the management cycle.

We conducted a reassessment of the work that was completed in 2022 to carry out a taxonomy risk assessment across 3,460 suppliers from our 2023 supplier spend portfolio.

Ethical sourcing guidelines

We extended the use of the ethical sourcing guideline to 44 blanket purchase order agreement suppliers during the reporting period for \$11 million of the no-payroll spend.

St John of God Health Care will be banning the use of a common anesthetic agent that has a significant impact on our environment. We are the first Australian private health care organisation to stop purchasing this product across its entire network, significantly reducing our carbon footprint as we progress with the activities included in our Environmental Sustainability Strategy.

Suppliers Code of Conduct

Our **Suppliers Code of Conduct**, provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

Modern slavery policy

The annual review of the **Modern Slavery Policy** was completed in February 2024. The key change was an update to job titles in alignment with the new organisational structure.

Education and training

We are extending the training to 89 key members in the procurement and supply chain, facilities management and other identified areas in St John of God Health Care. The eLearning modules were accessed resulting in 202 completions during the year. The five eLearning Modern Slavery modules continue to be available in our learning and development platform and compulsory training measures will be set for the aforementioned groups.

New members added to the working group undertook Modern Slavery 101, Business Readiness and Grievance Mechanisms and Remedy training, available on our learning and development platform.

During the year, 122 staff members from our invited suppliers participated in the capacity-building webinars hosted by ACAN.

Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board and Audit and Risk Committee to ensure scrutiny and oversight.

Communication

We continue to improve awareness as part of our Formation framework to help caregivers better understand modern slavery, the risks and flags they may encounter. Additionally, we clarify our organisational position, including St John of God Health Care's actions to reduce the risk of modern slavery within the procurement and supply chain environment.

We continue to leverage the International Day for the Abolition of Slavery to promote understanding and awareness of modern slavery internally through a range of mass communication via electronic channels.

Action plan

We have refined and extended our action plan, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance, and communication, which forms part of a broader five-year roadmap.

Our plans for 2024 and beyond

We plan to:

Enhance campaigns to increase communication and awareness.

Continue to focus on improving our maturity level across the following dimensions: supplier engagement, worker voice, operational processes, communication, and awareness.

Engage with the identified 427 suppliers to review, understand, and formulate risk mitigation plans if required.

Communicate the existing mechanisms to empower caregivers within the supply chain to speak up about issues related to modern slavery, labor exploitation, or human rights abuses.

Launch an internal information campaign to inform our workforce about the risk identification and management framework for modern slavery, empowering participation in decision-making processes, workplace initiatives, and fostering meaningful contribution and impact.

Initiate the reassessment of our strategies, processes, and measures in place to assess, mitigate, and monitor modern slavery risks.

Equip our teams with reports and information to empower decision-making and improvement activities.

Continue with the existing activities to support maturity and effectiveness improvement.

Review our general terms for the supply of goods and services to include clear terms on modern slavery expectations.

Partnership with other Catholic health care providers

We continued to be part of a number of workgroups in partnership with the ACAN and CNA Joint Procurement Network to engage with suppliers collaboratively to address supply chain risks.

ACAN Health Working Group – collaborative approach with our peer healthcare providers to engage our suppliers on modern slavery risk in the supply chain.

CNA Leadership Forum – discuss and collaborate with our catholic peer group on procurement and supply chain initiatives.

CNA ICT Working Group – discuss and collaborate on ICT specific procurement and supply chain initiatives

Risk assessment

Following the extension of our taxonomy risk assessment to include 4,093 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in the environment.

Education and training

We continue to review our training requirements and plan to develop job-specific training in the high risk areas for facilities managers,

supervisors and coordinators to extend the training beyond the current 89 caregivers.

We continue to roll out **Modern Slavery 101 Business Relevance, Implementing a Modern Slavery Risk Management Program, Grievance Mechanism and Remedy, and Modern Slavery Risk management for Suppliers** training through our learning and development platform for inclusion in mandatory training for key caregivers in the procurement and supply chain division during 2024.

Contract management

We will continue to complete and execute variations to contracts, to include the modern slavery provisions for our top tier supplier categories, as well as across the leading tier suppliers in the ICT and PPE categories.

We will continue to work with 427 suppliers who completed the risk assessment to ensure that the contracts are reviewed and amended to include the relevant modern slavery clauses.

Supplier compliance framework

We continue to review modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the

onboarding process. We have launched an initiative to store supplier certifications in a central repository in our enterprise resource planning system.

We will continue to develop and implement supplier compliance frameworks, such as screening, ongoing evaluation, and auditing, to improve supplier practices through collaboration, relationship management and training for suppliers.

Change management

We will continue to confirm changes to policy and procedures with all facilities managers and undertake other change management activities to embed anti-modern slavery practices and initiatives within our organisation.

Governance and reporting

In accordance with our commitment to combat modern slavery, we will continue to implement and update our governance and reporting mechanisms to monitor the effectiveness of our efforts.

We will continue to monitor our KPIs to measure our progress and report to the St John of God Health Care executive team and Board for their oversight.

Furthermore, we recognise the importance of transparency in our reporting and will strive to continually improve it. Our current reporting framework provides information on spend, risk, and contracts by supplier

and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks.

In line with our zero-tolerance stance on modern slavery, we will continue to actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Recruitment

In 2024, we remain focused on building and retaining an engaged workforce. We have kicked off the year with our first ever national television recruitment advertisement and we look forward to welcoming more caregivers from Australia and beyond who are committed to bringing hope and healing to all those who come to us for care.



Statement from St John of God Health Care Board Chair and Group CEO

In the tradition of the Sisters of St John of God our focus is on providing compassionate care and upholding the dignity of the human person.

We have zero tolerance for modern slavery and the exploitation of people in any form.

Modern slavery can be difficult to detect, particularly within supply chains. We recognise this and work closely with our suppliers and contractors to meet human rights obligations and promote fair, transparent practices towards combatting modern slavery.

St John of God Health Care has completed audits and risk assessments across a broad range of suppliers and negotiated anti-modern slavery terms in existing and new supply contracts. Our approach includes being clear that we have zero tolerance for modern slavery and applying principles of good corporate governance as well as nurturing an ethical and responsible organisational culture.

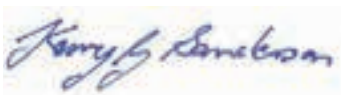
Our collaboration with other organisations, including the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA), and Catholic Network Alliance (CNA), has also helped improve our practices in identifying and mitigating modern slavery risks.

In line with our maturity roadmap, St John of God Health Care made progress in three key areas in 2023, namely across systems governance, policy and procedure, and supplier screening and traceability.

Eradicating modern slavery requires a collective effort, and we remain deeply committed to collaborating with government, and working with all our partners to address this issue.

We will continue to work to make progress in combatting modern slavery and uphold the dignity and rights of all individuals.

We are proud to present our third modern slavery statement, which has been reviewed and approved by the St John of God Health Care Board. We reaffirm our commitment to eradicating modern slavery in all its forms.

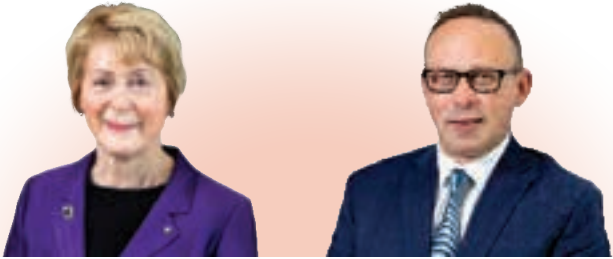


Hon Kerry Sanderson AC CVO



Bryan Pyne

This Modern Slavery Statement was approved by the principal governing body of St John of God Health Care Inc as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 31 May 2024. This Modern Slavery Statement is signed by a responsible member of St John of God Health Care Inc as defined by the Act.



Reporting Criteria 1 & 2: About St John of God Health Care

Governance and organisational structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry that was previously sponsored by the Sisters of St John of God.

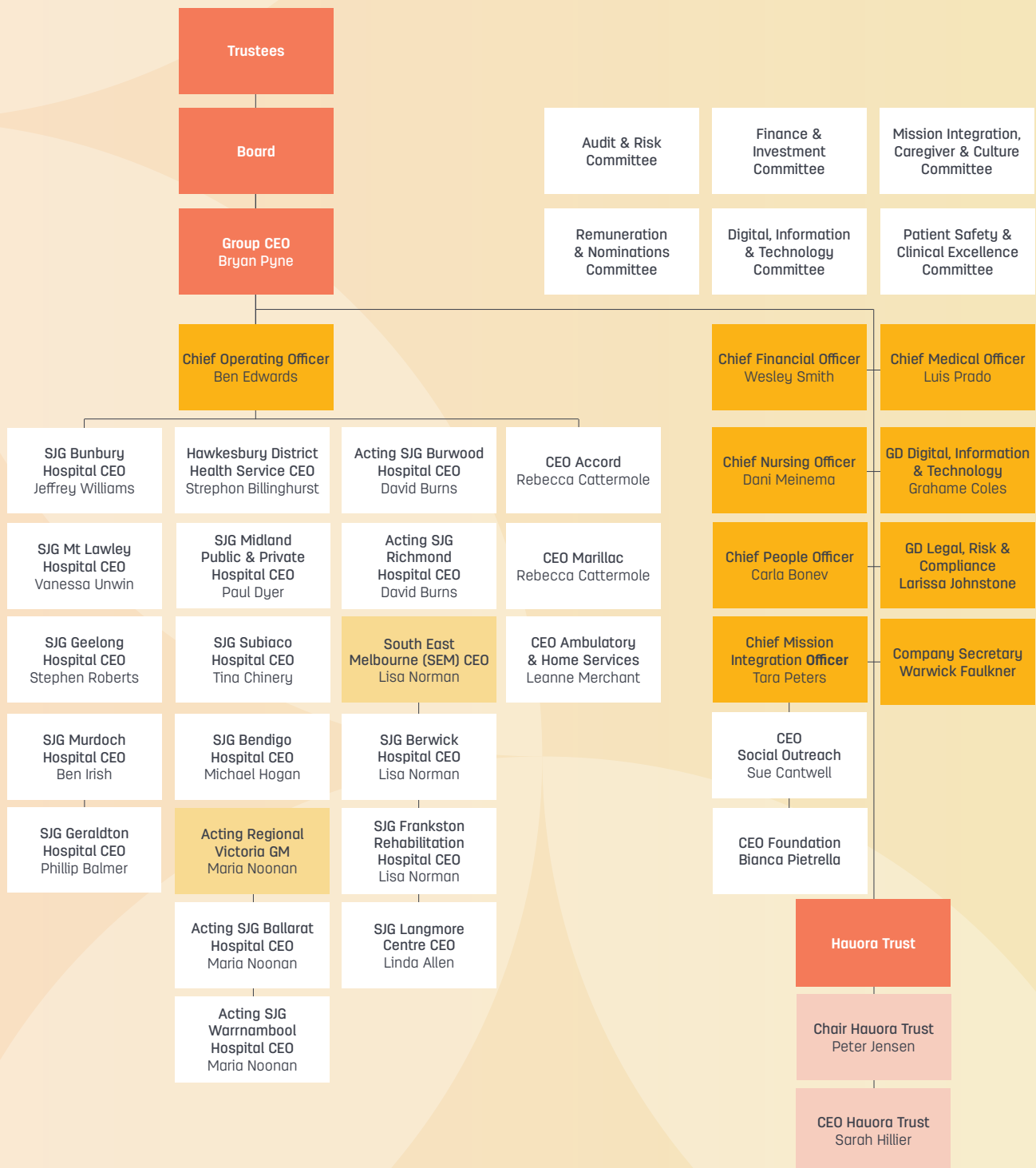
The Sisters are members of St John of God Australia Ltd and share sponsorship of the ministry with eight of the dioceses where the group operates.





St John of God Health Care Organisational structure

As at 31 December 2023



Our governance framework

Our governance structure is two-tiered, comprising Trustees and a Board.

The Trustees have canonical responsibility for St John of God Health Care. They appoint and evaluate the performance of Board members.

The Board is accountable for the organisation's ongoing stewardship and strategic development. The Board is assisted by the Board Committees in discharging its responsibilities.

St John of God Health Care applies principles of good corporate governance and good practice, based on recommendations by the Corporate Governance Council of the Australian Stock Exchange.

The roles and responsibilities of the Trustees, Board and management are set out in the St John of God Health Care Inc. constitution and delegated responsibility to management is outlined in a **Governance Authority Matrix** and a **Management Authority Matrix**.

The Audit and Risk Committee (ARC) has accountability for oversight of the management of modern slavery risks.

Our people

St John of God Health Care employs more than 17,000 people across Australia and New Zealand.

We are an inclusive organisation and recognise the contribution of all our people for their skill, expertise, experience and innovative thinking.

A snapshot of our workforce reveals that 50 per cent are professional nurses and midwives, and 80 per cent are female. Our workplace is where people can be themselves and feel they belong. Volunteers are an important part of our community, and in 2022-2023, 1,003 volunteers worked alongside

us to ensure patients and visitors were as comfortable as possible in our care.

The employment of people with disability and a heightened level of inclusion is a growing feature of the organisation's recruitment and selection process and a critical component of our **Disability Action and Inclusion Plan**.

Caregiver wellbeing and wellness is an important area of focus, particularly in light of the challenges of the past three years. In April 2023, after extensive consultation across the organisation, we released a refreshed OHS and Wellbeing Policy Statement. The new policy reflects our commitment to provide a safe and healthy working environment that is positive, productive and grounded in both ethical and legislative responsibilities. It recognises the importance of good mental health and wellbeing, leadership at all levels, a safe workplace culture, and engagement and collaboration with caregivers on health and safety matters impacting them.

Our operations

St John of God Health Care is a provider of high quality health care and community services.

Hospital operations and nursing

We are an experienced hospital operator with 11 private acute hospitals in Western Australia, Victoria and New South Wales. Most of our hospitals are acute and we are particularly well-known for our maternity, oncology and orthopedic services.

In addition to our acute hospitals, we have three specialist mental health hospitals, St John of God Richmond and Burwood Hospitals in New South Wales and St John of God Langmore Centre in Victoria, and a specialist rehabilitation hospital, St John of God Frankston Rehabilitation Hospital in south east Melbourne.

We operate two public hospitals under public private partnerships (PPPs), St John of God Midland Public Hospital in Western Australia and Hawkesbury District Health Service in New South Wales.

In total, we have 3,360 hospital beds.

In 2022-23 we treated more than 370,000 overnight and same day patients. More than 11,000 babies are born at our hospitals every year and are the biggest provider of private maternity services in Western Australia.

We operate a range of public and community health care contracts in all three states.

St John of God Social Outreach services

As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. These are delivered by St John of God Social Outreach for free or at low cost through an allocation of eligible revenue from hospitals across 53 locations in Australia.

Outreach services build capacity and support the physical, mental and emotional wellness of vulnerable and disadvantaged communities. Social Outreach supported 4,087 people, provided 48,487 nights of stable accommodation in 2022-2023.

The services build capacity and support the physical, mental and emotional wellness of people in vulnerable and disadvantaged communities in WA, Victoria, NSW and the Asia Pacific.

Services include:

- Community mental health counselling and support provided by St John of God Mental Wellbeing Services and Midland Head to Health
- Specialist mental health support for new parents via St John of God Raphael Services

- Support for people with drug and alcohol dependence, provided by the South West Community Alcohol and Drug Service and the Drug and Alcohol Withdrawal Network
- Accommodation services for young people and adults experiencing, or at risk of, homelessness, at St John of God Horizon House and Casa Venegas

St John of God Social Outreach's international health team also works with several governments and health care providers in the Asia Pacific region:

- Timor-Leste – the team supports the Timorese government and counterparts to develop the capability of the health care workforce
- Papua New Guinea – St John of God Social Outreach supports the Brothers of St John of God to operate the first drop-in centre in the nation for people experiencing mental health issues

St John of God Accord

For over 65 years, St John of God Accord has worked to make a difference in the lives of people with disability. They specialise in supporting people with intellectual disability, providing a range of services across all metropolitan regions of Melbourne.

- Support coordination
- Therapy services
- Individualised services
- School leaver employment supports
- Disability employment services
- Short-term accommodation
- Supported independent living
- Accord Plus (after hours)

They supported 1036 clients in 2022-2023 in 40 accommodation houses and 45 sites in Melbourne's northern, eastern, western, and southern suburbs.

St John of God Healthcare at Home

St John of God Healthcare at Home provides compassionate and timely health care from 10 service delivery centers to people in their own home following a hospital stay, so they can continue to receive expert assistance while benefitting from being in comfortable and familiar surroundings with those they love.

In 2022-23, we delivered more than 76,546 episodes of care.

Services are provided in metropolitan and regional WA and Victoria, and include:

- After-hospital clinical care at home
- Postnatal home assistance for families who have recently welcomed a new baby
- Rehabilitation in the home provided by therapists to enable patients to continue to build their strength and endurance after treatment or surgery in hospital

Disability services

We provide disability services across 43 sites in Victoria through St John of God Accord, and accommodation services through Marillac. We also provide disability services at a range of locations in New Zealand, through St John of God Hauora Trust.

St John of God Foundation

Our fundraising and philanthropic arm, called St John of God Foundation, exists to provide support for state-of-the-art advancements in medical technology and research carried out at our hospitals. From the profound personal impact of tailored treatment, to the far-reaching effects of leading medical research, St John of God Foundation is helping transform both individual patient experiences and community health outcomes across Australia.

Group services and corporate functions

Our corporate head office is split with most functions managed from our office on Wellington Street, Perth and a small number of functions managed from St Kilda Road, Melbourne.

Recruitment campaign

While there are still challenges in certain specialties, notably midwifery, theatre and anaesthetic nursing, St John of God Health Care has significantly reduced vacancy rates across all hospitals and services through a targeted, large scale national and international recruitment campaign. This included a highly targeted digital and public relations advertising campaign, and participation in 24 trade events and career expos targeting doctor, nursing, midwifery and allied health recruitment. In the last two years we expanded our domestic recruitment to target international recruits, and in 2022-23 we launched a large-scale campaign focusing on the UK and Ireland.

Our recruitment campaign has been very successful and 1,653 new doctors, nurses and midwives commenced in 2022-23. We supported 182 new clinical caregivers from overseas to relocate to Australia on sponsorship visas.

1,653

new doctors, nurses and midwives commenced in 2022-23.

182

new clinical caregivers from overseas supported to relocate to Australia on sponsorship visas.

Our supply chain

As a health care organisation, our direct supply chain consists primarily health care service provision to our patients and community we operate in.

What we buy:

prosthetics

medical and surgical supplies

facilities management

construction

clinical services

drugs and pharmaceutical products

recruitment and agency

ICT

professional services

logistics

clinical capital, repairs and maintenance

food and beverage

corporate services

utilities

finance

marketing and advertising

leasing and property expenses

consulting

property advisory

uniforms

conferences and training

advertising

equipment hire

fleet and vehicles

In 2020 we had 153 active contracts and \$760 million non-payroll procurement spend with our suppliers where annual spend is >\$50,000 across approximately 4,800 suppliers.

In 2021 we had 201 active contracts and \$808 million non-payroll procurement spend across approximately 4,300 suppliers. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 98 per cent of our total expenditure. 80 per cent of our procurement spend is with 179 suppliers.

In 2022 we had 284 active contracts and \$1,089 million non-payroll procurement spend across approximately 4,266 suppliers. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 97 per cent of our total expenditure. 80 per cent of our procurement spend is with 175 suppliers.

In 2023 we had 376 active contracts and \$949 million non-payroll procurement spend across approximately 4,093 suppliers. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 95 per cent of our total expenditure. 80 per cent of our procurement spend is with 190 suppliers.

Our supply chain: key statistics

\$949m

spend with suppliers

4,093

Appx. 4,093 suppliers

~379

active contracts

24

categories

Reporting Criteria 3: Modern slavery risks in our operations and supply chain

Operational risks

St John of God Health Care has been operating for more than 125 years and is an integral part of the communities we serve.

Our Mission, Vision and Values set the foundation for a reflective and ethical culture. Our service ethos and deep belief in the dignity of the human individual are fundamental to our operations and guide decision-making.

In addition to external audit, we have a well-resourced and effective internal audit function that operates and reports to the Audit and Risk Committee. The focus of Internal Audit is on the key risks faced by the organisation. This is supported by an Integrated Assurance function, which is focused on building the systems that provide confidence that St John of God Health Care can reliably, repeatedly and efficiently understand and communicate changes in high priority risks.

Ongoing assessment of the adequacy and effectiveness of risk management systems is undertaken by the Board through its committees and various internal, external and regulatory agency reviews including the internal audit program.

A dedicated risk and compliance team are responsible for establishing and monitoring the systems that enable the key risk and compliance artefacts articulated by the Board to be operationalised across the group.

Internal audits are undertaken in relation to specific areas of risk for the organisation. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

Areas of assurance are mapped against key risk areas as part of the annual internal audit planning process, ensuring targeted and effective reviews. Management responses to risk issues, and action plans to rectify identified or potential risks, are monitored to ensure effectiveness and appropriate implementation.

All employees are required to abide by our Code of Conduct, which supplements our Mission, Vision and Values. Our goal is to ensure we provide the highest standards of care and support to patients and clients within an environment that ensures the behaviours and actions of caregivers comply with all regulatory and legislative requirements and are honest and transparent.

In the wake of COVID-19, health care recruitment became more competitive than ever with many health care providers competing against each other to fill high workforce shortages. Grappling with these challenges, St John of God Health Care launched a national and international recruitment strategy to bring new and highly skilled caregivers to the organisation.

During 2022 and 2023, St John of God Health Care recruited more than 8,500 caregivers including 534 international recruits and reduced the vacancy rate from 10 per cent in December 2022 to three per cent by the end of the financial year.

In 2024, we remain focused on building and retaining an engaged workforce.

Supply chain risks

In 2023, we identified our highest risk suppliers according to the risk indicators below.



Industry sector

Specific industry sectors that are deemed as high risk in international and national guidance documenta-



Commodity/product

Specific products and commodities that are deemed as 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.



Geographic location

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters.



Workforce profile

In undertaking our supplier analysis we 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).

The total spend for the 3,460 suppliers for whom the taxonomy risk assessment was completed amounts to \$949 million.

Our focus for 2023 has been on the 2,249 suppliers who we invited to complete online supplier risk assessment questionnaire. We focus on two additional categories (PPE with spend of \$12 million and ICT with spend of \$32 million) to mitigate any risk with plans in place to extend our focus during the next 12 months.

Additionally using the taxonomy categories, we identified that the high risk spend is within six spend categories: prosthetics, medical and surgical supplies, facilities management, construction, clinical capital repairs and maintenance, and fleet and vehicles (61% per cent).

These six highest risk spend categories are made up of 1,899 suppliers out of 3,460 suppliers.

Suppliers classed according to risk with total spend

61%

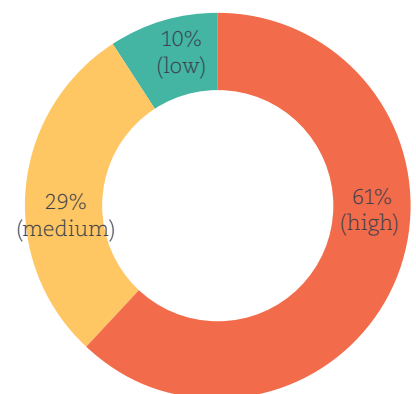
● (\$581 million, 1,899 suppliers) are in the high risk category

29%

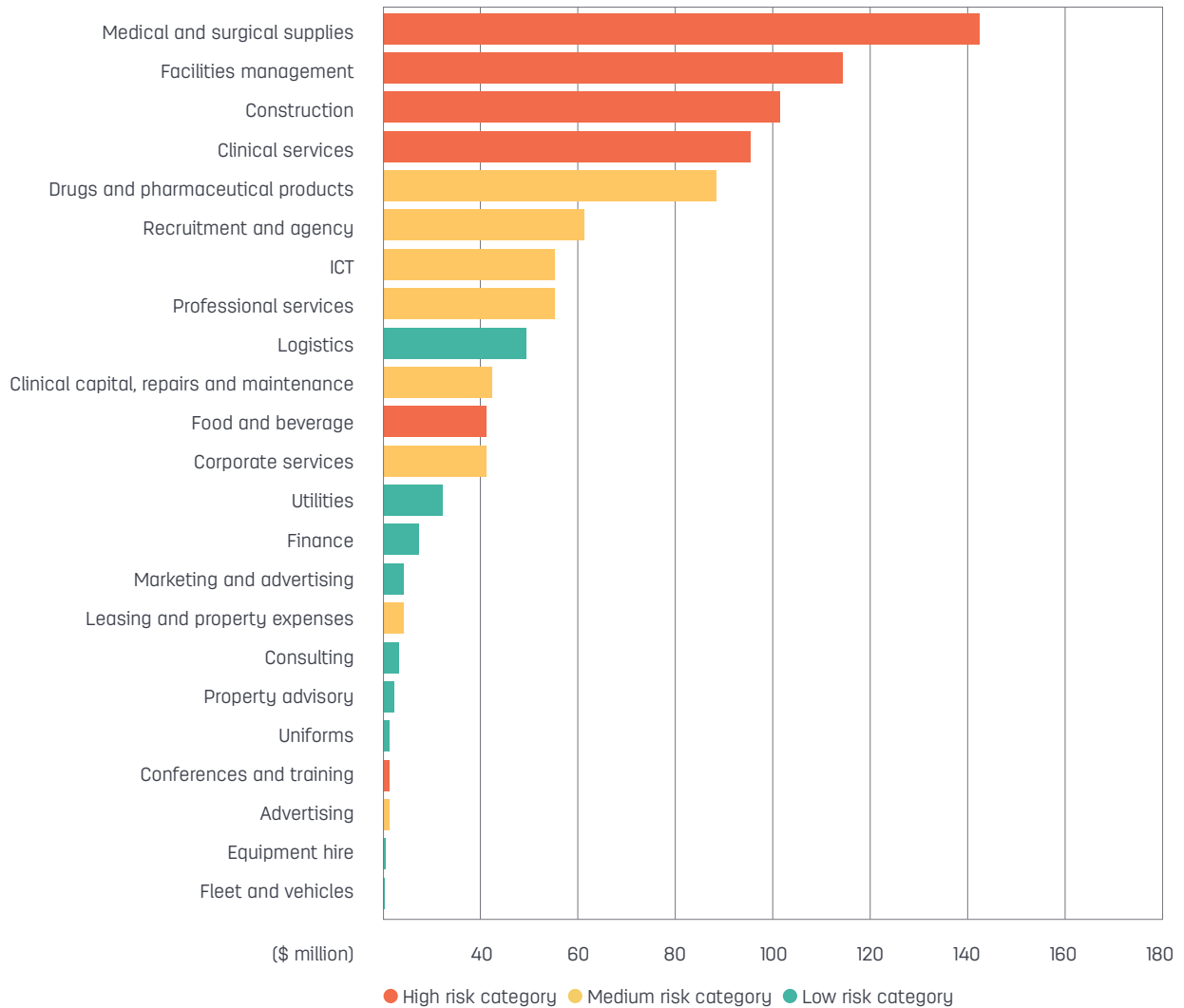
● (\$274 million, 992 suppliers) are in the medium risk category

10%

● (\$94 million, 569 suppliers) are in the low risk category



Modern slavery risk by spend category



Donations

St John of God Health Care and the St John of God Foundation receive donations from members of the community and undertakes fund raising through the Foundation.

We have a procedure in place governing the acceptance, recording and acknowledgement of gifts. This procedure outlines responsibilities in the instance where there is suspected unethical or socially irresponsible behaviour and specifically references modern slavery as an example of unacceptable behaviour.

We undertake due diligence on all gifts valued at \$10,000 or more.

Reporting Criteria 4: Actions taken to assess and address risk

St John of God Health Care assessed the risks of modern slavery in more detail during 2023 across our top 2,249 suppliers with 427 completing the online risk assessment questionnaires.

Modern slavery gap analysis

St John of God Health Care assessed the risks of modern slavery in more detail during 2023 across our top 2,249 suppliers with 427 completing the online risk assessment questionnaires.

We conducted a maturity/gap review during Dec 2023 to measure against our previous gap assessment on how we are tracking in our approach to the modern slavery risks.

The results showed a small improvement across three areas with no change across 19 areas across the key indicators of management systems, and procurement and supply chain.

St John of God Health Care has progressed slightly from last year's gap analysis and continue to drive initiatives across all the listed categories above.



Indicator/target	Progress by calendar year			
	2020	2021	2022	2023
Management systems				
Governance				
Commitment				
Business systems				
Action				
Monitor and report				
Risk management				
Risk management framework				
Operational risk				
Identifying external risk				
Monitoring and reporting risk				
Human resources and recruitment				
Awareness				
Policies and systems				
Training				
Labour hire/outsourcing				
Customers and stakeholders				
Customer attitude				
Information provision				
Feedback mechanisms				
Worker voice				
Procurement and supply chain				
Policy and procedures				
Contract management				
Screening and traceability				
Supplier engagement				
Monitoring and corrective action				

ACAN introduce new maturity score methodology

We retired the aforementioned gap analysis scoring methodology towards a focus on the maturity of our modern slavery risk management approach. As we present the fourth modern slavery statement for those involved with ACAN from the start, it's essential to recognise the need for a reset to aim for continuous improvement.

This transition underscores the importance of assessing our approach's maturity to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

- 1. Business process and governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- 2. Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.

- 3. Supply chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- 4. Worker engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- 5. Entity's program and activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- 6. Grievance mechanisms and remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, the maturity is measured cross governance, risk assessment, risk management, and effectiveness measures.

Modern slavery working group

We revisited the workgroup activities and membership of 11 representative across various functional area. We invited six new members to replace the outgoing members of the

workgroup and continued working as a cross-functional working group from procurement and supply chain, workforce, legal, international health, corporate affairs, compliance, policy and risk. We plan to meet every other month during the next period.

Partnered with other Catholic health care and education providers

We continued working with ACAN to leverage their strength and expertise across Australia's large network of Catholic hospitals and aged care service providers.

We continued to collaborate with the CNA Joint Procurement Network to engage with suppliers collaboratively.

We maintained our partnership with ACRATH via our Formation team across a range of events to promote awareness of modern slavery and specifically human trafficking.

We continued our partnership with Catholic Mission's during their Christmas Reflection to highlight what St John of God Health Care has done in the anti-slavery space to inform their community awareness programs.

The analysis by pillar for the corresponding 2023 gap assessment using the maturity scorecard are presented below:

Pillar	A	B	C	D	2023
	Governance	Risk Assessment	Risk Management	Effectiveness of Actions	Maturity Score
1. Business Process and Governance					
2. Operations					
3. Supply Chain					
4. Worker Engagement					
5. Entity's program and activities					
6. Grievance Mechanisms and Remediation					
Average					

International day for abolition of slavery

On the International Day for Abolition of Slavery, we shared our commitment that as a Catholic ministry, we at St John of God Health Care believe in personal freedom and the intrinsic and unique dignity of every person. We have zero tolerance for modern slavery and the exploitation of people in any form. We recognise that this can be insidious and difficult to detect, particularly within supply chain management, and we apply principles of good corporate governance and foster an ethical and responsible organisational culture to reduce the risk.

Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 2,249 suppliers to understand their procurement and sourcing practices. We received 427 comprehensive responses and continue to work with our remaining top suppliers to address modern slavery supply chain risks in more detail.

Risk assessment and framework

Following the extension of our risk assessment to include the 2,249 suppliers, we will continue to review and update the analysis as we improve our understanding of the supply chain risk in their environment while focusing on the 427 suppliers who provided detailed feedback.

We revisited the work done identifying and conducting a taxonomy risk assessment of our 3,460 suppliers. We continue to invite our leading tier suppliers to join the Sedex platform to work together to understand modern slavery risk in the supply chain. 37 of our top suppliers have joined the platform to date with three suppliers preferring to engage with St John of God Health Care from outside the platform.

Ethical sourcing guidelines

We extended the use of the ethical sourcing guideline to 44 blanket purchase order agreement suppliers during the reporting period for \$11 million of the no-payroll spend.

We will be banning the use of a common anesthetic agent that has a significant impact on our environment. We are the first Australian private health care group to stop purchasing this product across its entire network, significantly reducing our carbon footprint as we progress with the activities included in our Environmental Sustainability Strategy.

Supplier code of conduct

We reviewed the **Suppliers Code of Conduct**, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing on an annual basis. The supplier code of conduct is available on internal and external platforms for visibility and as information on how to engage with St John of God Health Care.

Modern slavery policy

The **Modern Slavery Policy** annual review was completed in February 2024. Updates were identified and added to the policy during the review period.

Education and training

We extended the training to 89 key members in the procurement and supply chain, facilities management and other identified areas in St John of God Health Care. The eLearning modules was accessed resulting in 202 completions during the year. The five eLearning Modern Slavery modules continue to be available in our learning and development platform and compulsory training measures will be set for the aforementioned groups.

New members added to the

working group undertook Modern Slavery 101, Business Readiness and Grievance Mechanisms and Remedy training, available on our learning and development platform.

Capacity building

ACAN hosted regular webinars to facilitate supplier engagement across a variety of industry sectors. During the webinars ACAN shared information on the mission and vision of catholic entities, identifying risks to people in supply chain operations, increase awareness of relevant modern slavery legislation and informed the suppliers about catholic customer/buyer expectations. 122 staff members from our invited suppliers participated in the capacity-building webinars hosted by ACAN.

Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board Audit and Risk Committee to ensure scrutiny and oversight.

Our current reporting framework provides information on spend, risk, and contracts by supplier and category. We will work towards enhancing this framework to ensure that it remains relevant and effective in identifying and addressing modern slavery risks. We also highlight specific risks once we become aware or identify the risk to our supply chain.

In line with our zero-tolerance stance on modern slavery, we will actively monitor our grievance and whistleblowing platforms to address any concerns raised by internal or external parties. By doing so, we aim to provide a safe and confidential platform for individuals to voice their concerns and help us maintain the highest standards of ethical conduct across our operations.

Vendor onboarding

We reassessed the processes and documentation for onboarding new vendors and modern slavery is explicitly stated as a focus. Vendor onboarding links directly to the **St John of God Health Care Suppliers Code of Conduct**.

We have included modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the onboarding process. We plan to refine the storing of certifications and relevant information while we transition to a new enterprise resource planning system.

Modern slavery action plan and roadmap

Action plan

We have a five year roadmap with an action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance and communication.

Year 1/2019	Year 2/2020	Year 3/2021	Year 4/2022	Year 5/2023	Year 6/2024
Awareness and Mobilisation	Approach	Extend and Involve	Effectiveness Review and Monitoring	Effectiveness Review and Monitoring	Maturity and Effectiveness Improvement
Establish working group	Conducted risk assessment and gap analysis	Reviewed approach/framework	Communication and awareness campaign	Improved communication and awareness campaign	Improve communication and awareness campaign activities
Review and understand obligations under the Act	Performed a change impact assessment	Extended risk assessment beyond Tier 1 suppliers	Improved supplier engagement and communication	Improved supplier engagement and communication	Improve supplier engagement and communication by involving more members across the organisation
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required	Reviewed goals, targets and KPI's	Extended Sedex adoption across all tier 1 suppliers	Continued to extend Sedex adoption across all tier 1 suppliers	Continue to extend Sedex adoption across all suppliers who indicate that they may be willing to join the platform
Undertook due diligence activities	Established regular reporting	Completed all top 50 suppliers' contract variations	Rollout Modern Slavery Training to a broader group of caregivers	Continued to rollout Modern Slavery Training to a broader group of caregivers	Continue to rollout Modern Slavery Training to a broader group of caregivers beyond the identified caregivers
Engaged Board and Audit and Risk Committee	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress	Revisit assessment and show maturity improvement	Revisit assessment and show maturity improvement	Review the new matrix model and align assessments and actions to show maturity improvement
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact	Operationalise Supplier Risk Assessment	Continued to operationalise Supplier Risk Assessment beyond the Procurement and Supply Chain team	Continue to operationalise Supplier Risk Assessment beyond the procurement and supply chain team by involving more teams

Year 1/2019	Year 2/2020	Year 3/2021	Year 4/2022	Year 5/2023	Year 6/2024
Awareness and Mobilisation	Approach	Extend and Involve	Effectiveness Review and Monitoring	Effectiveness Review and Monitoring	Maturity and Effectiveness Improvement
Identified top tier suppliers	Developed and deployed initial training for working group	Extended the inclusion of the modern slavery clauses to next 50 suppliers	Progressed the embedding of supplier engagement on modern slavery practices and supply chain risk in annual/quarterly contract review meetings	Continued to embed supplier engagement on modern slavery practices and supply chain risk in annual/quarterly contract review meetings	Continue to embed supplier engagement on modern slavery practices and supply chain risk in annual/quarterly contract review meetings by conducting information and follow-up sessions
	Launched awareness and communication campaign	Initiated the implementation of Modern Slavery training for key caregivers in St John of God Health Care learning and development curriculum		Actively engaged with CNA through various established forums to engage suppliers jointly to manage modern slavery risk across supply chains	Actively engage with CNA through various established forums to engage suppliers jointly to manage modern slavery risk across supply chains
	Changed the vendor onboarding process and documentation	Updated Agreement and RFX templates to include Modern Slavery clauses		Continued to engage with ACAN and other Catholic peers to identify, understand and refine our modern slavery risk management practices	Continue to engage with ACAN and other Catholic peers to identify, understand and refine our modern slavery risk management practices and review the submissions received from the suppliers
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses	Revisited Change Impact Assessment		Refined the Modern Slavery reports on the analytics portal and provide access to the reports for the executive and operations teams where appropriate	Refine the Modern Slavery reports on the analytics portal and provide access to the reports for the executive and operations teams where appropriate
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	Added top 25 suppliers to Sedex platform		Initiated a Modern Slavery KPI Dashboard to measure and monitor supply chain risk, supplier engagement and performance across our supply chain	Establish a Modern Slavery KPI Dashboard to measure and monitor supply chain risk, supplier engagement and performance across our supply chain
	Reviewed and updated the Supplier Code of Conduct and published on St John of God Health Care website	Reviewed modern slavery policies and procedures			Review the supplier risk assessment to determine next actions to verify the risk, if any
	Prepared first Modern Slavery Statement	Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across SJGHC			

Reporting Criteria 5: Effectiveness assessment

Our modern slavery governance and risk management action plan is reviewed on a regular basis as part of our audit and risk management review process.

Our Audit and Risk Committee meets on a regular basis to review potential risks in our organisation and provide guidance and propose mitigation actions.

Assessing the effectiveness of our actions is an important actions to manage and mitigate modern slavery risks in our operations and supply chain. We plan to develop specific measures during the next period to ensure that we track progress and identify any potential risk proactively.





For this reporting period we have assessed the effectiveness of our actions against the following key process indicators:

Indicator/target	Achieved
Reassessed the business maturity across the main modern slavery criteria, – adopting the new proposed maturity scoring methodology from ACAN	Yes
Extended the Supplier Risk Assessment across the 2023 spend range of supplier and categories	Yes
Progressed with the inclusion of the modern slavery terms across Top Tier, PPE and ICT Suppliers	Yes
Continue partnership with ACRATH to communicate the impact of modern slavery to improve awareness across St John of God Health Care	Yes
Continued partnership with ACAN and CNA partners for a further term	Yes
Reviewed and updated modern slavery policies and procedures	Yes
Added/on-boarded top 37 Suppliers to the Sedex platform	Yes
Extended partnerships with University of Notre Dame, Catholic Mission and Health on key initiatives	Yes
Detail risk assessment across 2,249 key suppliers with 427 returning completed questionnaires	Yes
Improved spend and taxonomy category spend visibility	Yes
Maintained and communicated awareness on modern slavery principles and key events during the period	Yes
122 supplier staff members attended capacity building webinars	Yes
14 Sedex SAQ completed	Yes
5 Social Audit completed with one corrective actions taken	Yes
202 eLearning modules completed by caregivers	Yes
Invite six new members to join the modern slavery working group to replace those whose tenure has come to an end	Yes

Reporting Criteria 6: Process of consultation with owned or controlled entities

The controlled entities are listed in the disclosure statement at the front of this document. They all operate under the direction and governance of St John of God Health Care Inc and share the same executive management.

St John of God Health Care places great emphasis on consultation with its owned or controlled entities to ensure effective communication and collaboration. This process involves regular meetings where stakeholders from these entities are invited to provide input, share concerns, and discuss potential strategies. Through these consultations, St John of God Health Care aims to foster a sense of partnership, ensuring that decisions made are well-informed and reflective of the collective goals and priorities of all involved parties. Open communication and transparency are key principles guiding this process, allowing for a cohesive approach to decision-making and ultimately enhancing the quality of care and services provided by St John of God Health Care and its affiliated entities.








ST JOHN OF GOD
Health Care



Modern Slavery Statement 2023



This Modern Slavery Statement was approved by the Board of Mater Misericordiae Ltd as defined by the Modern Slavery Act 2018 (Cth) (the Act) on Friday 17 May 2024.



Patrick Brady

Chair, Mater Misericordiae Ltd. Board of Directors

Disclosure Note

This statement has been made on behalf of Mater Misericordiae Ltd. ACN – 096708922 ABN – 83096708922. This Statement covers all entities owned or controlled by Mater Misericordiae Ltd. This Statement has been developed in accordance with the Modern Slavery Act 2018 (Cth). All patient and spend statistics referred to within this report are based on our 2022/2023 Financial Year. However, in order to align our Modern Slavery Statement to other Australian Catholic Anti-Slavery Network (ACAN) members, our modern slavery risk mitigation strategies are reported for the calendar year 1 January 2023 to 31 December 2023.

ABNs

MML (ABN) – 83096708922

Mater Education Ltd – 50148130349

Mater Research Ltd – 28109834719

Mater Foundation Ltd – 96723184640

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Statement from our Chair

With modern slavery impacting millions of people around the world, Mater is committed to ensuring that its processes for the supply of goods and services align with its vision to honour and promote the dignity of human life.

As part of the Catholic healthcare sector, Mater strives to make a positive difference beyond compliance, and works closely with the Australian Catholic Anti-Slavery Network to address widening inequality around the world.

This is Mater's fourth Modern Slavery Statement and reports on the period from January to December 2023.

With the latest Global Estimates of Modern Slavery revealing an increase from 10 million people in 2016 to 50 million in 2022, it is important that Mater continues to work closely with its suppliers and contractors to ensure our standards and values are upheld.

We remain resolute in our commitment to drive greater awareness of our policies and corporate objectives, and expect our people, suppliers, contractors and service partners to share our values and principles.

Patrick Brady
Mater Chair

About us

Mater is Queensland's largest Catholic not-for-profit network of hospitals and healthcare services, bringing together collective expertise across health, education and research with a shared vision to live better lives through improved health and wellbeing.

Mater is committed to a culture of compassion and care inspired by God's mission of mercy to help those in need. In the spirit of Catherine McAuley and her legacy, which has been carried forward by the Sisters of Mercy, we embrace opportunities to provide healing and hope to the communities we serve.

In delivering the healing ministry of Jesus, Mater not only responds to, but actively seeks to support individuals and families disadvantaged by health or social circumstances.



Our Mission, Values and Strategic Vision



Our Mission

We serve together to bring God's mercy to our communities through compassionate, transforming, healing ministries.

Our Values

We honour and promote the dignity of human life and of all creation.
We act with compassion and integrity.
We strive for excellence.

Our Strategic Vision

Empowering people to live better lives through improved health and wellbeing.

Modern slavery risk management initiatives

Mater strives to embed ethical and sustainable practices into every aspect of our business.

Mater's Board and Executive remain committed to complying with the Australian Modern Slavery Act 2018, and to undertaking the roles, responsibilities and accountabilities outlined in the legislation. This statement, pursuant to the Act, sets out the actions taken by Mater to address modern slavery in our operations and supply chain from 1 January 2023 to 31 December 2023.

The practice of healthcare is inextricably linked with the philosophical belief that every human life is valuable and should be respected as such. This belief is enshrined in our Mission and Values, which promote the dignity of human life and all creation. This concept of dignity and respect is also embedded into our policies and procedures, and extends to all our stakeholders, both internal and external.

In 2023 Mater continued the program of work to mitigate the risk of modern slavery in our operations and supply chain which are outlined in the reporting criteria 1 – 5 within this statement. Mater is committed to responsibly assessing modern slavery risks within our operations and supply chain and will formalise the management of these risks by implementing a Modern Slavery Risk Management Framework in 2024 to appropriately identify, manage and mitigate modern slavery risks and harms.

Reporting criteria 1 and 2

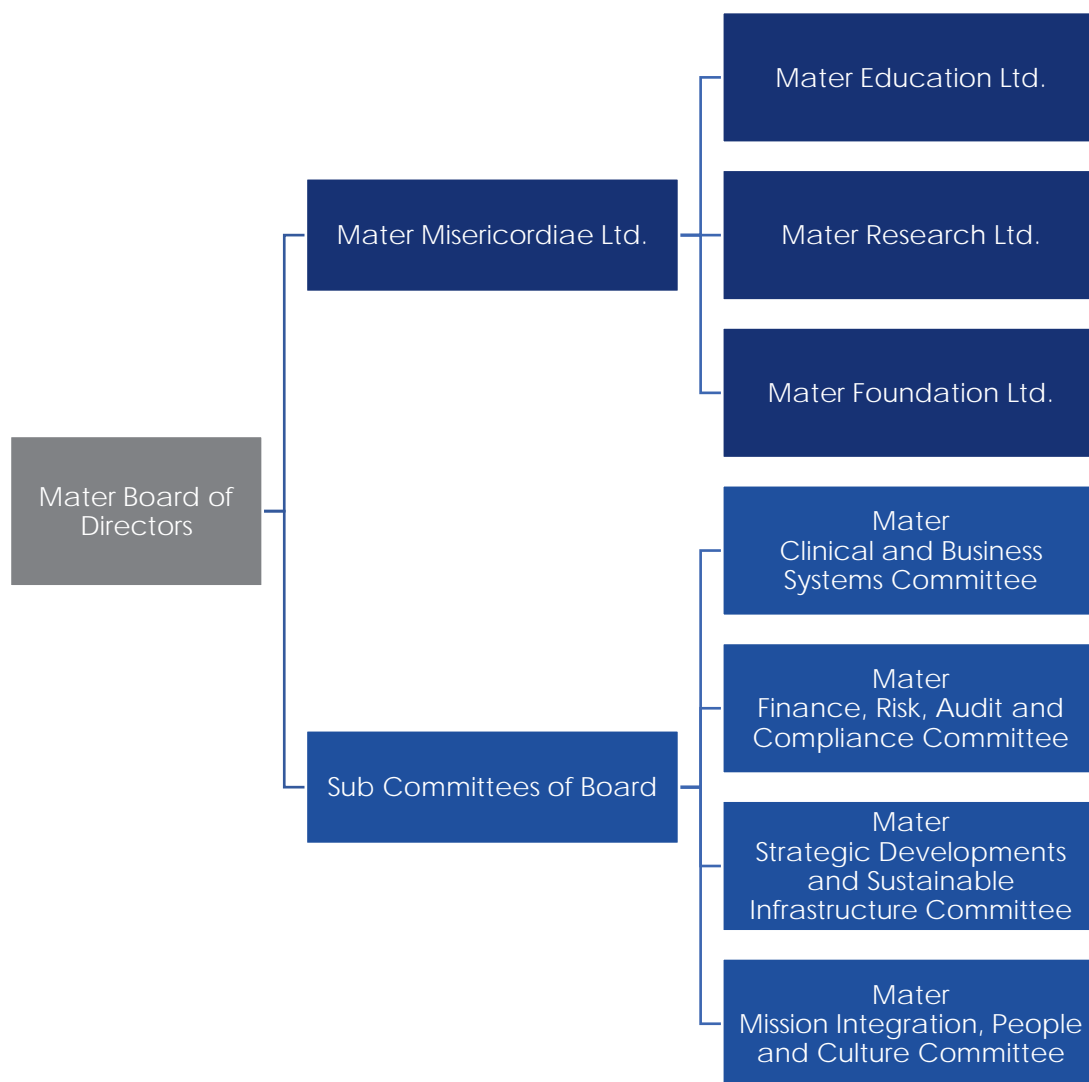
About Mater

Our organisational structure

Mater's organisational structure reflects our commitment to the strategic and consistent integration of health, education and research.

In July 2020, a single Board of Governance was established to unify all Mater hospitals and healthcare services across Queensland to further our vision—empowering people to live better lives through improved health and wellbeing.

Our Head Office is located at 14 Stratton Street, Newstead, Queensland (mater.org.au).



Our operations

Mater is an extensive network of public and private hospitals, healthcare at home services, community services, health centres and related businesses, as well as a nationally accredited education provider, a world-class medical research institute and a philanthropic foundation.



Mater Health

Mater Health comprises 11 hospitals across Queensland, as well as a range of healthcare services. These services combine to help Mater offer comprehensive healthcare that addresses unmet community needs.



Mater Education

Mater Education is a nationally-accredited, hospital-based independent Registered Training Organisation—the only one of its kind in Queensland. It offers a range of courses for students and further education opportunities for highly experienced practicing clinicians.

By combining our collective expertise and resources across health, education and research, we are able to deliver new services in new ways and continue to fulfil our Mission to meet the healthcare needs of our community by delivering safe, high-quality, compassionate care.

Mater's Board and Group Chief Executive have governance over Mater Health, Mater Education, Mater Research and Mater Foundation in addition to corporate services.

Mater Research

Mater Research is an internationally recognised leader in medical research, connecting its findings from bench to bedside and translating medical research into clinical practice to deliver better outcomes for our patients and the wider community.



Mater Foundation

Mater Foundation raises funds by engaging community to partner with Mater to improve the health of Queenslanders through fundraising and philanthropic opportunities.

Operations during 2023



Figure 1: Mater locations across Queensland



636,188

Patients seen



11,713

Babies born



105,216

Emergency attendances



10,360

Mater People



60,000+

Volunteer hours



2,039

Mater Education students



\$33.1 million

Mater Research funding



\$30.9 million

Mater Foundation distributions

Figures sourced from Mater's 2022/23 Annual Review.

Our supply chain

Mater's procurement and supply chain activities are delivered through a centre-led operating model in partnership with our divisions. We seek to undertake business with suppliers and contractors who share Mater's Values and are environmentally and socially responsible.

Mater's procurement policies and procedures provide the governance and guidance for procurement activities to ensure due diligence checks are performed with social and environmental requirements included within tender documentation.

The procurement activity is predominantly undertaken by the clinical, non-clinical (such as waste, uniforms, electricity etc) and digital delivery teams. Additionally, a number of other areas across Mater undertake local procurement activities, including Development and Property, which is responsible for major and minor construction works, asset management and property maintenance, and Mater Foundation, which purchases equipment and hosts a range of activities in its work with donors.

Mater sources its supply through different approaches depending on the risk, complexity and value with different forms of contracts used. Mater's tender documentation requires suppliers to adhere to its contract terms and conditions, which reference environmental and modern slavery clauses and the Supplier Code of Conduct.

The below information provides a snapshot of Mater's business and procurement activities.



4,300

Suppliers engaged in
FY22/23



\$645 million

Total addressable
spend in FY22/23



37

Suppliers engaged
through CNA*
contractual
engagements



\$1.5 billion

Annual consolidated
entity revenue

**Mater is a member of the Catholic Negotiating Alliance (CNA), a network of Catholic health care facilities authorised by the Australian Competition and Consumer Commission with suppliers*

Mater procures goods and services from both domestic and international supply chains with a procurement spend of approximately \$645 million across three procurement categories and 13 broad procurement sub-categories.

Category spend FY 2022/23

Our largest supply categories include business services, medical and surgical consumables, pharmacy, prosthetics and medical equipment, equalling 68.62 per cent of the spend.

The clinical category accounts for 37.36 per cent of spend, which includes four sub-categories (medical and surgical consumables, pharmacy, prosthetics and medical equipment), with a further breakdown of the products or goods purchased under each of these key sub-categories shown below.

What we buy – clinical

Clinical / Direct			
Medical and surgical consumables	Pharmacy	Prosthesis	Medical equipment
<ul style="list-style-type: none"> ▪ Anaesthesia consumables ▪ Cardiovascular consumables ▪ Custom sterile ▪ Dental consumables ▪ Dialysis consumables ▪ Hygiene care and products ▪ IV and arterial administration ▪ Medical aids consumables ▪ Medical consumables ▪ Medical operator protection ▪ Medical research ▪ Needles and syringes ▪ Nutrition and feeding ▪ Orthopaedic consumables ▪ Pathology consumables ▪ Miscellaneous consumables ▪ Examination/monitoring ▪ Radiology and x-ray ▪ Respiratory consumables ▪ Resuscitation consumables ▪ Surgical consumables ▪ Sutures ▪ Wound care ▪ Burrs and blades ▪ Sterile instruments 	<ul style="list-style-type: none"> ▪ Pharmaceuticals and drugs ▪ Cytotoxic pharmaceuticals ▪ Pharmacy consumables 	<ul style="list-style-type: none"> ▪ Prosthetics - Cardiovascular ▪ Prosthetics - Craniofacial ▪ Prosthetics - ENT ▪ Prosthetics - General ▪ Prosthetics - Gynaecology ▪ Prosthetics - Maxillary-Facial ▪ Prosthetics - Neurosurgery ▪ Prosthetics - Ophthalmic ▪ Prosthetics - Orthopaedic ▪ Prosthetics - Orthotics ▪ Prosthetics - Plastics ▪ Prosthetics - Spinal ▪ Prosthetics - Urology ▪ Prosthetics - Vascular ▪ Prosthetics - Gastroenterology ▪ Loan kit service fees 	<ul style="list-style-type: none"> ▪ Medical bed and mattresses ▪ Diagnostic equipment ▪ Radiology and x-ray equipment ▪ Infant and maternity care ▪ Infusion pumps ▪ Monitors and monitoring systems ▪ Patient and shower trolleys ▪ Dental equipment ▪ Pathology equipment ▪ Resuscitation equipment ▪ Respiratory equipment ▪ Other medical equipment

The remaining 31.38 per cent includes non-clinical categories including facilities management, business services, utilities, hospitality and medical equipment and repairs.

An overview of the products and services procured is listed over the page.

What we buy – non-clinical

Indirect				
Facilities management	Business services	Utilities	Hospital	Medical Equipment and Repairs/Mtce
<ul style="list-style-type: none"> ▪ Furniture, fixtures and equipment ▪ Equipment hire (non-clinical) ▪ Facilities supplies ▪ Health and safety ▪ Pest control ▪ Airconditioning and heating ▪ Equipment ▪ Signage ▪ Waste management ▪ Hardware supplies ▪ Painting supplies ▪ Plumbing supplies ▪ Electrical supplies ▪ Fire safety supplies ▪ Landscaping supplies ▪ Locksmith services ▪ Cleaning and domestic services ▪ Pest control services ▪ Electrical services ▪ Plumbing services ▪ Carpentry services ▪ Flooring services ▪ Security services ▪ Painting services ▪ Window and door services ▪ Automatic door services ▪ Landscape and ground services ▪ Fire services ▪ Lift services ▪ Swimming pool maintenance ▪ Locksmith services ▪ Water treatment services ▪ Facilities/buildings and other engineering services 	<ul style="list-style-type: none"> ▪ Administration expenses ▪ Advertising and promotions ▪ Audit fees ▪ Business expenses ▪ Fleet ▪ Freight and courier ▪ Insurance ▪ Interpreter services ▪ External legal services ▪ Newspapers and journals ▪ Subscriptions and memberships ▪ Office equipment ▪ Stationery supplies ▪ Patient ambulance transport ▪ Printing ▪ Recruitment ▪ Temp labour including admin, nursing, medical, IT and other. ▪ Consultants (excluding Engineers, Architects, IT, etc.) ▪ Training and education ▪ Travel and accommodation ▪ Uniforms ▪ Printing services ▪ Postage ▪ Taxi/ride share. ▪ Salary packaging ▪ Document management and storage ▪ Allied Health ▪ HR services (Police checks) 	<ul style="list-style-type: none"> ▪ Electricity ▪ Coal ▪ Gas – clinical ▪ Gas – nonclinical 	<ul style="list-style-type: none"> ▪ Beverages ▪ Catering Services and supplies ▪ Food ▪ Food service and consumables ▪ Housekeeping ▪ Consumables ▪ Linen ▪ Laundry services ▪ Chemicals ▪ Supplements 	<ul style="list-style-type: none"> ▪ R&M Medical equipment ▪ R&M Radiology ▪ R&M Pathology ▪ Equipment lease and rental ▪ M&S lease and hire equipment.

Supplier Code of Conduct

Mater is committed to the responsible engagement of suppliers. This includes requiring all suppliers to comply with Mater's Supplier Code of Conduct.

In 2022, Mater strengthened the Supplier Code of Conduct (Code) and referenced this Code as a clause within its legal contract suite to reinforce Mater's commitment to upholding its Values. We expect our suppliers to apply this Code throughout their own supply chain. Mater's Supplier Code of Conduct is also published on our internet site and new suppliers are selected according to their compliance with Mater's standards and their ability to provide and maintain high-quality products and services. We expect our suppliers and their supply chains to share our Values and adhere to the same principles. These include:

Complying with international human rights laws and behaviours set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Managing all operations and supply chains to assess the risk of modern slavery practices and implement mitigation strategies to reduce this risk.

Ensuring compliance with relevant laws regarding forced or involuntary labour, child labour, discrimination, and security practices. This includes freedom of employees to leave their workplace after their shift ends or to resign giving reasonable notice.

Allowing freedom of association and collective bargaining for workers to join or form trade unions of their own choosing and to bargain collectively.



Reporting criteria 3

Modern slavery risks in operations and supply chain

Mater is committed to ensuring our procurement practices are transparent, fair and responsible, upholding high standards of integrity and honesty that align with our Values. We also recognise that instances of modern slavery are often complex and hidden.

Operational risks

The impact of COVID-19 created significant supply chain challenges and disruption with increased pricing and transport costs placing pressure on suppliers and contractors to provide sufficient continuity of supply of goods and services. Pricing and transport costs have continued to remain high. Mater is responding to these challenges by purchasing consumables, where possible, through known, long-term suppliers with a public, zero-tolerance position toward modern slavery.

Our people

With more than 10,360 employees and a further 600 volunteers across the state, Mater has policies and procedures in place which contribute to fostering a safe and fair work environment for all. To support the workforce, Mater engages agency medical or nursing resources under contract agreements with obligations to ensure environmental and modern slavery risks are mitigated.

Demonstrating a strong commitment to combating modern slavery, Mater continues to monitor and report on training and awareness. During the year, 89 personnel completed training bringing the total number of those trained to 469, including all Board and Executive members.

Further efforts to raise awareness and educate staff were undertaken by the Chief of Mission, introducing a segment on modern slavery into the Welcome Day induction agenda for new starters. Welcoming 1,082 new starters in 2023, each were encouraged to complete modern slavery training.

Supply chain risks

We understand that our suppliers could be directly linked to modern slavery practices through their own supply chain.

Mater has taken steps to gain a better understanding of potential modern slavery risks with its procurement spend mapped using a category risk taxonomy specifically developed for members of the Australian Catholic Anti-Slavery Network (ACAN) to assist in identifying supplier risk prioritisation and engagement activities. Mater has categorised the types of goods and services generating a risk dashboard.

The category risk taxonomy considers the following criteria:

Commodity/product

Specific products and commodities deemed as high-risk which align with 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.

Workforce profile

The type of labour involved in the production of our goods and services, particularly where low- skilled, vulnerable, or migrant labour was used, or where the work was deemed as '3D' (dirty, dull or dangerous).

Industry sector

Specific industry sectors deemed as high-risk in international and national guidance documentation.

Geographic location

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 Global Slavery Index.

While Mater predominantly uses Australian-based suppliers, we recognise that our goods and services may come from countries other than those where suppliers' headquarters are based.

Based on Mater's analysis of its procurement categories, \$374 million of procurement spend has been identified as potentially high-risk with \$28 million shown as medium risk and \$218 million as low-risk.

In June 2023 an ACAN Aged Care and Health Working Group was formed with the first inaugural meeting held at Mater. The establishment of this group enables members to collaboratively share information and undertake supplier risk assessments.

Modern slavery risk mitigation progress

As a member of ACAN, Mater continuously strives to improve its approach to modern slavery. In 2023, the fourth annual risk mitigation review was completed, reviewing existing processes and practices, identifying areas for further action (Table 1 over page).

This analysis highlights Mater's commitment to mitigating modern slavery risks at all levels of the organisation, with a particular focus on:

Identifying external risks: Mater has developed a supplier classification system to categorise suppliers based on their potential modern slavery risk (high, medium, low). High and medium-risk suppliers will undergo a comprehensive risk assessment within the next three years.

Monitoring and corrective actions in procurement and supply chains: Mater actively monitors its supply chain by conducting desktop reviews and convening meetings with suppliers, aiming to identify and address potential modern slavery risks within their operations and supply chains.

In 2024 ACAN will introduce a new, detailed risk mitigation review process which will delve deeper into five key risk categories, ensuring more comprehensive identification and mitigation of modern slavery risks across Mater's operations.

Categories of risk

External risks	Review and map risks and vulnerabilities of high-risk suppliers and their extended supply chains, in conjunction with the ACAN Aged Care and Health Working Group and CNA hospitals.
Awareness	Increase awareness and education-based communications to all Mater People in conjunction with Mater's Corporate Affairs team.
Training	In conjunction with Mater's Human Resources team, continue to seek ways to increase training activities both internally and externally.
Supplier engagement	Continue to engage with suppliers and encourage them to complete training and educational webinars to increase their knowledge and understanding of modern slavery risks.
Monitoring and corrective actions	Implement strategies for supporting the risk assessment and documentation relating to supplier engagement, in conjunction with ACAN.

Table 1: Modern slavery risk mitigation progress

Category	Topic	2020	2021	2022	2023
Management systems	Governance	●	●	●	●
	Commitment	●	●	●	●
	Business system	●	●	●	●
	Action	◐	●	●	●
	Monitor/report	◐	●	●	●
Risk management	Risk framework	◐	●	●	●
	Operational risk	●	●	●	●
	Identifying external risks	○	○	◐	◐
	Monitoring and reporting risk	◐	●	●	●
Human resources and recruitment	Awareness	○	◐	●	●
	Policies and systems	◐	●	●	●
	Training	○	◐	●	●
	Labour hire/outsourcing	◐	●	●	●
Customers and stakeholders	Customer attitude	◐	●	●	●
	Information provision	◐	●	●	●
	Feedback mechanisms	◐	●	●	●
	Worker voice	◐	●	●	●
Procurement and supply chain	Policies and procedures	◐	●	●	●
	Contract management	◐	●	●	●
	Screening and traceability	◐	●	●	●
	Supplier engagement	○	◐	●	●
	Monitoring and corrective action	○	◐	◐	◐

Legend ○ not started ◐ in progress ● completed/on track

Reporting criteria 4

Actions taken to assess and address risk

Mater's approach to assessing and addressing risk has included the following:

- Modern slavery training and awareness promoted to Mater People and new starters with regular progress reporting to Executive and Board members.
- All of Mater's suppliers invited to attend training and educational webinars.
- Governance structures implemented which include a cross functional Anti-Slavery Working Group reporting to Mater Executive and the Board.
- Modern slavery included as a risk within Mater's Risk Management System with reporting provided to Executive and Board members.
- Policies and procedures in place to support a fair and safe working environment for our staff and suppliers, including a Whistle-Blower Policy.
- Procurement policies and procedures updated to include environmental and sustainability requirements.
- Tender, contract documents and Supplier Code of Conduct updated to include modern slavery requirements/clauses.
- Modern Slavery Taxonomy applied to Mater's suppliers to identify high, medium, and low risk suppliers.
- Engagement with suppliers to assess modern slavery risks.
- In conjunction with ACAN, Mater conducted a wide-ranging review of its psychology and social work frameworks, policies, procedures and processes for identifying modern slavery risks.
- Development of a supplier site on Mater's website to provide further information to suppliers, including the Modern Slavery Statement and reference to training and education resources.

Modern slavery action plan and road map

Mater has undertaken a number of activities over the past 12 months to progress mitigation of modern slavery risks.

Actions undertaken include but are not limited to:

- A supplier page on Mater's internet site launched in April 2023. The site provides suppliers with access to Mater's Modern Slavery Statement, links to training and development, Code of Conduct and other information for our suppliers.
- Mater's Procurement intranet site updated with the latest Modern Slavery Statement to ensure easy access for staff to remain updated.
- During 2023, Mater encouraged all suppliers to complete a modern slavery survey and encouraged membership of SEDEX - a global online IT platform for environmental and modern slavery support, assistance and information sharing with Mater and other ACAN entities. Additionally, Mater invited its suppliers to attend webinars to further understand modern slavery legislation and gain a better understanding of modern slavery risks.
- 285 suppliers completed a modern slavery survey which was assessed in conjunction with ACAN.
- 88 suppliers attended an ACAN webinar in 2023.
- All Board and Executive members, Mater's senior managers, procurement and purchasing staff and the Anti-Slavery Working Group completed modern slavery training.
- A total of 89 personnel completed training in 2023 with a total of 469 personnel having completed training since 2022. A total of 1,082 who commenced work with Mater in 2023 were made aware of the modern slavery training modules at their Welcome Day induction and encouraged to undertake this training.
- Continued engagement with Mater People on the progress of activities as stated in Mater's Modern Slavery Statement 2022.
- Progressed actions on remediation and counselling with the social work and psychology team. See over page for a case study, titled "Remediation and Counselling - Sharing our journey to identify modern slavery victims".
- The ACAN Aged Care and Health Working Group performed supplier risk assessments with approximately 50 suppliers to gain an understanding of their operational and or supply chain risks. This body of work will be finalised in 2024 by the group.

Case Study

Remediation and counselling

Sharing our journey to identify modern slavery in clinical health settings

Mater strives to promote the goals of the Modern Slavery Act 2018, moving beyond operations, procurement and supply chain, into clinical settings. In 2023 key Mater social workers and psychologists engaged with ACAN to explore how modern slavery presents in the clinical setting. In particular, the correlation between domestic and family violence (DFV) presentations and those of modern slavery.

This analysis occurred through Mater's specialist project, Addressing Domestic Abuse (ADA), having identified it as a possible vehicle to advance the goals of modern slavery health screening. With guidance from ACAN, Mater explored how it could contribute to enhanced health assessment and targeted responses to this vulnerable population, through both fresh initiatives and existing frameworks.

Collaboration highlighted that without a validated, accessible screening tool to systematically screen for indicators, those with modern slavery experiences were at risk of remaining unrecognised.

Mater social work and psychology professionals devised a model to counter modern slavery in clinical settings by implementing an advanced seven-step framework (MS7). Designed as an innovative and robust modern slavery response model, MS7 comprised:

1. Awareness raising
2. Education and training
3. Policy and procedures
4. Stakeholder engagement
5. Screening
6. Intervention
7. Research and evaluation

While the MS7 model continues to be refined and funding sourced, it represents a vision where Mater targets Modern Slavery exploitation both operationally and clinically.

MS7 would build upon the established domestic and family violence screening and response framework, further drawing upon Mater's extensive expertise across health, research and education.

Mater has special capacity to screen for modern slavery indicators in four concentrated health arenas: women and newborns, regional reach, child protection and refugee health.

Mater is Australia's largest single site provider of healthcare services for women and newborns. Recording 11,713 births in 2023, Mater's health network is positioned to screen for forced marriage and forced surrogacy. 75 per cent of victim-survivors referred to the Support for Trafficked People Program (STPP) by the Australian Federal Police (AFP) in 2019 were women and children, with forced marriage the most prevalent modern slavery referral category in Australia.

With facilities across Queensland, Mater has the geographical reach pertinent to scanning for practices that can occur via the Pacific Australia Labor Mobility (PALM) scheme in remote pockets of Queensland.

Illustrating Mater's capacity to engage with 'hard to reach' Culturally and Linguistically Diverse (CALD) and vulnerable populations, Mater recently celebrated 21 years of delivering free, quality healthcare to people from refugee and asylum-seeking backgrounds, including those without access to Medicare, at the Mater Refugee Complex Care Clinic (MRCCC).

MRCCC is the longest continuing clinic of its kind in Australia and provided 1,701 clinical appointments in 2023. Mater Refugee Health Services also operate a dedicated refugee maternity model of care and 'Refugee Health Connect', a service that partners with CALD, refugee, and settlement agencies. If funded, MS7 will be shaped by such expertise in its design and implementation.

Mater has an internal Child Protection Unit (CPU) staffed by clinicians who are cognisant of screening for child exploitation. This unit operates in adherence with Australian and Queensland child protection legislation and ensures mandatory training for clinicians and reporting compliance. Mater's CPU received 1,410 referrals in 2023.

In 2023, Mater's public emergency departments processed 105,216 presentations of crisis, illness and injury throughout Queensland. Although victim-survivors of modern slavery are often hidden and isolated, emergency departments are recognised as establishments where they periodically present. Further, Mater has capacity to screen for modern slavery outside its hospital walls with many services involving home visitation. In 2023, Mater at Home conducted 28,535 consultations at private residences across the community.

MS7 would enable health consumer scanning of physical, sexual or psychosocial injuries resulting from forced labour or domestic servitude, as well sex or organ trafficking. The tool would incorporate the AFP's contemporary list of modern slavery victim-survivor indicators including:

- Threats of violence, including to victim survivors loved ones.
- Deception.
- Coercion.
- Concealment.
- Sexual injury or disease.
- Untreated or delayed injury care.
- Mental illness.
- Language barriers.
- Poverty.
- Secretive organ transplant arrangements.
- No access to earnings, movements controlled, lacking passport, visa or travel documentation.
- No home key or knowledge of address.
- Not permitted to communicate directly with health professionals.
- No contact with family, neglected, malnourished or drug effected appearance.
- No days off to attend medical appointments.
- Overcrowding, residential mobility, and transiency.

Through establishing and implementing MS7, a modern slavery clinical screening framework, Mater would draw on its internal expertise, leverage stakeholder relationships and build upon its DFV foundations to systemically strengthen its commitment, ensuring continuity of protection from the storeroom through to the consult room.

Reporting criteria 5

Effectiveness assessment

Mater understands the importance of assessing the effectiveness of the actions we are taking to address modern slavery risks.

We have implemented a program review and evaluation process as part of our reporting requirements which is reviewed on a regular basis in collaboration with the cross functional Anti-Slavery Working Group and reported to the Procurement and Supply Chain Steering Committee, Executive and Board on a quarterly basis. As part of reporting, the risk mitigation process review will continue to be a point of focus to ensure all categories and topics continue to be reviewed, monitored, and actioned in the year ahead.

Mater has worked closely and collaboratively with ACAN who remain supportive of Mater's activities and progress.

Reporting criteria 6

Process of consultation with entities owned or controlled

The Mater Board also governs the wholly owned subsidiaries, Mater Education Ltd, Mater Research Ltd and Mater Foundation Ltd, with representatives within these subsidiaries committed to mitigating modern slavery risks as members of the cross-functional Anti-Slavery Working Group.

Raising awareness of efforts to combat modern slavery, a copy of Mater's Modern Slavery Statement is shared with the Archbishop of Brisbane and Bishops from Rockhampton (includes Mackay and Bundaberg) and Townsville to inform Mater's anti-slavery actions.

Reporting criteria 7

Other

Mater is committed to internationally recognised human rights frameworks, standards and goals, including:

- International Bill of Human Rights.
- International Labour Organisation (ILO) Declaration Fundamental Principles and Rights at Work.
- UN Guiding Principles on Business and Human Rights.
- Sustainable Development Goals – including Target 8.7 to eradicate modern slavery.

Plans for 2024

Mater's Anti-Slavery Working Group invited a representative from ACAN in March 2024 to join a planning workshop mapping out a three-year program of work. Yet to be finalised, the program will be submitted to Mater Executive and the Board for approval. One of the actions to be undertaken in 2024 includes the development and implementation of a formal Modern Slavery Risk Management Framework.

Other actions to be continued in 2024 include:

- **Strengthening modern slavery training:** This includes incorporating training into existing processes, expanding its reach, and ensuring it becomes a well-established practice. Regular reporting on training completion will also be implemented.
- **Collaboration with ACAN Health and Aged Care Working Group:** Mater will continue to work with the ACAN Health and Aged Care Working Group on actions related to supplier assessment for modern slavery risks.
- **Monitoring MS7 development:** Mater will keep track of the progress being made on the development of the MS7 Modern Slavery Clinical Screening Framework (MS7).

2025 and beyond

- **Build on three-year program:** Continue to implement and develop the actions identified in the three-year anti-slavery program.
- **Enhance modern slavery resources:** Maintain and improve the information available on Mater's internal and public websites providing easy access to resources about modern slavery.
- **Ongoing training and awareness efforts:** Continue to provide training and raise awareness about modern slavery, both internally and externally, increasing the scope and reach of initiatives.



Patrick Brady

Chair, Mater Misericordiae Ltd. Board of Directors



Mercy Health

Care first

MODERN SLAVERY STATEMENT

2023







Title: *wabung-ngetel*

Call of Country
Gunnai Language

Artist

Dixon Patten
Bayila Creative
Gunnai and Yorta Yorta

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ABOUT MERCY HEALTH

Mercy Health is a Catholic not-for-profit organisation that provides a range of health, aged and community care services to communities in Victoria, the Australian Capital Territory, New South Wales, Western Australia and Queensland. We care for people throughout life from conception to death. We are focused on the whole person: their health, their wellbeing and their capacity and freedom to thrive.

Mercy Health operates at all times as part of the mission of the Catholic Church. In the tradition of the

first Sisters of Mercy and based on the vision of their founder, Catherine McAuley, we are an organisation dedicated to action. We are impelled by the principles of equity and social justice that were evident in that founding vision.

Central to our mission is providing care for those in need, irrespective of religion, faith, beliefs or background.

WELCOME FROM THE MERCY HEALTH CHAIR

In 1827, Catherine McAuley opened the first House of Mercy in Baggot Street, Dublin. It was the beginning of what Pope Francis would refer to in his February 2024 *Message for the Tenth World Day of Prayer and Awareness Against Human Trafficking* as a journey of dignity. The House of Mercy welcomed the poorest of the poor – women and children – offering shelter and education.

This complex journey continues to be characterised, as identified by Pope Francis, by listening, dreaming and acting. Listening to the needs of those who have no voice, dreaming of a better future for all and doing something about it.

Pope Francis has called modern slavery ‘a crime against humanity’ and has continued to encourage us to be unwavering in our commitment on this journey of dignity. In this he invites us to dream a world that is shaped by the wisdom of Catholic social teaching that has at its heart the absolute belief in the dignity of all.

We hear the cries of those who do not experience freedom, those for whom life is burdened by unjust work practices, exploitation and slavery like conditions. We dream of a better life for all as we contribute to the work eradicating of slavery.

We hear the call of the Pope who reminds us of the interconnectedness of all who share our common home. We hold close our responsibility to care for the earth and for each other.

Over the past year we have strengthened our policies and procedures to enable our people to flourish in our employment. We have examined our labour hire arrangements to ensure we hire only from registered providers. We continually review our policies and procedures to ensure they are reflective of our values. Our Modern Slavery and Ethical Purchasing Working Group continues the journey of the review of providers.

Mercy Health is pleased to be part of the Australian Catholic Anti-Slavery Network (ACAN) and for this modern slavery statement to form part of ACAN’s compendium of modern slavery statements. This statement is made together with a range of Australian Catholic organisations in the Australian Catholic Anti-Slavery Network (ACAN).

As Chair of Mercy Health, I would like to thank everyone who is working to eliminate modern slavery in the supply chains of Mercy Health. I look forward to continuing to lead and support our ongoing efforts to eliminate modern slavery and I encourage all to join me in this journey of dignity.



Virginia Bourke
Chair, Mercy Health



THIS MODERN SLAVERY STATEMENT

This modern slavery statement is a joint statement made on behalf of the three reporting entities within Mercy Health:

- Mercy Hospitals Victoria Ltd (revenue \$591,759,919 in 2023)
- Mercy Aged and Community Care Ltd (revenue \$350,623,196 in 2023)
- Mercy Health Australia Ltd (does not produce consolidated accounts, but is the sole member of all the entities in the group and had a consolidated revenue in excess of \$986 million in 2023).

The statement covers all entities owned or controlled by Mercy Health Australia Ltd, known together as 'Mercy Health'.

All of the entities within Mercy Health are registered as charities with the Australian Charities and Not-for-profits Commission. Annual information statements, financial reports and other information for those entities can be found at www.acnc.gov.au.

Although Mercy Health generally reports on a 1 July to 30 June basis, we have adopted the reporting period of the ACAN's compendium members for the purpose of this statement. Accordingly, this statement is given for the period 1 January to 31 December 2023.

OUR ORGANISATIONAL STRUCTURE

Mercy Health

Mercy Health is comprised of Mercy Health Australia Ltd and its subsidiaries. Mercy Health Australia Ltd is the sole member of each of the following companies:

Mercy Hospitals Victoria Ltd	ACN 614 116 013	ABN 74 762 230 429
Mercy Hospitals NSW Ltd	ACN 075 648 350	ABN 53 075 648 350
Mercy Palliative Care Ltd	ACN 614 116 148	ABN 77 896 699 763
Mercy Aged and Community Care Ltd	ACN 088 254 460	ABN 77 191 901 062
Rice Village Ltd as trustee of the Rice Village Trust*	ACN 089 460 935	ABN 58 089 460 935
St Brigid's Convent of Mercy Perth Ltd	ACN 617 402 767	ABN 57 714 505 919
Mercy Health Foundation Ltd as trustee of the Mercy Health Foundation**	ACN 107 275 230	ABN 73 107 275 230
Mercy Health Property Ltd	ACN 082 093 150	ABN 26 412 756 615
Mercy Health Service Albury Ltd	ACN 068 291 234	ABN 82 068 291 234

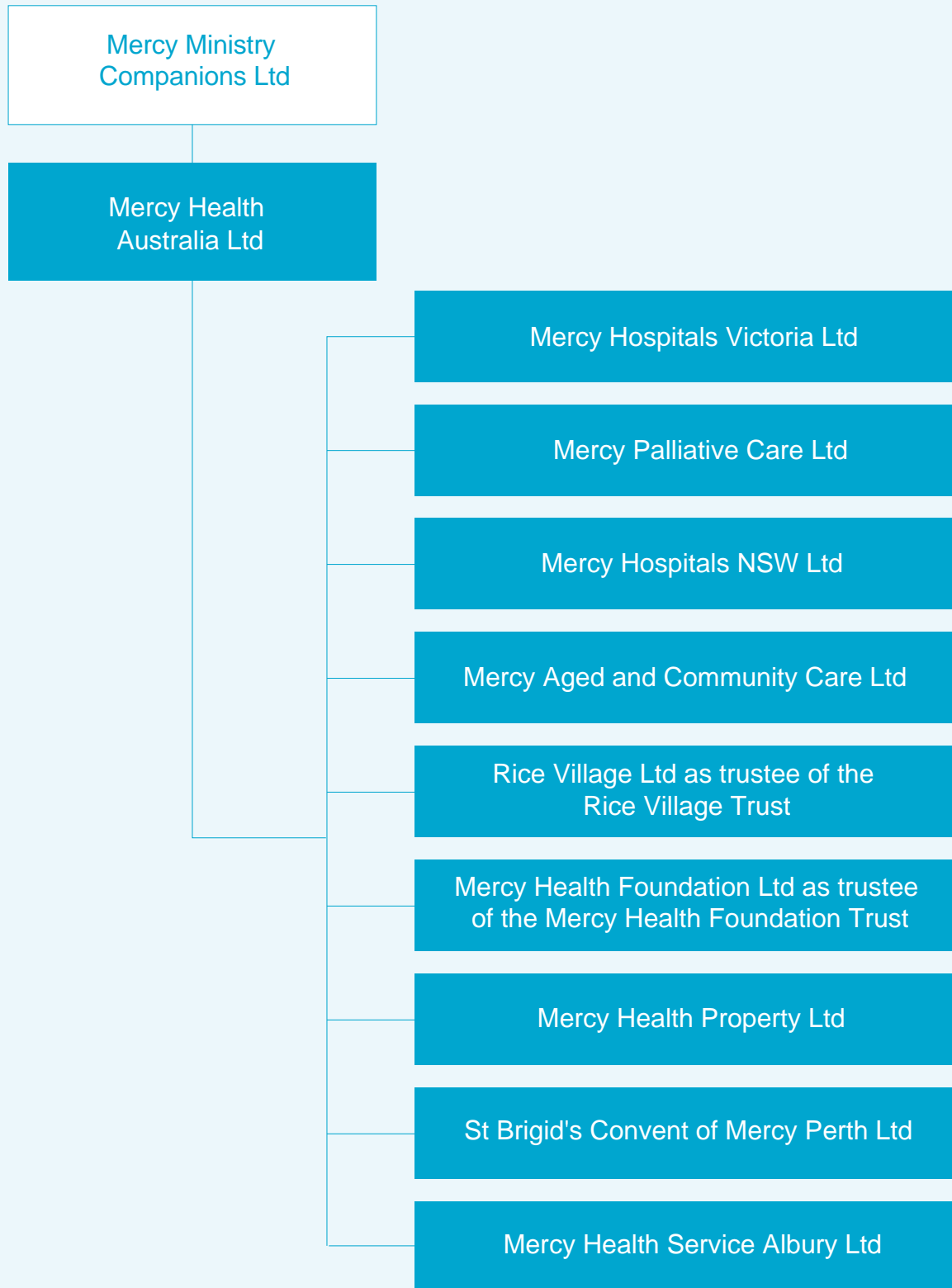
* A trust established in accordance with the wills of Hannah Kathleen Moylan and Margaret May Rice administered cy-pres in accordance with Orders made by the Supreme Court of Victoria on 19 November 1993 and leave pursuant to section 63 of the Religious Successory and Charitable Trusts Act 1958 (Vic) given in Orders made by the Supreme Court of Victoria on 30 November 1994.

** A trust established by deed made 30 March 2005 and as amended.



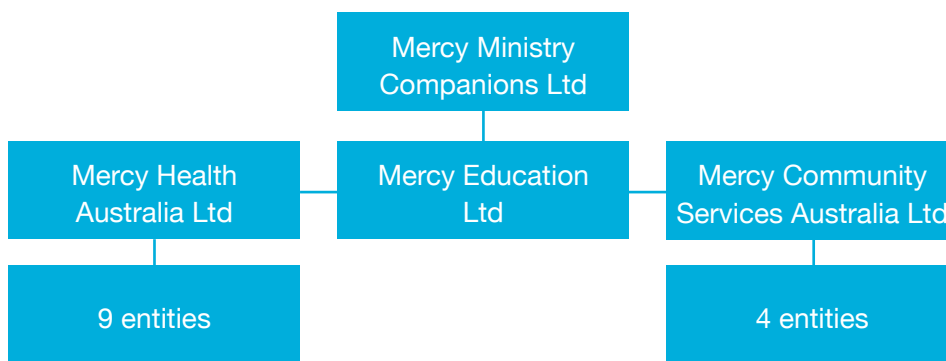
*Home Care client Ray
and his carer Anna*

Mercy Health's corporate structure is illustrated in the following chart:



MERCY MINISTRY COMPANIONS

On 3 December 2021, ministries established by the Sisters of Mercy in Australia, including Mercy Health, were reorganised to become members of the Mercy Ministry Companions group, as illustrated in the following chart:



The reorganisation emerged out of the Sisters’ understanding that the number of Sisters skilled in governance is declining, and a desire that their ministries should continue in accordance with their ethos. The reorganisation has empowered the laity

(as directors of Mercy Ministry Companions Ltd) to take on a greater role in governance, while Sisters remain involved for now as members of Mercy Ministry Companions Ltd. The reorganisation has not changed the day-to-day operations of Mercy Health.

OUR GOVERNANCE FRAMEWORK

The membership of the Boards of all of the companies that make up Mercy Health, other than Mercy Health Foundation Ltd, is concurrent. The concurrent boards are known as ‘the Mercy Health Board’.

Mercy Health Foundation — which seeks philanthropic support for the work of Mercy Health — has a separate Board of Directors, referred to here as the ‘Foundation Board’.

All of the entities that make up Mercy Health are supported by our Group Chief Executive Officer and Executive management team based in Melbourne. Support services functions are also shared across the organisation. For example, human resources and procurement teams support the organisation as a whole.

OUR OPERATIONS AND SUPPLY CHAIN

Operations

Mercy Health provides a range of health, aged and community care services in Australia.

Mercy Health provides public hospital services in Victoria and New South Wales. We cared for approximately 133,000 people in our Victorian hospitals in 2023. In that year, just over 8,500 babies were born in those Victorian hospitals, 892 families were supported by our early parenting centre and more than 850 people received mental health services.

At the end of 2023, Mercy Health was operating 30 residential aged care homes across four states, providing care to about 2,200 people.

Mercy Health also supports people to live independently at home. In 2023, we provided care for more than 5,600 people in their own homes.

Supply chain

Mercy Health purchases a wide range of goods and services, including:

- medical and related services, such as allied health services, medical imaging services, pathology services and agency staff
- building, construction and infrastructure services, including waste management and medical gas supply
- ancillary services such as food, cleaning, linen and laundry and security
- communications, information technology hardware and support, and software solutions and support.

We deal mainly with suppliers that have an Australian presence. However, our suppliers' head offices are based all around the world, with key countries including Australia, New Zealand, China, the United Kingdom, the United States of America and Germany.

Mercy Health's suppliers manufacture or source from manufacturers all over the world. Manufacturing occurs in a number of countries including Australia, the United States of America, Germany, Turkey, Japan, China, Malaysia, Mexico, Columbia and Sri Lanka.



Werribee Mercy Hospital surgical team

MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Operational risk

About 12,974 people — 79 per cent of whom are women — worked for Mercy Health in 2023. Of the total number of staff, 6,519 worked in health services, 5,128 worked in residential aged care, 825 worked in home care and 499 worked in support services.

While Mercy Health employs people from approximately 143 countries, including India, the Philippines, Nepal and the United Kingdom, the vast majority of our employees are engaged in Australia.

Just over 557 staff from 38 countries hold temporary visas. Visa applications related to those positions are managed by an in-house team in accordance with our Visa Policy and Procedure, and in compliance with immigration requirements under Australian law.

Mercy Health engages our employees under a wide range of enterprise agreements and modern awards, as well as under common law, and frequently engages with trade unions acting on our employees' behalf.

Some staff are engaged through agency and other labour hire arrangements. Where state laws require it, we engage such staff only from registered labour-hire providers.

Mercy Health has a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation. Mercy Health has a rolling internal audit plan that includes review of employee related entitlements.

Mercy Health has a Code of Conduct that governs how our employees conduct themselves in our operations. The Code of Conduct is based on our organisational values: compassion, hospitality, respect, innovation, stewardship and teamwork.

Mercy Health does not tolerate improper conduct by our employees, officers or volunteers, and we are committed to protecting and supporting whistleblowers who disclose improper conduct. This is explained in greater detail in our Whistleblowers Policy and Procedure and on our website.

The policies and procedures that govern how we relate to our people are available throughout the organisation and are reviewed and updated on a regular basis.

Supply chain risks

Turning to Mercy Health's supply chain, in 2023, Mercy Health purchased goods and services to the value of more than \$208 million from 2,045 suppliers for the purpose of carrying out its activities.

The goods and services purchased by Mercy Health to support its operations are outlined on page 11. Those goods and services include a number of categories identified as high risk in the ACAN Category Risk Taxonomy:

High Risk Categories — ACAN Category Risk Taxonomy, August 2023

Building and construction	Furniture and office supplies
Cleaning and security	ICT Hardware
Events and event management	Labour Hire
Facility management and property maintenance	Linen, laundry and textile products
Finance and investment	Medical devices and supplies, uniforms and personal protective equipment
Food and catering services	Waste management services

ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS

Modern Slavery and Ethical Purchasing Working Group

Mercy Health established a Modern Slavery and Ethical Purchasing Working Group in February 2020, chaired by General Counsel. The Working Group includes Executive representation from the Chief Financial Officer; Executive Director People, Learning and Culture; and the Executive Director Communications and Stakeholder Relations. The Group also includes representatives from procurement, health services, aged care and risk teams.

The Working Group discusses its progress against the actions at each meeting.

Partnerships

Mercy Health operates in partnership to address risks of modern slavery.

Australian Catholic Anti-Slavery Network

Mercy Health is a member of the Australian Catholic Anti-Slavery Network (ACAN), made up of more than 40 Catholic organisations around Australia including large Catholic health and aged care providers.

Mercy Health modern slavery liaison officers attended monthly ACAN meetings with the aim of understanding and responding to the potential risks of modern slavery in our organisation and supply chain.

Mercy Health worked with ACAN to develop our internal education and training and business systems.

Health Share Victoria

Mercy Health procures certain goods and services for its Victorian hospitals and community palliative care service through Health Share Victoria. Health Share Victoria procures goods and services for public sector health services in Victoria. Health Share Victoria repudiates modern slavery and has adopted a risk-based approach to combating modern slavery in health service supply chains.



*Support Services staff from Richmond (L-R)
Aditya, Lucille, and Ahmed*

Australian Federal Police

In December 2023, Australian Federal Police gave a presentation to staff of Mercy Health’s Victorian Hospitals about human trafficking. The presentation focussed on how hospital staff can work with police by reporting suspicions of human trafficking. An outline of resources available to support victims of human trafficking was also given.

Stopline

Mercy Health engaged Stopline to provide a third-party whistleblower service receiving disclosures of serious misconduct at Mercy Health, including concerning modern slavery practices in our operations and supply chain. Whistleblowers inside and outside of Mercy Health can use a range of technologies – including a website – to make disclosures. Disclosures may be made anonymously or confidentially, allowing whistleblowers to make them without fear of retribution. The service became operational early in 2023. To date, there have been no reports of modern slavery practices.

Enterprise risk management

The Mercy Health Board reviews and approves an Enterprise Risk Management Framework annually. This framework ensures a consistent approach to identifying, evaluating and managing all significant risks across the enterprise. The risk of Modern Slavery was explicitly embedded in the framework in 2022, as part of the Environmental, Social and Governance risk category, and is regularly reviewed. Further to this work, our Enterprise Risk team has drafted a due diligence process to continuously identify, manage and mitigate modern slavery risks which has been incorporated into our organisation-wide Modern Slavery Policy.

Investment

Mercy Health – including the Foundation – invests in accordance with Mercy Health’s Investment Management Policy, which has included ethical investment guidelines since at least 2019.

Mercy Health’s Investment Management Policy and its ethical guidelines frame our approach to ethical considerations in investing. We seek to invest in companies that promote human welfare, dignity and respect, and the general good.

Process	1. Risk stratify inventory	2. Risk-based engagement	3. Appropriate remediation
Risk management activities	Maintain inventory of suppliers with information regarding their potential modern slavery risk (high, medium or low) (ACAN Risk Taxonomy)	Assess the level of strategic and value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy) Develop Engagement Strategy based on the Strategic/Value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)	Where instances of modern slavery are identified, a prioritised risk management approach is taken: i. Modern slavery risk caused by our Entity ii. Contributed to by our Entity iii. Directly linked to our Entity
Scope	Mercy Operations; Suppliers/Vendors and their Suppliers; Emerging Suppliers		
Foundation	Core Internal Controls; ACAN Supplier Engagement Strategy; ACAN Risk Taxonomy; Modern Slavery Act 2018		
Objective	Care First: We will care for, and about, marginalised and disadvantaged groups		

We avoid, limit or minimise investments in companies whose products, services or practices are contrary to Mercy Health values or teachings of the Catholic Church, cause or perpetuate injustice and suffering, or infringe human rights. We also exclude investments in companies where their practices are unacceptable from a human rights or modern slavery perspective.

External investment advisors engaged by the Foundation are required to comply with our policy, including ethical guidelines relating to modern slavery, when providing us with advice or investing on our behalf.

Internal education and awareness

Mercy Health has continued to promote internal education and awareness of modern slavery.

We are continuing to deliver online training using ACAN modules for the Working Group and relevant business units (procurement, information technology, finance and property). The number of staff who have completed training is listed below.

Training	Working Group	Business units
Modern slavery 101	5	132
Implementing a modern slavery risk management program	5	1
Business relevance	8	6
Grievance mechanisms and remedy	5	–

While we have focussed on educating and training the most relevant staff within Mercy Health, the online training module ‘Modern slavery 101’ was made available to all Mercy Health staff via our online education platform toward the end of 2021.

We published three posts on our internal collaboration platform, Workplace, to inform our staff about the work Mercy Health is doing to address the risk of modern slavery and the availability of the Modern slavery 101 module on our e-learning platform.

Supplier education and awareness

We also encouraged our suppliers to educate themselves about modern slavery.

Mercy Health invited suppliers to attend webinars for suppliers to Catholic entities presented by ACAN which covered modern slavery risks, expectations of suppliers to cooperate in modern slavery risk management and ways for suppliers to build internal capacity. ACAN have advised that 14 suppliers attended those webinars in 2023.

Community awareness

To promote awareness of modern slavery and Mercy Health’s efforts to overcome it, we placed the Mercy Health Modern Slavery Statement 2022 on the Mercy Health website along with a summary.

Remediation

Mercy Health is committed to ensuring we provide appropriate and timely remedies to people affected by modern slavery.

Mercy Health is a founding partner of Domus 8.7, an independent program providing remedy to people affected by modern slavery. By partnering with Domus 8.7, Mercy Health can help people affected by modern slavery achieve meaningful outcomes.



Linette and baby Marcella at Mercy Hospital for Women

ASSESSMENT OF OUR EFFECTIVENESS

The Modern Slavery and Ethical Purchasing Working Group continues to meet three-to-four times per year and will review the effectiveness of the actions Mercy Health is taking in addressing the risk of modern slavery in our operations and supply chain.

In 2022, the Working Group commenced providing the minutes of its meetings to the Mercy Health executive to allow ongoing governance by the executive of the Working Group's effectiveness.

CONSULTATION WITHIN MERCY HEALTH

The entities owned or controlled by Mercy Health Australia Ltd were consulted in the preparation of this statement as follows:

- The Mercy Health Board was briefed on progress and approved the giving of this statement.

- Members of the management team involved in the Working Group work across all entities that constitute Mercy Health.

Neither Mercy Hospitals Victoria Ltd nor Mercy Aged and Community Care Ltd own or control any other entities.



Left: Werribee Mercy Hospital Special Care Nursery midwives Jenny (L) and Claire (R) with mum Danielle and baby Flynn

Opposite: Mercy Place Mandurah staff and residents

APPROVAL

This statement was approved by the Board of Mercy Health Australia Ltd in its own right and as the parent entity of Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd, at its meeting on 11 June 2024.



Virginia Bourke
Chair, Mercy Health Australia Ltd





Mercy Health

Care first

For more information

General Counsel

Mercy Health Support Services

2/12 Shelley St

Richmond Vic 3121

mercyhealth.com.au



Mercy Health acknowledges Aboriginal and Torres Strait Islander Peoples as the first Australians. We acknowledge the diversity of Indigenous Australia. We respectfully recognise Elders past and present. This report was produced on Wurundjeri Country.



Modern Slavery Statement 2023





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Kaya Ngaji gurrijin Hello

MercyCare acknowledges Aboriginal and Torres Strait Islander Peoples as Traditional Custodians of Country throughout Australia. We pay our respect to their cultures, Elders past, present and emerging, and we commit to working together for our shared future.

Disclosure Statement

This is a joint modern slavery statement made by MercyCare Ltd (ACN 098 197 490) on behalf of itself and the entities it controls or owns including:

Mercy Community Services Ltd (ABN 96 487 116 582)
Mercy Human Services Ltd (ABN 21 612 759 654)
together, for the purposes of this statement "MercyCare".



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Our Mission is to bring compassion and justice to life so that people and communities can thrive.





PART 1

About Us

Our Entities

This statement is prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) in relation to the following entities:

MercyCare Ltd (ACN 098 197 490)

Mercy Community Services Ltd (ABN 96 487 116 582)

Mercy Human Services Ltd (ABN 21 612 759 654)

MercyCare is a leading Catholic provider of early learning, family and community, and aged care services.

In 1846, a small group of the Sisters of Mercy arrived in Western Australia and, despite the hardships of an early settlement, set out to care for the vulnerable. This heritage inspires us in our work today.

Our Mission is that MercyCare strives to bring compassion and justice to life so that people and communities can thrive.

MercyCare envisions a future where we strengthen our existing services and strategically target new growth opportunities to advance our Mission. We aim to identify and pursue sustainable solutions that meet the evolving needs of our community. By investing in resources and infrastructure, we will continue to support our services and empower the people across MercyCare.

Our Impact is to ensure we provide support to vulnerable members of our community. This support ranges from childcare to youth homelessness, disability services, home care for seniors and residential aged care.

MercyCare extends its support to the community across both the Perth metropolitan area and regional Western Australia through the provision of approximately 25 services spanning 30 locations.

Our Growth continued during the year including a new state-of-the-art 108-bed, residential aged care facility and increasing our early learning services capacity with the opening of one new childcare centre. Our future objectives encompass further expansion in community-based aged care, family services, and disability support. Annual revenue for the Financial Year ending June 2023 amounted to \$130M.

PART 2

Our Structure, Operations, People and Supply Chains

Our Structure

MercyCare is a Public Juridical Person (PJP). MercyCare Limited is the civil entity.

Mercy Community Services Ltd and Mercy Human Services Ltd are subsidiaries of MercyCare Limited.

The MercyCare civil entities are companies limited by guarantee. They are governed by a Board of Directors with the requirement to operate as a non-profit organisation pursuant to their relevant constitutions.

MercyCare Ltd is registered as a charity with the Australian Charities and Not-for-Profits Commission and has Public Benevolent Institution (PBI) status.

Our Operations

OUR KEY SERVICES ARE CENTRED AROUND:



Residential Aged Care



Community Aged Care



Family and Community Services, including Disability Services



Early Learning Services

Our services are provided, and facilities are located in Western Australia, predominantly across the Perth Metro area. We also manage Aboriginal short-stay accommodation in the Kimberley region of Western Australia.

Modern Slavery prioritisation at an operational level within our organisation is still in the early development phase, and we recognise the need for a continued investment in building our capacity. It is acknowledged that Business-as-Usual (BAU) activities across our operations develop and remain vigilant against the threat of modern slavery. To empower our workforce, we have plans to focus on the following key areas to enhance our services and uphold our commitment to ethical practices.

Enhancing Workplace Practices:

Strengthening workplace practices to ensure they align with ethical standards and promote a safe, inclusive environment for our employees.

Stakeholder Engagement:

Actively engaging with stakeholders, including employees, clients, and community members, to gather feedback and enhance service delivery across all operational areas.

Continuous Improvement:

Demonstrating our commitment to continuous improvement by regularly reviewing and updating policies and procedures to mitigate modern slavery risks and improve the quality of our services.



Community Partnerships:

Establishing strong partnerships with community organisations to provide support to vulnerable populations and address social issues in the communities we serve.

Training and Development:

Providing ongoing training and development opportunities for our employees to enhance their skills and knowledge, enabling them to deliver exceptional services to our clients.

By focusing on these key areas, we are committed to enhancing our services and upholding ethical practices in our operations.

Our People

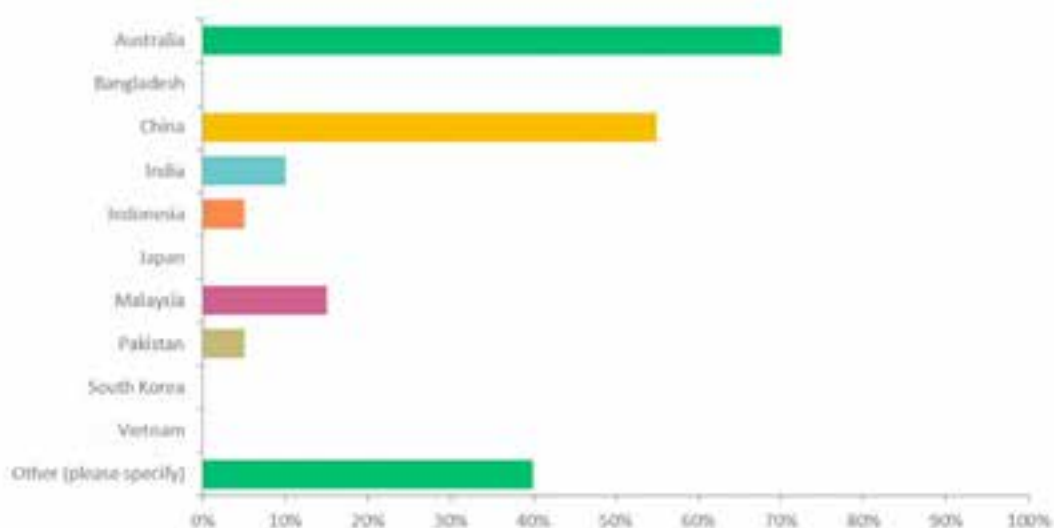
MercyCare’s workforce is deeply dedicated to advancing our Mission. We are proud to have over 1,450 employees and 166 volunteers contributing to our cause.

Our Supply Chains

In 2023, MercyCare invested \$50 million across its supply chain. While all suppliers are Australian entities, many of the goods acquired are sourced from international supply chains. This is evident in the chart below, sourced from Australian Catholic Anti-Slavery Network’s Supplier Survey, completed by 52 suppliers out of 798 approached. This disparity highlights the global reach of the supply chains MercyCare engages with, despite the survey’s limited direct response rate. However, as our understanding of risks evolves, specifically in relation to the origin of goods throughout our suppliers’ supply chain, MercyCare aims to actively engage with suppliers to mitigate risks, making it an action point for the upcoming year.

Q15: In which country or countries are the good(s) made?

Answered: 20 Skipped: 32



We have worked to consolidate our vendors and currently have around 450 active suppliers.

PART 3

Modern Slavery Risks

MercyCare stays alert to the threat of modern slavery, both within its operations and throughout the supply chain. Although the likelihood of slavery occurring within Australia is low, instances of worker exploitation have been documented. It is crucial that we stay vigilant, identifying areas of risk and implementing processes to reduce the potential for such practices to occur.

We continue to be involved with the Australian Anti-Slavery Catholic Network (ACAN) and have collaborated on initiating a risk assessment of our key suppliers in September 2023. Assessing our suppliers involved providing supplier data to guide our next steps for engagement. Providing comprehensive supplier data to the ACAN program team has enabled us to identify common suppliers, evaluate supplier risks, conduct analysis and due diligence, and formulate our supplier engagement strategy. Upon agreement on a supplier engagement strategy, we can implement it with ACAN's support and receive regular ACAN Supplier Engagement Progress Reports.

Although we currently lack a formal risk identification process, we rely on widely available data to stay informed about the most critical sectors of concern. For instance, we reference resources like the List of Goods Produced by Child Labor or Forced Labor from the Bureau of International Labor Affairs in the United States, or the 2018 Global Slavery Index by Minderoo's Walk Free, to guide our understanding of risk related to the goods and services we procure.

In addition to ACAN, MercyCare subscribes to CIPS (Chartered Institute of Procurement & Supply) literature to further educate ourselves on global Modern Slavery topics. Additionally, we rely on WA.gov.au guidelines to inform our obligations under the Modern Slavery Act and best practices.

Internal Labour & Agency Management

The labour market, especially in the care sector, has encountered significant challenges due to shortages. With a higher percentage of employees from migrant backgrounds, there is an elevated risk of exploitation. The main risks revolve around the recruitment and management of employees, as well as the utilisation of labour hire agencies. Labour hire currently represents slightly over 18% of our total supply chain cost and has been increasing in importance.

Labour shortages were particularly pronounced over recent years, leading to a sharp increase in costs related to labour hire. Further analysis has allowed us to align our operational needs with our procurement strategy and engage with both existing and new labour hire organisations for tendering. This approach will be complemented by actions to strengthen our labour hire agreements.

Construction & Facilities Management

Our largest expenditure is in the construction and facilities management sectors. MercyCare commissioned a new aged care facility and contracted a major construction company to lead the project and oversee associated labour and procurement activities. While this contractor is committed to complying with the Modern Slavery Act, we engaged in regular discussions regarding labour treatment and employee safety on this project. Additionally, many facilities management companies rely on short-term labour contracts, creating a risk of exploitation that must be managed.



Hospitality

Food, beverages, and related hospitality supplies are essential for our care services. We are aware of risks in the food and beverage sector, particularly with imported foods like fish. Tracing the supply chain is challenging, but working with reputable suppliers will help to mitigate risks.

Information Technology

The technology sector is crucial for our operations, but it comes with complex risks due to deep supply chains that begin with the mining of essential resources. Our technology mainly consists of standard equipment such as laptops and printers, allowing us to focus our risk assessment on commonly acquired products and use external benchmarks to continually evaluate areas of concern.

Other Supply Chain Risks

In 2023, our total supply chain expenditure amounted to \$50,000,000. The remaining expenditure encompasses a wide array of goods and services, including property leases, fleet, clinical equipment (such as specialised beds and wheelchairs), professional services, and corporate services.

All sectors present risks, particularly in supply chains that span multiple borders and jurisdictions. MercyCare is acutely aware of these risks and endeavours to communicate their significance to our suppliers.



PART 4

Actions Taken to Assess and Address Modern Slavery Risks

MercyCare is committed to combating modern slavery in all its forms. In 2023, we took significant steps to strengthen our approach to identifying and addressing modern slavery risks within our operations and supply chains. Our efforts included:



POLICY

MercyCare introduced a Modern Slavery Policy in 2021, with the next review scheduled in 2024. In 2022, our Procurement Policy was revised to explicitly incorporate Modern Slavery risk assessment and action. Looking ahead, MercyCare aims to establish a Social and Ethical Procurement Policy to provide additional guidance to our team members as we continue our efforts to combat modern slavery.



AWARENESS

SUPPLIERS

In 2022, MercyCare collaborated with students from the McCusker Centre for Citizenship at the University of Western Australia to create a toolkit for our suppliers. Subsequently, we engaged with the same organisation, offering a McCusker Intern the opportunity to work with us. The goal was to enhance the social and ethical procurement policy framework, enabling MercyCare to develop and refine our policies and procedures. This framework incorporates the social and ethical considerations of our procurement practices, in addition to the standard metrics used.

We observed a significant increase in supplier engagement, with 47 surveys completed compared to just 6 in the previous year (2022). This uptick indicates a growing awareness and dedication to combatting modern slavery within our organisation. This improvement can be attributed to our inaugural contractor conference held in late 2023, where we presented our contractors with the Australian Catholic Anti-Slavery Network supplier risk assessment and outlined MercyCare's Modern Slavery responsibilities. The conference played a pivotal role in raising awareness among our contractors regarding modern slavery risks and our expectations for ethical practices.

Moreover, a total of 38 suppliers participated in webinars throughout 2023, where we discussed modern slavery risks and strategies to address them. This level of engagement underscores our commitment to working collaboratively with our suppliers to combat modern slavery.

STAFF

MercyCare is committed to eradicating Modern Slavery, particularly within its supply chain. Our Procurement team has launched education sessions to deepen understanding of procurement-related topics, specifically Modern Slavery. By enhancing our grasp of Modern Slavery, our aim is to raise awareness across our organisation. One of our initiatives in this endeavour is our partnership with Australian Catholic Anti-Slavery Network to conduct a staff participation survey. The survey is scheduled in 2024.



RECRUITMENT

Our recruitment policy and procedures are well-documented and regularly reviewed to ensure MercyCare remains vigilant against potential risks. Our recruitment and onboarding checklist includes confirmation of working rights (visa checks), identity verification, and other checks such as National Police Checks and Working with Children Checks. As with all policies and procedures, we review and validate these processes at defined intervals.



SUPPLY CHAIN (All Categories)

In 2022, we formulated supply chain 'category strategies' for key procurement areas of expenditure. Each strategy examines associated risks, including those related to modern slavery. For high-risk categories, modern slavery inquiries are mandatory during the tender process and are integral to the supplier selection evaluation. In 2023, we have updated our standard terms and conditions to align with our Modern Slavery requirements, which are now included in all contracts.

Insurance and police checks validation are crucial for many of our expenditure categories, particularly for individuals who will be visiting our premises. Previously, these records were centrally archived, but as of 2023, they are now stored in our Asset Management System. This change has enhanced change management processes related to the location of audit-related documents across the organisation.

The implementation of a procure-to-pay system, scheduled to launch in June 2024, will enhance our ability to control order placement and utilise preferred (approved) suppliers. A comprehensive and formal vendor policy will bolster our overall governance concerning vendor selection and help mitigate risks associated with high-risk vendors in our supply chain.



LABOUR HIRE

Vendors scoped for tender are obliged to present a modern slavery policy, further ensuring that our partners are aligned with our commitment to combating modern slavery.

MercyCare recognises the importance of Labour hire and agency staff in supporting our services. Our recruitment team recently supported a tender opportunity to ensure that obligations relating to modern slavery and fair employment terms are met by the various invitees associated with the strategic sourcing plan. This approach enables MercyCare to mitigate risks associated with hiring staff not directly employed by MercyCare, such as undeclared subcontracting and monitoring conditions of work and in-house (community-based) subcontractor behaviour. To achieve this, we aim to develop a high-quality matrix of potential labour providers and strive to build enduring relationships in this category.

As we continue to strengthen our efforts to combat modern slavery, we are committed to transparency and accountability. We will continue to update our stakeholders on our progress and invite feedback on how we can further improve our practices.



PART 5

Assessing Effectiveness

Judging the effectiveness of actions is challenging. Our engagement with the Australian Catholic Anti-Slavery Network assists us in this. At present we can use metrics to gauge the effectiveness of our anti-slavery efforts and to hold ourselves accountable. While some of these metrics are proxy measures, a maturity approach is one that serves as a foundation for continuous improvement, ensuring that our efforts are impactful and contribute significantly to eradicating slavery.

Our suppliers are now required to adhere to a revised set of terms and conditions that encompass Modern Slavery responsibilities. We approach this obligation with utmost seriousness. Concurrently, we are updating our service agreement documents to ensure they align with these standards. Our goal is to have a higher number of suppliers under active contracts and to enhance our supplier performance reviews, focusing on a range of responsibilities and topics related to modern slavery. Recent tender activities have also emphasised modern slavery

considerations in the scoring process, guiding our decision-making regarding the selection of suppliers for goods and services provision.

While MercyCare is still only in its third reporting cycle, there has been notable progress in maturity. However, quantifying these advancements is challenging due to the transition from a gap analysis to a maturity assessment for end-of-cycle reporting. This shift signifies a more holistic approach to evaluating and mitigating modern slavery risks. Although direct quantification of improvements may be difficult, the change in reporting methodology reflects a deeper understanding and a proactive approach to addressing modern slavery issues. This strategic shift is expected to result in more effective risk management and improved outcomes over time.

MercyCare continues to work with Australian Catholic Anti-Slavery Network in the maturity assessment of our Modern Slavery effort and to establish maturity targets for the next cycle.





The below multi-year action plan will be used to guide us as we work to reach our targets:

Year 1 (2024)

Improvement to Vendor Risk Areas

- Conduct bi-annual communications to enhance awareness throughout the supply network.
- Develop training programs to educate the wider organisation about modern slavery risks and mitigation strategies.

Staff Engagement and Feedback

- Conduct an initial staff survey to gather feedback on modern slavery awareness and practices.
- Hold follow-up sessions during the year to address feedback and promote understanding.
- If feasible, conduct a second survey to measure improvements and gather additional feedback.

Modern Slavery Policy Update

- Update the Modern Slavery Policy.
- Establish a process for ongoing management and review of the policy.

Management of Approved Suppliers

- Implement a system for ongoing monitoring and management of approved suppliers, including regular audits and reviews.

Matrix of Labour Hire Staff/Agencies

- Develop a high-quality matrix to assess and manage the risks associated with labour hire staff and agencies.
- Strengthen our Labour Hire Agreements.
- Build strong relationships with key labour hire providers to improve transparency and compliance.

Year 2 (2025) and Beyond

Continuous Improvement

- Continue to conduct bi-annual communications and training programs to raise awareness and improve practices.
- Conduct regular staff surveys and follow-up sessions to ensure ongoing engagement and feedback.
- Review and update the Modern Slavery Policy as necessary to reflect changes in legislation and best practices.

Supplier Management

- Maintain a robust system for managing approved suppliers, including regular audits and reviews.
- Continue to build strong relationships with key suppliers to promote ethical practices and transparency.

Labour Hire Staff/Agencies

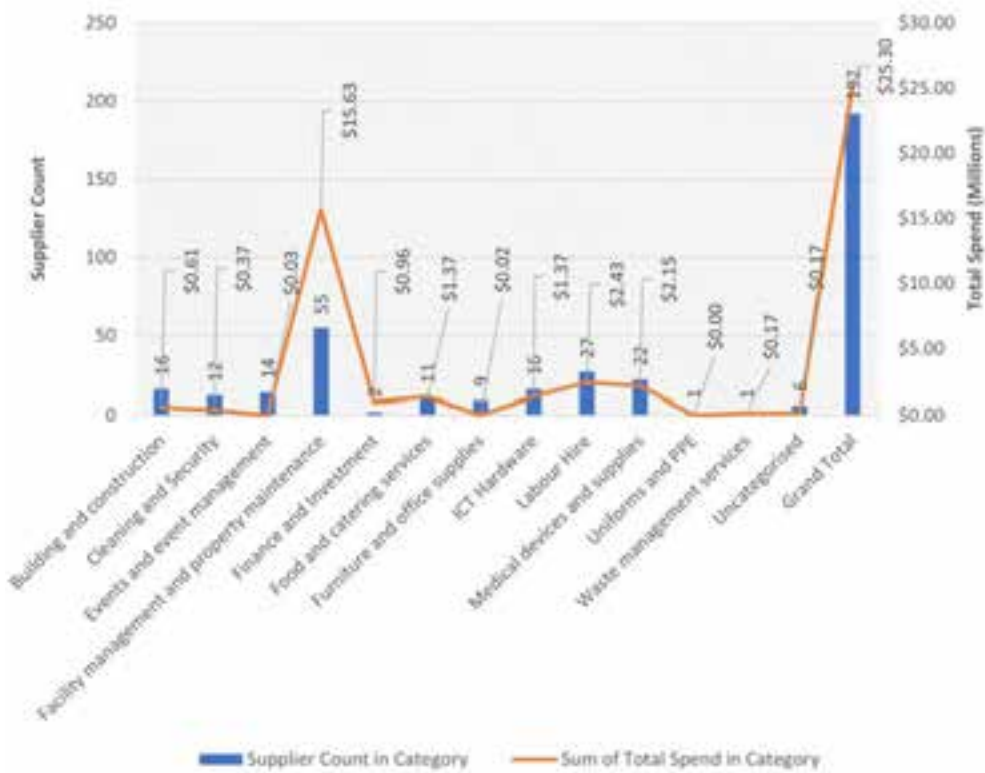
- Review and update the matrix of labour hire staff/agencies to ensure it remains effective in identifying and mitigating risks.
- Strengthen Labour Hire Agreements.
- Continue to build strong relationships with labour hire providers to promote ethical practices and compliance.

Monitoring and Reporting

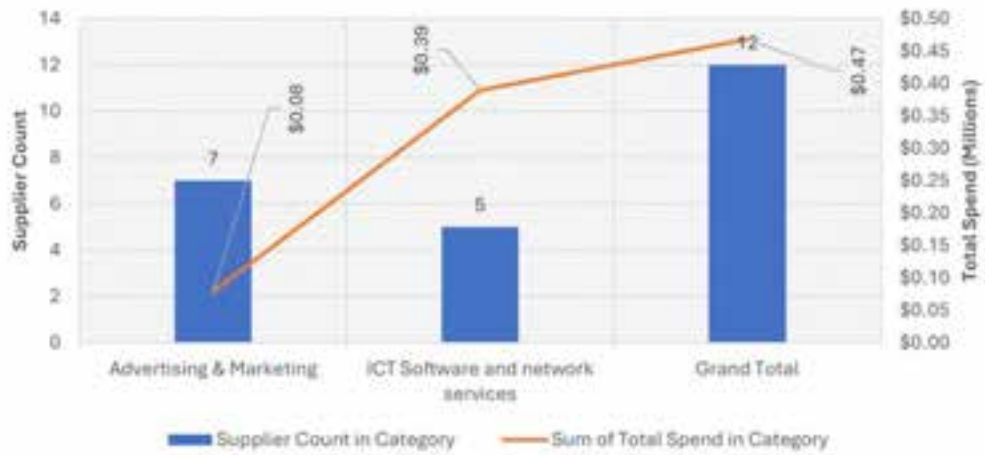
- Establish a system for monitoring and reporting on progress towards addressing modern slavery risks.
- Publish regular reports to stakeholders on the organisation's efforts and achievements in this area.

Our statement addresses continuous improvement in risk identification compared to previous years. It indicates that the metric used involves categorising suppliers according to risk, in alignment with Australian Catholic Anti-Slavery Network’s risk taxonomy. The statement also shows progress by stating that \$30 million out of \$50 million has been categorised, with plans to categorise the remainder in 2024. This demonstrates an ongoing effort to improve risk identification and management as illustrated below:

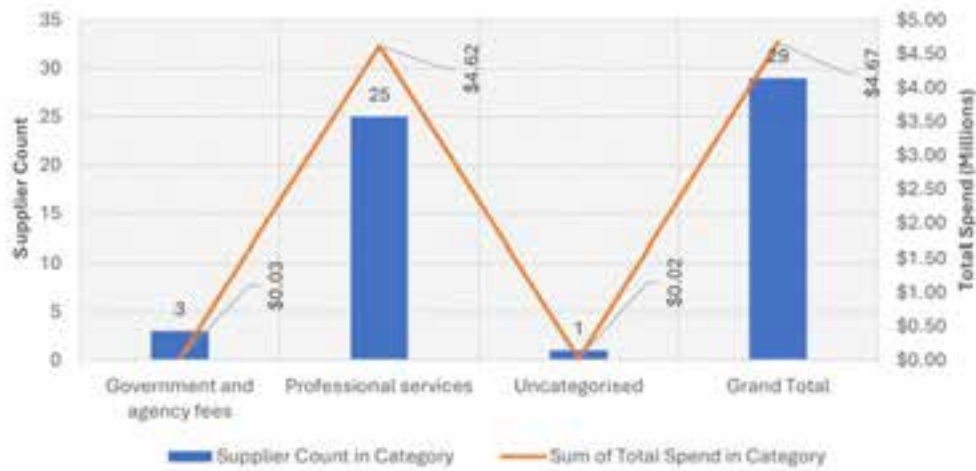
High Risk Supplier Categorisation & Spend Spread



Medium Risk Supplier Categorisation & Spend Spread



Low Risk Supplier Categorisation & Spend Spread



PART 6 Consultation with Owned or Controlled Entities

In refining our approach to modern slavery, MercyCare has collaborated with our advisors and Australian Catholic Anti-Slavery Network to address our modern slavery obligations and this statement. Our Board of Directors is fully committed to ensuring that the organisation fulfils its legal obligations and contributes to combating modern slavery. We aim to work closely with our operational teams to enhance our overall maturity score regarding modern slavery efforts at MercyCare.

PART 7 Any other relevant information

All entities owned and governed by MercyCare fall under the management and oversight of the same Executive Team and Board. MercyCare has consulted with each of these entities for the development of this modern slavery statement. Each entity understands and shares MercyCare’s commitment to minimising modern slavery risks in its operations and supply chain. MercyCare will maintain ongoing discussions with each controlled entity regarding modern slavery risks.

Endorsement

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the Board of Directors of MercyCare Ltd. on 11 April 2024.

PF Walsh
Patrick Walsh
Board Chair



mercyCare.com.au





2023 MODERN SLAVERY STATEMENT

Mercy Community Services SEQ Limited (Mercy Community)
ABN 51 166 477 318

Reconciliation statement

In the spirit of Reconciliation, Mercy Community acknowledges the traditional owners and country on whose lands we provide our services and recognises the cultural and spiritual connection of Aboriginal and Torres Strait Islander people earth, land and sea.

We wish to pay respects to the Elders past and present, as well as the emerging leaders, and the important role they share across these Mercy Community sites.

MERCY COMMUNITY MODERN SLAVERY STATEMENT

1 JANUARY 2023 to 31 DECEMBER 2023

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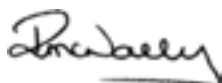
FOREWORD, APPROVAL AND SIGNATURE

This 2023 Mercy Community Modern Slavery Statement reflects the efforts of our organisation to act on the critical issue of modern slavery risks within our supply chains and operations for the past year. It is through these efforts that we truly embody the teachings of our Catholic faith and the Sisters of Mercy Charism, demonstrating compassion, dignity, and respect for all individuals, particularly the most vulnerable in society.

Ending modern slavery in our globalised world presents complex real-world challenges. Yet, it is precisely these challenges that highlight the importance of our mission. Our organisation is committed to scrutinising our supply chains, enhancing our operational transparency, and fostering ethical partnerships.

At Mercy Community we are seeking ways to continuously improve and strengthen our approach. This includes ongoing education, advocacy, and participation in the Australian Catholic Anti-slavery Network (ACAN) to forge a united front against modern slavery. We remain dedicated to making a meaningful difference, guided by our faith, mission, and values.

Signature



Name

Rowena McNally

Title

Board Chair



This Modern Slavery Statement was approved by the principal governing body of Mercy Community as defined by the *Modern Slavery Act 2018* ("the Act") on 29 May 2024.

This Modern Slavery Statement is signed by a responsible member of Mercy Community as defined by the Act.

CRITERION 1: ABOUT MERCY COMMUNITY

The reporting entity is Mercy Community Services SEQ Limited (Mercy Community), a company limited by guarantee. Mercy Community's ABN is 51 166 477 318.

The Mercy Community head office is located at:

131 Queens Rd

Nudgee QLD 4014

<https://mercycommunity.org.au/>

For the 2023 financial year, Mercy Community had total revenue of \$126,261,000.

Mercy Community is a Catholic ministry continuing God's mission of mercy by compassionately inspiring and supporting people to live hopeful, connected lives within inclusive communities. The establishment of Mercy Community is inspired by the work of Catherine McAuley who founded the Sisters of Mercy in Ireland in 1831 in response to the call of the gospel and meet the social justice needs of that time. Mother Vincent Whitty, a pioneer Sister of Mercy from Dublin, started the first community work in Brisbane in 1861. As a company, Mercy Community was established in 2013. Mercy Community is part of the Mercy Partners group of companies.

In 2023, Mercy Community had three key service streams: Aged Care Services, Disability Supports, and Families and Young People Services.

Mercy Community's values are Compassion, Integrity, Dignity and Empowerment. We are committed to the safety, well-being, legal and human rights of the people we support and Mercy Community people. Our Code of Conduct sets the standard for ethical and professional behaviour of Mercy Community people.

Mercy Community's key governance arrangements can be found in the Annual Report 2021-2022 on the Mercy Community website: <https://mercycommunity.org.au/>. The Annual Report provides a snapshot of the programs we delivered in that year and the impacts they have, the projects undertaken, as well as the challenges faced and overcome.

Financial Statements for Mercy Community are available from the Australian Charities and Not-for-profits Commission's (ACNC) website.

CRITERION 2: ENTITY STRUCTURE, OPERATIONS AND SUPPLY CHAIN

STRUCTURE

Mercy Community is a not-for-profit organisation registered with the ACNC, committed to enhancing the quality of life and well-being of those who access its services.

Mercy Community was incorporated in 2013 and The Corporations of the Trustees of the Order of the Sisters of Mercy in Queensland transferred some business and assets to the company with effect on or about 30 November 2013.

In 2023, Mercy Community provided management services to Mercy Health and Aged Care Central Queensland ABN 34 096 724 033 Mercy Community Services North Queensland Limited ABN 80 154 512 026. From 1 July to 31 December 2023, Mercy Community provided management services to Stella Maris Aged Care Facility.

Mercy Partners Limited ABN 85 656 883 957 is the sole member of Mercy Community. Mercy Community does not have any subsidiaries.

The Mercy Community Organisational Structure Chart, "What we do at Mercy Community" is shown below and it includes the operations Mercy Community manages for the entities referred above.

Mercy Community's Board of Directors is the ultimate decision-making body and is responsible for its overall governance. The Board abides by the Mercy Community Code of Conduct, acting ethically and with the highest standard of integrity and accountability.

Mercy Community's Modern Slavery Working Group (MSWG) meets as and when required to strengthen our approach to managing modern slavery risk and compliance with the Act. The MSWG has a direct reporting link to the Finance, Audit and Risk Management Committee which reports directly to the Board. The working group comprises the Compliance and Risk Manager (who is also the Australian Catholic Anti-slavery Network Modern Slavery Liaison Officer), Chief Risk Officer, Head of Talent Acquisition, and Financial Controller.

OPERATIONS

Mercy Community operates in the State of Queensland and provides management services to an aged care provider in New South Wales. It has no operations outside of Australia. On any given day, there are over 1,700 Mercy Community employees supporting many thousands of individuals and families through a comprehensive range of programs and services that cater for all ages, circumstances, and seasons of life, in the key areas of Aged Care Services, Disability Supports and Families and Young People Services.

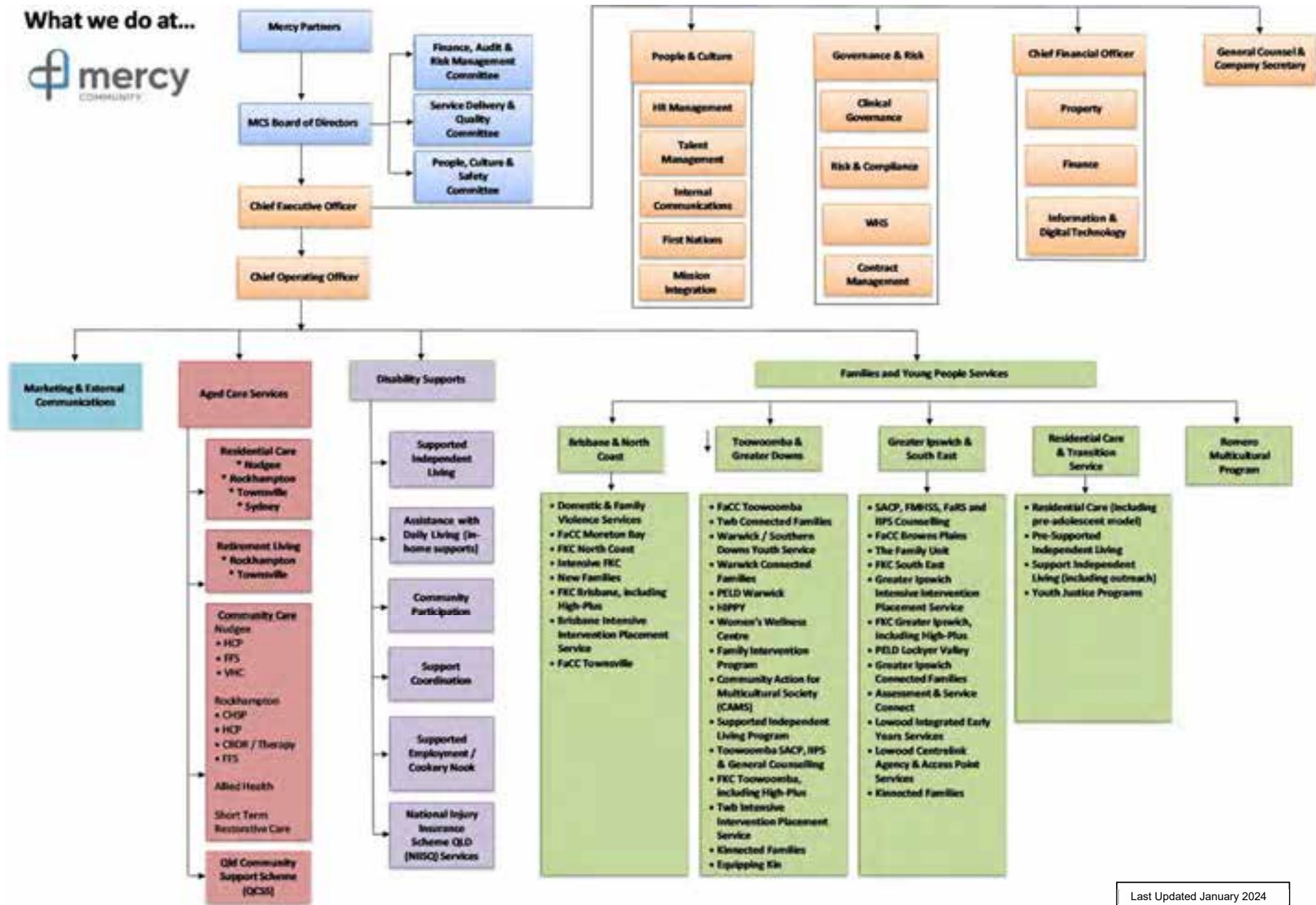
Aged Care Services: include Home Care, Retirement Villages and Residential Aged Care. These services span the continuum of care and allow individuals the flexibility to adapt their level of care as their needs change.

Disability Supports: includes Support Coordination, Supported Independent Living, a range of in home and community participation supports including learning and life skills, and the supported employment service known as the Cookery Nook (a catering service and cafes).

Families and Young People Services: includes foster and kinship care programs, residential care and transition programs (i.e. out-of-home care for children and young people), with significant partnerships within Aboriginal and Torres Strait Islander communities in Queensland. Additionally, we offer counselling, live-in home support for mothers and babies, community engagement and development programs and multicultural support for refugees and migrant families.

Romero Centre: is a dedicated resource centre for people and families seeking asylum in Brisbane and is funded by Mercy Community and the generous support of religious institutes and community members. The team at Romero provide case coordination and a range of welcoming, inclusive support services for people seeking asylum.

What we do at...



SUPPLY CHAIN

Mercy Community evaluates and selects its suppliers to maintain a reliable supply of products and services vital to service delivery. The supply chain process includes purchasing the following goods and services categorised as high risk:

- Building and construction
- Cleaning and Security
- Events and event management
- Facility management and property maintenance
- Finance and Investment
- Food and catering services
- Furniture and office supplies
- ICT Hardware
- Labour Hire
- Linen, laundry and textile products
- Medical devices and supplies
- Uniforms and PPE
- Waste management services.

CRITERION 3: MODERN SLAVERY RISKS

Mercy Community assesses the risk of modern slavery practices whether it causes, contributes to, or is directly linked to modern slavery.

We are fully committed to acting responsibly with the highest ethical standards and reject any form of modern slavery.

We acknowledge that people may experience modern slavery through human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and services and child labour. We also acknowledge that as an acquirer of goods and services, Mercy Community has a legal and moral duty to embed policies and procedures to assess and address modern slavery risks to people in its supply chains as “business as usual.”

At Mercy Community, we obtain goods and services from a wide range of suppliers. We expect all our suppliers to take steps to manage potential and actual modern slavery risks in their operations and supply chains, as well as other risks of human rights harm.

We use a questionnaire for all new suppliers to help us understand how our suppliers are managing their modern slavery risks. We understand that every supplier is different and that the actions taken by small suppliers to manage these risks may differ from larger suppliers, including due to differences in size and capacity.

Risks that Mercy Community causes modern slavery practices. Mercy Community assesses this risk as low. The controls in its processes are effective in mitigating the risk.

Risks that Mercy Community contributes to modern slavery practices. Mercy Community uses a value-based, transparent, and ethical purchasing system. Value is not limited to monetary cost but considers other factors such as environmental impact, quality, and service. For the period under reporting, Mercy Community had 702 suppliers (an increase of 19 since the last reporting period).

A new supplier is evaluated, then after evaluation, added to the active list and a purchase order is raised. Mercy Community has assessed the risk of contributing to modern slavery practice as negligible, given the services it provides.

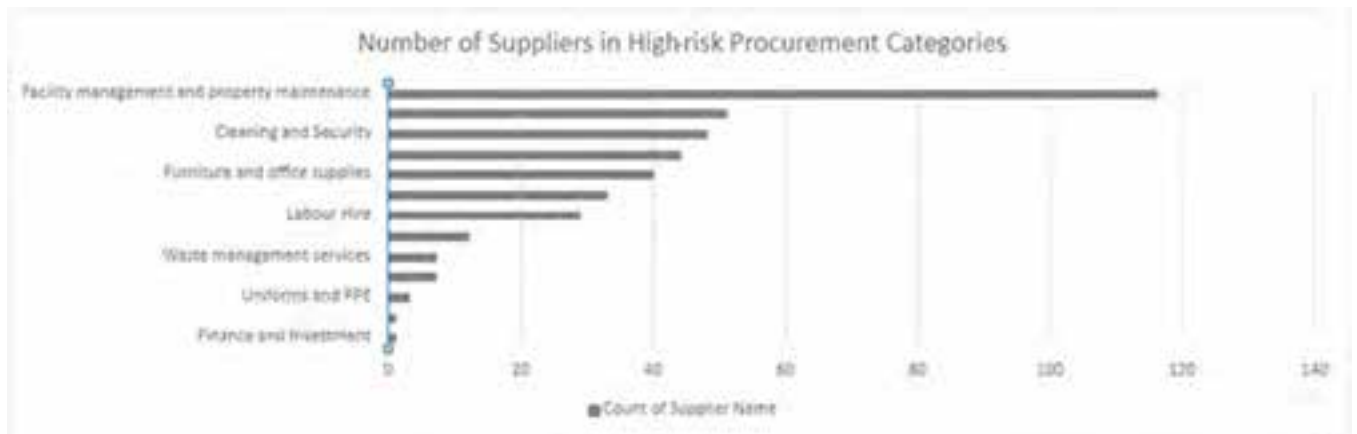
Risks that Mercy Community is directly linked to modern slavery practices.

Mercy Community recognises that there may be risk of connecting with an entity involved in modern slavery practices. Mercy Community has conducted a review of its top 30 suppliers to determine whether those suppliers are in the high-risk categories of sector and industry risks, product and service risks, geographic risks, and entity risks. Labour hire was found to be the top supplier category in terms of *both* potential modern slavery risk and spend amount.

At the start of the reporting period, the top 30 suppliers accounted for 62.3% of Mercy Community’s total supplier expenditure.

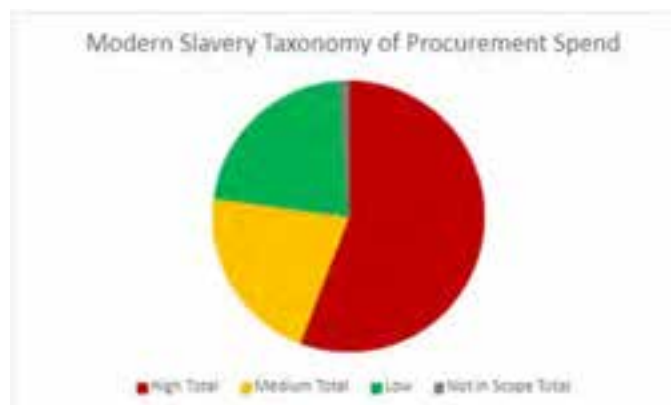
At the start of the reporting period, the top 5 supplier categories by spend amount are as follows in order of spend:

1. Facility management and property maintenance
2. Cleaning and Security
3. Furniture and office supplies
4. Labour Hire
5. Waste management services.



During our review, we identified that the top 30 suppliers or 62.3% of Mercy Community direct spend is with suppliers based in Australia. We are also aware that supply chains are complex and understanding the controls in place for our Tier 1 suppliers will also improve overall controls to modern slavery conditions in our supply chain. Mercy Community understands that risk is often not relative to spend and does not equate to actual risk.

Mercy Community’s risk analysis determined that labour hire represented the highest risk due to the lack of visibility of those suppliers’ modern slavery risk controls. All labour hire firm’s engaged by Mercy Community were selected to formally ask about their risks and controls in relation to modern slavery and how that presents risks to Mercy Community.



Almost all Mercy Community spending is with suppliers based in Australia. The 2023 Global Slavery Index considers Australia to be low risk geographically, however some of the suppliers are providing products and services belonging to the high-risk categories such as labour hire. Mercy Community has applied the ACAN Risk Taxonomy to its supplier spend profile.

Risk Level	ACAN Risk Taxonomy Category	Count of Supplier Name	Sum of Total Spend
Low	Government and agency fees	6	3376414.09
	License / membership fees	9	147730.76
	Professional services	138	7969579.14
Low Total		153	11,493,723.99
High	Building and construction	33	1553461.18
	Cleaning and Security	48	729981.11
	Events and event management	12	380508.98
	Facility management and property maintenance	116	3000576.68
	Finance and Investment	1	2031.04
	Food and catering services	51	2192594.96
	Furniture and office supplies	40	671419.87
	ICT Hardware	7	752124.04
	Labour Hire	29	3795045.71
	Linen, laundry and textile products	1	198931.15
	Medical devices and supplies	44	3424972.81
	Uniforms and PPE	3	42584.49
	Waste management services	7	114776.23
High Total		392	16,859,008.25
Medium	Advertising & Marketing	18	249378.85
	Fleet management, consumables and maintenance	11	1142761.92
	ICT Software and network services	57	4636471.79
	Print / Mail Provider	1	4350.5
	Travel and accommodation	50	2544643.39
	Utilities	13	840520.75
Medium Total		150	9,418,127.2
Not in Scope	Catholic Organisation	7	183885.22
Not in Scope Total		7	183885.22
Grand Total		702	37,954,744.66

CRITERION 4: ACTIONS TO ADDRESS MODERN SLAVERY RISK

Summary of Achievements and Future Actions

Achievements

During the reporting period, Mercy Community implemented the actions set out below to address modern slavery risk. Senior management commitment and support has enabled action to be taken effectively.

- Published the Modern Slavery policy on Mercy Community's public website mercycommunity.org.au
- Compiled a Supplier List and spend data for Mercy Community's 702 suppliers to enable extension of Invitations to Supplier Survey to High-Risk Category suppliers
- The provision of supplier details also enabled ACAN to ensure linking on Sedex (an online platform for expert guidance to manage, assess, and report on sustainability performance and supply chain goals) and accounting for any survey already undertaken by suppliers in high risk procurement categories for example, labour hire
- Alongside the supplier survey, ACAN used Mercy Community's supplier contact information to invite suppliers to webinars, creating an inclusive platform for dialogue, feedback, and collaboration. The two webinars available were held on 11th October 2023 and 8th November 2023
- On Mercy Community's behalf, ACAN conducted periodic follow-ups with our suppliers concerning Sedex onboarding
- Mercy Community identified labour hire as an area of highest supplier risk and requested all labour hire organisations to complete a questionnaire to assess modern slavery risk in our business operations and supply chains. (Unfortunately, only one labour hire organisation responded).
- Mitigated modern slavery risk by strengthening the New Supplier process to require responses about how modern slavery risk is being managed within their organisations
- Implemented training via ACAN e-learning modules for all current employees and new employees at induction
- Completed an ACAN survey of compliance.

Future Actions

- Further engagement with labour hire agencies to progress the development of a labour hire supplier risk profile
- Provide up-to-date training to all current and new employees
- Continue to work with ACAN to engage with suppliers, particularly high-risk category suppliers
- While not required to be reported on, consultation to ensure that the modern slavery risks relating to the entities Mercy Community manages have been appropriately identified, assessed and addressed and that the other entities are aware of what actions need to be undertaken.

Mercy Community utilises Sedex as our preferred risk management platform. During the reporting period, we engaged with Tier 1 suppliers (via ACAN) to complete onboarding activities and to join ACAN's capacity building webinars. We will continue the engagement and onboarding activities in 2024.

New suppliers are evaluated if they are a Modern Slavery Act reporting entity or not. Reporting entities with Modern Slavery Statements are preferred. Engaging a supplier without such a statement is assessed based on risk and the supplier's completion of a New Supplier form.

Mercy Community added a modern slavery clause in its template contracts.

Suppliers without existing contracts will go through the new supplier evaluation and selection process.

All existing suppliers must agree that to the best of their knowledge, they do not cause, contribute to, or be directly linked to modern slavery through their operations and supply chains.

Mercy Community is undertaking steps to gain more information to understand where the current suppliers are based, and the type of services provided.

Grievance mechanism/feedback

Mercy Community welcomes feedback about our services from people we support, family and friends, stakeholders and members of the public. This feedback helps us improve our processes and how we deliver our services and supports. More information can be found here:

<https://mercycommunity.org.au/feedback/>

Remediation

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

Mercy Community has access to Domus 8.7 – an independent program to provide remedy to people impacted by modern slavery. Mercy Community staff can contact Domus 8.7 to seek guidance on modern slavery concerns, support for workers and advice regarding how to approach providing remedy. By partnering with Domus 8.7, Mercy Community can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

If Mercy Community becomes aware that a supplier has engaged in modern slavery, Mercy Community is committed to working with the supplier that caused the harm to ensure remediation and mitigation of its recurrence to the satisfaction of Mercy Community.

Additional information about Domus 8.7 can be found on <https://www.acan.org.au/domus87>

CRITERION 5: EFFECTIVENESS MEASURES OF ACTIONS

Mercy Community has taken steps to raise awareness and conduct risk assessments of its suppliers.

Mercy Community has undertaken the ACAN Entity Profile Survey to arrive at a Modern Slavery Maturity Assessment score.

The score card will be used by our MSWG to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The score card ranges from: 0 to 100.

Achieving a score of 100 - signifying the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence - is an aspirational and long-term goal.

The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.

The score card provides for:

Holistic Overview: Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader, long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

Contextual Understanding: Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.

Flexibility and Adaptability: Organisations are dynamic and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.

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

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Program and Activities:** Considers the broader initiatives and engagements we undertake to address modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

Maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach:

- 1) governance
- 2) risk assessment
- 3) risk management
- 4) effectiveness.

The 2023 result for Mercy Community is 32/100.

Mercy Community - Overview



Mercy Community - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	31%	49%	28%	27%	34%
2. Operations	28%	38%	26%	31%	31%
3. Supply Chain	13%	65%	21%	13%	28%
4. Worker Engagement	9%	33%	18%	14%	18%
5. Entity's program and activities	50%	35%	50%	41%	44%
6. Grievance Mechanisms and Remediation	55%	60%	20%	20%	39%
Average	31%	47%	27%	24%	32%

Maturity Score 2023 Individual scoring by pillar and sub-pillar, including averages and total 2023 score



Mercy Community's score falls within the 31% - 50% range indicating an Emerging Practice level appropriate for Mercy Community's size, procurement spend and third year of activity. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means our processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

Additionally, we have adopted ACAN Baseline Data to capture key metrics that can be compared from this year going forward and assist with action planning especially around supplier engagement and engagement with our indirect workforce.

MERCY COMMUNITY 2023	ACTIVITY	METRICS
INTERNAL / STAFF	Hours spent on modern slavery activities	56
	Individual staff completed e-learning	47
	E-learning modules completed	49
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	702
	Number of suppliers with visible contact information and ABN	7
	Number of suppliers across high-risk categories	392
	Number of ACAN Supplier Surveys completed	37
	Supplier staff attending capacity building webinars	2
	Invited to join Sedex	8
	Joined Sedex	0
	Sedex SAQ completed	0
	Social audits	1
	Corrective actions	0
	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
Individuals with modern slavery cases remediated	0	
DOMUS 8.7 EXTERNAL REFERRALS		

Actions planned to be implemented in the next reporting period 1 January 2024 to 31 December 2024 include:

- Engage further with those labour hire organisations that did not respond to the request to complete the modern slavery risk questionnaire to understand vulnerabilities and the risk posed by suppliers falling within the category of labour hire
- Ongoing monitoring of the New Supplier process to mitigate Mercy Community’s exposure to modern slavery risk
- Actively engage with and monitor those identified as high-risk suppliers to encourage Sedex membership.

CRITERION 6: CONSULTATION

No consultation is required..

CRITERION 7: ANY OTHER RELEVANT INFORMATION

Mercy Community has programs that address the root causes of modern slavery such as poverty, forced migration and lack of education.

Mercy Community’s Romero Centre provides asylum seekers with practical support, legal connections, English language and skills growth, and community connection.



Mercy Community's Community Action for Multicultural Society (CAMS) Program supports migrant and refugee community in the Darling Downs South West Region.

Mercy Community's Unaccompanied Humanitarian Minors Program (UHMP) provides young people under the age of 18 years from refugee backgrounds with support services as they settle in Australia.



Little Company of Mary Health Care Ltd

Modern Slavery Statement 2023

Disclosure Note

This statement has been made on behalf of Little Company of Mary Healthcare Ltd. This Statement covers all entities owned or controlled by Little Company of Mary Healthcare Ltd.

ABN 11 079 875 697



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About us

Calvary has provided healthcare to the most vulnerable Australians, including those reaching the end of their life, since the arrival in Australia of the Sisters of the Little Company of Mary in 1885. We are a charitable Catholic not-for-profit organisation operating across seven states and territories in Australia with 13 public and private hospitals, 62 residential aged care homes, 17 retirement living villages, and 17 home care centres.

The Spirit of Calvary expresses how we care for each other, and how we care for our patients, our residents and our clients by 'Being for Others'.

- Everyone is welcome
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.



Our Vision and Values

As a Catholic health, home care and aged care provider, our vision is to excel, and to be recognised as a continuing source of healing, hope and nurturing to the people and communities we serve.

We bring the healing ministry of Jesus to those who are sick, dying and in need through "Being for others":

- in the Spirit of Mary standing by her Son on Calvary;
- through the provision of quality, responsive and compassionate health, community and aged care services;
- based on Gospel values; and
- in celebration of the rich heritage and story of the Sisters of the Little Company of Mary.

Our Values are visible in how we act and treat each other. We are stewards of the rich heritage of care and compassion of the Little Company of Mary. We are guided by the values of Hospitality, Healing, Stewardship, and Respect.

Modern Slavery: Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle, and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church and, therefore, of Calvary.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is committed to upholding human rights, not only with respect to its own employees, and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery, who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extend throughout the business to staff and suppliers.

2023 in Review

In fighting the scourge of modern slavery, we believe that the business community needs to continually review and improve on our response to changing environments. Our 2021 gap analysis revealed areas of significant progress in identifying risks, and equipping our staff with the necessary tools to address them on the ground. Simultaneously, we also identified areas of improvement and growth, particularly enhancing communication with suppliers, which support the entire Calvary network. Consequently, we are exploring the integration of technology and automation in our systems, collaborating with our third party provider of supply chain transparency solutions, Sedex. The process of onboarding suppliers to Sedex is progressing as planned. Additionally, through the Australian Catholic Anti-Slavery Network (ACAN) we have been actively engaging with other Catholic entities to foster joint communication and leverage the strength of our network through collaboration.

Calvary's modern slavery risk management initiatives can be split into three broad categories:

- Risk identification and mitigation in our internal operations and supply chain
- Staff awareness through education and training
- Demonstrating our commitment through internal policies and procedures.

In 2023, we continued to work with our suppliers, hosting information sessions and ensuring compliance of new and renewed contracted suppliers to Calvary's ethical business practices. We also identified an opportunity to improve on data collection so as to improve our ability to monitor compliance.

We build on the capability of our staff, requiring more staff to complete our online modules, and hosting training and information sessions for procurement staff throughout the Calvary network.

We launched a review of our internal policies and procedures, which strengthened our contracts, primarily with recruitment companies, in response to a significant risk presented in the use of third party workforce. In 2024, we are aiming to complete this review and strengthen and simplify our policies.

Our Plans for 2024

In 2023, we have been building our automation capabilities, which in 2024 will offer much stronger tracking and data. This includes:

- Continuation of our long-term road map, to strengthen our risk management of our supply chains.
- We plan to substantially increase our ability to survey suppliers, through automation, allowing us to build a much stronger picture of our risk.
- Expanding our program with a greater number of our suppliers who operate in high risk sectors, and bring in new suppliers in Sedex.
- Continue with the development of a whistle-blower hotline for workers, contractors, and sub-contractors.
- Building our staff awareness initiatives, through additional training and materials, particularly on grievance mechanisms and remedy pathways.
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery.

Our Plans Beyond 2024

Beyond 2024, Calvary will:

- Continuously improve our due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs.
- Conduct random audits of high risk suppliers.
- Expand our supply chain mapping and update our risk profile, expanding our modern slavery program accordingly.
- Roll out our governance and process into an online supplier platform to capture more suppliers in our risk mitigation.
- Monitor and report on adherence to our ethical sourcing policy and documents.

Statement from Martin Bowles, National CEO,
Little Company of Mary Health Care Limited



I'm proud to present Calvary's fourth Modern Slavery Statement, in line with the *Modern Slavery Act 2018*, which outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.

Throughout 2023, supply chain issues continued to challenge us, compounding with significant workforce shortages, which will likely remain an issue for businesses over the coming years. These present a significant risk to our business, as the products and services that support Calvary are often critical, and occasionally lifesaving.

Product shortages often create new modern slavery and forced labour risks for our teams to predict and manage. I am proud to say that we have continued to develop and build on our approach to modern slavery with the key initiatives we have taken this year:

- Increased the number of staff trained in modern slavery risk management
- Built on past year's Supplier Assessment Questionnaires, and remedy pathways for suppliers, which do not meet our expectations
- Increased our level of industry coordination through our membership with the ACAN.

Our Mission is to bring the healing ministry of Jesus to those who are sick, dying and in need through 'Being for others'. We maintain this year, as we have in prior years, that this responsibility extends to the people who support us, in our operations and supply chain. We cannot be an organisation dedicated to healing knowing the possible harm we are causing to people working in our supply chains.

This Modern Slavery Statement has been approved and endorsed by Little Company of Mary Health Care Limited Board of Directors as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 26th June 2024 and is for the period 1 January 2023 to 31 December 2023. This modern slavery statement is signed by a responsible member of the Board of Directors as defined in the Act.

A handwritten signature in black ink, appearing to read 'Jim Birch'.

Mr Jim Birch AM
Chair, Little Company of Mary Health Care

A handwritten signature in black ink, appearing to read 'Martin Bowles'.

Mr Martin Bowles AO PSM
National CEO, Calvary

Reporting Criteria 1 & 2: About Calvary

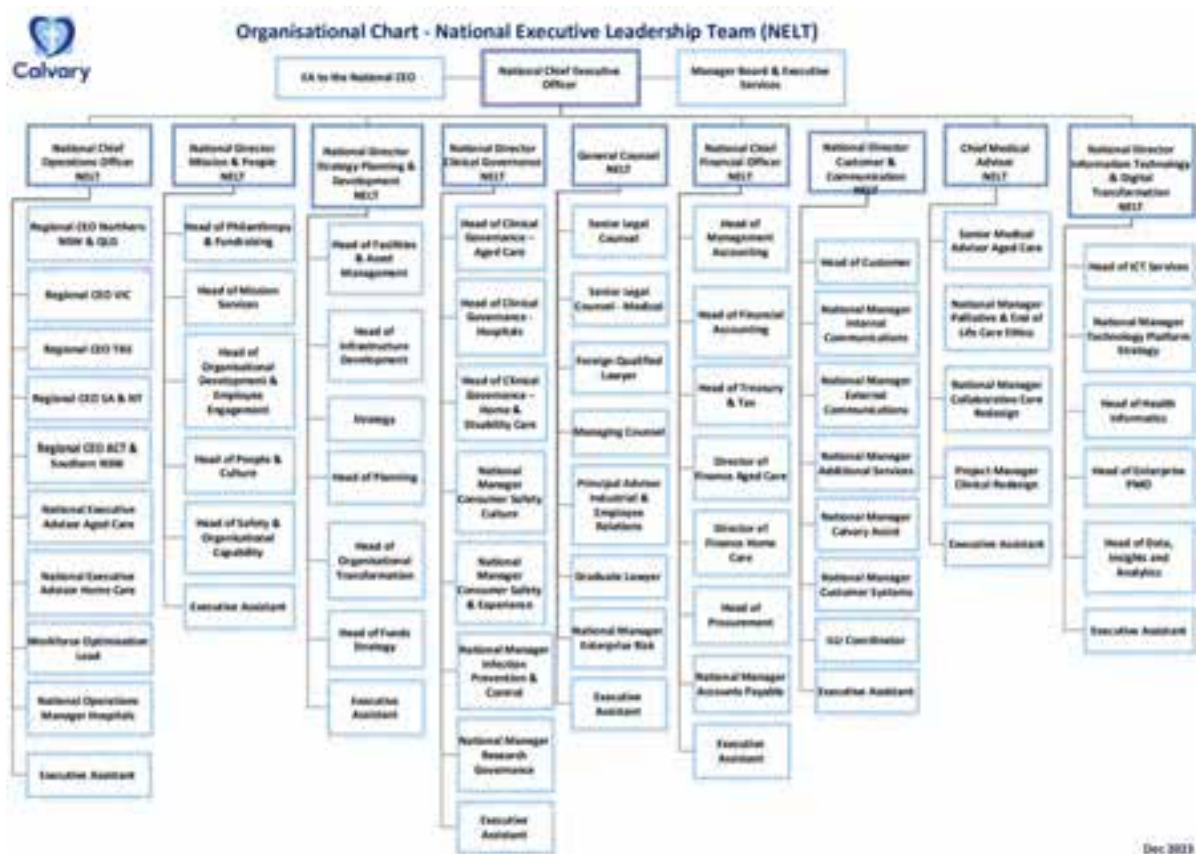
Our Organisational Structure

Little Company of Mary Health Care Limited (LCMHC) and its subsidiaries (trading as Calvary Health Care) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

Calvary’s Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and well-being of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found on our [website](#).

Our National Executive Leadership Committee, under National CEO, Martin Bowles AO PSM, oversees Calvary’s strategic intent, and delivers on Calvary’s mission of “Being for others”.

Calvary operates as a parent company, with hospitals, residential aged care and home care services as controlled entities.



Dec 2023

Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2023 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as human resources, procurement, legal, and training and development teams.

In 2018, Calvary established a modern slavery steering committee, with representation strategically selected from a cross-section of business units, which were well positioned to enable rapid changes to policy, process, and mandated activities. The steering committee developed non-negotiable criteria for business partners, which were approved by the Board in 2018.

During the 2023 reporting period, Calvary's modern slavery initiatives were supported by the People, Values, Communications, and Culture Committee (PVCCC), with regular communications being produced for this group. The PVCCC advises on embedding Calvary's mission, vision and values into its strategic focus, leadership, and organisational behaviours, and took a special interest in advancing modern slavery and human rights issues within the Calvary business. In addition to this critical group, Calvary's Finance, Performance, and Risk Committee provided guidance and feedback to strengthen the governance process.

Our Operations

Calvary operates 13 public and private hospitals, 62 residential aged care homes and 17 retirement living villages, and a national network of 17 home care centres around Australia. Calvary's head office is located at Level 15 - 345 George Street, Sydney, New South Wales 2000. With a team of more than 17,407 employees, in 2023 Calvary had 234,198 hospital admissions, conducted 141,480 surgical procedures, provided home care services to 16,943 clients and provided 2.62 million hours of care to our aged care residents. In 2023, revenue from our operations was \$1,844,471

Calvary has three public and ten private hospitals providing acute and sub-acute care. Our hospitals cover a broad geographical footprint across Victoria (Vic), Tasmania (Tas), South Australia (SA), New South Wales (NSW) and Australian Capital Territory (ACT). Calvary Home Care has been supporting people in their own homes and communities for more than 20 years in Vic, Tas, SA, Northern Territory, NSW, and ACT. We deliver a range of aged care, disability and other support services enabling independence, improved social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment where residents are respected for their individuality.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multinationals and small, local businesses, which provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and information and communication technology (ICT) hardware and software.

A significant focus over the reporting period was the continued implementation of the "new Calvary" homes into the Calvary business. The additional homes were successfully implemented in 2021/22, with continued review and consolidation into the supply chain.

Our Supply Chain

As a multi-faceted healthcare organisation operating throughout Australia our supplier base is diverse, ranging from large multinational organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2023 reporting period, Calvary transacted with 6,183 suppliers.

We procured goods and services in the following primary spend categories:

Indirect	Direct
Recruitment and Agency	Drugs and Pharmaceutical Services
Professional Services	Clinical Services (e.g. Pathology, Allied Health)
Facilities Management	Major Medical Equipment
ICT	Medical and Surgical Supplies
Logistics	Prosthetics

Calvary's expenditure on externally sourced goods and services in 2023 was more than \$1.198 billion, which is managed by National Procurement.

In order to effectively manage security of supply, Calvary operates a "multi-region multi-supplier sourcing strategy". This strategy, in conjunction with the broad, and sensitive range of medical consumables required for our day-to-day operations, dictates that we engage with suppliers both locally and internationally. Manufacturing facilities for the goods used in our daily operations are heavily concentrated in China, Europe, and the USA.

Reporting Criteria 3: Modern slavery risks in operations and supply chain

We believe the importance of a modern slavery program extends beyond an organisation's legal accountabilities. Ensuring that modern slavery does not exist in our supply chain or operations aligns with our core values and mission as a care-giving organisation.

In 2023, our efforts focused on fostering a transparent and collaborative relationship between our organisation and our suppliers, educating our staff to understand and recognise the risks, and building systems and processes to allow for the reporting and escalation of any suspected or observed risks.

In the 2022 reporting period, Calvary renewed our membership of ACAN. We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat map exercise and supply chain investigations that we conducted with ACAN have enabled us to identify key risks and areas of focus, develop an effective response and build plans for the future, which are contained in this report.

OPERATIONAL RISKS

Overview

Calvary provides a diverse range of services to patients, residents and clients, where consumer and clinical choice is often a factor in procurement decision making. As a result, we recognise that the risk of modern slavery is something that occurs in our operations and supply chain. We work to proactively identify and mitigate these risks through a program outlined in this statement.

Throughout 2023, Calvary has looked to increase our modern slavery risk management approach and continuous improvement activities across different key areas of operation.

- **Business Process and Governance:** the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- **Operations:** focus on internal practices and how effectively we manage risks within our day-to-day activities.
- **Supply Chain:** examine our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- **Worker Engagement:** manage worker engagement and the standards upheld to prevent exploitation.
- **Entity's Program and Activities:** look at the broader initiatives and engagements we undertake to combat modern slavery.
- **Grievance Mechanisms and Remediation:** evaluate the channels available for reporting concerns and the processes for addressing them.

In line with best practice, Calvary with the support of ACAN, is committed to continuously improving our maturity across governance, risk management, risk assessment by identifying strengths and weaknesses in Calvary's approach.

Our People

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary employs most of our team directly, lowering the risk of modern slavery occurring within our workforce. However, we occasionally utilise third party labour hire.

As of December 2023, Calvary has 17,407 employees. Of our staff, 14,042 are female, making up approximately 80 per cent of our workforce.

Calvary's recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong national and local Human Resources team.



"Calvary North Adelaide Hospital staff."

Modern Slavery Gap Analysis

In 2023, Calvary has partnered with ACAN and reviewed maturity of our own organisation. Our analysis provided considerable insight into areas of improvement which we will endeavour to improve over the 2024 reporting period.

The evaluation helps to identify strengths and weaknesses in Calvary's approach, across the four pillars.

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.
- **Risk assessment:** at-risk-areas in our operations and supply chain, continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** mitigating actions, and adaptable to changing circumstances, and driving measurable impact.
- **Effectiveness:** the impact of our anti-slavery efforts and what holds us accountable.

While many such metrics are proxy-measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

Calvary will develop an action plan based on the initial findings for each pillar and look to set SMART (Specific, Measurable, Achievable, Relevant, Time-bound) objectives to guide further improvements for 2024 to Calvary's Modern Slavery program.

SUPPLY CHAIN RISKS

The ACAN Health working group was established to coordinate the effort across all hospitals and aged care providers in ACAN. Throughout 2023, we have started to work together to understand where our supply chains overlap. The plan is to start engaging high risk suppliers, where more than one ACAN entity is procuring product and/or services to leverage our joint scale. Importantly, this work is precompetitive, and no information about individual pricing or volume is shared. All information is held and analysed by ACAN, not individual entities.

Reporting Criteria 4: Actions taken to assess and address risk

Calvary's modern slavery risk management initiatives can be split into three broad categories:

- Risk identification and mitigation in our internal operations and supply chain
- Staff awareness through education and training
- Demonstrating our commitment through internal policies and procedures.

Modern slavery action plan and road map

Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and those involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was assigned to 625 staff members. In 2022, 36 per cent of staff completed this course compared to 27 per cent in 2021. This module has also been made available to all staff through our e-learning platform to encourage broader organisational learning about modern slavery.



- In 2020, we reported that a second module would be added during 2021. This module was completed and tested in 2022. This module has now been rolled out.

- **Supplier Engagement**

- Calvary has continued to communicate with all current suppliers on the steps we have and are undertaking to ensure we meet, and where possible exceed, our obligations with regards to modern slavery legislation.
- Calvary has notified all suppliers of our expectations of them, as our partners, in supporting our efforts in addressing this issue including adhering to our Business Partner's Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.
- Calvary joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.
- Calvary invited high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
- Moving forward Calvary plans to use Sedex to:
 - Manage the risk of modern slavery with existing suppliers
 - Validate inherent risk against actual risk
 - Screen new suppliers as part of tenders and supplier on-boarding processes
 - Gain visibility further upstream in the supply chains
 - Monitor and report on progress in the profile of suppliers.

- **Our People**

- Calvary's third party labour hire contracts have been updated to include modern slavery risk management requirements.

- **Our Policies and Contract Terms**

- Calvary maintained our policies on modern slavery and ethical sourcing including:
 - Business Partner's Criteria
 - Ethical Sourcing Policy
 - Code of Business Practice
 - Declarable Minerals List.
- Calvary requires all new contracted suppliers agree to our Business Partner's criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary's minor works and supply contract templates, which were revised during the 2021 reporting period, and used as our standard terms for minor works during 2022 and throughout 2023.

- **Sector collaboration**

- Calvary is a member of the ACAN and has actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to modern slavery.
- Calvary is a member of the Catholic Negotiating Alliance CNA and issued supplier self-assessments to our joint top-30 high risk suppliers.
- Calvary continues to work with other CNA members to address any identified risks.

- **Remediation**

Calvary intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if Calvary is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Calvary will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established Domus 8.7, to provide remedy to people impacted by modern slavery as reported in 2022.

Domus 8.7 is a not-for-profit unincorporated association established to act as a community and social welfare service for individuals, groups and entities who seek advice in relation to modern slavery, including providing relief to victims of modern slavery. Domus 8.7 will provide remediation services for people impacted by modern slavery and a confidential advisory service.

Domus 8.7 Principles:

- Independent advice and support
- Ensuring people impacted are safe and protected
- Any work undertaken is with the full knowledge and consent of people impacted
- Human rights based approach.

Domus 8.7 Overview:

- A vital service and key element of the ACAN Program in Australia.
- Addresses a key mandatory reporting requirement of the Master Service Agreements.
- Provides the support needed for a rapid, coordinated response when victims are identified
- Develops the internal capability to manage risk and engage staff
- Establishes a documented process to manage complex humanitarian issues
- Upholds Catholic Social Teaching
- Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.

Through Domus 8.7, Calvary will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response. It is the intention of Calvary to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Calvary is directly linked to modern slavery by a business relationship Calvary is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Calvary staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

Calvary has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult Calvary to ensure victim-centred remediation processes are implemented to the satisfaction of Calvary.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, Calvary staff will continue to contact relevant law enforcement agencies if a person is in immediate danger and Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2023, as well as identifying new opportunities to improve our modern slavery program.

In 2023 we met all targets as detailed in this report, including:

- Calvary has extended direct invitations to 121 suppliers to join Sedex, of which 53 have been accepted.
- Through our collaboration in the ACAN health working group, overlap in the supplier base has been identified resulting additional suppliers which are already on Sedex being linked to us.
- Of our suppliers on Sedex, 89 have not finalised the Sedex Self-Assessment Questionnaire (SAQ). This year, 32 suppliers completed the SAQ, an increase of 14 from the previous year.
- With the 32 SAQ completions, the outcome has resulted in 24 suppliers classified as low risk and eight medium risk.
- It is important to note that this risk classification hasn't identified any high-risk suppliers. This could be a result of the real high-risk suppliers being reluctant to part take in the process possibly because they have their own programs.
- Calvary will keep an eye on this in the future, using the ACAN risk taxonomy for those who do not engage and complete further steps as requested.
- Applying the ACAN risk taxonomy, Calvary has 5,854 suppliers classified as having an inherent risk level of 'high'. We will continue to test this assumption moving forward.

In 2024 and future years, we will be establishing milestones centred around:

- percentage of staff who have completed mandatory training
- number of audits conducted against suppliers
- number of supplier remediation programs completed.

While we recognise the need to develop and evolve our targets and measurements, in 2023 we have taken steps to enhance our metrics (as seen in the Supply Chain Risk section of this statement).

Being the third year of measuring, we recognise that we can improve further on how we measure this.

We can provide the following data as a baseline for further reporting:

Focus	Description	2023
Internal	Hours spent on Modern Slavery Activities	242 hours
	eLearnings completed	56
External	Total number of suppliers	6,183
	Total number of high-risk suppliers	5,854
	Invited to join Sedex	121
	Joined Sedex	67
	Suppliers completing Sedex risk assessment SAQ	32
	Suppliers attending training	4
	Social audits (Supplier site audit)	7

In the future, we aim to evolve these metrics further, e.g.; by adding new and more accurate metrics or by retiring metrics which weren't useful.

In 2024, future metrics could involve audit results/corrective actions, supplier and staff engagement etc., but ultimately any new metric should refine the underlying understanding of the risk we have and the impact to people.

Reporting Criteria 6: Process of consultation with entities owned or controlled

The LCMHC Board is the single Board which governs all entities, owned and controlled. Similarly the National Executive Leadership Committee manages all entities, owned and controlled with the support of Regional CEOs, to whom all owned and controlled service level executives report.

As the reporting entity, Calvary has developed policies, procedures and mandatory training and education materials for use by all Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.

Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the ACAN. Along with the network, we have contributed to a wider risk management process across multiple industries.

We are continuing with our membership of ACAN next year, as addressing the risk of modern slavery involves long-term commitment.

MODERN SLAVERY STATEMENT

2023

Reporting Period 1 January 2023 – 31 December 2023

Catholic Healthcare Limited
ABN 69 064 946 318



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ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care and retirement living reaching across the east coast of Australia. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities, which we have done for 29 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit.

Our person-centered holistic approach focuses on client wellbeing with a continuum of care that is tailored and flexible. Today, Catholic Healthcare operates 41 residential aged care homes, 13 retirement living communities, and provides home and community services to more than 5,800 clients.



BRIEF STATEMENT FROM THE

Board Chair & Chief Executive Officer

Catholic Healthcare is committed to upholding the human dignity of those who work with us, whether directly or indirectly. We also support actions that contribute towards a more compassionate and humane society, and this includes supporting Australia's Modern Slavery Laws.

There is no place for modern slavery within our organisation and we are committed to using reasonable means at our disposal to ensure we do not participate in modern slavery activities.

Our work is particularly focused on the care and support of seniors through our Residential Aged Care Homes, Retirement Living Communities and Home and Community Services.

As part of our work, Catholic Healthcare engages with a diverse range of suppliers of goods and services, with whom we seek to raise awareness of the risk of modern slavery and ensure our supply chains are comprised of credible providers. Catholic Healthcare continues to educate employees on the issue of modern slavery, and we progressively refine our procurement practises with a focus on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's fourth Modern Slavery Statement and commend the officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal.

Stephen Teulan
Chair

Josh McFarlane
Chief Executive Officer

Catholic Healthcare Limited

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 6 June 2024.

2023 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

ACHIEVEMENTS

Highlights include:

- Commencement of a transition to in-house cleaning services in our residential aged care facilities.
- A comprehensive review and consolidation of the use of nurse agencies including improved controls via a booking platform and all agencies subject to Catholic Healthcare's standardised contracts (including modern slavery clauses).
- 80% of uniform purchases from three Sedex registered manufacturers.
- All key Catholic Healthcare food suppliers also registered with Sedex and all new food distributors are questioned on their ethical sourcing arrangements.
- Catholic Healthcare's Modern Slavery Liaison Officer (MSLO) group was expanded to incorporate all main business units in 2023 to focus on business unit specific Action Plans.

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2023 reporting period. Our taskforce, comprising members from across our organisation including Procurement Services, Legal, Mission and the Executive, has continued to roll out educational initiatives relating to modern slavery. We have made further modern slavery improvements to organisational policy and procedures.

Our plans for 2024 and beyond

In 2024 and beyond, Catholic Healthcare intends to continue to extend modern slavery training throughout the organisation, strengthen our policies and procedures, promote further supplier involvement in anti-modern slavery actions and reduce our reliance on outsourced services in high-risk roles. Further details are set out in this Statement. We also intend to review our supplier management systems to improve our understanding of supplier risks.

Criterion 1

ORGANISATIONAL STRUCTURE

Catholic Healthcare’s mission is to promote the dignity, life, and spirituality of older people through connected and inclusive communities.

We are guided by our values of courage, compassion and integrity.

As a trusted leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, retirement living and healthcare across New South Wales and South-East Queensland. Catholic Healthcare has been operating for 29 years and provides care and support to people from all faiths, backgrounds and ethnicities.

Catholic Healthcare was founded in 1994 by the Bishops of the Province of Sydney at the request of six founding members: Sisters of Charity, Sisters of St Joseph (NSW Province), Sisters of Mercy (Singleton), Little Company of Mary, Sisters of St John of God and Brothers of St John of God.

Guided by our Members and Trustees, Catholic Healthcare has a single operating entity, Catholic Healthcare Limited. Catholic Healthcare Limited operates as an integrated provider of aged care services through two (2) divisions:

Operations

- Residential aged care homes
- Retirement living communities
- Social housing for seniors
- Home Care packages
- Commonwealth Home Support services
- Homelessness services
- Hoarding and squalor services
- Assessment services for seniors

Corporate Services

- Mission
 - Human Resources
 - Information Technology
 - Finance
 - Property
 - Strategy and Marketing
 - Practice and Quality
 - Company Secretariat
 - CEO’s Office
-

Criterion 2

OPERATIONS AND SUPPLY CHAIN

Head Office Location

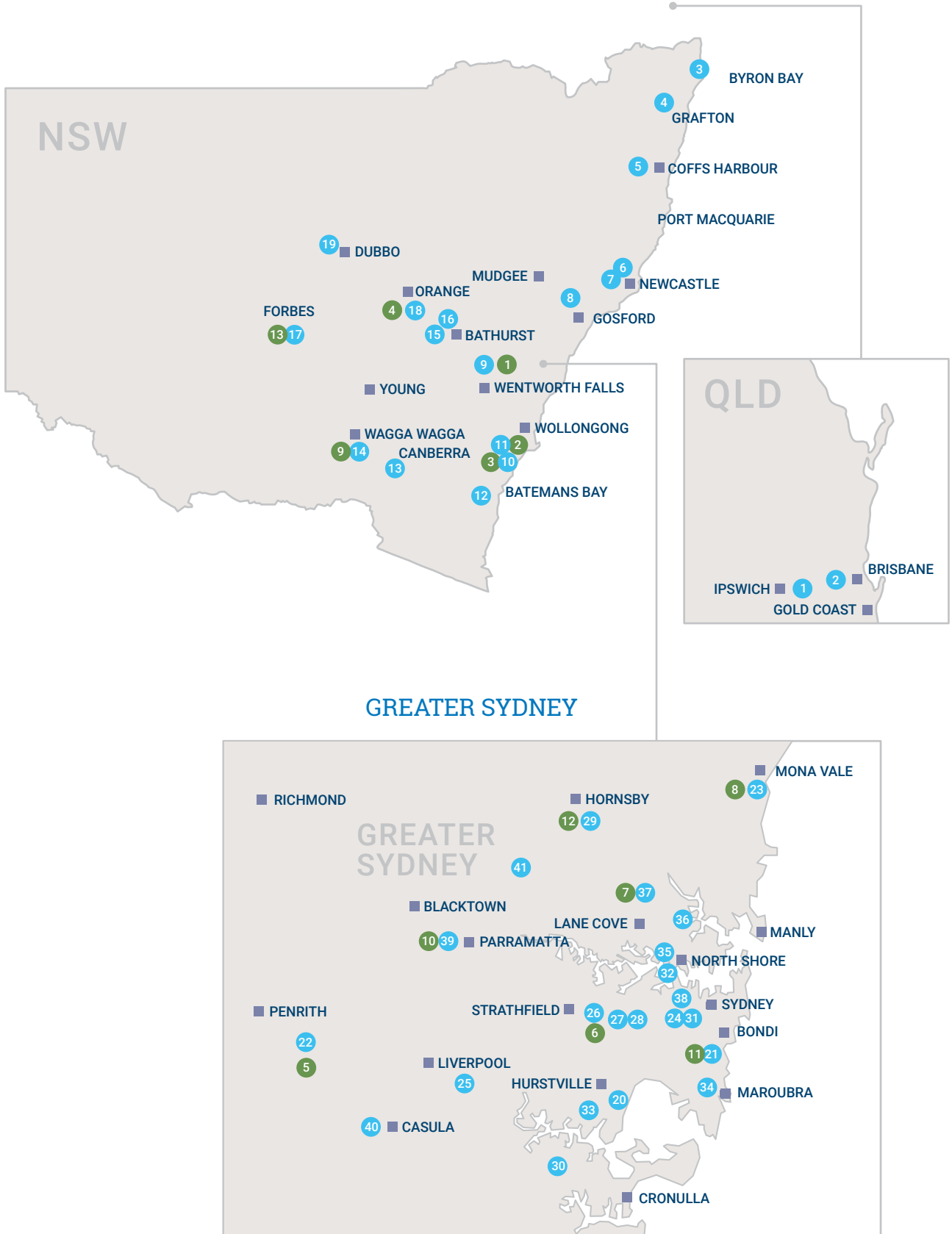
Suite 1, Level 5, 15 Talavera Road Macquarie Park, NSW 2113

AT A GLANCE

As at 31 December 2023.



Our locations



Our locations

● RESIDENTIAL AGED CARE

- 1 VILLA MARIA CENTRE**
Eastern Heights
- 2 VILLA MARIA**
Fortitude Valley
- 3 COOLAMON VILLA**
Mullumbimby
- 4 ST FRANCIS AGED CARE**
Grafton
- 5 ST JOSEPH'S AGED CARE**
Coffs Harbour
- 6 CHARLES O'NEILL**
Mayfield West
- 7 ST JOHN'S VILLA**
New Lambton
- 8 OUR LADY OF LORETO GARDENS**
Hamlyn Terrace
- 9 BODINGTON**
Wentworth Falls
- 10 ST MARY'S**
Berkeley
- 11 VILLA MARIA CENTRE**
Unanderra
- 12 MARANATHA LODGE**
Batehaven
- 13 BLAKENEY LODGE**
Tumut
- 14 THE HAVEN**
Wagga Wagga
- 15 MACQUARIE CARE CENTRE**
Bathurst
- 16 ST CATHERINE'S**
Bathurst
- 17 JEMALONG RESIDENTIAL VILLAGE**
Forbes
- 18 ST FRANCIS AGED CARE**
Orange
- 19 HOLY SPIRIT DUBBO**
Dubbo
- 20 BETHLEHEM HOUSE**
Kogarah
- 21 BRIGIDINE HOUSE**
Randwick
- 22 EMMAUS VILLAGE**
Kemps Creek
- 23 GEORGE MOCKLER HOUSE**
Mona Vale
- 24 GERTRUDE ABBOTT AGED CARE**
Surry Hills
- 25 HOLY SPIRIT AGED CARE**
Revesby
- 26 HOLY SPIRIT CROYDON**
Croydon
- 27 LEWISHAM NURSING HOME**
Lewisham
- 28 LEWISHAM RETIREMENT HOSTEL**
Lewisham
- 29 MCQUOIN PARK**
Wahroonga
- 30 PERCY MILES VILLA**
Kirrawee
- 31 THE SISTER ANNE COURT**
Surry Hills
- 32 ST ANNE'S AGED CARE**
Hunters Hill
- 33 ST BEDE'S HOME**
South Hurstville
- 34 ST JAMES VILLA**
Matraville
- 35 ST JOSEPH AGED CARE**
Hunters Hill
- 36 ST PAUL'S**
Northbridge
- 37 ST PETER'S**
Lane Cove North
- 38 VINCENTIAN AGED CARE SERVICE**
East Sydney
- 39 ST HEDWIG VILLAGE**
Blacktown
- 40 HOLY SPIRIT**
Casula
- 41 MACKILLOP HOUSE**
Norwest

● RETIREMENT LIVING

- 1 AQUINAS COURT**
Springwood
- 2 BISHOP McCABE RETIREMENT VILLAGE**
Towradgi
- 3 ST MARY'S RETIREMENT LIVING**
Berkeley
- 4 THE BAILLY**
Orange
- 5 EMMAUS RETIREMENT VILLAGE**
Kemps Creek
- 6 THE BRIGHTON**
Croydon
- 7 ST PETER'S GREEN**
Lane Cove North
- 8 CHARLES O'NEILL**
Mona Vale
- 9 THE HAVEN**
Wagga Wagga
- 10 ST HEDWIG VILLAGE**
Blacktown
- 11 STRATHALLEN VILLAGE**
Randwick
- 12 MCQUOIN PARK RETIREMENT LIVING**
Wahroonga
- 13 JEMALONG RESIDENTIAL VILLAGE**
Forbes

■ HOME CARE

You will find us in regional and metro areas across NSW and South East QLD. Only key locations are shown here, please enquire to find a service near you.



Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly those who are most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

Our Trustees and Board, who both have oversight and governance of Catholic Healthcare's mission, are conscious of the risks of modern slavery infiltrating supply chains and as a result actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our clients and residents from more than 2,000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages sourced through providers who provide quality products locally or regionally.

- Linen and laundry supplies.
- Medical and care supplies including medications, incontinence aids, protective personal equipment (PPE).
- Property supplies and services ranging from those required for new, and refurbishment of, residential aged care homes and independent living communities and property maintenance services for all existing properties.
- Information technology services ranging from system applications for Catholic Healthcare buildings, telephone and mobile devices and computer equipment.
- Marketing and communications services including printing, publications and website design.
- Workforce supplies including employees, consultants and agency workforce. This includes a small number of workers on visas.

Some suppliers, themselves, source goods that are on-sold to Catholic Healthcare. Some of these goods may be sourced from foreign countries.

Criterion 3

MODERN SLAVERY RISKS

Modern Slavery Risks in Operations and Supply Chain

Catholic Healthcare understands that some goods (including their component parts) may have been impacted by modern slavery practices. As explained in our 2021 Modern Slavery Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation, to determine which and how many of our top suppliers can be categorised as 'high risk'. We currently analyse new suppliers as we engage them.

To expand upon this analysis, in 2023, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating modern slavery practises from our organisation.

Operational Risks

Our People

Catholic Healthcare employs more than 5,000 individuals including full time, part time and casual workers. Around 83% of our workforce identify as female which is recognised to be common among the caring professions. Although we do not regularly collect data on the country of origin of our employees, it is known that we employ a diverse workforce with employees representing many nationalities including Australian, European, Asian, North and South American and African.

Catholic Healthcare has invested in a human resources information system which, once implemented, will allow for the collection of more accurate data on the demographics of our workforce.

Catholic Healthcare recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission, making the risk of modern slavery in our directly employed workforce low. A smaller percentage of workers in our corporate service's divisions and head office are employed under individual contracts of employment. Agency workers, when required, such as registered nurses, enrolled nurses, assistants in nursing and care workers, are engaged under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are engaged under individual contractor arrangements that allows for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category and to address this we have updated our standard agency contracts to include robust anti-slavery clauses, which ensures contractors comply with our Modern Slavery Policy and requires them to report instances of modern slavery to Catholic Healthcare. To date, no contractors have raised any issues with these new standard clauses.

Supplier Risks

In 2023 we reviewed the original risk assessment and concluded that it is still valid. The original risk assessment mapped the potential for modern slavery practises across our top 50 suppliers by spend so as to improve our understanding of the key procurement categories that contain high risks of modern slavery.

Catholic Healthcare procures goods and services across 18 broad procurement categories including:

- Building and construction
- Professional services
- Linen and laundry
- Events and entertainment
- Allied health
- Waste management
- Food and beverage
- Utilities
- ICT software and network services
- Labour hire
- Cleaning services
- Uniforms and PPE
- Medical supplies
- Facility management and property management
- Travel services
- ICT hardware
- Furniture and office supplies
- Printing and mail provider.

The list below was developed by ACAN covering a range of organisations and we have identified the following high-risk categories as relevant to our organisation:

- Medical equipment, supplies and consumables
- Building, construction, and fabrication services
- Prostheses, implants and medical devices
- Food, beverage and hospitality
- Property, facility, and maintenance
- Cleaning services
- Labour hire
- Office and teaching supplies, furniture and services
- Waste management
- Clothing, PPE and other personal equipment
- Linen and laundry
- Events, excursions, camps, and entertainment
- Security services.



Criterion 4

STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

Catholic Healthcare has endeavoured to consolidate its policies and procedures concerning modern slavery and to evolve our practices that prevent modern slavery in our organisation or supply chains.

Catholic Healthcare identified out-sourced cleaning at our residential aged care facilities to be a high risk activity and during 2023 commenced a program to bring this in-house and therefore under the direct control of Catholic Healthcare management.

Catholic Healthcare also carried out a comprehensive review and consolidation of agencies used for nursing services. This includes the introduction of a booking platform process and 100% engagement under standardised contracts (which includes modern slavery clauses).

Catholic Healthcare purchases uniforms from one Australian distributor with the supply chain limited to three overseas manufacturers covering 80% of purchases. Both distributor and manufacturers are registered with Sedex.

All key Catholic Healthcare suppliers are now registered with Sedex and all new food distributors are questioned on their ethical sourcing arrangements from food suppliers.

Other high risk suppliers continue to be encouraged to register for Sedex and were invited to attend ACAN contractor training.

Catholic Healthcare's MSLO group was expanded to incorporate all main business units in 2023 to focus on business unit specific action plans.

Catholic Healthcare has prioritised internal education and establishing the structures and resources needed to support the anti-modern slavery efforts of the organisation to ensure that changes made are monitored for effectiveness. To this end, Catholic Healthcare finalised an organisational Modern Slavery Policy in 2022. This policy is published on Catholic Healthcare's Resource Centre and is made available to contractors through a Resources for Contractors page. The Modern Slavery Policy is regularly reviewed.

After joining ACAN in 2020, Catholic Healthcare made use of its resources including ACAN educational tools, which focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced Modern Slavery Awareness training for those in key roles including senior members of the Modern Slavery Taskforce and in 2022, the Catholic Healthcare Leadership team. We plan to incorporate education about modern slavery into the onboarding process of new employees.



Domus 8.7

Catholic Healthcare is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the need of the victim and relevant laws and guidelines, including the UN Guiding Principles on Business and Human Rights and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.

Remediation includes taking action to address harm to individuals impacted by modern slavery and to mitigate future risks. Due to the complexity of remediation, specialised resources are required to ensure the best outcomes for individuals affected by modern slavery. To address this, Domus 8.7, a not-for-profit established by the Catholic Archdiocese of Sydney, provides remedy pathways and a confidential advisory service to individuals affected by modern slavery.

Domus 8.7 will in future triage cases referred to it by Catholic Healthcare and refer victims to internal or external specialists who can provide support, advice and assistance regarding legal, social, and human rights responses to cases of modern slavery. It will also partner with international organisations to ensure supply chain remedial action and prevention is available.

Through Domus 8.7, Catholic Healthcare aims to help individuals impacted by modern slavery to achieve outcomes that can be reported and used to continuously improve risk management and operational response. Any future grievances related to modern slavery are to be mediated through Domus 8.7, and Catholic Healthcare is committed to working with any entity that caused harm to ensure remediation and prevention of recurrence.

In 2023, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains.

Criterion 5

EFFECTIVENESS OF STEPS TAKEN UNDER CRITERION 4

No instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate this does not mean that we do not necessarily have any cases of modern slavery. Catholic Healthcare therefore continues to review the effectiveness of our Modern Slavery Risk Management procedures including assessment of high risk suppliers across different Catholic Healthcare departments, staff and supplier awareness training.

Monitoring (tracking) is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to modern anti-slavery action by setting goals and future Action Plans for each year.

Set out below is a table outlining our initial three-year goals, and progress made towards them, and in CRITERION 7 are our planned future actions.

Planned Completion Year	Action	Status as of 2023 CY
2021	Introduce modern slavery (MS) clause to all Procurement Contracts	Completed
2021	Develop remediation guidelines based on findings/ experiences from Y1	Completed
2022	Develop KPIs for suppliers which correlate with ethical sourcing	Ongoing
2022	MS training to Board, Leadership team and high-risk roles	Completed
2022	HR training webinar on the role of HR in MS risk management, reporting obligations and other tools, resources and requirements relevant to HR	Completed
2022	Commence training of high-risk and high-spend suppliers: Design and develop Supplier MS workshops based on supplier group/classification and risk rating –undertaken by ACAN in November and December 2022	Ongoing
2022	Commence process of contacting suppliers and contractors to receive their updated MS policies	Completed
2023	Roll out MS training to the next level of Catholic Healthcare Managers concentrating on Property Finance and IT	Completed
2023	Onboarding MS training program for new employees to be implemented	Ongoing
2023	Complete action plans for other Catholic Healthcare departments including Property and HR	Completed
2023	Design, formalise and introduce ethical vendor questionnaires (e.g. ACAN guidelines) or disseminate supplier self-assessment questionnaire.	Ongoing



We will continue to use goal setting/action plans and assessment of completion against the actions identified in the table, as our primary metric when it comes to measuring the success of modern slavery initiatives. We will continue to review and evaluate our performance.

As at 31 December 2023, the following training has been conducted by Catholic Healthcare:

- Modern Slavery 101 Training – Procurement employees, Leadership team and all Board Members, being a total of 153 employees.
- Modern Slavery Business Relevance Training – completed by 141 employees.
- Modern Slavery Suppliers webinar and survey – 69 suppliers attended an ACAN webinar out of 197 invited. 48 of these also completed an ACAN risk survey.

Criterion 6

INTERNAL CONSULTATION

Catholic Healthcare has one current operating entity, Catholic Healthcare Limited. Consultation is as described in this statement, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 2.



Criterion 7

ANY OTHER RELEVANT INFORMATION

Planned future actions:

- Continue transition to bring cleaning services in-house for residential aged care facilities.
- Investigate the opportunities to bring linen services in-house.
- Investigate supplier and contract management systems to streamline communications and process supplier data on modern slavery activities.
- Continue to arrange ACAN modern slavery training for new contractors and to an expanded group of existing suppliers via expanded MSLO group.
- Review contractor arrangements as part of a larger contractor engagement project and consolidate supplier numbers to reduce modern slavery risks.
- Continue to identify high risk suppliers, invite these to modern slavery contractor training, and update supplier preferred listings to incorporate their stance on modern slavery.
- Provide training on 'ethical sourcing' to Procurement category managers to upgrade sourcing skills.
- Update and disseminate a supplier Code of Conduct.
- Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry out purchasing activities and add this module to Catholic Healthcare's E-learning platform and/or onboarding process.
- Modern Slavery Awareness Training for frontline employees.
- Develop and disseminate communications to all the high-risk vendors who do not publish Modern Slavery Statements to inform them of the importance of this practice and advise that this is part of Catholic Healthcare's prequalification assessment for any sourcing suppliers.
- Update our preferred supplier lists by reference to their compliance with modern anti-slavery requirements.
- Update our supplier evaluation process with minimum ethical sourcing requirements including exploring the development of an ethical practices questionnaire.

Specifically in connection with Property:

- Continue project to ensure all Property contracts and agreements include relevant Modern Slavery Clauses and review as part of Property/Legal contracts workshop.
- Continue to review modern slavery policies in place with key/largest suppliers and action any concerns.
- Expand modern slavery awareness training to all Property staff and key suppliers.



catholichealthcare.com.au



EREA

Modern Slavery
Statement

Acknowledgment of Country

We acknowledge the Aboriginal Peoples as the Traditional Owners of each of the Countries on which our schools and offices are located.

We acknowledge the Torres Strait Islander Peoples who are the Traditional Owners of the Torres Strait Islands.

We are honoured to have the world's oldest living and surviving cultures.

We pay our respect to Ancestors, Elders and Leaders of the future who have the spiritual connectedness and relatedness to Country and all living systems.



Edmund Rice Education Australia (EREA)

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EREA 2023 Modern Slavery Statement

Reporting Period 1 January – 31 December 2023

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Foreword, Approval and Signature

Edmund Rice Education Australia (EREA) is committed to addressing modern slavery risks in our operations and supply chains. This commitment is deeply rooted in the enduring values taught by Blessed Edmund Rice, our founder, whose life's work was dedicated to uplifting the poor and marginalised.

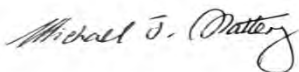
As an educational community, we are uniquely positioned to foster awareness, encourage reflection, and inspire action among our students and stakeholders, forging pathways towards greater justice and equity in the wider world.

The issue of modern slavery demands a consistent and proactive approach. That is why we will continue to participate in the Australian Catholic Anti-slavery Network (ACAN) alongside other Catholic entities.

We acknowledge the impact that commercial activities - including ours - can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk in our operations and supply chains.

We will continue to engage and partner with suppliers who share our respect for human dignity, ethical business practices and humanitarian values. By doing so, we honour Blessed Edmund Rice and the Christian Brothers' tradition of working to empower disadvantaged and vulnerable people.

Signed,



Michael Slattery

President

Trustees of Edmund Rice Education Australia

This Modern Slavery Statement was approved by the principal governing body of Edmund Rice Education Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 7th June 2024.

This modern slavery statement is signed by a responsible member of Edmund Rice Education Australia as defined by the Act.

CRITERIA 1: About EREA

The formation of Edmund Rice Education Australia (EREA) by the Congregation of Christian Brothers continues their work in education that began in Australia 1872. The name represents the founder of the global Christian Brothers Congregation, Br Edmund Ignatius Rice. The governance, accountability and responsibility for all Christian Brothers owned and operated schools in Australia transferred to EREA on 1 October 2007. EREA is an incorporated body under the Roman Catholic Church Communities Lands Act 1942 (NSW).

The Council and Board of EREA were entrusted with the governance of the schools. In turn, they appoint an Executive which administered the schools, ensuring their faithfulness to their mission, and maintained relationships with Church and government authorities.

EREA, as part of the mission of the Catholic Church, was initially charged with the responsibility for the governance of over 55 schools throughout Australia. Each school has a separate character and history but all draw life from the charism of Edmund Rice and the Gospel.

The annual revenue of EREA in 2023 was: \$1,189,748,779.

Up to 31 December 2022, schools were managed and operated by the Trustees of Edmund Rice Education Australia (TEREA). As part of EREA's regeneration, on 1 January 2023 a new incorporated governance structure came into effect. From that date, a new subsidiary company, Edmund Rice Education Australia Ltd (EREA Ltd), was created with TERE (Proprietor) being its sole member. Three new subsidiary companies became the active overseer of schools under EREA Ltd, namely Edmund Rice Education Australia Colleges Ltd, Edmund Rice Education Australia New South Wales Colleges Ltd and Edmund Rice Education Australia Flexible Schools Ltd, (EREA Flexi Schools Ltd).

The Flexi Schools (other than Victoria) and the two Special Schools were transferred to EREA Flexible Schools Ltd. The seven NSW Colleges were transferred to EREA NSW Colleges Ltd. The twenty Colleges and Early Learning Centres located in Queensland, Western Australia, South Australia, Tasmania and ACT were transferred to EREA Colleges Ltd. The operation of the schools and colleges continued in an uninterrupted manner through the execution of a School Transfer Agreement, which recorded the terms of the transfer of the school buildings and working assets and Liabilities from the Proprietor to the Company.

In December 2023, a new subsidiary company came into existence, namely St Kevin's College Ltd, this new subsidiary took over the management and operation of St Kevin's College apart from its Early Learning Centre (ELC). The ELC will transfer over to St Kevin's College Ltd once registration formalities have been finalized. As with the other subsidiary companies, TERE is the sole member of St Kevin's College Ltd.

Throughout 2023, schools in Victoria continued to be managed and operated by TERE until approval is obtained from Victorian Registration and Qualifications Authority (VRQA) to move to a new governance structure at which time Edmund Rice Education Australia Victorian Schools Ltd will come into effect. TERE will be the sole member of this company.

The following chart summaries the new organisation structure once all new subsidiary companies come into effect:



- Trustees of EREA (TEREA) is the Member of Edmund Rice Education Australia Ltd (EREA Ltd) - ABN 77 659 849 715
- EREA Ltd is the Member of three companies established to govern schools across Australia:
 1. Edmund Rice Education Australia Colleges Ltd - ABN 71 659 944 831
 2. Edmund Rice Education Australia New South Wales Colleges Ltd - ABN 60 661 601 118
 3. Edmund Rice Education Australia Flexible Schools Ltd - ABN 52 659 978 846
- TERA is the Member of St Kevin's College Ltd - ABN 31659900026
- Edmund Rice Education Australia Victorian Schools Ltd - ABN 90 659 880 985 is to be established on 1 January 2024, with TERA as its member.

EREA – A Snapshot



Our Charter

The Charter for Catholic Schools in the Edmund Rice tradition describes our distinct, though not unique, identity as Edmund Rice Education Australia. The Charter provides a practical expression of this identity and so is of crucial use in decision-making, planning and review.

The Charter uses four Touchstones to describe the culture of a Catholic school which is striving for authenticity in the Edmund Rice tradition.

These Touchstones give us ideals authentically linked with the Charism which underpins the ministry in our schools and educational endeavours. They help us set our direction and define our goals as, following Blessed Edmund's vision, we continue to reflect and to seek to make the Gospel a living reality in our communities.

These Touchstones give us ideals authentically linked with the Charism which underpins the ministry in our schools and educational endeavours. They help us set our direction and define our goals as, following Blessed Edmund's vision, we continue to reflect and to seek to make the Gospel a living reality in our communities.



Liberating
Education



Gospel
Spirituality



Inclusive
Community



Justice and
Solidarity

CRITERIA 2: Our Structure, Operations, and Supply Chains

EREA Governance Structure

EREA was established to succeed, carry on and expand the education ministries conducted by the Congregation of Christian Brothers in Australia. The purpose of EREA is to own, govern, manage and conduct these ministries in fulfilment of the mission of Jesus Christ in the Catholic tradition and in continuation of the charism of Blessed Edmund Rice.

EREA Council

The members of the Council of EREA comprise the governing body of EREA under canon law and they are also the members of the body corporate known as Trustees of Edmund Rice Education Australia under civil law. The members of the EREA Council are appointed by the Congregation Leader of the Christian Brothers. The EREA Council appoints the EREA Board and delegates to it certain responsibilities related to the management and strategic direction of EREA.

The EREA Council (as canonical stewards):

- ensures the Identity of EREA as Catholic and an expression of the charism of Blessed Edmund Rice
- relates on behalf of EREA to Church authorities, and
- approves the establishment or termination of an apostolic work of EREA.

The EREA Council (as civil stewards):

- is the proprietor of the schools and approves the acquisition or alienation of the resources of EREA (according to the Constitution).

The EREA Board:

- sets the strategic directions for EREA.
- oversees the financial wellbeing of EREA.
- oversees the management of EREA.
- contributes to the nurturing of key external relationships
- provides opportunities for formation in the mission of the Catholic Church and the charism of Edmund Rice, and

The EREA Governing Body Boards:

- governs the operation of their schools.
- sets the operational policy framework.
- oversees the financial wellbeing of their schools.
- oversees the management of its relevant Governing body.
- contributes to the nurturing of key external relationships.
- supports and guides the Governing Body Executive.

The EREA National Executive Director

- implements the strategy and policy approved by the EREA Board.
- articulates the Vision and Mission of EREA and provides leadership which empowers others to bring the EREA Charter to life.
- appoints staff to fulfil the leadership, management and operational structures of EREA.
- ensures the provision of appropriate faith formation and spiritual development of all staff, and
- ensures the sustainability, growth and development of EREA while complying with statutory obligations.
- delegates the day-to-day operation and management of EREA's schools to its Principals and certain other responsibilities to School Advisory Councils.

Our Schools

Across Australia, Catholic Schools in the Edmund Rice tradition have been educating young Australians in every state and territory since 1872. All our schools aim to offer a Liberating Education, based on a Gospel Spirituality, within an Inclusive Community committed to Justice and Solidarity. Our schools are diverse, including primary and secondary, co-educational, boys, regional/rural, boarding, early learning centres and flexible education.

Around Australia, EREA operates 22 flexible learning centres (FLC's), each a registered school. They provide a place and an opportunity for young people to re-engage with learning and community. Flexible learning centres operate on a common ground basis in which young people are empowered to determine their own pathways.

The young people who attend our FLC's have typically experienced one or more significant and complex educational, social, developmental, psychological, health, legal or familial situations which demand unique responses. Such interventions are embedded within an educational framework but also typically involve medical, multidisciplinary, legal and/or social support personnel network systems.

A fundamental component of flexible learning is an emphasis on relationship development. Complementing this process is the provision of a values and relationship education program, which draws on the common ground principles and relates to the life experiences of young people.



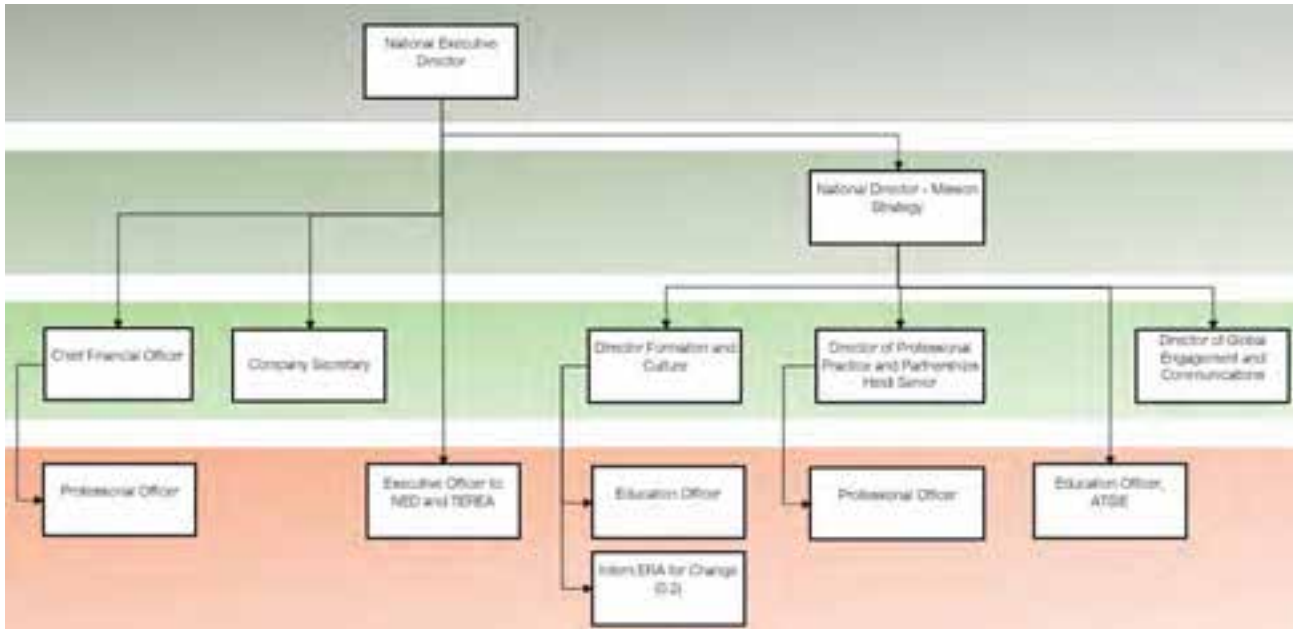
Supply Chains

With 55 Schools across all states and territories in Australia, our supply chains are very diverse. We have analysed our supply chains and have highlighted categories that we would consider high risk. These categories include construction, facilities management, ICT Software & services, clothing suppliers, food services, IT supplies and services.

Our policy underpins EREA's commitment to working with suppliers to promote social justice. EREA will seek to increase the value of procuring goods and services to encompass additional objectives for social justice and inclusion. We intend to hold our suppliers to the highest standards with the implementation of a Supplier Code of Conduct. This Code of Conduct will outline the standards and behaviours expected of our suppliers, including their employment practices to ensure no forced or involuntary labour is used.



Our Organisation Chart - TEREA



CRITERIA 3: Modern Slavery Risks

In the 2023 reporting period EREA selected a range of procured products and services with diverse profiles from 11 schools to assess the level of risk. This selection focused on 2,665 suppliers and approximately \$149 million of spend. Of this selection almost \$96 million was spent with 789 suppliers that were categorized as high-risk.

EREA used the ACAN Category Risk Taxonomy which identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the 2023 Global Slavery Index and the International Labor Organisation (ILO). Four key factors are also used to determine the level of risk:

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

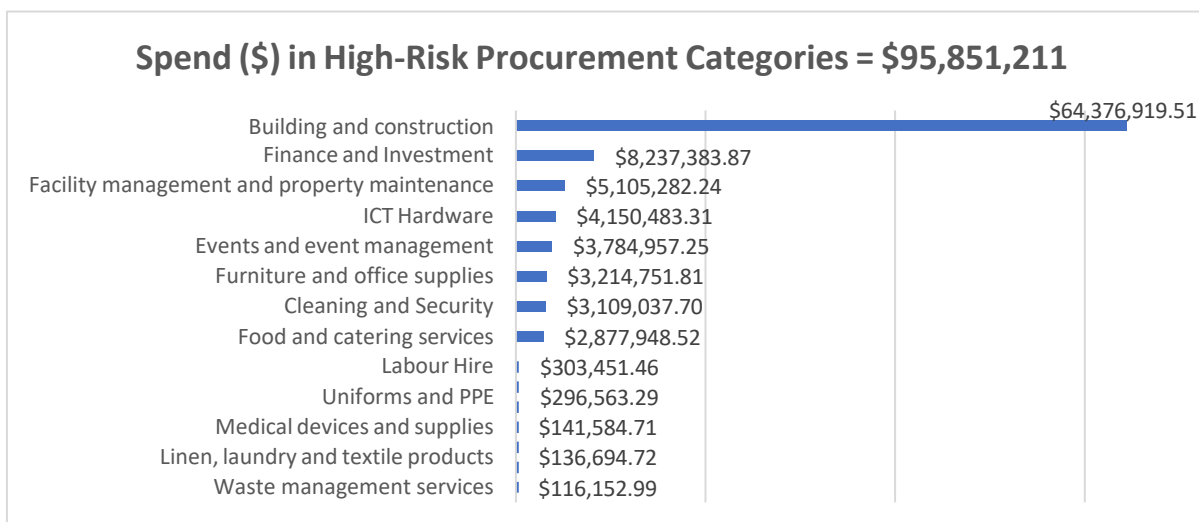
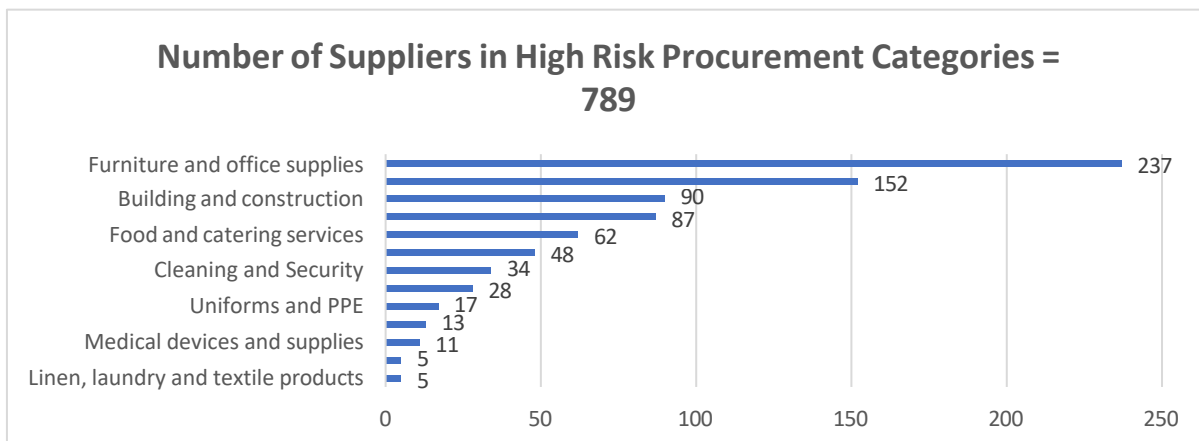
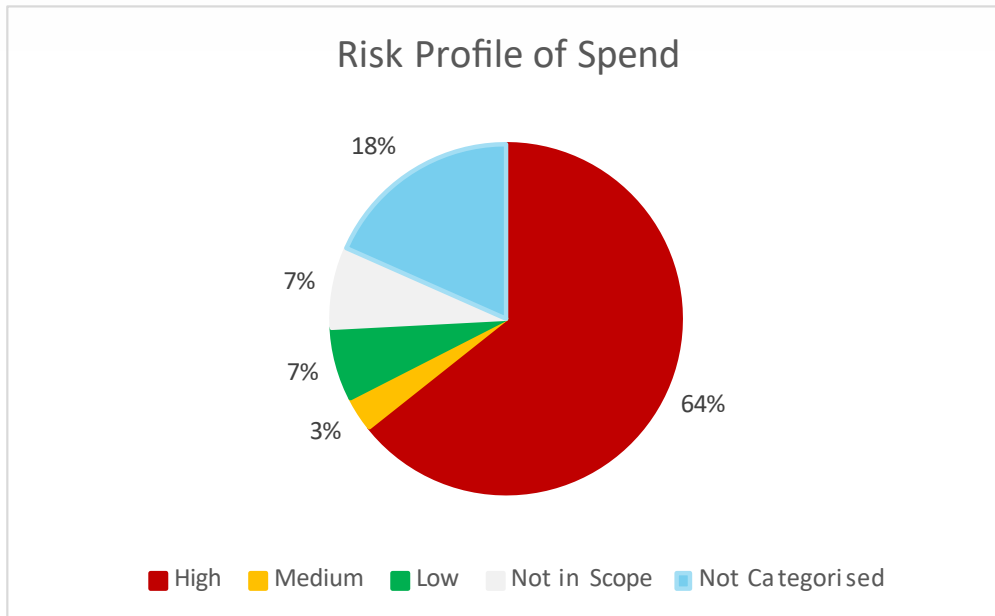
Labour hire

In Australia, people employed via labour hire contractors are particularly vulnerable to labour exploitation such as wage theft, underpayments, cash back schemes, unfair deductions, and more serious forms of modern slavery such as deceptive recruitment, debt bondage or forced labour. For some migrant workers, their visa status is tied to their employer and this dependency can be exploited. Workers might endure poor working conditions because they fear that complaining could lead to job loss and affect their visa status.

Labor hire arrangements often involve temporary or casual positions which lack the security and benefits of permanent jobs. This precariousness can make workers hesitant to complain or stand up for their rights for fear of losing their jobs. Many workers, especially migrants or temporary visa holders, may not be fully aware of their rights or the legal standards in Australia. This lack of awareness can be exploited by employers to deny proper wages and working conditions. Unauthorised subcontracting may also add another layer of vulnerability for workers. Labour hire risks are most relevant for EREA in: building and construction, facility management and property maintenance, events and catering, cleaning, security and waste management.

Investments

Investments can directly or indirectly fund companies and projects that utilise forced labour or benefit from modern slavery. This can occur through investments in industries known for labour rights abuses, such as certain agricultural sectors, mining, construction, and manufacturing. Investors may unknowingly contribute financial resources that enable these companies to continue their exploitative practices. EREA has significant investments that are managed through various Archdiocese Development Funds. These development funds play a crucial role in supporting various religious and charitable activities within the community. When it comes to ethical investment of funds, these organizations are increasingly recognizing the importance of aligning their financial decisions with their values and principles. Considerations is given to ethical investment by choosing investments that are socially responsible, environmentally sustainable, and in line with Catholic teachings. This involves investment in companies that promote social justice, human rights, and environmental stewardship. EREA incorporates these ethical considerations into our investment decisions by continuing to support the Archdiocese Development Funds, who make a positive impact on society.



CRITERIA 4: Actions to address Modern Slavery Risks

EREA's modern slavery risk management program is underpinned by ethical business practices and takes into consideration all our stakeholders (including people who are at-risk of and/or experience modern slavery practices).

As a participating entity with the Australian Catholic Anti-Slavery Network (ACAN) we have utilised many of their resources in the development of our Modern Slavery Policy. We view our participation of this network as essential in our quest to end modern slavery, human trafficking and forced labour risks in our operations and supply chains. Some of the key ACAN resources we have utilised include the supplier spend and data analysis and engagement actions.

As an organization, we are committed to taking firm and proactive actions to address modern slavery within our operations and supply chains. To effectively combat modern slavery, the following is a summary of the measures we have implemented:

1. **Supply Chain Due Diligence:** We conduct regular risk assessments and due diligence on our suppliers to identify and address any potential risks of modern slavery. This includes assessing suppliers' policies, practices, and adherence to ethical standards.
2. **Supplier Engagement:** We engage with our suppliers to raise awareness about modern slavery and encourage them to adopt responsible labor practices. We provide training and resources to help suppliers improve their processes and ensure compliance with our standards.
3. **Grievance Mechanisms:** We have established robust grievance mechanisms to allow employees, suppliers, and other stakeholders to report any concerns related to modern slavery. These mechanisms ensure that grievances are promptly, and effectively addressed, and appropriate actions are taken.
4. **Remediation:** In cases where instances of modern slavery are identified, we take swift and decisive action to remedy the situation. This may involve working with suppliers to improve their practices, providing support to affected individuals, and taking steps to prevent recurrence in the future.

By implementing these actions and mechanisms, we are actively working towards eradicating modern slavery from our operations and supply chains. We are committed to continuously improving our efforts and collaborating with stakeholders to create a more ethical and responsible business environment.

Further to the above, we also ask that the following actions are addressed by our workers, business partners and suppliers.

Management, Staff and Contractors

- Anyone working for EREA, or on our behalf, is expected to implement the following measures:
 - ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers.
 - business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden.
 - any actual or suspected activity that could breach our Policy must be reported to EREA immediately.
- Any relevant, external stakeholders engaged will support our Policy (for example suppliers, contractors, joint venture or other business partners).
- Anti-slavery clauses shall be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment to eradicating modern slavery in supply chains, and capacity to manage identified risks. This includes any new company that wants to do business with EREA.

Roles and Responsibilities

Role	Responsibilities
TEREA Board	<ul style="list-style-type: none"> • Approving our Modern Slavery Policy • Ensuring our policy is reviewed and updated as needed • Reviewing compliance with our policy • Ensuring our policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.
EREA National Executive Director and Governing Body CEO's	<ul style="list-style-type: none"> • Developing procedures and guidelines supporting adherence with our policy • Ensuring our Policy is implemented
Principals	<ul style="list-style-type: none"> • Implementing our Policy and any associated procedures and guidelines

EREA will actively engage with suppliers to promote our Policy and assist to develop their capabilities to identify and manage modern slavery risks in their own supply chains.

EREA expects suppliers to share our goals and values in relation to ending modern slavery.

Suppliers are expected to support EREA's efforts to assess the levels of risk within their operations and supply chains, and to gauge their commitment and capability to manage modern slavery risks.

Suppliers shall demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains

Grievance Mechanism

Edmund Rice Education Australia (EREA) is committed to a culture of respect and ethical conduct in the way we work and relate to each other. We recognise the value of keeping the laws and standards that apply to us in our work and encourage everyone to report wrongdoing. We will not tolerate corrupt, illegal or other undesirable conduct nor condone detrimental acts against anyone who intends to disclose or has disclosed wrongdoing.

EREA does not have a grievance mechanism targeting workers in supply chains. EREA will consider using the ACAN grievance mechanism and worker voice resources once they become available. However, EREA does have a Whistleblower Policy and YourCall service that is accessible to staff, service providers and contractors.

EREA's Whistleblower Protection Policy and accompanying Guidelines are available to all current or former:

- EREA Council and Board Members
- EREA National Executive Director
- EREA National Directors, Stewardship and Mission Team staff members
- Governing Body Board Members
- Governing Body CEO's and National Office staff members
- Principals, Deputy Principals & Business Managers
- permanent, part-time and casual staff (teaching and non-teaching)
- Volunteers
- Contractors
- Suppliers

Internal reporting of actual or potential modern slavery risks by staff is expected. Staff shall immediately report any suspected violations of the Policy or other illegal or unethical conduct to their line manager for escalation through to their Principal and EREA through Assurance. Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. EREA commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures. If a supplier or any other person outside EREA provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation through to their Principal and EREA.

Remediation

EREA is committed to ensuring appropriate and timely remedy to people impacted by modern slavery, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in actions to address harms to people and root causes to mitigate future risks if EREA is found to have caused or contributed to modern slavery.

As an ACAN participating entity, EREA is a founding partner of Domus 8.7, - an independent agency of the Archdiocese of Sydney that provides a remedy pathway and support to people impacted by modern slavery.

Where EREA is directly linked to modern slavery by a business relationship, we are committed to working with the entity which caused the harm, 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 EREA to ensure victim-centred remediation processes are implemented to the satisfaction of EREA.

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

CRITERIA 5: How we assess the effectiveness of our actions

Since mid-2021, the ACAN Program has provided EREA with membership of Sedex - Supplier Ethical Data Exchange. Sedex is a global not-for-profit membership organisation supporting businesses to manage and improve social and environmental performance in supply chains.

Sedex provides a platform for businesses to share information and collaborate with suppliers and buyers, in order to promote ethical and sustainable practices throughout the supply chain. As a member of Sedex, EREA continues to benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.

At EREA, we recognize the importance of collaboration and partnership in the fight against modern slavery. We are committed to working with other stakeholders, including suppliers, industry peers, government authorities, and non-governmental organizations, to address and prevent modern slavery in all its forms. Our collaborations are guided by the principles of transparency, accountability, and mutual respect.

Key initiatives and actions under this criterion include:

1. Partnering with suppliers: We engage with our suppliers to ensure that they understand and adhere to our anti-modern slavery policies and practices. Through regular communication and collaboration, we work together to identify and address any risks of modern slavery within our supply chains.
2. Industry partnerships: We actively participate in industry initiatives and partnerships that aim to combat modern slavery. By sharing best practices, resources, and knowledge with our industry peers, we contribute to a collective effort to eradicate modern slavery from supply chains.
3. Government engagement: We maintain regular communication with relevant government authorities to stay informed about regulatory changes and expectations regarding modern slavery. We actively participate in consultations and stakeholder engagements to contribute to the development of effective anti-slavery policies and legislation.

By actively engaging in partnerships and collaborations, we demonstrate our commitment to upholding human rights, promoting fair labour practices, and working towards a world free from modern slavery.

CRITERIA 6: Consultation with controlled entities

As we have moved to a new corporate structure, it's essential to ensure that anti-slavery policies and practices are integrated and effectively implemented across all levels of our organisation. Addressing modern slavery is a critical issue that requires our ongoing attention and commitment and one that EREA takes very seriously.

To effectively address modern slavery under our new structure, we are currently implementing the following strategies across all our controlled entities:

1. **Policy Development:** Develop comprehensive policies and procedures specifically focused on preventing modern slavery within our schools. These policies should outline expectations, define roles and responsibilities, and establish reporting mechanisms.
2. **Training and Awareness:** Provide training and raise awareness among all staff, including leadership, teachers, and support staff, about the risks of modern slavery, how to identify potential indicators, and the company's commitment to combatting it.
3. **Due Diligence:** Conduct thorough due diligence on suppliers, contractors, and other third parties to ensure they adhere to ethical labor practices and do not engage in modern slavery.
4. **Monitoring and Reporting:** Implement robust monitoring and reporting mechanisms to track and evaluate the effectiveness of anti-slavery efforts. Encourage staff and stakeholders to report any concerns or suspicions of modern slavery promptly.
5. **Collaboration:** Foster partnerships with NGOs, industry groups, and government agencies to exchange best practices, share resources, and collaborate on initiatives to combat modern slavery.
6. **Transparency:** Maintain transparency in our efforts to address modern slavery by regularly communicating progress, challenges, and successes internally and externally.

During the reporting period we proactively integrated our strategies by actively engaging with each of our Governing Bodies and their respective schools. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates. EREA, as the sole member of these bodies, strives to demonstrate our commitment to combat modern slavery and establish a culture of accountability and transparency across our organization.

CRITERIA 7: Other relevant information

As we navigate our new corporate structure, we acknowledge the imperative work ahead in bringing our subsidiaries up to par with modern slavery requirements. We are heartened by the support and commitment of our subsidiaries in driving forward this initiative, and we remain steadfast in our dedication to prioritizing the eradication of modern slavery within our operations. Together, we are confident in our ability to make meaningful strides towards a more just and equitable future for all.

*Edmund Rice Education Australia offers a
liberating education based on a gospel spirituality,
within an inclusive community committed to
justice and solidarity*

For further information please contact:

Edmund Rice Education Australia

9TheVaucluse (PO Box 91) Richmond VIC 3121 Australia



Mercy
Education

Modern Slavery Statement

2023

Mercy Education Limited
ABN 69 154 531 870



Mercy Education Ltd Modern Slavery Statement 2023

We wish to acknowledge the traditional custodians of the land on which we operate, the Wurundjeri people of the Kulin Nation. We pay our respects to their Elders past, present, and emerging, recognising their enduring connection to this land.

Mercy Education acknowledges the rich cultural heritage and ongoing contributions of Aboriginal and Torres Strait Islander peoples to our community. We honour the wisdom, resilience, and custodianship of the land that they have demonstrated over generations.

This Modern Slavery Statement has been provided in respect of Mercy Education Ltd. The use of the title 'Mercy Education' within this document refers to 'Mercy Education Ltd.'

Mercy Education is a stand-alone legal entity. Mercy Education is the sole member of Emmanuel College Foundation Limited.

National Office: 720 Heidelberg Rd, Alphington, VIC, 3078

Website: www.mercy.edu.au/

Contact: contact@mercy.edu.au

This Statement covers the 13 colleges that Mercy Education directly governed in 2023:

Western Australia

Mercedes College, Perth

Santa Maria College, Attadale

St Brigid's College, Lesmurdie

South Australia

St Aloysius College, Adelaide

Victoria

Academy of Mary Immaculate, Fitzroy

Catherine McAuley College, Bendigo

Emmanuel College, Warrnambool

Mount Lilydale Mercy College, Lilydale

Our Lady of Mercy College, Heidelberg

Sacred Heart College, Geelong

Sacred Heart College, Kyneton

St Aloysius College, North Melbourne

St Joseph's College, Mildura

This statement does not cover other schools that choose to affiliate with Mercy Education Ltd who receive support and professional development operating within a Mercy framework. Such schools have their own governance structures that either do not meet the threshold for reporting under the Act, or who may report as part of another larger entity.

ABN 69 154 531 870 | ACN 154 531 870



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Statement, Approval and Signature

Statement from our Board Chair

Since the introduction of the Modern Slavery Act (Cth) in 2018, the awareness of modern slavery practices existing both globally and locally has increased markedly at Mercy Education and in our Colleges.

At a governance level, the Board has approved a Modern Slavery Policy and Supplier Code of Conduct, and our Risk Committee seeks to ensure that modern slavery is identified and eliminated within our operations, business relationships and extended supply chains.

At the school level, our Modern Slavery Liaison Officers meet regularly with the National Office to report on curriculum programs, case studies and student involvement in anti-modern slavery initiatives.

Mercy Education acknowledges the existence of modern slavery across the world and believes that it should never be accepted nor tolerated. Our Catholic Christian and Mercy values guide us and teach us to reject all forms of slavery in our society.

I am pleased to present the Mercy Education Modern Slavery Statement for 2023.



Georgina Smith
Board Chair

This Modern Slavery Statement was approved by the principal governing body of Mercy Education Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 24 May 2024. This Modern Slavery Statement is signed by a responsible member of Mercy Education Limited as defined by the Act.

Reporting Criterion 1: About Mercy Education

Mercy Education is a single legal entity (company limited by guarantee) that operates 13 Catholic secondary schools across three states. Our canonical (Church Law) governor is Mercy Ministry Companions Ltd (MMC).

The vision of Mercy Education is to develop and support a dynamic network of Catholic Colleges united by a commitment to the Gospel of Jesus, fidelity to the tradition and spirit of Mercy and the mission of Catherine McAuley, founder of the Sisters of Mercy.

The Mercy Education annual turnover for 2023 was \$325 million.

Mercy Education Values

An education in the Mercy tradition invites us to take up a challenge – one that encourages us to develop our own God-given talents. At the same time, it ignites within us a desire to assist others, so they too “may have life, and have it to the full.” (John 10:10)

The six core values of Mercy Education are Compassion, Justice, Respect, Hospitality, Service and Courage.





Mercy Education Strategic Plan

Mercy Education has recently reviewed its strategy for 2022-2025, and in addition to the review, the Board has updated its company vision and mission. The renewed vision emphasises enriching a dynamic community of Catholic schools committed to the spirit of Mercy. Likewise, the mission reaffirms Mercy Education's dedication to leading, governing, and growing our schools in alignment with Catherine McAuley's vision of the lived Gospel, with particular attention to those on the margins.

Mercy Education's four-year strategy consist of three core goals that will continue to guide our efforts:

Goal 1

Catholic and Mercy Identity - Ensuring that Catherine McAuley's vision of the lived Gospel remains central to the ethos of each school community.

Goal 2

Corporate Governance - Exercising sound governance practices over our communities and responsibly stewarding our resources.

Goal 3

Excellence in Education - Supporting the development of safe, inclusive learning environments that foster a culture of excellence across all educational communities.



2023 Modern Slavery Initiatives

In respect of the 2023 reporting year, Mercy Education:

- Continued to provide detailed training (via both online courses and face-to-face discussions) to Board Directors, Principals, Business Managers, and selected staff involved in procurement, at the National Office and individual schools
- Included anti-modern slavery clauses into sizeable procurement agreements and major building contracts
- Researched curriculum initiatives related to anti-modern slavery across our schools
- Approved a Code of Conduct for suppliers, including clauses related to anti-modern slavery

Our Plans in 2024

In 2024, Mercy Education's goals are to:

- Further develop and implement specific strategies for managing modern slavery risks in our four highest risk procurement sectors: building and construction, ICT hardware, clothing and textiles, cleaning and security
- Ensure tender documentation includes anti-modern slavery declaration and affirmation, and that employment arrangements are transparent and comply with Commonwealth and State employment legislation
- Continue reviewing procurement through a modern slavery lens to enhance our supplier profile and mitigate associated risks
- Explore new ways to develop curriculum material on anti-modern slavery
- Encourage school student leaders to actively promote anti-modern slavery issues

Our Plans in 2025

- Develop construction project protocols and templates
- Expand the focus on education from the Board Directors to all school leadership and staff
- Support the inclusion of anti-modern slavery resources in curriculum review

Reporting Criterion 2: Operations and Supply Chain

Our Organisational Structure

In 2023, Mercy Education operated 13 Catholic secondary schools across Victoria, South Australia, and Western Australia. Most of these schools are over 100 years old and founded by local Australian congregations of the Sisters of Mercy.

The National Office based in Alphington, Victoria provides executive level support to both the Board and to schools. This support is focused on strategic and structural matters relating to mission, quality, finance, governance, child safety and wellbeing, compliance, and risk.

Our Board directors have full responsibility for all civil governance matters. To assist with this oversight, the Board maintains standing committees in respect of Finance and Audit, Risk and Compliance, Education Standards and Effectiveness, Mercy Identity, and Succession Planning and Nominations.

Operational decision-making at each of the 13 schools is the responsibility of the College Principal, who reports directly to the Chief Executive of Mercy Education.





Our Governance Framework

The supervision of Mercy Education's responsibilities under the Modern Slavery Act 2018 (Cth) has been allocated to the Risk and Compliance Committee (RISKCOM) of the Mercy Education Board. This is consistent with the treatment of other compliance requirements obligated by legislation.

Whilst RISKCOM has primary carriage of this responsibility, it is acknowledged that other Board Committees have a significant interest in the topic including the Board's Finance and Audit Committee (in respect of procurement) and the topics are of particular significance to the Mercy Identity and Mission Committee (in respect of our moral and ethical obligations as people of Mercy).

For these reasons, the Board of Mercy Education will always maintain an active role in the supervision of our progress in respect of anti-modern slavery.

Our Operations

The following datapoints provide a snapshot of Mercy Education operations in 2023:

- Operated Catholic schools in South Australia(1), Victoria(9) and Western Australia(3)
- Seven of these schools provide a single gender education for girls and the remaining six operate on a co-educational basis. All schools offer a full secondary curriculum, with three of our schools incorporating primary year levels into their operations
- Eight of our schools are based in capital cities and five in major regional centres
- Three of our regional schools operate across dual campuses – all other schools are single campus
- Two of our schools in Western Australia offer boarding facilities
- At census, 13,918 students were educated in Mercy Education schools in 2023
- In 2023, our youngest school was 86 years old, and our oldest school was 177 years old – the average age of our schools since establishment is over 130 years

Our Workforce Profile

The following staffing guide relates to Mercy Education's 2023 operations:

- Approximately 1,620 staff worked in full-time or part-time employment across Mercy Education schools
- A further 500 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles
- In many of the schools, maintenance, groundskeeping, catering, IT (Information Technology) and cleaning are outsourced to contractor services whose employees are not directly employed by Mercy Education. This category consists of an estimated 45 organisations





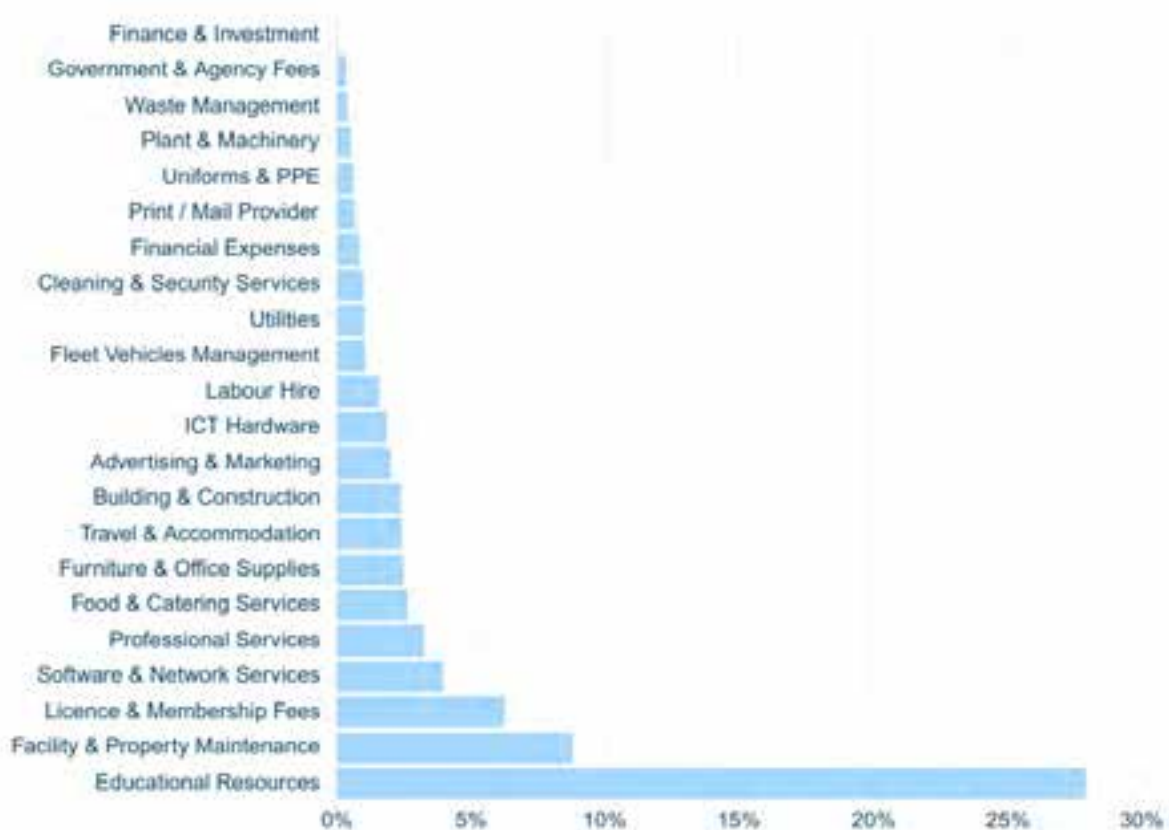
Our Supply Chain, Goods and Services

In 2023, Mercy Education had a total operational turnover of \$325m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment related cost represented 66% of our turnover.

In terms of non-staffing expenditure, in 2023, Mercy Education spent \$93m on recurrent expenditure and an additional \$54m on capital expenditure.

In 2023, a supplier analysis was undertaken, identifying that Mercy Education works with over 6,600 individual suppliers annually. A breakdown of total expenditure by our schools in each supplier category is included below.

Supplier Spend Per Category 2023



Reporting Criterion 3: Modern Slavery Risks

Mercy Education has formally acknowledged the risks of modern slavery within its corporate risk assessment and continues to improve its understanding of potential vulnerabilities within the supply chain. Our commitment remains steadfast in actively managing these identified risks, enhancing procurement protocols, and establishing robust reporting mechanisms moving forward.

Corporate Risk

The corporate risk to Mercy Education was reviewed and existing controls were documented:

- Risk and Compliance (RISKCOM) Board committee oversight
- Anti-Modern Slavery Working Party (stakeholder consultation) with Anti-Modern Slavery Liaison Officers re-appointed in each school
- Anti-modern slavery training provided for new Board Directors, Leadership, and key staff across the organisation
- Anti-modern slavery clauses form part of our major building contracts
- Mercy Education Supplier Code of Conduct formally adopted by our major suppliers

Future controls are proposed for 2024 and beyond:

- Integration of modern slavery topics and resources into individual school curricula
- Expansion of suppliers registered with ethical trade memberships
- Dissemination of anti-modern slavery information to staff, volunteers, and school communities
- Conducting comprehensive operational risk assessments for supply chains in critical procurement areas
- Development of Mercy Education's escalation protocols and remedy pathways
- Engagement of student leaders in advocating against modern slavery within the student body



Key Supply Chain Risks

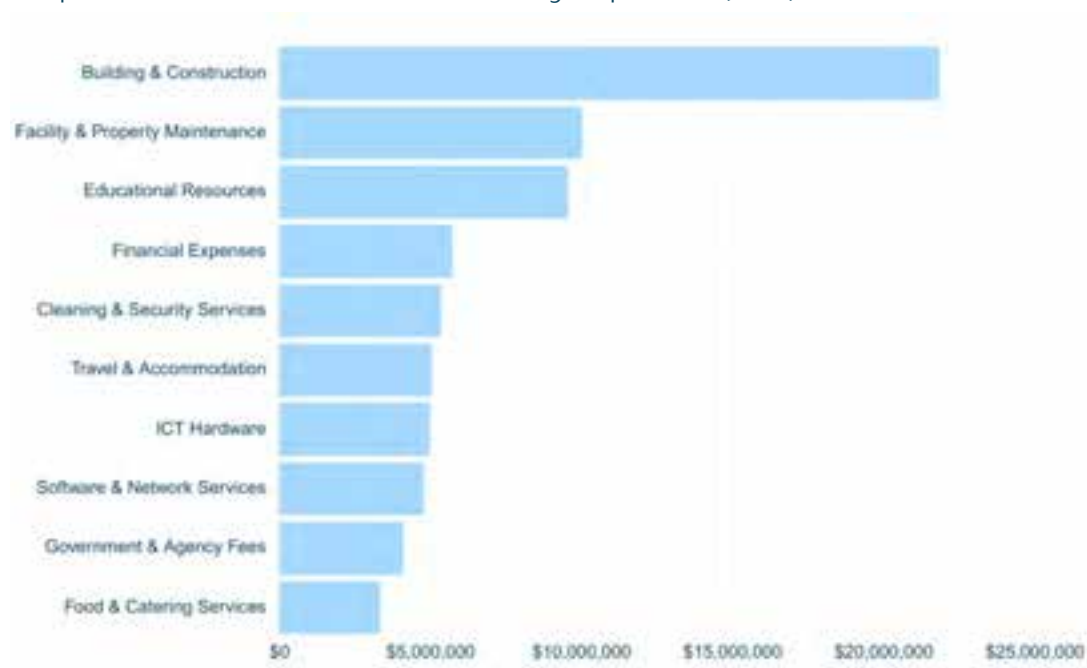
For the 2023 analysis, Mercy Education continued to rely on the Australian Catholic Anti-Modern Slavery Network (ACAN) procurement category risk taxonomy, which pinpoints specific industry sectors identified as high-risk. This analysis also considered commodity and product risks designated as high-risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor and the 2023 Global Slavery Index (GSI).

By enhancing its understanding of supplier profiles, Mercy Education has improved its ability to identify modern slavery risks in procurement processes, including a more profound understanding of geographical production risks.

One of the primary challenges identified by Mercy Education in conducting its supply chain analysis is the presence of a decentralised accounting system. Currently, each of the 13 Mercy Education schools and the National Office utilise a different software platform resulting in a lack of centralised data interchange.

For 2023, the top 10 procurement categories were identified as follows:

Top 10 Procurement Areas by Spend (\$M) For 2023



Mercy Education currently has limited data regarding specific supplier procurement practices. Risk is reflected in the following areas:

- Building and construction
- ICT hardware
- Clothing and textiles
- Cleaning and security



Detailed Analysis of Recurrent and Capital Procurement

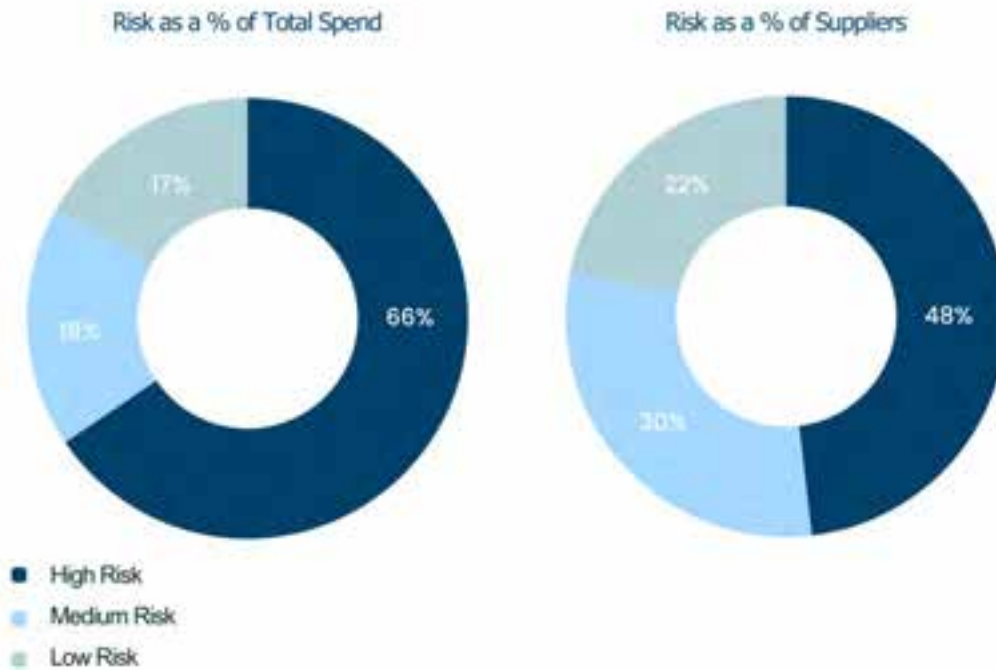
Risk Category	Supplier Taxonomy	Annual Spend	% of Total	No of Suppliers
High	Building & Construction	21,848,113	23.8%	145
High	Cleaning & Security Services	5,740,248	6.2%	65
High	Educational Resources	9,562,454	10.4%	1,720
High	Food & Catering Services	3,339,315	3.6%	161
High	Finance & Investment	15,579	0.0%	1
High	Furniture & Office Supplies	2,290,921	2.5%	152
High	Facility & Property Maintenance	10,030,294	10.9%	536
High	ICT Hardware	5,036,919	5.5%	114
High	Labour Hire	894,955	1.0%	97
High	Uniforms & PPE	1,051,849	1.1%	41
High	Waste Management	383,141	0.4%	25
Medium	Advertising & Marketing	1,189,788	1.3%	123
Medium	Fleet Vehicles Management	1,146,684	1.2%	66
Medium	Software & Network Services	4,980,187	5.4%	247
Medium	Plant & Machinery	617,818	0.7%	33
Medium	Print / Mail Provider	679,146	0.7%	42
Medium	Travel & Accommodation	5,365,591	5.8%	150
Medium	Utilities	2,405,620	2.6%	67
Low	Financial Expenses	4,783,846	5.2%	59
Low	Government & Agency Fees	4,094,903	4.5%	22
Low	Licence & Membership Fees	3,057,970	3.3%	379
Low	Professional Services	1,734,405	1.9%	204
Low	Small supplier (less than \$3,000 pa)	1,627,206	1.8%	1,584

Mercy Education has drawn on the ACAN references to categorise the modern slavery risks associated with each procurement category.



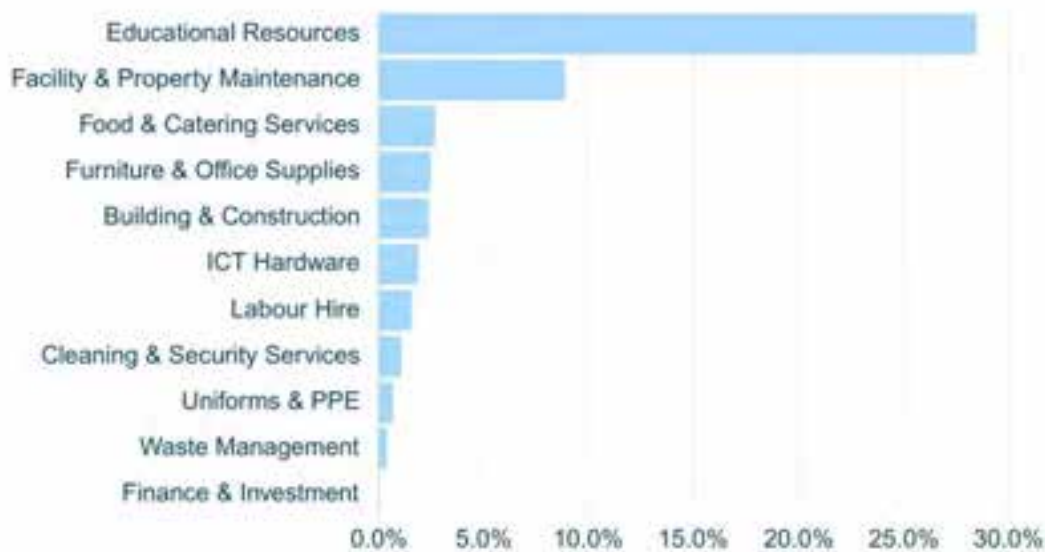
Supplier and Spend Percentage Breakdown

In 2023, Mercy Education procured \$92m of goods and services, of which 48% (\$60m) were purchases in potentially high-risk procurement categories from 3,057 suppliers.



Assessment of High-Risk Procurement

In considering the high-risk categories, Mercy Education has calculated the spend per supplier indicator to assist in prioritising our efforts.





Analysis of High-Risk Procurement

Procurement Category	Total Supplier Spend	% of High-Risk Spend	Mercy Education Reflections
Cleaning & Security Services	\$5,740,248	9.5%	<p>The majority of Mercy Education schools use contract cleaning services in their school operations.</p> <p>Whilst some of the suppliers in this area use their own employed staff (on award wages), Mercy Education does not currently have any formal guidance for schools about expectations in this area.</p> <p>Developing such protocols will be one of the 2024 priority projects.</p>
Building & Construction	\$21,848,113	36.3%	<p>Mercy Education has not historically understood construction (within Australia) to be high-risk and believes that a large proportion of the funds expended in 2023 was spent with Australian construction business and their sub-contractors, applying Australian employment laws.</p> <p>We accept that there is a modern slavery risk in Australian construction, and that the large contract sizes and the detailed oversight of such contracts make it highly amenable to customer-driven controls to reduce this risk.</p> <p>Monitoring this risk, and Mercy Education's response, continues to be a priority project for 2024.</p>
ICT Hardware	\$5,036,919	8.4%	<p>Mercy Education spends over \$4m each year on laptop devices across the organisation. Currently these laptops are supplied by five main suppliers: Apple, Dell, Hewlett-Packard, Lenovo, and Microsoft.</p> <p>These providers all submit annual Modern Slavery Statements. The sheer size of these suppliers and their high level of visibility contribute to a strong public focus on their supply chains, reducing but not necessarily removing modern slavery risks.</p> <p>Mercy Education's continued involvement with these suppliers will be dependent on evaluating their credentials via third-party certification agencies and participating in sector-wide projects. This may include increasing pressure on suppliers whose response lack significant insight or detail.</p>



Procurement Category	Total Supplier Spend	% of High-Risk Spend	Mercy Education Reflections
Educational Resources	\$9,562,454	15.9%	<p>Whilst this category represents a significant portion of Mercy Education’s high-risk spend, this area has not been prioritised for further in-depth review:</p> <ul style="list-style-type: none"> · Due to the nature of these expenses, it is considered likely that most expenditure in this category is low-risk and involves sole proprietors, small businesses, professional associations, and publishers operating in Australia · The sheer volume of suppliers in this category and the low average spend makes supplier engagement ineffectual <p>Mercy Education acknowledges that this expenditure area may contain actual risk sectors such as sporting goods, stationery, overseas printing. Further analysis of suppliers in this area will be considered in the 2024 action plan.</p>
Facility Management & Property Maintenance	\$10,030,294	16.7%	<p>At this stage, Mercy Education does not believe its supplier profile in this area is high-risk.</p> <p>Services under this expenditure category tend to be supplied by either a company with a national presence and significant quality systems in place (maintenance of lifts, essential services, painting, grounds) or by small local businesses (electrical, plumbing).</p>
Furniture & Office Supplies	\$2,290,921	3.8%	<p>Further analysis of suppliers in this area will need to be considered in the 2024 action plan.</p>
Uniforms & PPE	\$1,051,849	1.7%	<p>During 2023, 3 of 13 Mercy Education schools operated their own uniform shops. However, Mercy Education accepts responsibility for supply chain risks where uniform sales are managed by an external provider, therefore the procurement figure shown includes an estimate of the total procurement spend.</p> <p>More than half of those schools that contract their uniform operations use a single supplier.</p> <p>Mercy Education’s focus in 2024 will be to extend discussions with this supplier and confirm this via external agencies. Mercy Education may also commence discussions with other uniform suppliers as well.</p> <p>Discussions will be held in 2024 to confirm the operation of uniforms shops and develop appropriate standards and guidelines.</p>



Procurement Category	Total Supplier Spend	% of High-Risk Spend	Mercy Education Reflections
Food & Catering Services	\$3,339,315	5.5%	Further work needs to be done in this area to analyse the extent of providers used in this space, with a total of 161 suppliers currently in this category ranging from small to large operators.
Finance & Investment	\$15,579	0.03%	Further work needs to be done in this area to analyse the nature of providers used in this space.
Labour Hire	\$894,955	1.5%	Further work needs to be done in this area to analyse the nature of providers used in this space.
Waste Management	\$383,141	0.6%	Further work needs to be done in this area to analyse the nature of providers used in this space.

Reporting Criterion 4: Steps Taken to Address Modern Slavery Risks

Modern Slavery Action Plan and Road Map

Mercy Education will continue to work with ACAN to increase its response to address modern slavery in supply chains. This includes ongoing professional development and participation in action plans.

The following road map documents Mercy Education's key achievements for 2023 as well as objectives for 2024 and 2025.





Focus	2023	2024	2025
Our Governance	<p>Establish cyclical reporting framework and procedures.</p> <p>Provide anti-modern slavery training modules to Board Directors, Principals and Business Managers.</p> <p>Include anti-modern slavery in strategic plan.</p>	<p>Review progress and include in the evaluation of strategic plan.</p> <p>Review and refine training materials to Board Directors, Principals and Business Managers.</p>	<p>Review progress and include in the evaluation of strategic plan.</p>
Our Risks		<p>Work with ACAN to increase our leverage and access to quality resources.</p>	<p>Develop a remedy pathway for victims of modern slavery via the collaborative Domus 8.7 remedy pathway.</p>
Our Suppliers	<p>Identify key suppliers in building & construction, computer hardware, cleaning, and textiles (uniforms) and review their documented anti-modern slavery position.</p> <p>Develop Supplier Code of Conduct.</p>	<p>Develop supplier analysis based on our procurement over a calendar year across all schools.</p> <p>Review employment conditions of third-party contract staff not directly employed by the school,(i.e., cleaning, IT maintenance) as contracts are due for renewal.</p> <p>Implement a standard contract clause for significant purchases in selected procurement categories.</p> <p>Commence engagement with suppliers in these categories.</p>	
Our Staff	<p>Involve school leaders in education about modern slavery risks and reporting requirements.</p> <p>Ensure school leaders and senior procurement staff have completed training modules.</p>	<p>Survey curriculum offerings and resources related to anti-modern slavery.</p> <p>School leaders to actively promote modern slavery risks as professional development opportunity for other staff.</p>	
Our Students & Families		<p>Increase breadth of student programs focusing on anti-modern slavery.</p> <p>Establish documented curriculum coverage of anti-modern slavery issues in each school.</p>	



Grievance Mechanism and Remediation Pathways

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

Mercy Education has a Complaints Management Policy, Whistleblower Policy, and other mechanisms for the community to report suspected illegal or unethical conduct.

If Mercy Education is found to have caused or contributed to modern slavery, the response will include providing for, or cooperating with, actions to address any harm caused to people and to mitigate the root cause.

Mercy Education is a founding partner of Domus 8.7 – an independent agency of the Archdiocese of Sydney to provide remedy to people impacted by modern slavery. Due to the complexity of remediation, specialist resources are required to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery.

Mercy Education's remediation efforts will be enhanced in the future through policy development, a documented response procedure via engagement with Domus 8.7 and other stakeholders. Where Mercy Education is linked to modern slavery by a business relationship, Mercy Education is committed to working with the entity to ensure remediation and mitigation.



Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

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

The scoring scale ranges from: 0 to 100

Achieving a score of 100 signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence. This is an aspirational and long-term goal.

By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

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

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Program and Activities:** Considers the broader initiatives and engagements we undertake to address modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.



Our maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach that cover: governance, risk assessment, risk management; and effectiveness.

The 2023 result for Mercy Education is 34%

This score reflects an emerging level of practice beyond foundational and basic risk management. Our processes are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources.

Pillar	Governance	Risk Assessment	Risk Management	Effectiveness of Actions	Maturity Score 2023
Business Process and Governance	40%	48%	29%	27%	36%
Operations	40%	15%	22%	31%	27%
Supply Chain	0%	80%	25%	12%	29%
Worker Engagement	13%	41%	20%	14%	22%
Entity's Program and Activities	85%	25%	50%	26%	46%
Grievance Mechanisms and Remediation	63%	60%	29%	25%	44%
Average	40%	45%	29%	22%	34%



Additionally, Mercy Education has adopted ACAN Baseline Data metrics in 2023 that capture the outcomes of some of our actions. This will help to demonstrate continuous improvement when compared with data year on year and assist in planning future actions.

2023	Activity	Mercy Education
Internal / Staff	Hours spent on modern slavery activities	30
	Individual staff completed e-learning	20
	E-learning modules completed	100
External / Supplier Engagement	Total number of suppliers	6,033
	Number of suppliers with visible contact information and ABN	213
	Number of suppliers across high-risk categories	1,337
	Number of ACAN Supplier Surveys completed	76
	Supplier staff attending capacity building webinars	42
	Invited to join Sedex	12
	Joined Sedex	3
	Sedex SAQ completed	1
	Social audits	1
	Corrective actions	0
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Reporting Criterion 6: Internal Consultation

Mercy Education does not own or control any other entities. Mercy Education is the sole member of Emmanuel College Warrnambool Foundation Limited.

Internal consultation is currently managed by the appointed Anti-Modern Slavery Officers in each school.

Reporting Criterion 7: Other Information

No other relevant information.

Case Studies

Sacred Heart College, Geelong: Mercy in Action

Sacred Heart College, Geelong, hosted a Year 12 Seminar, Day 2 focussed on 'Mercy in Action'. Alumnus Kristi Davidson shared her experiences founding Offspring, a non-for-profit aiding young women rescued from human trafficking in Kolkata. Students engaged in discussions and created keyrings pledging support. They also supported Offspring through fundraising. The topics below were covered on the day:

1. Employment (vocational training)
2. Education
3. Empowerment
4. Safe place to live (community hubs)

Following on from their education of 'Mercy in Action,' students choreographed Clairvaux House Dance for the Arts Day Competition, highlighting the issue of human trafficking. The dance symbolises survivors' resilience and invites awareness and action against human trafficking.

Sacred Heart College, Geelong: Fundraising with ACRATH

Sacred Heart College, Geelong students from Padua House launched fundraising activities in collaboration with ACRATH (Australian Catholic Religious Against Trafficking in Humans). Activities included a coin line/trail to raise awareness about poverty and wealth distribution, together with setting fundraising goals for the term.

Mercy Ministry Companions Conference

Additionally, 15 of our school leaders attended the Mercy Ministry Companions Conference, and a workshop led by Mercy Education, that presented the topic on "What is Modern Slavery and the various faces of Modern Slavery in Australia?". The presentation identified high-risk areas in education and provided examples of how modern slavery is being addressed, both at a governance level, and at a school level through policy and the school curriculum.





2023 Modern Slavery Statement

1 January – 31 December 2023



Disclosure Note

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

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

DEA Head Office:
3 Mary St
Hunters Hill NSW 2110
www.dominicaneducationaustralia.com

Contact for modern slavery:

Robert Napoli
Chief Executive Officer
mslo@dominicaneducationaustralia.com

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Introduction

Dominican Education Australia (DEA) is a Ministerial Public Juridic Person (PJP) which was established in 2016 by three congregations of Dominican Sisters - the Congregation of the Dominican Sisters of North Adelaide, the Holy Cross Congregation of Dominican Sisters, Adelaide and the Congregation of the Dominican Sisters of Eastern Australia and the Solomon Islands.

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

This is our first Modern Slavery Statement.

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

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

DEA is committed to ensuring that effective policies and procedures are in place to minimise the risk of

modern slavery occurring within our Ministries' business operations and supply chain. We respect the human rights of our students and their families, our staff, our suppliers and of the communities in which our Ministries operate. Our collective intention is to identify and manage risks related to human rights across our network and through our supply chain management.

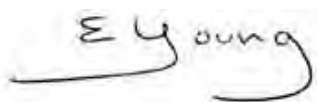
In addition, DEA is a member of the Australian Catholic Anti-Slavery Network (ACAN) which brings together Catholic entities to share resources and coordinate action to manage modern slavery risk across their respective industry sectors.

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

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

This statement sets out how we are working within our Ministries to identify, mitigate and manage risk of modern slavery in those Ministries and their supply chains. This statement has been prepared for the financial year ended 31 December 2023.

Eileen Young – Chairperson



Paul Reid – Treasurer










This Modern Slavery Statement was approved by the principal governing body of Dominican Education Australia as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 20 June 2024.

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

Reporting Criterion 1: About Dominican Education Australia

Dominican Education Australia Limited, is a Public Juridic Person established under the Canon Law of the Roman Catholic Church and is also a company limited by guarantee under the Corporations Act 2001. It has responsibility for the stewardship of six separately incorporated education Ministries. DEA and each of its Ministries is a charity registered with the Australian Not-for-profit and Charities Commission.

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

Our Mission

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

Our Vision

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

The Dominican Ideals

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

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

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

Priorities

As this is our first Modern Slavery Statement, DEA decided to begin with the implementation of a modern slavery risk management program at one of our Ministries, Siena College Limited. Based on the lessons learned and experience from working with Siena College in 2023, DEA will then extend the program to all six Ministries in subsequent years. As a result of the collaborative work undertaken with Siena College, DEA will shape a more tailored approach in its development of a modern slavery risk management program, that will maximise opportunities to minimise and mitigate risks of modern slavery.

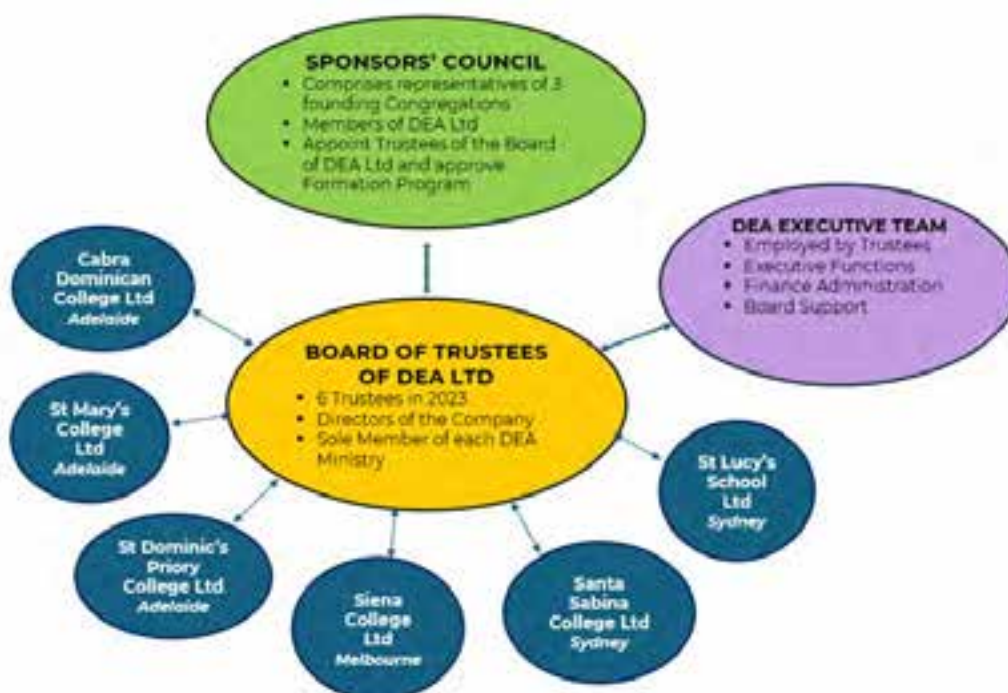


Reporting Criterion 2: Operations and Supply Chain

Our Organisational Structure

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

DIAGRAM SHOWING ORGANISATIONAL STRUCTURE OF DEA



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

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

The six Trustees that comprised the Board of DEA in 2023, have responsibility for both canonical and civil governance matters. To assist with this oversight, the DEA Board maintains the following Subcommittees:

- Finance & Risk
- Safeguarding
- Formation

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

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

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

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

Operations

The following provides a snapshot of the operations of DEA Ministries in 2023:

- Six Ministries operated Catholic schools in South Australia (3), Victoria (1) and New South Wales (2)
- 4825 students were educated in Dominican Education Australia Ministries

Workforce Profile

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

- Approx 933 staff worked in full-time or part-time employment;
- A further 421 staff were employed on a casual basis as emergency teachers, sports coaches, music tutors and in other roles
- In many of the Ministries, maintenance, groundskeeping, catering, IT and cleaning are outsourced to contractor services – these staff are not directly employed by those Ministries. This category includes an estimated 88 organisations

DEA Modern Slavery Working Group (MSWG) in 2023

The DEA MSWG was comprised of:

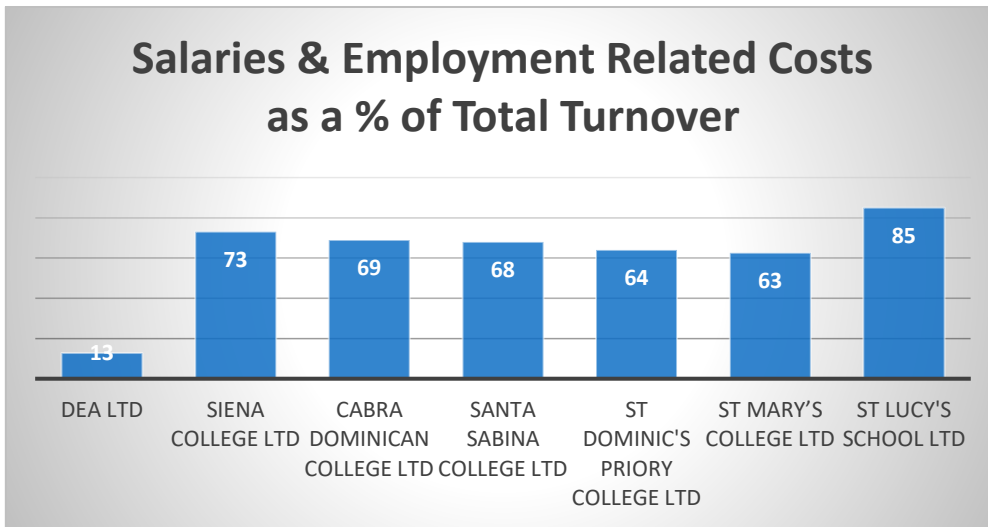
- the DEA CEO
- a DEA Finance & Risk Committee Member
- the Business Manager from Siena College
- other representatives of stakeholders in Siena College
- ACAN representatives

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

8 meetings took place in 2023.

Supply Chains, Goods and Services

In 2023, the aggregated operational turnover of DEA and its six Ministries amounted to \$134 million. As each of the Ministries is an educational institution, the major element of their expenditure is on teaching staff and learning and support staff, represented in the graphic below:



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

The aggregated total procurement spend for DEA and its six Ministries: \$46,046,895

DEA has identified 9 supply chains that support our Ministries' operational requirements:

Banking
Business support services
Facilities

Information Technology
Marketing
Professional services

Support services
Telecommunications
Travel



Reporting Criterion 3: Modern Slavery Risks

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

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

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

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

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

Classification

High Risk	Medium Risk	Low Risk
<ul style="list-style-type: none"> • Building and construction • Cleaning and Security • Events and event management • Facility management and property maintenance • Finance and Investment • Food and catering services • Furniture and office supplies • ICT Hardware • Labour Hire • Linen, laundry and textile products • Medical devices and supplies • Uniforms and PPE • Waste management services 	<ul style="list-style-type: none"> • Advertising & Marketing • ICT Software and network services • Utilities • Fleet management, consumables and maintenance • Travel and accommodation • Print / Mail Provider 	<ul style="list-style-type: none"> • Professional services • Financial expenses • Government and agency fees • License / membership fees

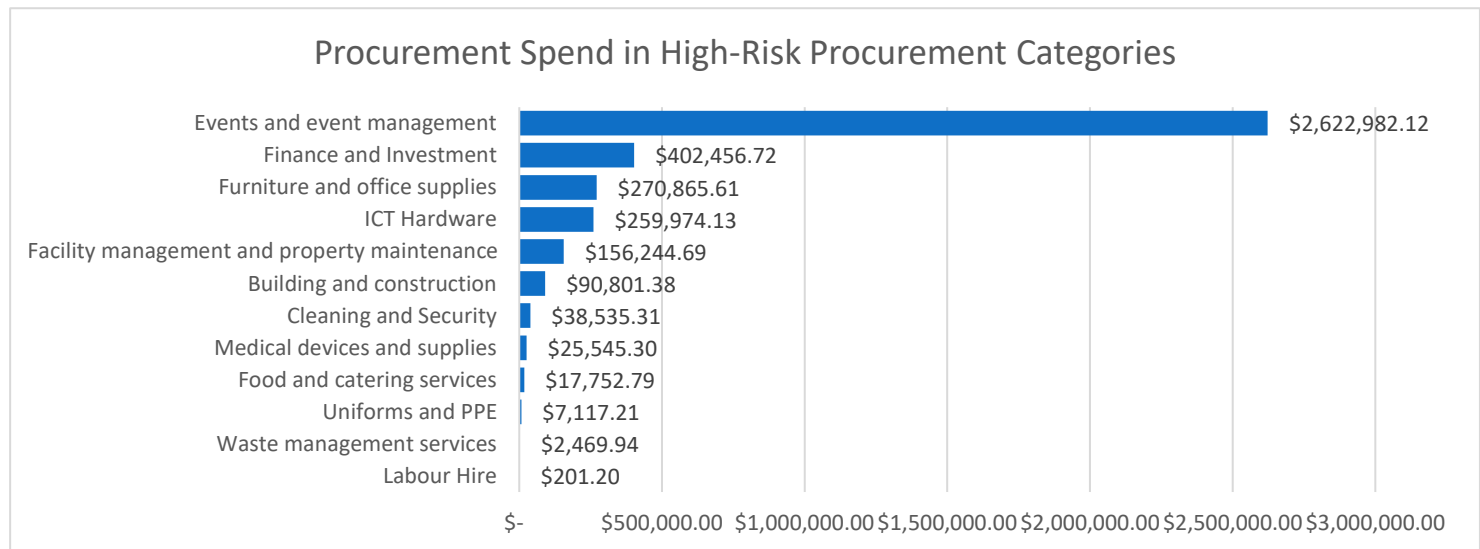
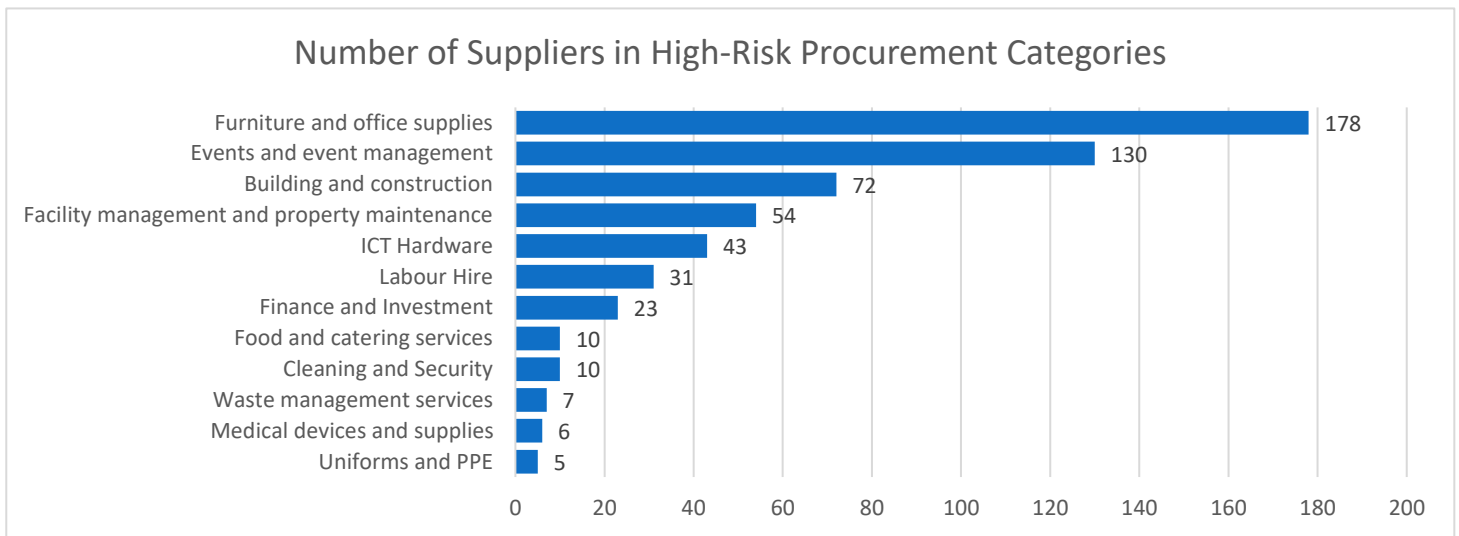
Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

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

As DEA and its Ministries operate in the State and Federal regulated education environment, and within a highly regulated labour market, with award safeguards for employees, the risk of modern slavery in our operations is assessed as low.

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

Preliminary investigations conducted with Siena College have identified the following procurement categories which are designated as High Risk under the ACAN Taxonomy:



While the above described procurement categories fall within the High Risk category under the ACAN taxonomy, that does not mean that all or a majority of the suppliers themselves are inherently High Risk.

DEA currently is in the process of compiling data regarding specific supplier procurement practices at each of our Ministries to determine the level of inherent risk.

Reporting Criterion 4: Steps taken to address Modern Slavery Risk

DEA continues to work with ACAN to increase our collective response to address modern slavery in supply chains. The following represents DEA's progress in 2023 and objectives for 2024.

Modern Slavery Action Plan and Road Map: Siena College

Siena College has undertaken the following steps in 2023 and committed to the following action in 2024:

FOCUS	2023	2024
<i>Strategy & Compliance</i>	Procurement Policy specifically names the Modern Slavery Act ("MSA") compliance requirements	MSA compliance is included as a goal for the Siena College 2024 Annual Action Plan
<i>Our Risks</i>	Siena worked with ACAN to increase our leverage and access to quality resources	Siena is to explore whether there is a separate category in their Risk Register for Modern Slavery
<i>Our Suppliers</i>	Implemented a standard contract clause for significant purchases in selected procurement categories requiring MSA compliance	MSA compliance requirements will be built into all 2024 contracts and requests for tender, including future building tenders. ACAN MS Questionnaire to be attached to this
	Recent Cleaning tender identified MSA compliance as a non-negotiable requirement	Included in Siena Procurement Policy
	Cleaning and uniform suppliers have provided evidence of compliance.	Requests for evidence of ongoing compliance will be made on a regular basis
	8 major suppliers were asked for evidence of compliance with MS Act- most of these provided evidence as required	Where responses have yet to be provided, follow up requests will be made to provide evidence of MSA compliance
	Siena is in the process of populating the ACAN Sedex spreadsheet containing a database of supplier chains accessed and their MSA compliance	Continue to update ACAN Sedex spreadsheet. Arrange meetings with suppliers identified as non-compliant from the ACAN spreadsheet. Inform staff about non-compliant suppliers.
<i>Our Staff</i>	Members of the Siena Leadership Team have begun to undertake the ACAN MSA online Training Modules	Ensure that the Leadership Team completes MSA Training Modules by the end of Term 2. Term 3 – provide staff with context around: <ul style="list-style-type: none"> MSA and Siena's 2023 actions Siena's current terms of engagement of new and current suppliers with the MSA Term 3: Staff to complete ACAN's Staff Awareness Survey to provide a baseline for knowledge, attitudes and beliefs. This can further inform future actions. Term 4: Facilitate the completion of MSA Training Modules by staff
<i>Our Students & Families</i>	Religion and Society (RAS) subject in VCE: students complete a unit of work which explores Modern Slavery. A group of passionate Eco Warrior students actively engage in social justice initiatives, and anti-Modern Slavery is one of them.	Look for opportunities to include anti-modern slavery in the school curriculum. Create opportunities to share anti-Modern Slavery information with the families within our schools

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

DEA will develop supplier analysis based on procurement over a calendar year across all schools.

DEA will propose that the Ministry Business Managers should be the designated Modern Slavery Liaison Officer (“MSLO”) for each Ministry.

Together with the CEO of DEA, they would form a network where resources and workload can be shared. It is also proposed that this network would meet together twice in the remainder of 2024.

In 2024, DEA and its Ministries will prioritise the following tasks:

FOCUS	Priorities
<i>Strategy & Compliance</i>	<p>Define DEA Modern Slavery Framework [align with ACAN risk management program]</p> <p>Approve a Modern Slavery Policy that includes expectations in relation to sourcing of goods and services.</p> <p>Complete ACAN Entity Profile Survey to obtain a maturity capability assessment for 2024.</p>
<i>Risks</i>	<p>Ministries work with ACAN to understand and address modern slavery risks to people in their operations and supply chain using quality resources, risk ratings, agreed metrics and scorecards.</p> <p>Create a category in each Ministry's Risk Register for Modern Slavery and define the risk appetite.</p>
<i>Supplier Due Diligence</i>	<p>Modern slavery pre-qualification requirements included into all 2024 contracts and requests for tender, including future building tenders.</p> <ul style="list-style-type: none"> - Supplier Survey [entry point engagement = 20 questions, 5 mins to complete] - Webinar attendance/training completion - Sedex membership and Self-Assessment Questionnaire (SAQ), as requested <p>Implement a standard contract clause for significant purchases in selected procurement categories.</p> <p>Complete the ACAN Supplier Data spreadsheet with supplier data that will inform supplier risk prioritisation and engagement strategy.</p> <p>Commence supplier engagement in collaboration with ACAN.</p> <p>ACAN to monitor and report on supplier engagement and escalate non-responses or other issues to DEA and Ministries, as required.</p>
<i>Staff</i>	<p>Use internal communications channels to engage our staff.</p> <p>Staff to complete ACAN's Staff Awareness Survey to provide a baseline for knowledge, attitudes and beliefs. This can inform future actions.</p> <p>Members of the leadership team, and Board Chair, undertake the assigned ACAN modern slavery e-learning modules (four modules are included in the course).</p>
<i>Students & Families</i>	<p>Consider opportunities to include the topic of anti-Modern Slavery in the school curriculum. e.g. in the Religious Education Curriculum, Humanities and other curriculum areas.</p> <p>Provide avenues for students to actively engage in anti-slavery action-learning</p> <ul style="list-style-type: none"> - 8 February Feast Day of St Josephine Bakhita - 8 March International Women's Day - 1 May Feast Day of St Joseph the Worker and International Workers Day - 30 July UN World Day Against Trafficking in Persons - 11 October International Day of the Girl Child - 2 December UN World Day for the Abolition of Slavery - School events – ACAN team member in each Ministry's geographic location <p>Communicate our anti-slavery commitment to stakeholders</p> <ul style="list-style-type: none"> - Website / Social media / Newsletters

Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

During this reporting period, we worked to embed anti-slavery practices at Siena College to provide some internal assurance. There is much more to be done to ensure this work has a measurable impact on the victims of modern slavery.

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

The scoring scale ranges from: 0 to 100

Achieving a score of 100 signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence. This is an aspirational and long-term goal.

By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

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

1. **Business Process and Governance**
2. **Operations**
3. **Supply Chain**
4. **Worker Engagement**
5. **Program and Activities**
6. **Grievance Mechanisms and Remediation**

Our maturity is also measured across four sub-pillars to help evaluate strengths and weaknesses in our approach that cover: 1) governance; 2) risk assessment; 3) risk management; and 4) effectiveness.

The 2023 result for DEA is 30:

This score reflects a basic level of practice that has progressed beyond ad hoc activities. There is a shift towards planned, measured, and controlled actions to manage modern slavery risks, supported by basic project management principles. It reflects that DEA has begun to have structured efforts with a documented plan.

Dominican Education Australia - Overview



Dominican Education Australia - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Principles and Governance	32%	42%	23%	25%	31%
2. Operations	36%	38%	22%	26%	30%
3. Supply Chain	17%	80%	21%	26%	30%
4. Worker Engagement	0%	3%	0%	6%	7%
5. Entry's program and activities	60%	10%	50%	25%	30%
6. Grievance Mechanisms and Remediation	55%	60%	38%	28%	43%
Average:	33%	35%	23%	23%	30%

Maturity scores assess individual scoring by pillar and sub-pillar, including averages and total pillar scores

Additionally, DEA has adopted ACAN Baseline Data metrics in 2023 that capture the outcomes of some of our actions. This will help to demonstrate continuous improvement when compared with data year on year and assist in planning future actions.

DEA is committed to continuous improvement in this area and will establish clear targets and measures to assess effectiveness in the future.

We will continue to review our modern slavery risks as part of our overall risk management framework in the next financial year.

2023	ACTIVITY	Dominican Education Australia
INTERNAL / STAFF	Hours spent on modern slavery activities	16
	Individual staff completed e-learning	10
	E-learning modules completed	10
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1817
	Number of suppliers with visible contact information and ABN	1817
	Number of suppliers across high-risk categories	33
	Number of ACAN Supplier Surveys completed	131
	Supplier staff attending capacity building webinars	0
	Invited to join Sedex	59
	Joined Sedex	11
	Sedex SAQ completed	1
	Social audits	0
	Corrective actions	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Reporting Criterion 6: Internal Consultation

Priorities

As this is DEA's first effort to comply with the Modern Slavery Act 2018, a decision was made to pilot implementation of a modern slavery risk management program at one of our six Ministries, Siena College. Based on the lessons learned and experience from working with Siena College in 2023, DEA will then extend the program to all six Ministries in 2024.

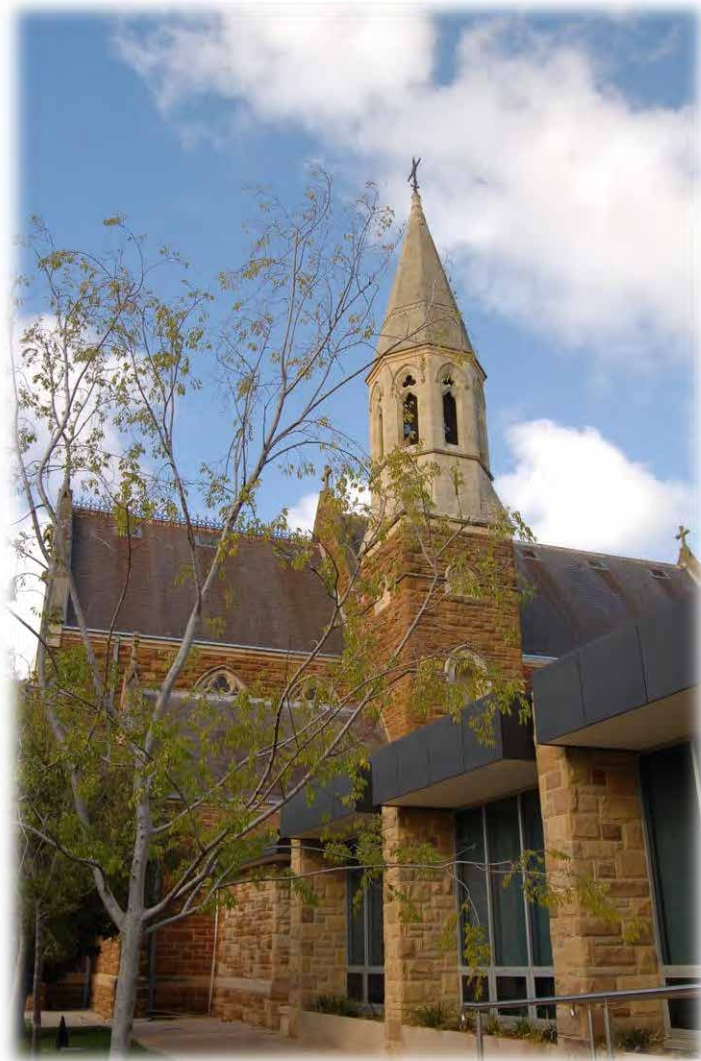
From the 2023 lessons learned and the collaborative work undertaken with Siena College, DEA will shape a more tailored approach in its development of a modern slavery risk management program, that will maximise opportunities to minimise and mitigate risks of modern slavery.

The CEO of DEA provided an update to all Board Chairs, Principals and Business Managers in September 2023, regarding progress made with Siena College, and preparing them for 2024 and the implementation of anti-slavery practices across all DEA Ministries. In March of 2024, Board Chairs and Principals will receive a further briefing in relation to the Modern Slavery Act, DEA's commitment to anti-slavery practices and available support through the ACAN Network.



Reporting Criterion 7: Other Information

No other relevant information



Marist

MARIST SCHOOLS AUSTRALIA

2023 Modern Slavery Statement



1 January – 31 December 2023

ABN 76 654 014 794

Acknowledgment of Country

We acknowledge Australia's first peoples and as the traditional owners and custodians of the land on which we live, work and play.

We pay our deep respects to elders past, present and emerging, and acknowledge all aboriginal children, young people, families, and staff who are a part of Marist Schools Australia.

We embrace and commit to the spirit and work of self-determination and reconciliation.

Disclosure Note

This statement has been made on behalf of Marist Schools Australia Ltd ABN 76 654 014 794. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth).

Marist Schools Australia Ltd Head Office:

Suite 5.01, 247 Coward St

Mascot NSW 2020

www.msa.edu.au



**Marist Schools Australia
2023 Modern Slavery Statement**



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Foreword, Approval and Signature

As a Catholic institution, and consistent with the Catholic world view that the Church must play a part in putting an end to slavery, Marist Schools Australia Limited (MSA Ltd) recognises its duty to assess and address modern slavery within its operations and supply chains. This position is consistent with the tenets of Catholic Social Teaching, and the belief that the dignity of all people is rooted in their creation in the image and likeness of God. Upholding an ethical reputation is essential, as it fosters trust in our community service. MSA Ltd remains committed to the Australian Catholic Anti-slavery Network Modern Slavery Risk Management Program (ACAN Program), collaborating with other Catholic entities to end modern slavery.

Our stance on modern slavery acknowledges the potential impact of commercial activities, including that of MSA Ltd, on vulnerable populations. We are dedicated to taking practical measures to mitigate risks within our operations and supply chains. We will closely collaborate with ACAN to engage with both current and potential suppliers and contractors, ensuring adherence to our policy and safeguarding the freedom and dignity of all individuals.

MSA Ltd have prepared this statement as the first step in this process. MSA Ltd further commits to continually reviewing and improving its practices and those of its suppliers to ensure the risks of modern slavery within the organisation's operations are addressed.



A handwritten signature in black ink that reads "David Hall".

Professor Brother David Hall fms
Board Chair



A handwritten signature in black ink that reads "F. C. Malloy".

Dr Frank Malloy
National Director

This Modern Slavery Statement was approved by the principal governing body of Marist Schools Australia Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 21 June 2024.

This Modern Slavery Statement is signed by a responsible member of Marist Schools Australia Board Limited (MSA Ltd) as defined by the Act.

Marist Schools Australia Limited's Modern Slavery Statement is made pursuant to the *Commonwealth Modern Slavery Act 2018 (Cth)* ("the Act") and relates to activities undertaken in 2023.



Criterion 1: About Marist Schools Australia

Marist Schools Australia (MSA Ltd) is a not-for-profit company established to carry on the Marist tradition of quality Catholic education founded by the Marist Brothers in Australia in 1872 and inspired by St. Marcellin Champagnat. MSA Ltd governs, operates and manages 12 schools in 9 Dioceses across 6 States and Territories of Australia. It also provides professional learning, staff formation, youth ministry, and solidarity opportunities to Marist schools governed by 19 Diocesan Catholic education authorities. MSA Ltd's mission is to support the Catholic Church's evangelising mission to make Jesus Christ known and loved and to ensure quality education in the Marist tradition through its schools.

MSA Ltd is the largest provider of school boarding programs in Australia, offering boarding in 6 of its schools. It also provides a specialised school for those students that are unable to participate in mainstream schooling in the Sydney, NSW area. MSA Ltd schools provides education through its various schools in both a single sex and co-educational setting from Kindergarten/Foundation to Year 12.

MSA Ltd's priority is to ensure that the 12 Colleges, which they govern, manage and operate, follow modern, best-practice governance. This ensures compliance with Australian laws (including education regulations) and provides a safe and supportive learning environment that reflects Marist values.

Criterion 2: Our Structure, operations and supply chains

Structure

MSA Ltd is a public not-for-profit company limited by guarantee and registered with the Australian Charities and Not-For-Profit Commission. MSA Ltd was formed to continue the education ministry of the Trustees of the Marist Brothers and the Association of St Marcellin Champagnat in order to continue to make Jesus Christ known and loved, and to ensure quality Catholic education in the Marist tradition through its schools.

There are over 600 Marist schools across the world educating young people in over eighty countries. There are 56 schools across Australia that operate in the Marist tradition and who are part of the Marist Schools Australia Network. MSA Ltd directly governs 12 schools Australia-wide including in New South Wales, Queensland, Victoria, South Australia, Australian Capital Territory and Western Australia.

In 2023, the Board of MSA Ltd comprised 10 directors, all highly skilled and eminent Australian educators.



PROFESSOR BR DAVID HALL



MS PAMELA BETTS



DR MICHAEL BEZZINA



MS ELIZABETH DENNY



MR PETER GRACE



MS SANDRA HARVEY



BR DANIEL HOLLAMBY



MR NOEL KENNEDY



MR ROSS TARLINTON



MR PETER TURNER

The MSA Ltd Board of Directors;

- set the strategic direction of MSA Ltd
- appoint the National Director to implement and manage the operational framework of Marist Schools Australia
- provide oversight of MSA Ltd's finance and auditing
- oversee educational standards and effectiveness
- oversee the effectiveness of formation through the education ministry

The Board of MSA Ltd appoints a National Director to manage the education ministry's operations. The National Director appoints the College Principal who conducts the day-to-day operations of the school and reports to the National Director via a Regional Director.

The role of National Director includes;

- putting into action the strategies and policies decided by the MSA Ltd Board
- clearly communicating MSA Ltd's vision and mission, inspiring and empowering others to fulfil MSA Ltd's goals
- appointing leaders and staff to manage and operate MSA Ltd's National and Regional Offices, and each of the 12 MSA Ltd governed Colleges effectively
- ensuring all staff have opportunities for spiritual growth and development
- guiding MSA Ltd towards long-term sustainability, growth, and development, in accordance with all legal requirements

The National office of MSA Ltd is located in Sydney, Australia. The National Director appoints the Principal of each member College. The College Principal has the delegated authority and responsibility of the day-to-day management of the College from the National Director/Executive Officer.

Each College Principal reports to the National Director through a Regional Director, who provides additional support. The National Director also provides leadership and guidance to each College Principal including supporting the implementation of strategic and structural matters relating to;

- mission
- governance
- educational quality and standards
- finance
- compliance, and
- risk

Marist Schools and Colleges

Colleges in the Marist tradition have been operating in Australia for more than 150 years. The network of schools operating in the Marist tradition in 2023 was 56 Australia wide with 12 directly governed by MSA Ltd. Of the 12 Colleges governed directly by MSA Ltd there are;

- 4 in New South Wales
- 4 in Victoria
- 1 in Queensland
- 1 in South Australia
- 1 in Western Australia, and
- 1 in the Australian Capital Territory

Of the 12 Colleges governed by MSA Ltd, 7 are co-educational institutions, while 5 are focused on boys education.

6 of our colleges across the country offer boarding facilities.

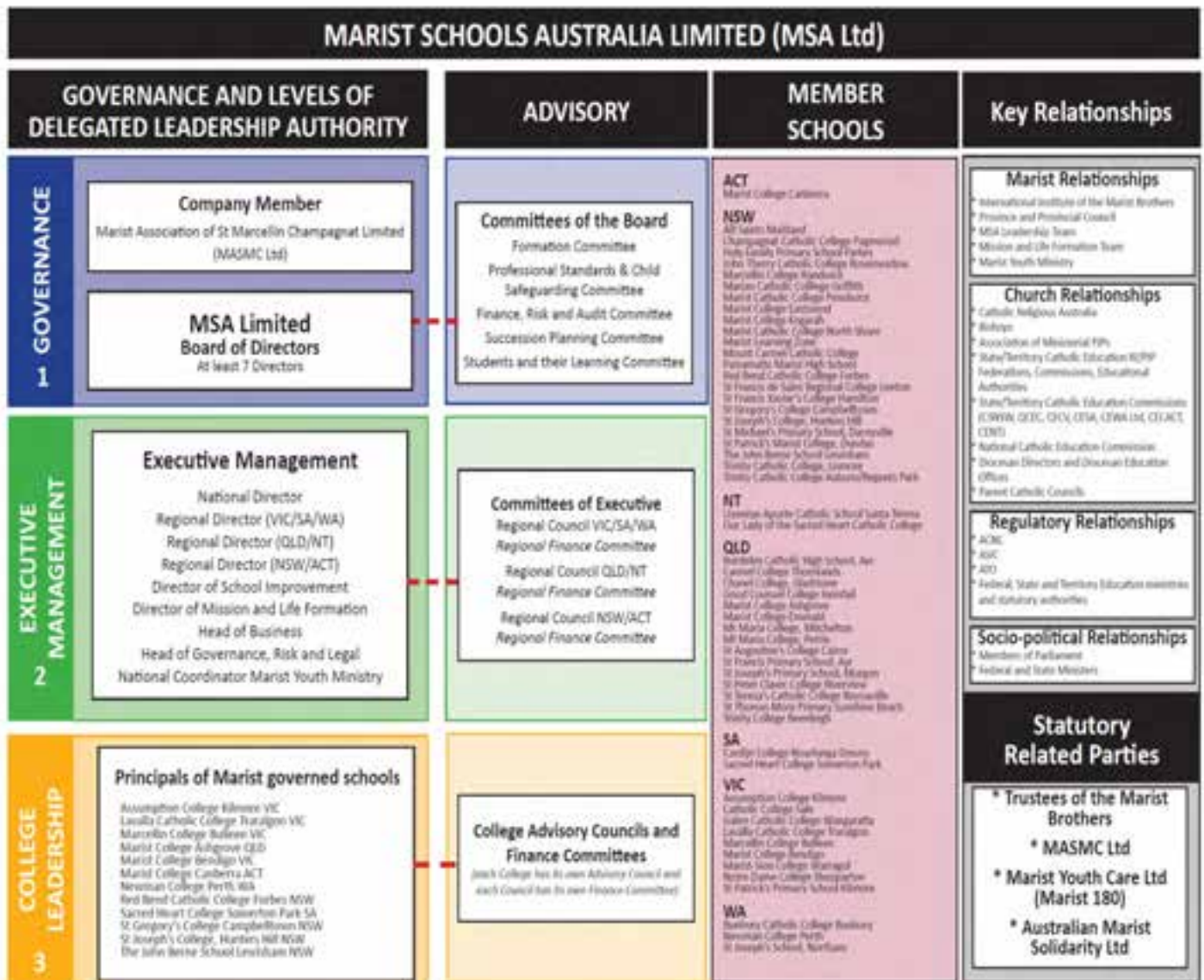
MSA Ltd also operates a co-educational flexible learning centre, which endeavours to fill the gap in the education system for young people in Years 7 to 10 who find it challenging to participate in mainstream education.

The majority of MSA colleges are single campus colleges although MSA Ltd does operate a number of double campus colleges.



St Joseph's College, Hunters Hills

Organisational Structure



MSA Ltd provides education for 15,760 students, supported by 2,101 staff consisting of 1,257 teaching staff and 844 other staff.

MSA Ltd's annual turnover for 2023 was \$440m. Income from the Colleges includes 49% from Government funds and MSA gratefully acknowledges the financial support provided by the Commonwealth, State and Territory governments in recurrent and capital funding. A further 46% of income is from the support of parents and caregivers through tuition, boarding and other fees. The remaining 4% of income is from investments.

Marist Schools Australia Ltd Operations and Supply Chains

MSA's primary focus is on Catholic teaching and learning. This has been supported by improvements in facilities and resources with over \$42m in capital projects being undertaken in 2023, including major upgrades of boarding facilities in two Colleges to provide further boarding opportunities.

MSA Ltd's 12 Colleges and 3 Marist centres across Australia operate using a diverse network of goods and services engaging contractors and subcontractors for catering, cleaning, gardening, waste management, building, and facilities maintenance tasks.

Across MSA's Colleges and Centres, purchases and engagement of contractors are made at a local level due to geographical diversity, although Principals are subject to financial spending limitations. Major capital works projects are governed by MSA policy and require approval by the MSA Ltd board at several stages. The selection of builders and contractors for large capital works are subject to assessment of suitability.

Funds set aside for Long Service Leave and other longer term purposes are subject to investment policy requirements, including ethical considerations.



Red Bend Catholic College, Forbes

Criterion 3: Risks of modern slavery practices in the operations and supply chains

MSA Ltd recognises the risks associated with modern slavery as an integral component of its corporate risk assessment. It has gained a more comprehensive understanding of potential risks and vulnerabilities within its supply chain. Ongoing efforts will prioritise the mitigation of identified risks, enhancement of procurement procedures, and establishment of robust reporting mechanisms.

MSA Ltd has employed the ACAN Category Risk Taxonomy to pinpoint inherent or potential risks of modern slavery linked to significant expenditure categories. This methodology draws upon sources like the Global Slavery Index and the International Labor Organisation (ILO) to identify these risks. Four key factors are also used to determine the level of risk:

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

Building and Construction

The building and construction industry presents a heightened risk for modern slavery due to several factors:

1. **Complex Supply Chains:** Building and construction projects typically involve numerous subcontractors and suppliers, often spanning multiple countries. This complexity can make it challenging to monitor and ensure compliance with labour standards throughout the supply chain.
2. **Low-skilled and Vulnerable Workforce:** Many tasks within the construction industry, such as manual labour and construction work, require low-skilled workers who may be more susceptible to exploitation. These workers may face language barriers, lack of awareness of their rights, and limited access to legal recourse.
3. **Temporary and Migrant Workers:** Construction projects frequently rely on temporary and migrant labour, who may be particularly vulnerable to exploitation due to their precarious employment status. They may be subjected to debt bondage, passport confiscation, or threats of deportation, making them reluctant to report abuse or exploitation.

4. **Subcontracting Practices:** Subcontracting is common in the construction industry, leading to fragmented supply chains and reduced transparency. This can create opportunities for unscrupulous subcontractors to exploit workers further down the chain without the knowledge of the primary contractor or client.
5. **Informal Economy:** In some regions, parts of the construction industry operate within the informal economy, where labour standards are often disregarded, and workers are more susceptible to exploitation and abuse.

Detailed Analysis of All Recurrent and Capital Procurement in 2023 Across Our Schools

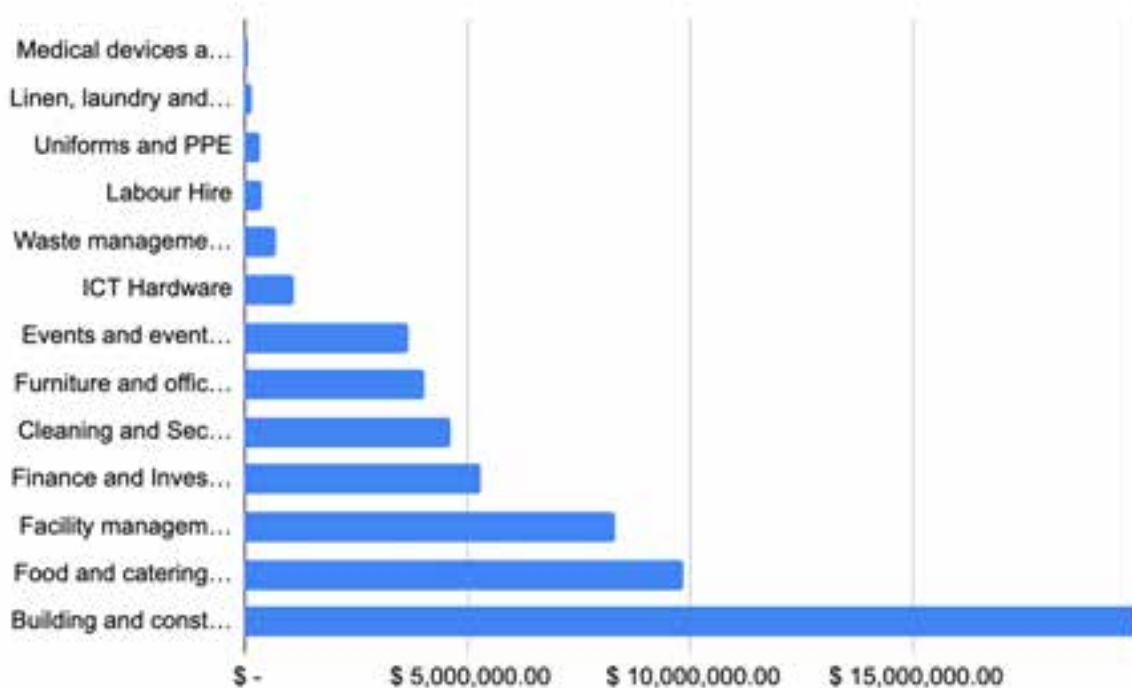
Risk Category	Supplier Taxonomy	Annual Spend	% of Total	No of Suppliers
High	Building and construction	54,132,009	40%	191
High	Cleaning and Security	4,649,395	3%	58
High	Events and event management	4,447,091	2.5%	308
High	Facility management and property maintenance	3,665,386	6%	537
High	Finance and Investment	8,312,368	4%	40
High	Food and catering services	5,308,692	7%	300
High	Furniture and office supplies	9,835,288	3%	650
High	ICT Hardware	4,054,452	1%	23
High	Labour Hire	1,114,448	0.3%	21
High	Linen, laundry and textile products	395,066	0.1%	27
High	Medical devices and supplies	179,507	0.6%	31
High	Uniforms and PPE	86,457	0.25%	63
High	Waste management services	339,632	0.5%	25
High	Education & Training	4,447,091	3%	165
Medium	Advertising & Marketing	495,168	0.4%	67
Medium	ICT Software and network services	6,381,835	4.7%	244
Medium	Utilities	2,273,873	1.6%	35
Medium	Fleet management, consumables and	1,822,976	1.3%	93

	maintenance			
Medium	Travel and accommodation	6,415,569	5%	201
Medium	Print / Mail Provider	967,044	0.7%	49
Low	Professional services	11,075,609	8%	697
Low	Financial expenses	1,465,100	1%	14
Low	Government and agency fees	6,831,475	5%	46
Low	Licence/Membership fees	1,868,442	1.3%	256

Notes: 1. MSA Ltd has drawn upon the detailed resources and references of the ACAN network to categorise the modern slavery risk associated with each procurement category.

A thorough analysis of these supply chains has identified the following categories that MSA Ltd would consider high risk including building and construction, food and catering, facilities management, cleaning and security, ICT Software & services, clothing suppliers, IT supplies and services.

Supply Chain Risk Distribution (2023)



Criterion 4: Our actions taken to prevent and manage Modern Slavery Risks

MSA Ltd is committed to the values which underpin Catholic education in the Marist tradition, and to ensuring that our social justice frameworks and modern slavery risk management processes take into consideration all of our stakeholders, including our staff and students. This is directly aligned to the Marist Schools Australia Strategic Plan 2021-2024.

Throughout 2023, MSA participated in the Australian Catholic Anti-Slavery Network (ACAN) and has extensively utilised ACAN resources in progressing its anti-slavery program and developing its Modern Slavery Policy and Statement. MSA Ltd's participation in this network is integral to its commitment to addressing modern slavery, human trafficking, and forced labour.

Among the invaluable ACAN resources MSA has leveraged are training modules, fact sheets, risk assessment tools, and supplier analysis information.

During 2023, MSA undertook the following important anti-slavery actions:

2023 Actions

- **Modern Slavery Policy** and Statement was approved and published
- **Modern Slavery Working Group** was established and included the MSA National Director, Head of Business and Head of Governance, Risk and Compliance. The Head of Governance, Risk and Legal was appointed the Modern Slavery Liaison Officer
- **Training** at Board and Executive level was reviewed and it was agreed it would include modern slavery prevention training
- In November 2023, a national **MSA School Business Managers Conference** was led by the MSA National Director and MSA Head of Business. A key conference item was the MSA Anti-Slavery program which served as both a learning opportunity for School Business Managers and also an opportunity to launch a gap and risk analysis of suppliers at the school level. It is important to note that at present procurement, subject to some financial limits, is not centralised with MSA but is a delegated school function and consequently most procurement decisions are made by the Principal in consultation with the school Business Manager
- In December 2023, each of the 12 MSA governed schools provided their **supplier data** for spend and risk **analysis**

The following principles guide our modern slavery policy implementation:

- MSA Ltd will not knowingly engage in or support modern slavery practices in any form
- MSA Ltd will actively strive to identify and eliminate modern slavery practices within its operations, business partnerships, and supply chains
- Any form of exploitative treatment, abuse of labour rights, or coercive control of workers is unacceptable
- MSA Ltd will comply with all relevant laws and regulations concerning worker recruitment, remuneration, working conditions, and freedom of association
- MSA Ltd's purchasing decisions prioritise ethical considerations beyond price, including worker welfare and responsible recruitment practices
- MSA Ltd expects and supports our suppliers and business partners to assess and address modern slavery risks, enhancing transparency, traceability, and accountability across our supply chains

For 2024, MSA plans to maintain its membership with ACAN and supported by this engagement MSA intends to undertake the following actions to evolve its anti-slavery program

2024 Actions

- **Modern Slavery Policy** and anti-slavery program to be embedded at school level
- Strengthen and develop **responsible investment policies** by explicitly covering modern slavery
- **Modern Slavery Working Group** to be expanded to include representation of school Business Managers
- **Training** at Board and Executive level to be undertaken by MSA directors and MSA executives
- Develop a **Risk Appetite Statement** to work towards eliminating modern slavery practices in the supply chain and operations of the schools and include modern slavery risk as one of the MSA **macro operational risk** areas. Continue to **assess and monitor emerging risks** against this objective
- Invite high risk suppliers to participate on **Sedex**
- Review standard form supplier **contracts** with a view to including anti-slavery clauses
- Expand school **communications** and engagement activities to include awareness raising about modern slavery and the preventative actions being

undertaken by MSA

- Continue to **participate** in the **ACAN** Modern Slavery Risk Management Program

Further, the ACAN Program has granted MSA Ltd's membership to Sedex - the Supplier Ethical Data Exchange. Sedex, a global not-for-profit membership organisation, aids businesses in managing and enhancing social and environmental performance within their supply chains.

Through Sedex, businesses access a platform to exchange information and collaborate with suppliers and buyers, fostering ethical and sustainable practices across the supply chain.

As a Sedex member, MSA Ltd continues to leverage a suite of services and tools aimed at mitigating supply chain risks, fostering supplier engagement, and advancing ethical and sustainable business practices.

MSA Ltd's intentions in 2024 for utilising Sedex include:

1. Managing the risk of modern slavery within current supplier relationships
2. Assessing inherent risk against actual risk
3. Screening new suppliers during tender processes and supplier onboarding
4. Gaining visibility further upstream in the supply chains
5. Monitoring and reporting progress regarding the profile of suppliers

Whilst MSA Ltd believes the scope of our modern slavery response has been comprehensively documented across the first five criteria, we are committed to;

- Participating in the ACAN Modern Slavery Risk Management Program through to 2026, which involves providing ACAN with supplier details in order to facilitate supplier engagement.
 - This includes tasks such as completing the ACAN Supplier Survey to identify high-risk and high-volume Tier 1 suppliers for onboarding to Sedex.
 - Once MSA Ltd suppliers are invited to join the Sedex platform, they must complete a self-assessment questionnaire (SAQ), which generates a risk score based on site characteristics.
 - Throughout 2024, ACAN will engage with high-risk suppliers via Sedex, a significant step toward meeting the requirement for continuous improvement under the MSA.
 - Additionally, there will be a continued rollout of ACAN e-learning modules to key stakeholders, and the integration of Modern Slavery Risk Management policies into procurement procedures, practices, and governance controls.

Grievance Mechanism and Remediation Pathways

MSA Ltd has a Whistleblower Policy that applies to its Colleges and Centres and provides an important channel by which complaints can be raised, and investigations undertaken, about improper workplace practices or business activities.

MSA Ltd is committed to developing and implementing clear grievance mechanisms and remediation pathways for those individuals impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, *Commonwealth Modern Slavery Act 2018* – Guidance for Reporting Entities and relevant Australian laws.

During 2023, MSA did not receive any complaints, disclosures or concerns relating to modern slavery.



Criterion 5: Assessment of the effectiveness of our actions

The ACAN Entity Maturity Capability Assessment provides a score card of our capabilities to mitigate the risk of modern slavery in our operations and supply chains. The scorecard is a snapshot in time generated from a self-reported Entity Profile Survey. The score card assists MSA Ltd to set future direction, identify where to allocate resources and how we can improve.

The score card ranges from: 0 to 100



Achieving a score of 100 - signifying the complete demonstrated capability to assure modern slavery is not present in operations and supply chain risks through validated and verifiable evidence - is an aspirational and long-term goal.

The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

- 1. Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities.
- 2. Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
- 3. Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- 4. Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- 5. Entity's Program and Activities:** Considers broader initiatives and engagements we undertake to combat modern slavery.
- 6. Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

MSA Ltd achieved a score of 31 in 2023, our first year of reporting, exceeding its target. This reflects a basic level of maturity expected in year 1 – 3 of reporting. We aim to implement a more structured and managed approach in 2024 so we can demonstrate improvement.



Marist Schools Australia - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	39%	47%	25%	17%	32%
2. Operations	40%	38%	15%	14%	27%
3. Supply Chain	0%	80%	0%	0%	20%
4. Worker Engagement	8%	20%	11%	16%	14%
5. Entity's program and activities	75%	20%	50%	20%	41%
6. Grievance Mechanisms and Remediation	70%	60%	40%	30%	50%
Average	39%	44%	24%	16%	31%

Maturity Score 2023 Individual scoring by pillar and sub pillar, including averages and total 2023 score



MSA Ltd will adopt the ACAN Baseline Data table in the next reporting period as another measure of our effectiveness.

Criterion 6: Process of consultation with other entities

MSA Ltd does not own or control any other entities.

Criterion 7: Other relevant information

No other relevant information





**MacKillop
Family
Services**



Modern Slavery Statement 2023

1 January 2023 – 31 December 2023

mackillop.org.au

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Introduction, Approval and Signature

This is the fourth Modern Slavery Statement (“Statement”) submitted by MacKillop Family Services Limited (“MacKillop”) pursuant to the Commonwealth Modern Slavery Act 2018 (the “Act”).

Modern slavery is defined by the Act as: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services (“Modern Slavery”).

At MacKillop, we are deeply committed to working for the rights of children, young people and families to promote healing from trauma and loss, and to enable hopeful futures. The Act and its objectives are consistent with our organisational Purpose, Vision and Values.

As MacKillop embarks on a journey to embed sustainability in our work, we acknowledge the disproportionate impact that Modern Slavery has on vulnerable populations. We recognise that factors which impact on the rights of children, young people and families are varied and operate at multiple layers of an organisation, community and society. As such, we are committed to identify and address our impact through our work as outlined in this Statement and in our Sustainability Strategy.

This is a joint Statement made with a range of Australian Catholic organisations that are participating in the Australian Catholic Anti-Slavery Network (“ACAN”). It forms part of ACAN’s 2023 Compendium of Modern Slavery Statements.

This Statement relates to the period 1 January 2023 to 31 December 2023 (“Reporting Period”).

This Statement was approved by the principal governing body of MacKillop on 11 June 2024 and is signed by a responsible member of MacKillop as defined by the Act.

Brian Keane
Chair of the Board
MacKillop Family Services

Criteria 1: About MacKillop Family Services

Today, MacKillop continues the work of our founding congregations within the framework of Catholic Social Teaching and in the spirit of the Gospel - one of radical inclusion, restoration and accompaniment. Just like our founders, we are deeply committed to our work and are driven by social justice. Every child should be protected from abuse, neglect and exploitation, and as a child-safe organisation, we are committed to protecting and advocating for the best interests of children and families across all our programs.

MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families across all our service locations. Services and programs are offered in family support, foster care, residential care, disability services, youth support, education and training, parenting, family therapy, mental health, family violence, early childhood, and support to women and men who, as children, were in the care of MacKillop's founding agencies.

We also operate three specialist schools in Victoria and are in the process of establishing our first specialist school in New South Wales.

For more information on MacKillop and our services, visit www.mackillop.org.au.



Our Founding Story

On 1 July 1997, MacKillop was formed as a new organisation by re-founding seven agencies operated by the Sisters of Mercy, the Christian Brothers and the Sisters of Saint Joseph of the Sacred Heart in Victoria. However, our legacy and inspiration are much older. From the 1850s, these three congregations - respectively founded by Catherine McAuley, Edmund Rice and Mary MacKillop - worked in Victoria to establish homes for children who were orphaned, destitute or neglected, and for families who were in need of care and support. Throughout the years, the original model of institutional care evolved into different forms of residential care, foster care, education, family support and disability services.

The purpose and character of MacKillop as a Catholic organisation continues to draw from the lives, works and inspiration of our three founders, who provide a living model for the way our staff and volunteers approach their work. Woven through this ethos is the acknowledgement and recognition of the inherent Aboriginal spirituality of this country and respect for the cultures of the peoples who have lived here for thousands of generations.

Our Purpose

Like our founders, MacKillop's work is underpinned by a passionate commitment to social justice - to work for the rights of children, young people and families to be safe, to learn, feel nurtured and connected to culture. We provide high quality services to promote healing from trauma and loss, and to enable hopeful futures.

MacKillop will care compassionately, respond large-heartedly and advocate courageously.

Our Vision

Children, young people and families are welcomed and supported by MacKillop to be empowered and thrive.

Our Values

We commit to the following five foundational values which we continue to embed in the culture of our organisation and practice:



Justice

We believe in the right of all people to experience respect and to have access to quality services irrespective of sex, race, ethnicity, culture, language, religion, marital status, disability, sexuality or age. We advocate for inclusiveness and social justice in the wider community and commit to these principles across our organisation and all services we provide.



Hope

We commit to creating positive and hopeful relationships where people find meaning in their experiences and relationships and are able to learn, explore their strengths and create possibilities for growth and change.



Collaboration

In our work with individuals, families and other organisations and groups, we commit to working in a collaborative spirit through cooperation, coordination, partnership and empowerment.



Compassion

Compassion is an attitude of the heart, an expression of our shared humanity and a deep desire to alleviate another's suffering. We commit to creating an attitude of openness to others and to their circumstances.



Respect

We value ourselves and other people, the earth and all creation. We seek to listen and learn from each other and build relationships with respect, being proud of what we hold in common and with understanding and tolerance of our differences.

Sanctuary Commitments

MacKillop's values are brought to life through our commitment to the Sanctuary Model. Sanctuary is an evidence-supported, whole-of-organisation framework that guides how we practice as an agency. Sanctuary enables a shared language, knowledge, and response to the impact of trauma and loss on all of us.



Non-Violence

Mean what you say and don't be mean when you say it



Democracy

Everyone is heard



Growth and Change

Open to new ideas and ways of thinking



Emotional Intelligence

Look out for yours and other people's feelings



Open Communication

Be honest and share information



Cultural Humility

We practice compassionate self-reflection and self-critique in order to cultivate safety for all



Social Learning

We all learn from, and teach each other



Social Responsibility

We all help each other... It takes a village to raise a child

Strategic Goals

1. Grow high quality, inclusive services to prevent harm, to support healing and to respond where the need is great.
2. Be an innovative and responsive leader by developing best practices and advocating for social justice.
3. Deepen our commitment to Aboriginal self-determination, reconciliation and cultural safety.
4. Ensure accountable and integrated systems that prioritise the safety and wellbeing of children, families, volunteers and staff.
5. Strengthen organisational and financial sustainability.



Sustainability at MacKillop Family Services

MacKillop is committed to sustainability and views itself as a custodian of the future of the children, young people, and families it works with. We aim to operate in a way that meets the current needs of our stakeholders while also securing a future where they can thrive.

Our vision is to promote equity and justice within and between generations by embracing and seeking to embed five elements of sustainability in our organisation:

<p>Social sustainability</p> <p>Ensuring the processes, systems and institutions of our society support today's and future communities to be equitable, diverse, connected and democratic where people have a good quality of life.</p>
<p>Cultural sustainability</p> <p>Recognising the importance of identity and heritage and a sense of place to support the co-existence of different ways of life and values and equal participation.</p>
<p>Environmental sustainability</p> <p>Recognising and living within ecological limits to protect natural resources for future generations.</p>
<p>Economic sustainability</p> <p>Using resources (human and material) in a way that supports long-term economic growth without negatively impacting people and the planet.</p>
<p>Financial sustainability</p> <p>Ensuring the organisation can grow its services in a way that is resilient and viable.</p>

Table One: MacKillop Five Elements of Sustainability

To develop our strategy, MacKillop consulted with various stakeholders, including staff, foster carers, young people living in residential homes, and philanthropic trusts. The insights gathered from these stakeholders informed a materiality assessment, which informed our first Sustainability Strategy.

In 2023, we launched our Sustainability Strategy 2023-2027 ("Sustainability Strategy"), which outlines our commitment to making a positive impact.

Our sustainability efforts align with external strategies, UN Sustainability Goals, and the principles outlined in Pope Francis' encyclical *Laudato Si*. The UN Sustainability Goals have been adopted by United Nations Member States to guide global development efforts until 2030.

In the global Catholic context, *Laudato Si*, an encyclical letter written by Pope Francis in 2015, is a call for action on the environment and recognises the interconnectedness of social, environmental and economic sustainability. *Laudate Deum*, an addendum to *Laudato Si* released in 2023, is an appeal for more urgent action to address climate change noting the disproportionate impact of the failure to act on the most disadvantaged and vulnerable.

By incorporating these frameworks into our Sustainability Strategy, we aim to ensure our actions are globally recognised and contribute to a sustainable future.

Our Sustainability Strategy outlines the blueprint for implementing actions in four focus areas. A copy of our Sustainability Strategy can be found at www.mackillop.org.au/sustainability.

<p>Our four focus areas are:</p>
<p>Focus area 1:</p> <p>Deepening our commitment to Aboriginal self-determination, reconciliation and cultural safety.</p>
<p>Focus area 2:</p> <p>Nurturing a diverse, inclusive and culturally safe organisation.</p>
<p>Focus area 3:</p> <p>Acting on climate change and reducing our footprint.</p>
<p>Focus area 4:</p> <p>Building sustainability into our procurement and financial management.</p>

Table Two: MacKillop Four Focus Areas in its Sustainability Strategy 2023-2027

Criteria 2: MacKillop Family Services Structure, Operations and Supply Chains

Organisational Structure

MacKillop Family Services Limited is a registered company limited by guarantee, incorporated and domiciled in Australia under the Corporations Act 2001 (Cth). It is also a registered charity regulated by the Australian Charities and Not-for-profits Commission. It operates under the name MacKillop Family Services.

For the Financial Year ended June 2023, MacKillop had an annual revenue of over \$252 million.

Prior to 3 December 2021, our members were representatives from our founding congregations, being the Christian Brothers Oceania, the Institute of the Sisters of Mercy of Australia and Papua New Guinea, and the Sisters of Saint Joseph of the Sacred Heart.

On 3 December 2021, MacKillop's members transitioned from its founding congregations to a Ministerial Public Juridic Person (PJP) called Mercy Ministry Companions which is also incorporated as a public company limited by guarantee and is the sole member of Mercy Community Services Australia Ltd ("MCSAL"). MCSAL is the sole member of MacKillop. The change in governance does not affect our status as a separate legal entity.

The current Board of MacKillop will continue to govern the organisation until 1 July 2024. Our Board of Directors is comprised of thirteen Directors, who volunteer their time and experience. From 1 July 2024 MacKillop will retain five of its current Directors and have several more join as new Directors.

Mercy Community Services Group

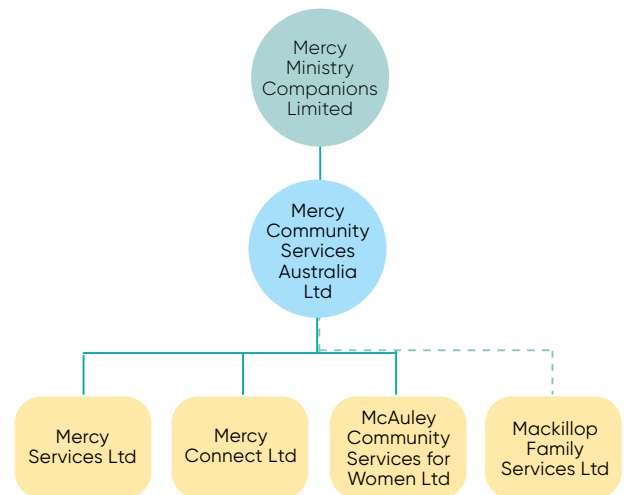


Figure One: MacKillop Group Organisational Structure



Governance Structure

MacKillop has established the following governance framework to manage Modern Slavery.

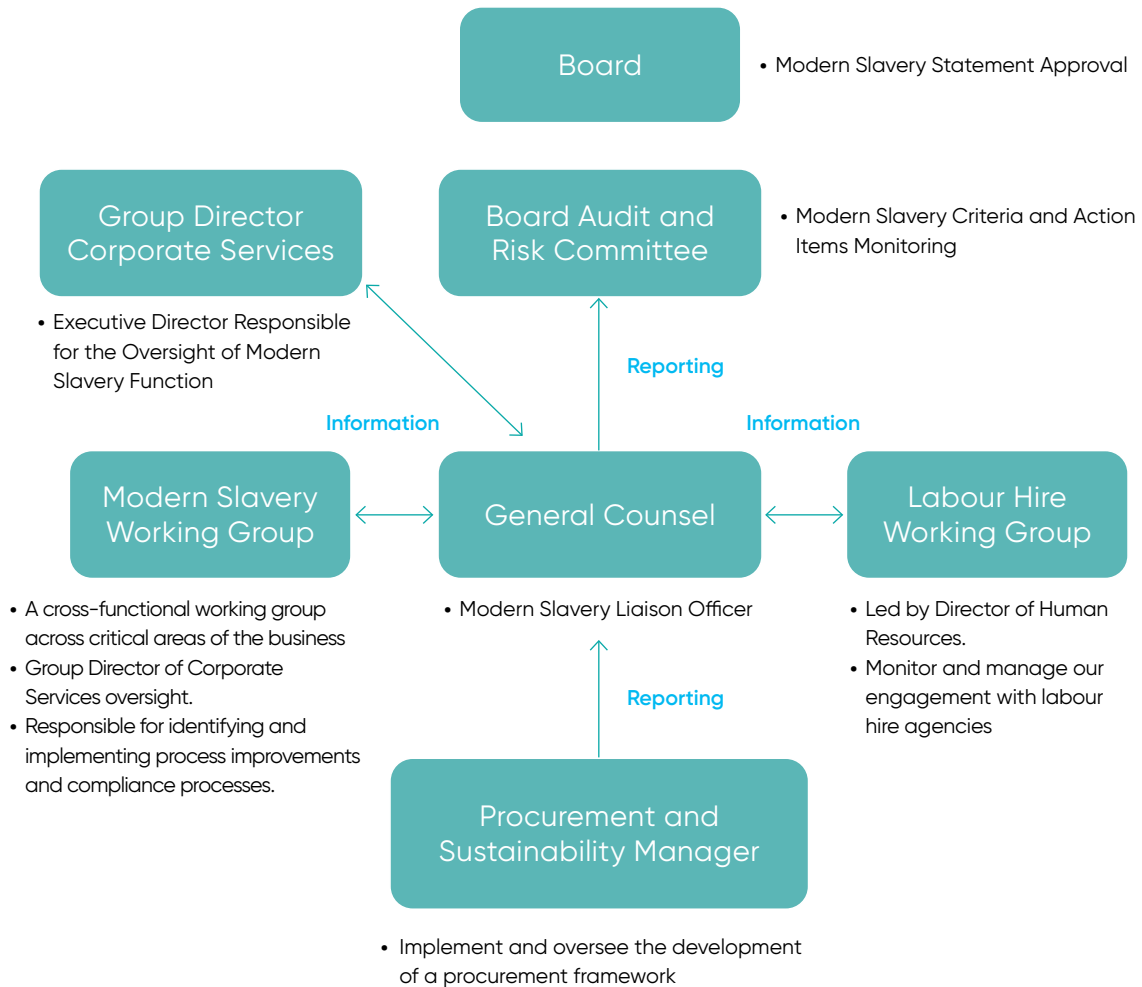


Figure Two: Internal Governance Structure

Modern Slavery Working Group ("MSWG"): A cross-functional working group has been established and meets quarterly. The working group is responsible for identifying and implementing process improvements and compliance processes. The Group Director of Corporate Services has Executive Responsibility for the working group, which is chaired by our General Counsel and comprised of the following people/roles: General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, Procurement and Sustainability Manager, General Manager of Property and Fleet, Director of Human Resources, Director of Community Engagement, Director Aboriginal Service Development and the Operational Directors for each of our States and Territories.

Labour Hire Working Group: A working group led by the Director of Human Resources and comprised of the following people/roles: Group Director Operational Performance, HR Manager - Engagement, HR Manager - Business Change Enablement, General Counsel. Operational Directors are also asked to participate when their input is required. This group monitors and manages our engagement with labour hire agencies and recruitment agencies. It ensures we are regularly monitoring and responding to our compliance obligations in relation to labour hire agencies, their staff and work health and safety issues.

Operational Structure

MacKillop's head office is located in South Melbourne, Victoria, with state-based administrative offices in Sydney, New South Wales, Perth, Western Australia, Darwin, Northern Territory and Australian Capital Territory. We also have many other offices and service locations in all of these states and territories. In total, during the Reporting Period, we operated from around 218 properties, including 46 administration sites.

Our places



New South Wales

Blacktown	Dubbo	Nyngan
Balranald	Goulburn	Quambone
Bateman's Bay	Grafton	Queanbeyan
Bega	Gulgambone	Tweed Heads
Brewarrina	Lightning Ridge	Walgett
Condobolin	Lismore	Wollongong
Coonabarabran	North Sydney	
Coonamble	Nowra	

Western Australia

West Perth
Bunbury
Karratha
South Hedland
Onslow
Newman

Australian Capital Territory

Belconnen

Northern Territory

Darwin

Our national and international footprint

We deliver training programs such as Sanctuary, ReLATE and Seasons for Growth across Australia. We also partner with organisations and trainers to deliver Seasons for Growth internationally in Scotland, England, Wales, New Zealand, Singapore and Ireland.

Victoria

South Melbourne	Footscray	Preston
Ballarat	Forest Hill	Sunshine
Bendigo	Geelong	Swan Hill
Broadmeadows	Hamilton	Wangaratta
Caulfield	Maidstone	Warrnambool
Cobblebank	Melton	Wodonga
Dandenong	Mildura	

Supply Chains

MacKillop sources significant quantities of goods and services, including stationery, IT equipment and mobile devices, cleaning, gardening and maintenance products and services, labour hire services, food, clothing, furniture and motor vehicles. During the Reporting Period, MacKillop continued to undertake significant refurbishment and fit-out works, which resulted in high spend in construction services and materials.

The majority of our annual procurement occurs with our first-tier suppliers located in Australia. However, we know our extended supply chains may be located overseas. For example, motor vehicles and IT equipment are mostly manufactured overseas. Our aim is to progressively develop a supply chain map to better demonstrate the geographic location and nature of products and services sourced.

Criteria 3: Risks of Modern Slavery

MacKillop works to promote human rights - particularly the rights of children - and is committed to protecting the rights of all people including our employees, the communities in which we operate, those who may be impacted by our activities, our clients, and those within our supply chains.

Our framework for the management of Modern Slavery risks incorporates the potential risks of Modern Slavery practices across our operations and supply chains, taking into account the risks outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"). The Guidance Report identifies three categories of risk, being risks that may cause, contribute to, and/or be directly linked to Modern Slavery practices. These risks can arise due to the sector/industry, types of products and services, geographic locations, and business models that businesses operate within.

In considering the services we deliver, and the goods and services we procure, we believe that while our operations do not either cause or contribute to Modern Slavery practices, we may be directly linked to Modern Slavery risks through our supply chains.

Operational Risks

We employ approximately 2,000 staff, operating out of around 218 properties, including 46 administration sites. Our employees are engaged either by contract or under an award and/or industrial agreement. Several collective industrial agreements are in place and employees have a number of unions they can join.

Within our workforce, we have approximately 115 migrant workers (workers on a Temporary Visa in Australia). Our Human Resources Team is responsible to ensure that they have the appropriate visa with rights to work. Of those, only a small number are sponsored to work with us. Visa applications related to those sponsored positions are managed by our Human Resources Unit and an external immigration lawyer in accordance with immigration requirements and Australian law.

In addition to our staff, we also have around 60 contractors that work for us across Australia. Contractors are managed centrally by the Legal and Governance Team who are responsible, in collaboration with the MacKillop Hiring Managers to issue Agreements and monitor relevant compliance requirements.

We also have a significant labour hire agency workforce. Labour hire agency and recruitment costs are our largest spend category, with spend of approximately \$39,000,000 and approximately 24 suppliers, during the Reporting Period. The labour hire workers to which this relates are predominantly contracted to work within our residential care homes. This category of suppliers is the focus of the Labour Hire Working Group, which is responsible for ensuring the labour hire agencies meet compliance requirements, have appropriate contracts in place and where state or territory laws require, hold a labour hire licence. The Labour Hire Working Group has established an approved labour hire agency supplier list and a very robust business case approval process for any new labour hire agencies not on that list. During the Reporting Period, the Labour Hire Group has made a number of improvements, as outlined in Table Five.

In addition to our staff, we have almost 1,000 volunteer foster carers across Australia.

We have a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation.

We have a significant number of Policies and Procedures which govern how we relate to our staff and volunteers as well as our expectations about how our employees conduct themselves in our operations. We also have a Code of Conduct which sets minimum expectations about how our staff, volunteers and contractors conduct themselves.

Our Policies and Procedures are based on our organisational Purpose, Vision and Values and are reviewed and updated on a regular basis. During the Reporting Period our Policies and Procedures Framework underwent a major upgrade and extensive training was provided to staff.

We are committed to protecting and supporting whistleblowers who disclose improper conduct, in accordance with our Whistleblowers Procedure.

We also have a Strategic Internal Audit Plan which is reviewed by the Board Audit and Risk Committee annually and articulates the internal audits to be carried out each year, based on the needs of the business and identification of high-risk areas.

Supply Chain Risks

MacKillop is committed to developing systems and processes with the goal of improving how it manages Modern Slavery risks within its supply chains.

Potential risks to MacKillop - including Modern Slavery risks - can arise due to the range of goods and services we source, the large number of geographic locations we operate in and the lack of controls or regulatory systems in the countries in which extended supply chains operate. Our aim is to progressively develop a robust approach to all procurement processes, practices and dealings with suppliers, which will assist in the mitigation of Modern Slavery.

During the Reporting Period, our Procurement and Sustainability Manager has implemented a new Category Management Strategy, which focuses MacKillop's efforts on suppliers with a higher Modern Slavery risk in their supply chains.

We purchase a large volume of goods and services to provide our programs and services to the community.

A majority of these purchases are processed through our spend management platform and this captured spend is used in our procurement category management processes.

Total Spend

For the Financial Year ended June 2022, MacKillop had annual revenue of over \$252 million.

During the Reporting Period, MacKillop's total spend was \$112,573,070 with over 3,166 suppliers. Table Three provides a breakdown of the number of suppliers and spend amount in each of MacKillop's spend brackets.

Spend Bucket	Number of Suppliers	Total Spend
Under \$1,000	1241	\$561,397
Between \$1,000 and \$4,999	1063	\$2,523,397
Between \$5,000 and \$9,999	265	\$1,888,231
Between \$10,000 and \$49,999	367	\$7,731,349
Between \$50,000 and \$99,999	82	\$5,816,579
\$100,000 plus	148	\$94,052,116

Table Three: Break-down of Suppliers by Spend Bracket

Managed Spend

MacKillop's Managed Spend consists of spend relating to nine main Procurement Categories and forty-five Sub-Procurement Categories.

For the purposes of our procurement function and assessing the risks in our supply chain, we used data extracted from our spend management platform. During the Reporting Period, the total spend analysed via our spend management platform was \$84,167,227 spread over 2,088 suppliers. This analysis enables us to identify more accurately our significant procurement categories and conduct effective procurement category management processes. MacKillop spent \$100,000 or more with 122 Suppliers within Managed Spend Procurement Categories

By using procurement categories, we identified spend allocated as follows (Graph One):

Graph One: Main Procurement Categories (Managed Spend)



Underneath our main Procurement Categories, MacKillop has forty-five Sub-Procurement Categories. Table Four shows a sample of MacKillop's Procurement Sub-Categories, with the greatest percentage of Managed Spend.

Category Main	Category Sub	Risk Rating	%
Human Resources Services	Agency Costs	High	45.99%
Insurances and Investments	Insurance Workcover	Low	11.36%
Mobility	Vehicles Purchased	Medium	6.71%
Buildings and Maintenance	Buildings at Cost	High	5.38%
Professional Services	Consultancy Costs	Low	3.85%
Buildings and Maintenance	Buildings Maintenance	High	3.57%
Human Resources Services	Temporary Labour / Contractors	High	2.31%
Information Technology and Telecommunications	Computer Repairs / Maintenance	Medium	2.15%
Information Technology and Telecommunications	Hardware	High	1.82%
Plant and Equipment	Plant and Equipment Purchases	High	1.44%
Human Resources Services	Training Courses	Low	1.42%
Buildings and Maintenance	Cleaning Services and Materials	High	1.42%
Buildings and Maintenance	Utilities	Medium	1.28%
Information Technology and Telecommunications	Software	Medium	1.20%
Mobility	Motor Vehicle Repairs/Tyres/Fuel	Medium	1.04%

Table Four: Procurement Category Sub-Categories as a percentage of Managed Spend (Top 15)

For the purpose of our category management, client costs are excluded from our analysis. Client costs relate to MacKillop's day-to-day operational spend on clients. The decentralised and ad-hoc nature of these transactions are often low spend amounts and from suppliers who are used irregularly. Spend in these categories is for general household and personal expenditure. However, for the purpose of our supplier analysis, they are included in the overall supplier spend.

Risks within MacKillop's Main Procurement Categories and Supply Chains

The analysis of this spend data identified a number of categories where there may be a high risk of Modern Slavery. The high-risk categories where MacKillop has a significant portion of spend are:

- a. Agency Costs (Labour Hire)
- b. Buildings Maintenance
- c. ITC Hardware
- d. Cleaning Services and Materials

Agency Costs (Labour Hire)

MacKillop spent over \$39 million with twenty-four suppliers for Agency (Labour Hire) services. We understand labour hire services can pose a high risk for worker exploitation and Modern Slavery. These factors include:

- focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour;
- recruitment of potentially vulnerable people such as new migrants, temporary visa holders, international students and undocumented workers;
- deceptive and opaque practices trapping workers into exploitative situations or Modern Slavery;
- demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour; and
- coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice.

During the Reporting Period, the Labour Hire Group has made a number of improvements, as outlined in Table Five.

Buildings Construction and Maintenance

In providing our services, MacKillop manages a large number of both commercial and residential properties. During the Reporting Period, we spent over \$7.5 million in maintenance and refurbishment costs with over 350 suppliers. A significant part of the labour force used in the property maintenance and construction sector consists of low skilled, low paid workers often contracted through labour hire companies. Workers are often temporary migrants who face language barriers and a lack of understanding of Australian workplace law and rights. In addition, numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia and internationally have been documented.



ICT Hardware

ICT hardware including computers, phones and computer peripherals are purchased through our Corporate Services IT team. During the Reporting Period we purchased over \$5.9 million in ITC related goods and services including \$1.5 million on hardware. According to the 2018 Global Slavery Index, electronics are the highest risk product for Modern Slavery in supply chains. Forms of Modern Slavery identified by the Global Slavery Index and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.

Cleaning Services and Materials

Cleaning services and materials comprises a significant part of our facilities maintenance costs. During the Reporting Period MacKillop spent a total \$1.2 million for cleaning service providers and cleaning materials. The cleaning sector typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. Opaque sub-contracting arrangements are also common. Jobs in this sector are low paid (often cash in hand), have high rates of staff turnover with staff often moved between multiple worksites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.

Criteria 4: Actions to Assess and Address Modern Slavery Risks

MacKillop undertakes a number of processes and actions to assess and address Modern Slavery risks in our supply chains. Through our new procurement Strategic Plan for 2024-2027, we have set new key priorities as detailed below.

Procurement Strategic Plan 2020-2023 and Procurement Strategic Plan 2024-2027

During the Reporting Period, we finalised implementation of our Procurement Strategic Plan 2020-2023 to implement the initiatives mentioned in this Statement.

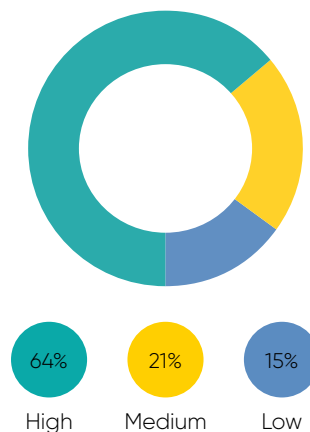
We developed our new Procurement Strategic Plan for 2024-2027, the key priorities are: category management, supplier relationship management, sourcing processes, and due diligence processes. A Work Plan for 2024 has also been developed to meet the goals and initiatives set for this year.



Category Management Processes

MacKillop's Procurement Team undertakes regular spend analytics and category management reporting. The reporting is used to identify areas of spend and the related suppliers that may pose a high risk of Modern Slavery and therefore requiring us to undertake a due diligence process. Through collaboration with the responsible stakeholder, we conduct an assessment of the supplier and the goods and services provided. This then determines the extent of the due diligence process required. Where we identify that the supplier does not meet our expectations, we terminate the relationship and seek an alternative supplier.

Managed Spend - Risk Rating



Graph Two: Spend risk rating as a percentage of total managed spend.

Sourcing Processes

MacKillop operates under a centrally led procurement structure where the Procurement Team provides the procurement framework and supports the organisation in its sourcing requirements. The Procurement and Legal and Governance Teams have a thorough understanding of Modern Slavery risks and the obligations of the organisation. In developing sourcing processes and supplier contractual terms, Modern Slavery considerations have been incorporated.

MacKillop has established tendering processes that include a supplier due diligence process. The due diligence process includes the request for information relating to Modern Slavery risks. In addition, tendering evaluation processes also include mandatory criteria for satisfying Modern Slavery requirements where applicable.

Supplier Relationship Management and MacKillop's Materiality Threshold

MacKillop continues to focus on a supplier relationship management approach as part of its procurement strategic objectives. MacKillop has built its Modern Slavery risk management strategy around its materiality threshold of suppliers with spend greater than \$100,000 during the Reporting Period ("Materiality Threshold"). An important part of this process is to identify key suppliers that may have inherent risks or a strategic benefit for MacKillop. As part of this targeted approach, we identify those suppliers in high-risk categories for Modern Slavery and undertake a due diligence process.

During the Reporting Period, we spent \$100,000 or more with 122 Suppliers in our Managed Spend Procurement Categories.

A high-level risk identification of the 123 suppliers was completed using the Australian Catholic Anti-Slavery Network (ACAN) Risk Taxonomy, the results of which are in Graphs Three and Four below.

Key Supplier Spend



Graph Three: Spend Risk Rating – Suppliers Over Materiality Threshold (123 Suppliers)

Key Supplier



Graph Four: Risk Rating – Suppliers Over Materiality Threshold as a percentage of total Suppliers over Materiality Threshold

Where these suppliers meet the compliance and onboarding requirements of MacKillop, they are classified as 'Preferred Suppliers' and added to our 'Preferred Supplier Register'. One of the requirements of a Preferred Supplier is that they meet our Modern Slavery risk mitigation requirements that includes acceptance of any Modern Slavery clauses in our supplier agreements and/or supplier code of conduct.

ACAN Due Diligence Process

MacKillop is a participant of the Australian Catholic Anti-Slavery Network (ACAN) Modern Slavery risk management program. ACAN has set a mission to eliminate Modern Slavery in all its forms from the operations and supply chains of Catholic entities in Australia. As a participant in this network, we have access to a number of resources including support in supplier due diligence processes.

As an extension to our own internal due diligence processes, we also participate in ACAN's supplier engagement and due diligence processes that are shown below. The aim of this further due diligence process is to assess as many of our suppliers as possible and to identify common suppliers throughout the ACAN network.

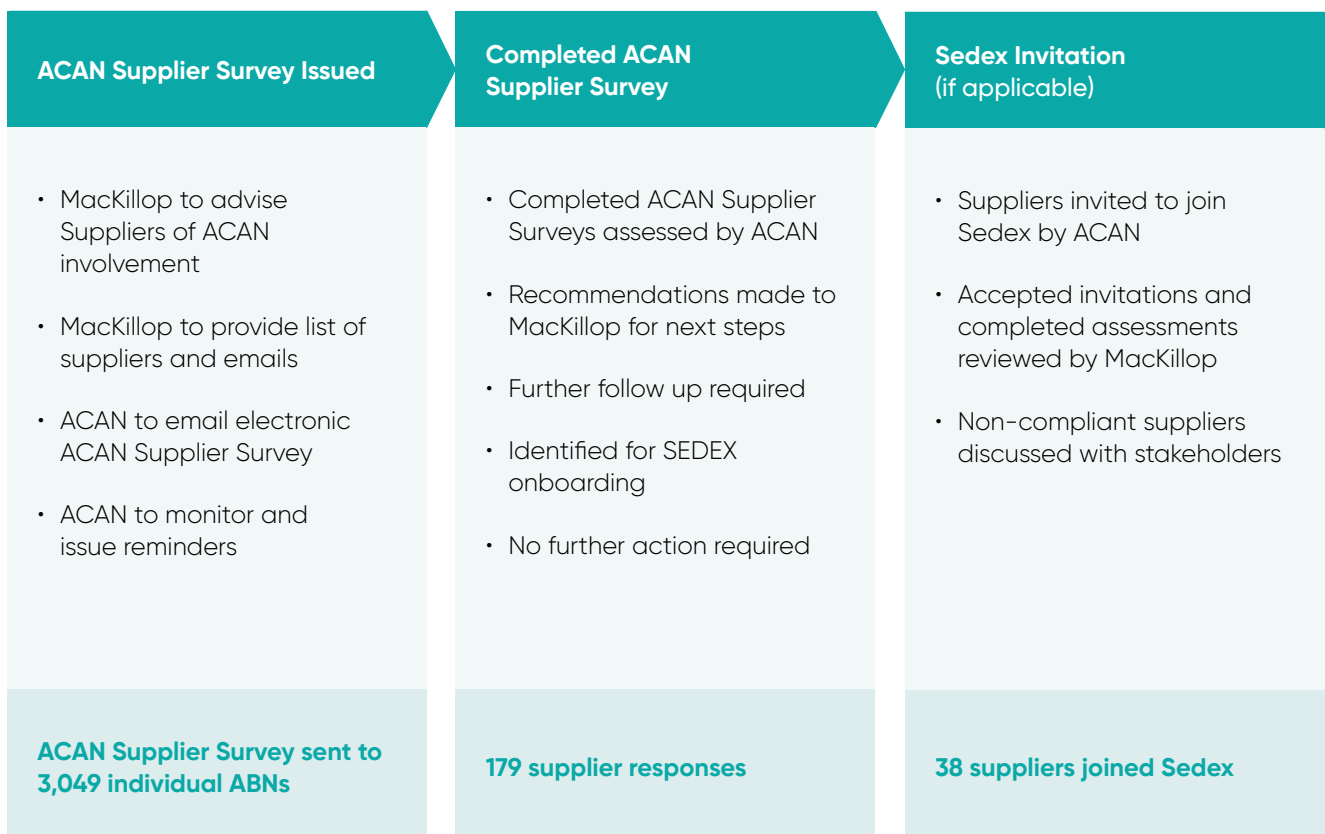


Figure Three: MacKillop and ACAN Due Diligence Process

Policies and Procedures

Our Policies and Procedures provide the foundation for our commitment to human rights. We have Policies, Procedures and a Code of Conduct that are intended to promote child safe, ethical and legally compliant personal and organisational conduct across all facets of the business, including directors, employees, contractors, suppliers and business partners.

MacKillop has adopted a continuous improvement approach to reviewing our Policies and Procedures during the Reporting Period.

Achievements During the Reporting Period

During the Reporting Period we have continued to implement our Procurement Strategy initiatives. The below table outlines our actions and achievements taken during the reporting period, and how we monitored, reported and evaluated the effectiveness of those actions:

Action/ Achievement	Measuring Effectiveness
We have incorporated Modern Slavery Risks into our Risk Management Framework that is reviewed by our Board Audit and Risk Committee.	Updated Risk Register and Risk Appetite Statement.
In addition to implementing mandatory training requirements, we made our Modern Slavery modules available to all staff. We maintained a consistent communications approach aligned to World Day events and informing the organisation of Modern Slavery risks and our approach in working towards eliminating all forms of Modern Slavery.	Number of staff trained. Number of communications issued.
We have reviewed the status of our Labour Hire Agencies and issued them with our Due Diligence Questionnaire and Checklist and a MacKillop standard Labour Hire Agreement.	Number of Labour Hire Agencies reviewed. Number of compliant Labour Hire Agencies
We have completed an analysis of our Labour Hire category spend and suppliers. An assessment of a Managed Services Provider (MSP) model was also evaluated as a potential alternative.	Completion of Category management reporting. Evaluation and recommendations of MSP model completed.
We have commenced issuing the updated Labour Hire Standard Service Agreement, which addresses Modern Slavery risks, to Labour Hire Agencies in Victoria.	Number of Labour Hire Agencies who have signed the new Service Agreement (which addresses Modern Slavery)
We have developed new Standard Service Agreements for our Labour Hire Agencies in New South Wales and Australian Capital Territory and onboarded agencies through our standard process.	Number of Labour Hire Agencies who have signed the new Service Agreement (which addresses Modern Slavery)

<p>Our Procurement Manager, in collaboration with the Legal and Governance Team and Human Resources Team has worked to negotiate the commercial terms of Service Agreements, and in particular, require transparency around fees and rates being paid to labour hire workers.</p>	<p>Number of Labour Hire Agencies who have provided a breakdown of fees and review in comparison to award rates.</p>
<p>Review of Contractors managed centrally by the Legal and Governance Team, in collaboration with the Hiring Managers to issue Agreements and monitor relevant compliance requirements.</p>	<p>Number of Contractors with signed Agreements in place. Number of Contractors with all compliance requirements met. Quarterly Audit of Contractors against spend.</p>
<p>We continued to investigate options for improving visibility into our supply chains and enhancing the effectiveness of our risk assessment activities. In collaboration with ACAN, we participated in an extended Due Diligence process to increase the volume of suppliers assessed.</p>	<p>Number of suppliers undertaking our Due Diligence process and ACAN Due Diligence process. Number of Suppliers registered with SEDEX.</p>
<p>We further developed our Supplier Relationship Management processes to better manage our key suppliers and incorporate Modern Slavery risk assessment requirements for 'Preferred Suppliers'.</p>	<p>Number of 'Preferred Suppliers'.</p>
<p>We established a MacKillop Family Services Preferred Supplier Database listing details of suppliers that have met the requirements of a Preferred Supplier.</p>	<p>Database maintained and up to date.</p>
<p>The purpose of our Preferred Supplier strategy is to build strong relationships with key suppliers and work towards better understanding the risks in their operations and supply chains. Through better understanding of their operations and supply chains we can make a better assessment of risks and the need for formal grievance processes.</p>	<p>Number of High Risk Suppliers. Number of Suppliers assessed.</p>

Table Five: Achievements in 2023

Future Goals

We are committed to ensuring we provide appropriate and timely remedy to people impacted by Modern Slavery as a result of our operations, or by the conduct and/or supply chain of our suppliers, in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Moving forward, the key initiatives we aim to undertake include the following, using ACAN's Maturity Assessment Pillars as a framework (refer to section 5):

Pillar	Action for 2024
Business Process and Governance	<p>Review relevant policies and procedures including (but not limited to): Recruitment Policies and Procedures, Whistleblower Procedure, Grievance and Complaints procedure, Code of Conduct, Labour Hire Procedure.</p> <p>Further enhancing our supplier engagement processes and embedding due diligence in supplier management processes.</p> <p>Developing Procurement Reporting Dashboards for the Executive Team, Board Committees and Board and include key Modern Slavery metrics into procurement reporting schedule and dashboard.</p>
Operations	<p>Review our training plan to ensure we identify key personnel involved in selection of suppliers and supplier relationship management where Modern Slavery training is required and compulsory.</p> <p>Working with key personnel involved in selection of suppliers to consider tender opportunities and consolidation of spend across a category.</p>
Supply Chain	<p>Continuing to mature our procurement function through implementing initiatives in our Procurement Strategic Plan 2023–2027.</p>
Worker Engagement	<p>Continue to raise the awareness of Modern Slavery through internal communications and reflection articles.</p> <p>Communicate our grievance mechanism channels to staff within our supply chains.</p>
Entity's Program and Activities	<p>Work with ACAN to explore opportunities for optimising our impact through a group approach and consolidating our efforts.</p>
Grievance Mechanisms and Remediation	<p>Establish a defined policy and strategy for responding to any identified Modern Slavery risks.</p> <p>Review our grievance channels and establish grievance mechanisms for employees and suppliers within our supply chains.</p>

Table Six: Future Goals for 2024

Grievance Mechanism

Our mission and values underline our commitment to ensure all employees and those working with MacKillop feel safe and supported and know that MacKillop is working to maintain the highest standards of governance, compliance and ethical behaviour.

MacKillop has a robust Complaints and Whistleblower Procedure which provide a way for employees, volunteers, suppliers, contractors or other eligible people to report their concerns confidentially.

In addition, MacKillop's Sanctuary Commitment to **Democracy** provides a good framework for staff to participate and influence decisions that affect them.

“ Behaving democratically starts by recognising that all voices are important in decision making, both those who are central and perceived to hold the power, but also people who are on the margins. And we need to bring those voices together because all of us are smarter than any one of us. ”

Cameron Burgess, National Program Director, Sanctuary

Practical applications of Democracy at MacKillop

Some of the ways we can participate at MacKillop include, Community Meetings, Team meetings, Care Planning, Flag meetings and Safety Planning. Below are some self reflection prompt to consider our culture of Democracy.

Community Meetings	Team Meetings	Care Planning with YP and Families	Red and Green Flag Meetings	Safety Plans
<ul style="list-style-type: none"> • Are we genuinely listening? • Is it culturally safe to allow for freedom of speech. • Do we retain or follow up on what's said? • Don't just assume it works. 	<ul style="list-style-type: none"> • Is there a culture of trust? • Are we generating a range of insights and ideas? • Do we have a culture of consultation? • Are people listening and talking? 	<ul style="list-style-type: none"> • Are we actively giving opportunities to be heard? • Are we inviting cultural voice – from community or elders? • Do we support through prompts, visual aids for those with challenges voicing their opinion? 	<ul style="list-style-type: none"> • Do we look for richness within conflict or problem solving? • Do we seek for creative collaboration around tricky problems? • Do we celebrate diversity of people and achievements? 	<ul style="list-style-type: none"> • Do we remain curious and open to learning about others safety and triggers? • Do we review through consultation of the YP?

Figure Four: Sanctuary Commitment of Democracy in Action at MacKillop

Remediation

As a participant in ACAN, we have access to Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. We will develop response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 we can help people impacted by Modern Slavery achieve meaningful, reportable outcomes and continuously improve risk management and our response.

Where we identify direct links to Modern Slavery through our suppliers, we are committed to working with the suppliers to ensure remediation and mitigation of the risk of recurrence. We intend to implement remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with us to ensure victim-centred remediation processes are implemented to our satisfaction.

Criteria 5: Measuring Effectiveness

MacKillop recognises and values the importance of reviewing its practices, with the objective of improving the effectiveness of processes and systems implemented to address Modern Slavery risks.

Our Procurement and Sustainability Manager has responsibility to implement the Procurement Strategic Plan 2024-2027. This includes the key initiatives and actions outlined in Table Six and the measurement of their effectiveness.

Risk Management Framework

The Procurement Team, in collaboration with the Risk and Compliance Manager, is continuing to embed Modern Slavery Risks into MacKillop's Risk Management Framework. During 2024, MacKillop aims to establish a defined policy and strategy for responding to any identified Modern Slavery risks.

Awareness and Training

One of the very important parts of our work is awareness and training.

We have introduced a number of Modern Slavery training modules into our Learning and Development system. So far our Board, the Executive Team and Managers have been trained. All MacKillop staff have also been invited to participate in the training as well. During 2024, the next step is a focus on hiring managers to undertake the training and be upskilled in the procurement processes. The training schedule provides us with key metrics to monitor completion of training.

We have developed a Modern Slavery Communications Plan as part of our overall Procurement Communications Plan. This is aimed at increasing awareness of National and International events related to Modern Slavery and providing important information to staff about our actions. We have committed to a minimum number of annual communications to ensure that Modern Slavery awareness and understanding continues to be enhanced throughout the organisation.

Maturity Assessment

In 2023, ACAN shifted from a 'Gap Analysis' presented in our last Statement to a Maturity Assessment. The shift to a Maturity Assessment marks a strategic evolution in ACAN's approach and reflects a continuous improvement journey.

The Maturity Assessment is a self-reported assessment scorecard designed to provide a comprehensive view of efforts across different key areas of operation, presented as pillars:

- 1. Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- 2. Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
- 3. Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- 4. Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- 5. Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- 6. Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, maturity is measured across governance, risk assessment, risk management, and effectiveness measures, which are presented as sub-pillars.

The responses provided a representation of the current status of MacKillop's maturity in each category and MacKillop is working with ACAN to develop a list of actions for consideration.

Other Measures

Other key metrics used to measure effectiveness include a minimum number of Executive Team members on our Modern Slavery Working Group (MSWG), minimum number of meetings held by our MSWG per year, continuous review of our Policies and Procedures, completion of the Procurement Work Plan each year, meeting goals in the Procurement Strategic Plans and ensuring MacKillop meets the reporting requirements within the Act.

Raising Awareness at MacKillop Family Services

MacKillop is committed to raising awareness on the risks of Modern Slavery and our broader Sustainability commitments. We endeavour educate our staff through ongoing communications within the organisation. Examples of communications throughout the year include:

- a. **8 February 2023 - International Day of Prayer and Awareness against Human Trafficking:** In each encounter with our children, young people, families, communities, and each other we are called to promote and defend human dignity. The theme for 2023 is "Journeying in Dignity". The theme was chosen by an international group of young people involved in the fight against Trafficking.
- b. **20 February 2023 - World Day of Social Justice:** Staff were invited to consider their role as a global citizen, be alert to the conflict arising across the world and to understand their responsibility in combatting issues.
- c. **18 - 24 June 2023 - Refugee Week:** The theme for Refugee Week in 2023 was "Finding Freedom". The focus of this was to raise awareness of the challenges that refugees face, including risks of Modern Slavery. Staff were sent information on the day.
- d. **30 July 2023 - World Day Against Trafficking in Humans:** We highlighted the significance of this issue in Australia and efforts to combat this problem.
- e. **7 - 13 August 2023 - Homelessness Week:** We highlighted the work we do to respond to family and youth homelessness and accompany children and young people to hopeful futures.
- f. **11 October 2023 - United Nations International Day of the Girl Child (IDG):** An annual and internationally recognised observance that empowers girls and amplifies their voices. The theme for 2023 is "Invest in Girls' Rights: Our Leadership, Our Well-being." Staff were sent information and resources on the awareness day.
- g. **25 November 2023 - International Day for the Elimination of Violence Against Women:** Staff were sent information and resources, which were collated on the intranet, and linked to the intranet homepage throughout the 16-day campaign.
- h. **10 December 2023 - Human Rights Day 2023:** The theme for 2023 is "Freedom, Equality and Justice for All Human Rights Day 2023." Staff were sent a reflection and resources.



Criteria 6: Consultation

Criteria 6 requires that MacKillop describe the process of consultation with certain entities. Given that MacKillop does not own or control any other entities, this criterion is not applicable.

This Statement was prepared in consultation with our Board, Board Committees, internal Committees, Executives and Senior Leaders, Procurement and Legal teams. Our governance structure, described in section 2, demonstrates the oversight of the MacKillop Modern Slavery Framework.

Criteria 7: Other Relevant Information

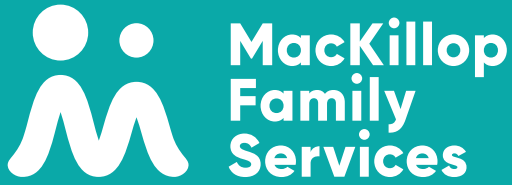
Attendance at External Forums

MacKillop's General Counsel has joined the Quarterly Modern Slavery Charity and Not-for-Profit Forum. This Forum includes legal and procurement specialists in the Charity and Not-for-Profit sector, who come together to share resources and gain insights and learn from each other.

The Australian Catholic Anti-Slavery Network

In June 2021, we joined ACAN. ACAN brings together Catholic entities to share resources and coordinate action to manage and mitigate modern slavery risks across their industry sectors. During the Reporting Period, MacKillop participated in the ACAN Forum's, completed an annual Entity Profile Survey, which forms the basis of the Compendium of Modern Slavery Statements aggregated data and contributes to a Maturity Assessment





MacKillop Family Services Limited

ACN 078 299 288

Registered Office

237 Cecil Street
South Melbourne VIC 3205

 03 9257 2288

 enquiry@mackillop.org.au



MacKillop Family Services acknowledges the Traditional Custodians and their Elders in each of the communities where we work.



As a Rainbow Tick organisation, MacKillop values an inclusive culture where lesbian, gay, bisexual, trans, queer, gender diverse, intersex and sexual people (LGBTIQ+) have the right to be safe.

mackillop.org.au



CABRINI AUSTRALIA LIMITED MODERN SLAVERY REPORTING STATEMENT 2023-24

Published June 2024



“In the eyes of God each human being is a free person, whether girl, boy, woman or man, and is destined to exist for the good of all in equality and fraternity. Modern slavery, in terms of human trafficking, forced labour and prostitution, organ trafficking and any relationship that fails to respect the fundamental conviction that all people are equal and have the same freedom and dignity, is a crime against humanity.”

JOINT DECLARATION OF RELIGIOUS LEADERS AGAINST MODERN SLAVERY | 2 DECEMBER 2014

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Board approval

This Modern Slavery Statement is for the reporting entity, Cabrini Australia Limited, for the actions taken during the 2023-24 financial year. This statement is made in accordance with the Modern Slavery Act 2018 (Cth) and was approved by the Cabrini Australia Limited Board, as the principal governing body of Cabrini Australia Limited and all entities owned or controlled by Cabrini Australia Limited, on 30 May 2024.

Disclosure notes

This statement has been made on behalf of Cabrini Australia Limited (ABN 42 624 828 306). This statement covers all entities owned or controlled by Cabrini Australia Limited (collectively referred to in this statement as "Cabrini"), who are governed in common by the Cabrini Board. This statement is intended to read in conjunction with Cabrini's statement for previous financial years.

STATEMENT FROM THE CHAIR AND THE CHIEF EXECUTIVE

Cabrini is committed to its promise of providing high quality care and service to our patients, clients and stakeholders. In the current operating environment, we plan for the future aligning our activity with our values of compassion, integrity, courage and respect to all we serve. We are committed to responding sustainably and ethically to meet the future needs of our community.

Eliminating human trafficking is one of Cabrini's three social justice causes and our support for this cause is embedded in our history. We take our responsibility to eliminate the risk of modern slavery seriously.

Our focus in previous years has been on benchmarking and we're pleased to say that through the direct surveying of suppliers, we have gained confidence that we are procuring goods and services from suppliers that share our commitment to ethical supply chains.

This year our theme is *progress*. Our modern slavery action plan has now progressed from the establishment of governance frameworks to the identification of risks and proactive engagement with suppliers to close any gaps.

As part of our commitment to transparency, this Modern Slavery Statement for 2024 is to be published to the Australian Border Force Modern Slavery Register as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium. The statement shows progress made to date as well outlining our commitments for the 2025 financial year.



Sylvia Falzon
Cabrini Australia Board Chair



Sue Williams
Cabrini Australia Chief Executive

OUR IDENTITY AND MISSION

Cabrini is a large, private, Catholic charitable organisation inspired by the spirit and vision of Saint Frances Xavier Cabrini and the Missionary Sisters of the Sacred Heart of Jesus (the 'Cabrini Sisters').

Our mission

- Who we are: We are a Catholic healthcare service inspired by the spirit and vision of Mother Cabrini and the Missionary Sisters of the Sacred Heart of Jesus.
- What we believe: We are a community of care, reaching out with compassion, integrity, courage and respect to all we serve.
- What we do: We provide excellence in all of our services and work to identify and meet unmet needs.

Delivering quality, compassionate care to our patients and residents is the primary focus of our work and at the heart of everything we do. As a not-for-profit health service, all surpluses are used to develop Cabrini's services and facilities to provide the best possible care for patients and families.

Cabrini Health is supported by the work of Cabrini Technology, Cabrini Research, Cabrini Outreach and Cabrini Foundation. While each division is unique, Cabrini shares a common vision and takes a singular approach to modern slavery across our organisation.



CABRINI'S COMMITMENT

Cabrini first became aware of the horror and tragedy of human trafficking, which is often driven by the need for forced labour, through the work of the Missionary Sisters of the Sacred Heart of Jesus (the “Cabrini Sisters”) and UNANIMA International.

UNANIMA is a not-for-profit organisation that started in 2002 as a coalition of congregations of religious sisters, of which the Cabrini Sisters were early members. UNANIMA’s mission is to advocate at the UN for the rights of women and children, particularly those living in extreme poverty.

Through UNANIMA’s work, we began to understand how we can unwittingly contribute to the global problem of modern slavery through uninformed purchasing and to recognise that each of us has a role to play in stopping exploitation.

Eliminating human trafficking is one of Cabrini’s three social justice causes and we take our responsibility to eliminate the risk of modern slavery both here in Australia and internationally very seriously.

Cabrini’s modern slavery action plan has progressed from the establishment of governance frameworks to further exploration of operations and supply chain to identify risks and proactively work with suppliers to close identified issues. Cabrini is also ready to confront more urgent issues as they become apparent.

For more details on previous activities, please refer to previous statements.



OUR ORGANISATION

Cabrini Australia Limited is a not-for-profit group of companies, which is owned and sponsored by the Missionary Sisters of the Sacred Heart of Jesus. Cabrini Australia Limited is the Cabrini reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

Other entities owned or controlled by Cabrini Australia Limited and covered by this Modern Slavery Statement include:

- Cabrini Health Limited (ABN 33 3370 684 005)
- Cabrini Property Limited (ABN 31 634 130 653)
- Cabrini Outreach Limited (ABN 91 637 994 720)

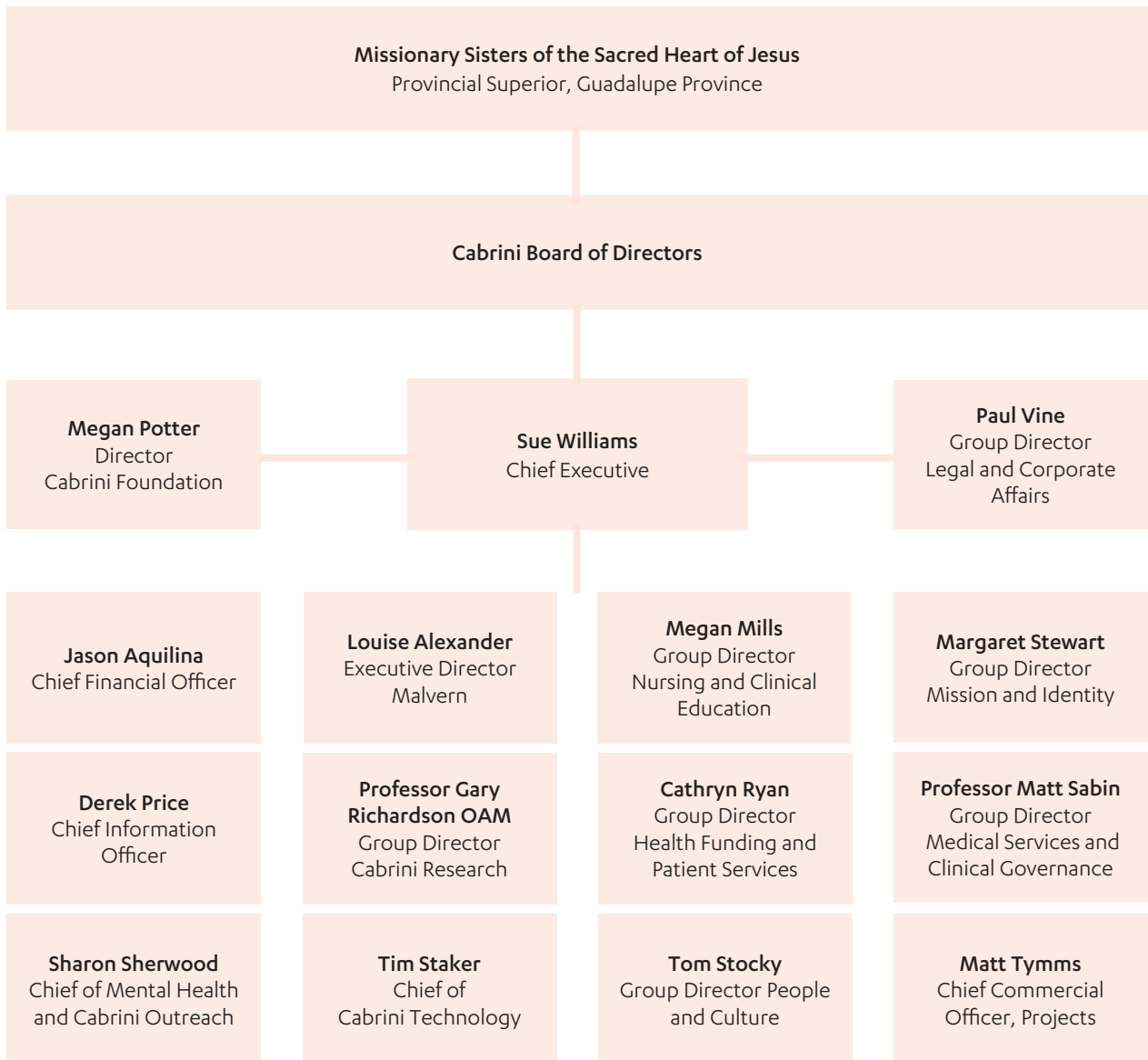


OUR MANAGEMENT AND GOVERNANCE

Cabrini’s day-to-day operations are managed by an experienced executive team that supports our Chief Executive. Cabrini’s Board oversees the strategic direction of our organisation and ensures appropriate governance structures are in place to comply with our legal and legislative requirements, including those under the Modern Slavery Act 2018 (Cth).

The Cabrini Modern Slavery Working Group, which is sponsored by the Chief Financial Officer, reports to the Board and the Audit and Risk Management Board sub-committee on its activity and outcomes to ensure the highest levels of control are in place across our organisation taking consideration of the work of each Division.

Our current organisation structure as at April 2024:



OUR OPERATIONS

Cabrini employs more than 4,400 staff (or 2900 full-time equivalent employees) and engages more than 1200 visiting medical officers.

Cabrini provides essential healthcare services and delivers a comprehensive range of high-quality acute, subacute, palliative care, primary care, diagnostic and community-based health services across its campuses, including our acute hospitals, women’s only mental health hospital, and outpatient health facilities.

Our services span, cancer care, cardiac services, orthopaedics, neurosurgery, urology, paediatrics, emergency care, maternity services, palliative care and women’s mental health.

Cabrini has been impacted by the global pandemic and measures introduced by government to protect the health and wellbeing of our community. Cabrini has continued to provide a high level of service as part of our healthcare operations:

Indicator	2021-22	2022-23
Inpatient care episodes	86,780	99,019
Surgical operations	49,013	51,830
Babies delivered	2,061	1,984
Emergency department attendances	25,181	25,349
Rehabilitation bed days	17,553	18,313
Medical images	133,441	142,322
Day procedures	25,180	23,290
Day oncology patient treatments	23,040	23,370



OUR SUPPLY CHAIN

Cabrini remains committed to ensuring that our acquisition of goods and services is ethical, transparent, fair and responsible.

Cabrini sources products and services for use in its Health operations mostly through local businesses or local subsidiaries of global businesses, while Cabrini Technology Group sources products and services through local and overseas businesses.

Procurement across Cabrini is covered by the same process framework. Our procurement process requires, to the extent possible, all suppliers to comply with our Ethical

Sourcing Code, ensuring our suppliers share and support our commitment to ethical and responsible sourcing and trading of goods and services.

In 2022-23, Cabrini had dealings with 2455 suppliers and transacted \$307,564,000 on purchased goods and services.

Cabrini is also a member of the Catholic Negotiating Alliance – a network of Catholic healthcare providers that are authorised by the ACCC to collectively bargain with suppliers.



RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

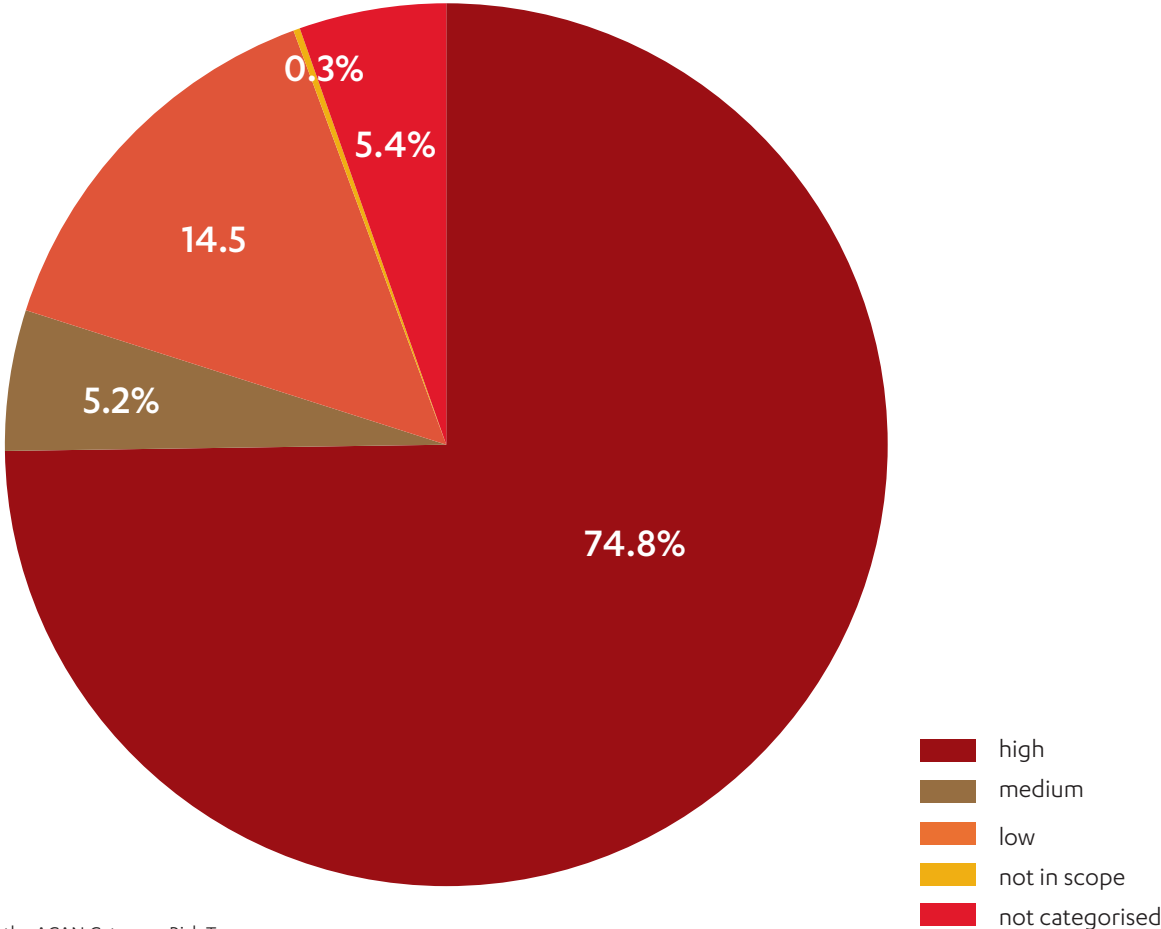
Cabrini’s most pressing risk of modern slavery exists through the supply chain. Cabrini recognises this is an ever-present challenge, and we strive to continue to refine our processes to detect issues and deal with them. In line with the commitments made in our previous statement, the focus of our organisation’s most recent action plan during the 2023-24 financial year, has been to:

- Survey a cross section of direct sourced suppliers to understand their inherent risks and control activities,
- Work with ACAN to leverage Sedex and other relevant systems to scan Cabrini’s supply base, highlight risks, and store supplier data, and
- Train staff who deal with suppliers, raise purchase orders, order and receipt goods to understand modern slavery risks and take appropriate remedial action.

Following the surveys conducted, Cabrini is now able to present the results of the risk assessments that informed our action plan.

A high proportion of Cabrini’s supply chain has a high inherent risk¹ as shown in Figures 1, 2 and 3 below:

Figure 1 | MODERN SLAVERY RISK TAXONOMY OF SPEND



¹ From the ACAN Category Risk Taxonomy

Figure 2 | NUMBER OF SUPPLIERS IN HIGH-RISK CATEGORIES FOR MODERN SLAVERY

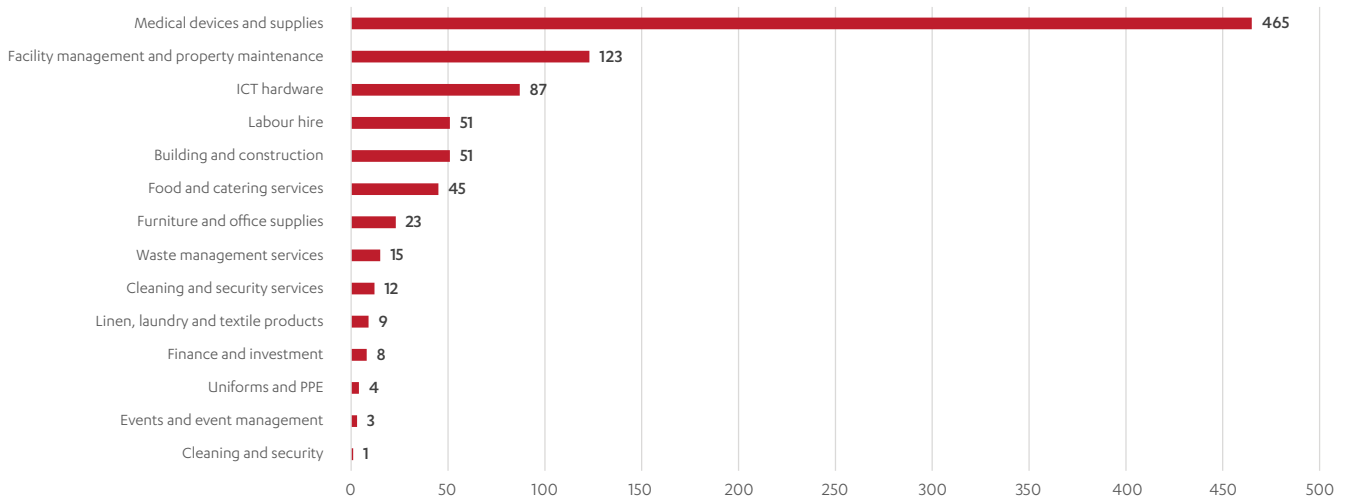
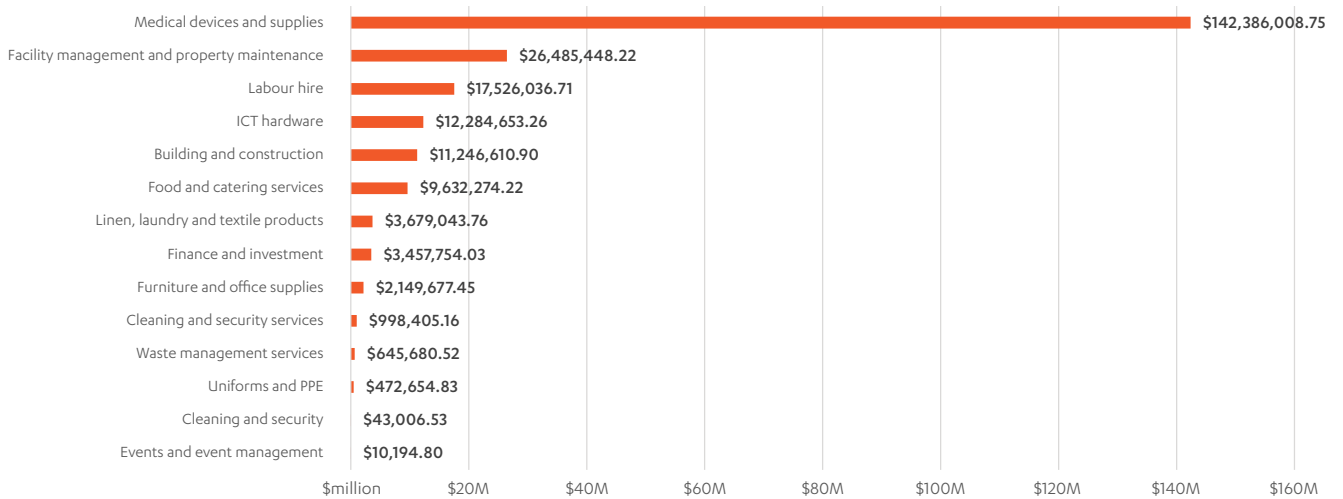
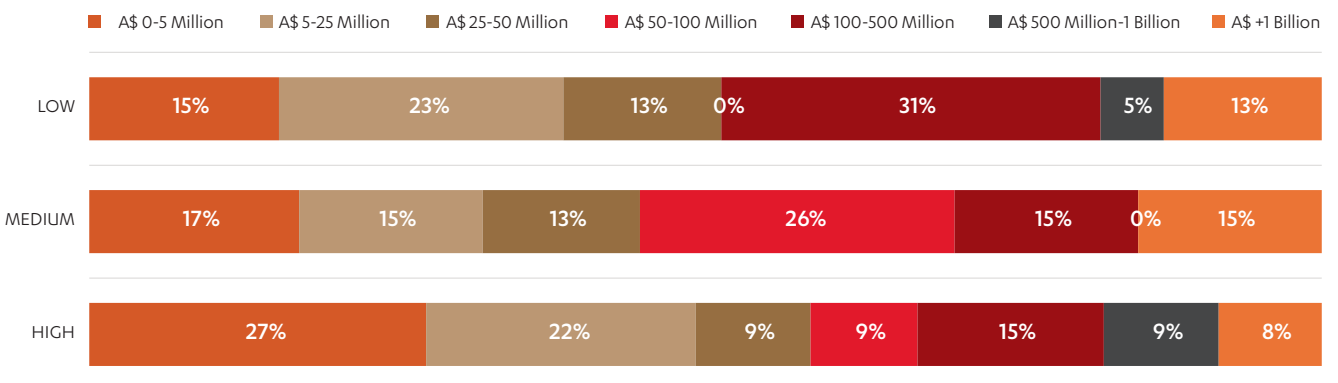


Figure 3 | PROCUREMENT SPEND PROFILE IN HIGH-RISK CATEGORIES FOR MODERN SLAVERY



Overall, Cabrini’s supply chain by risk level and turnover is shown in Figure 4 below.

Figure 3 | SUPPLIER PROFILE BY RISK CATEGORY



OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

As outlined in the section addressing ‘Potential Risks of Modern Slavery within our Operations and Supply Chains’, it is noted that a significant portion of Cabrini’s supply base falls within high-risk categories. Nevertheless, an examination of supplier policies and practices indicates a substantially lower actual risk. The information provided by suppliers, along with an assessment of the directness of the supplier relationship, serves as a basis for guiding and prioritising Cabrini’s initiatives.

Priority 1 actions are where suppliers are acting on Cabrini sites – in this case active follow-up of reported issues takes place (typically personnel policies).

Priority 2 actions are where Cabrini has a direct commercial relationship with the supplier with a high risk to the worker – in this instance active follow-up of reported issues also takes place.

Priority 3 actions are where Cabrini does not have a direct commercial relationship with the supplier with a high risk to the worker – in this case the actions are to firstly understand the first-tier supplier’s supply chain policies.

OUR MODERN SLAVERY COMMITMENT

In the 2024/25 financial year, Cabrini will:

- Work with suppliers on identified issues to steadily close the gaps, targeting a 5% reduction in open self-reported issues,
- Continue to expand surveying, and introduce modern slavery-related metrics into sourcing decisions,
- Maintain training with those directly interacting with the supply base while continuing to find ways to educate the employee base, and
- Respond to any urgent issues.

ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

Education of Cabrini staff and direct surveying of suppliers has provided increased confidence that our organisation is procuring goods and services from suppliers that share and support our commitment to ethical supply chains. Although no significant issues have been identified, Cabrini, via good governance and constant review, will respond immediately should any breach to policy arise.

cabrini.com.au





Southern Cross Care (NSW & ACT)
Modern Slavery
Statement

2023



Reporting period:
1 January 2023 – 31 December 2023

Acknowledgement of Country

Southern Cross Care (NSW & ACT) acknowledges the Traditional Owners of the land upon which we work and live. We pay our respects to the Elders past, present and emerging, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples.

We believe that a better understanding and respect for Aboriginal and Torres Strait Islander cultures will assist us to better engage with our Aboriginal and Torres Strait Islander residents/ clients and staff. An enriched appreciation of Australia's long cultural heritage is essential to the maturity of Australia as a nation.

Southern Cross Care (NSW & ACT) Limited

Website. sccliving.org.au | **Phone.** 1800 632 314 | **Email.** enquiries@sccliving.org.au

Head office. 16-18 Bridge Street, Epping NSW 2121 | ABN: 76 131 082 374

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About Southern Cross Care (NSW & ACT)

Southern Cross Care's (SCC) commitment to enhancing the lives of older Australians is encapsulated in its expansive network of compassionate services, including Home Care, Retirement Communities, and Residential Aged Care facilities. Embedded in over 40 diverse locales, SCC reaches deep into the heart of regional communities, which often face unique challenges and have distinct needs.

Our human-centered approach is powered by the deeply ingrained HEART values—honesty, empathy, acceptance, respect, and teamwork. These values not only infuse life into the culture of care but also shape the policies and interactions with all stakeholders,

ensuring an environment where the elderly can thrive, not just survive.

Our dedication to creating inclusive, supportive communities is evidenced in every facet of our operations, from the design of living spaces to the development of engaging, enriching programs that cater to the physical, mental, spiritual, and social well-being of each individual.

Recognising the importance of ethical integrity, SCC remains unwavering in its adherence to ethical practices, staunchly upholding the rights and dignity of every individual. Our Modern Slavery Statement is more than a document—it's a manifesto of SCC's journey towards a more transparent, responsible, and just world. By implementing rigorous oversight of our operations and supply chains, we are able to challenge industry norms and setting new standards for what it means to operate free from exploitation and injustice.



Message from the Chair



At Southern Cross Care (SCC), we are honoured to continue a rich tradition of compassionate care in the Australian aged care sector, a tradition characterised by profound respect and unwavering support for our elders. This commitment, born from a deep sense of community and humanitarian spirit, drives us to confront the complex challenges of modern slavery and human trafficking with both determined resolve and profound empathy.

Few are as vulnerable as those ensnared in the grip of slavery and trafficking. Pope Francis, championing this cause, calls upon us to abandon indifference and rise to action. As stewards of this mission, the Board of SCC is resolute in our commitment, guided by both our heritage and our pursuit for justice.

Recognising the magnitude of this task, we have strengthened our collaboration with the Australian Catholic Anti-Slavery Network (ACAN). Together, we leverage our collective influence to combat modern slavery in all its forms.

In this, our fourth Statement, we reflect on our progress from January 2023 to December 2023, focusing on supply chain mapping and risk assessment. Transparency and integrity are paramount as we strive for best practices in our operations and relationships with suppliers. Our 2023 Modern Slavery Statement builds upon our collective achievements, laying the foundation for a future where no one suffers under the chains of modern slavery.

As Chair, I am immensely proud of our organisation's dedication to this cause. Our relentless pursuit of justice and compassion reflects the very heart of who we are: a community built on honesty, empathy, acceptance, respect, and teamwork. Together, we uphold the dignity of every individual, especially those who suffer in the shadows.

Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 26 March 2024 by the principal governing body of Southern Cross Care (NSW & ACT), ABN 76 131 082 374, as defined by the Modern Slavery Act 2018 (Cth) ("the Act"). This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (NSW & ACT), as defined by the Act.

A handwritten signature in black ink, appearing to read 'Lawrie Hallinan'.

Lawrie Hallinan
Chair, Southern Cross Care (NSW & ACT)



Our Structure, Operations and Supply Chains

Structure

SCC is dedicated to innovating in the not-for-profit aged care sector. We are guided by a commitment to improvement and transformation, ensuring our practices and services genuinely meet the evolving needs of our communities. Our innovative approach is reflected in our comprehensive services and dedicated team, driving forward a new era of care centred on the needs and well-being of our community.

Registered with the Australian Charities and Not-for-Profits Commission and structured as a company limited by guarantee, we anchor our mission in integrity and service, devoid of share capital, ensuring our focus remains squarely on those we serve.

Located at 16-18 Bridge Street, Epping, NSW, our head office serves as a collaborative hub where we coordinate extensive care and services across all our sites. Reflecting

our transparent ethos, we've designated procurement@sccliving.org.au as a dedicated channel for all matters concerning modern slavery, emphasising our commitment to ethical operations.

In the fiscal year 2023, our total revenue reached \$234,600,000. This financial success has enabled us to expand and refine our services across a broad network that includes Retirement Villages, Home Care services, and Residential Care homes, covering more than 40 locations. Our commitment to delivering personalised, high-quality care and support is unwavering, especially in extending these services to regional communities, ensuring everyone has access to the care they need.

By February 2024, our passionate team had grown to 2,162 members, embodying diverse roles from full-time warriors of compassion to part-time angels of care, coming together to create a supportive and enriching environment.




Operations

Our operations are enhanced by a robust network of 1,904 suppliers, ensuring the seamless delivery and continuous improvement of our services. Most of these suppliers are based in Australia, and align closely with our values of integrity and accountability, reinforcing our dedication to bolstering our local supply chain.

Supply chains

Our supply chain is diverse, covering areas such as facilities management, services for domestic and client needs, medical supplies and equipment, and human resources services. Additionally, we work with professional services, information technology, utilities, corporate support, and vehicle fleet management to ensure comprehensive support and efficiency across all aspects of our operations.

Guided by our commitment to ethics, our Modern Slavery Working Group actively oversees and ensures compliance, embodying our dedication to justice and ethical conduct. Their diligent efforts are directly communicated to our CEO, ensuring a cascading effect of accountability and transparency up to SCC's Board, keeping modern slavery matters at the forefront of our operational ethos.




SCC operates 40 facilities throughout NSW & ACT, delivering services to residents and clients in both regional and metropolitan areas.

Modern Slavery risks in our operations and supply chains

SCC sources a wide range of products and services from various industries and undertakes diverse activities to achieve its strategic objectives.

Throughout 2023, SCC undertook several initiatives to assess the potential risks of modern slavery within our operations and supply chains. Through these endeavours, we identified risks across our supplier categories, leading us to implement a variety of measures based on this newfound understanding.



Supplier and category risk assessment matrix

In 2023, we initiated a robust Supplier and Category Risk Assessment, targeting our top 50 suppliers based on expenditure and risk, using the ACAN Category Risk Taxonomy to understand industry-wide Modern Slavery challenges.

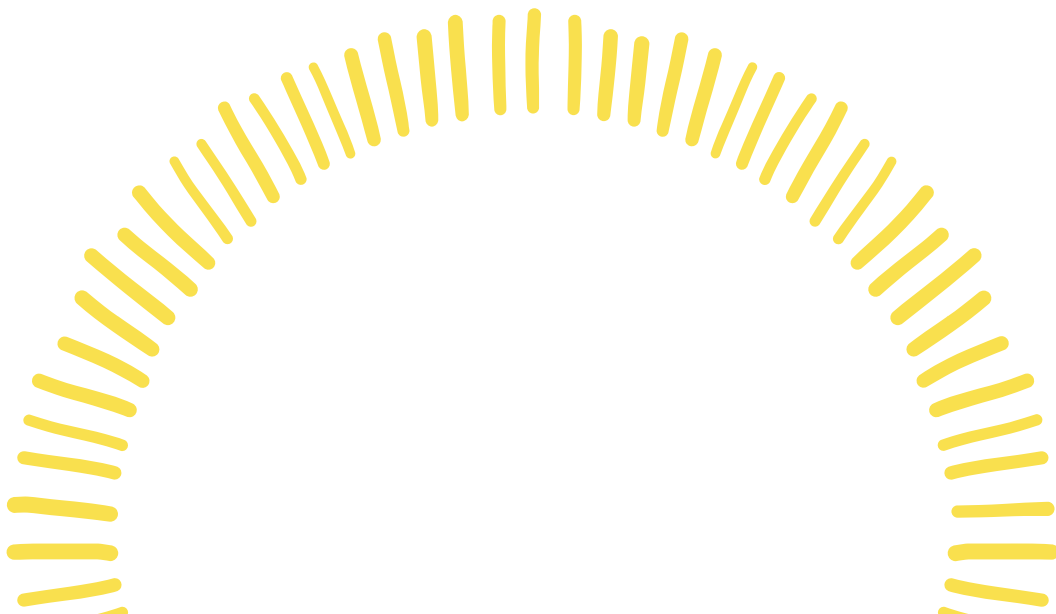
Understanding the intricate and global nature of supply chains in the aged care sector, which often extends into regions where modern slavery practices are more prevalent, we've recognised the urgent need to go beyond conventional risk assessments. Our approach has been to integrate comprehensive insights and benchmarks from across our industry, acknowledging that the challenges we face are not isolated but part of a broader industry-wide issue.

Our commitment extends beyond mere assessment; we're dedicated to forging deeper, more meaningful relationships with our suppliers. This commitment translates into a series of actions: conducting detailed vendor reviews with an emphasis on modern slavery concerns, and establishing a two-way dialogue that goes beyond the standard modes of communication like emails and website updates. We're innovating in the ways we connect and sharing best practices aimed at not just

informing but actively engaging our suppliers in meaningful discussions on ethical practices.

The cornerstone of our strategy is our Modern Slavery Policy, Modern Slavery Statement, and Supplier Code of Conduct. These are not just documents but are expressions of our core values and commitments. They serve as a foundation for our actions and interactions with our suppliers, underscoring our dedication to ethical conduct and the welfare of individuals in our supply chain.

Taking a step further, we have set a new standard for our top 100 suppliers by expenditure, moving from passive compliance to active commitment. We now require these suppliers to review and officially endorse SCC's Modern Slavery Attestation Statement. This is not just a formality but a declaration of our collective commitment to combat modern slavery, reinforcing our expectations for ethical practices and transparency.



Actions taken to assess and address risks

Throughout 2023, SCC has been steadfast in our commitment to eradicating Modern Slavery from our operations and supply chains. A cornerstone of our strategy has been our active membership and collaboration with the Australian Catholic Anti-Slavery Network (ACAN), a partnership that reflects our belief in the power of collective action against Modern Slavery.

Joining ACAN in February 2020 marked a significant step forward for SCC. It signified our recognition of the complex challenges Modern Slavery presents and our commitment to joining forces with like-minded organisations to foster meaningful change. Our collaboration with ACAN is ongoing; we are not only sharing our Modern Slavery statement with the network but also integrating insights and strategies from across the member base. This cooperative effort culminates in a joint submission to the Modern Slavery public register, amplifying our shared commitment to transparency and accountability.

In maintaining our engagement with ACAN throughout 2023, we've reinforced our anti-slavery initiatives, particularly through the active involvement of our procurement team. Their participation in ACAN's monthly Modern Slavery meetings has been instrumental in driving forward our agenda against Modern Slavery, leading to significant developments:

- The re-launch of our Modern Slavery whistleblower hotline, providing a secure and confidential channel for reporting potential abuses within our supply chain.
- The distribution of a Modern Slavery Self-Attestation Statement to our top 50 suppliers, ensuring they align with our commitment to ethical practices.
- A comprehensive review of a key supplier's supply chain and Modern Slavery program, reflecting our dedication to due diligence and collaborative improvement.
- The development and implementation of SCC's Action Plan, a strategic framework guiding our anti-slavery efforts.
- The creation and deployment of a comprehensive Modern Slavery training and education program, aimed at raising awareness and understanding within our organisation and among our partners.

These actions represent SCC's multifaceted approach to combating Modern Slavery, demonstrating our ongoing dedication to fostering safe, ethical, and transparent supply chains, both within our organisation and across the wider community.

Modern Slavery working group

Throughout the year 2023, SCC's dedicated Modern Slavery Working Group met six times, demonstrating our active commitment to combating Modern Slavery. The group, which holds quarterly meetings, consists of a cross-functional team of eight members from diverse departments including Marketing and Communications, People & Culture, Information Technology, Care Operations, and Procurement. This collaboration ensures a holistic approach to tackling Modern Slavery, with a commendable yearly attendance rate of 75% from our members, reflecting their dedication and commitment to this critical cause.

The presence of the Australian Catholic Anti-Slavery Network (ACAN) at our Modern Slavery Working Group meetings has been invaluable. ACAN's expert perspectives and insights have significantly contributed to the group's ability to achieve meaningful outcomes, enhancing the breadth and depth of our strategies.

Under the collective guidance and concerted effort of the Working Group, we have driven the effectiveness of our Modern Slavery program. Our approach is comprehensive and collaborative, ensuring that initiatives and actions aimed at mitigating instances of Modern Slavery in our operations and supply chains are well-informed and targeted. The group draws on the thoughtful contributions of all members, leveraging their diverse expertise to address the multifaceted challenges Modern Slavery presents.

Looking ahead to 2024, we are committed to maintaining the momentum of these quarterly meetings. Our aim is to continue

advancing our initiatives, refining our actions, and enhancing our overall strategy to combat Modern Slavery. By doing so, we reinforce our commitment to ethical practices and the dignity of all individuals within our operations and broader supply chains.

Whistleblower hotline

At SCC, we hold ourselves to the highest standards of integrity and responsibility. We have zero tolerance for improper conduct within our ranks, whether among our employees, officers, or volunteers. Our commitment runs deep. We stand firmly beside those brave whistleblowers who step forward to shine a light on any form of misconduct. They are not just voices in the dark; they are beacons of truth, guardians of our values.

In 2023, we took significant steps to empower our employees and strengthen our stance against unethical practices, including Modern Slavery. We re-launched our Whistleblower hotline, a confidential channel encouraging employees to report any form of corrupt, illegal, unethical, or undesirable behaviour.

As we move forward, SCC reaffirms its dedication to cultivating an environment



of transparency and respect, where every individual feels valued and heard. Our actions in 2023 are just the beginning of a continued journey towards ethical excellence and the protection of human dignity. We invite every member of our community to join us in this vital mission, to stand against injustice, and to contribute to a culture where integrity is not just expected, but exemplified.

Modern Slavery statement

In July 2023, SCC took a meaningful step forward by publishing our Modern Slavery Statement on our corporate website. This initiative is not just about compliance or transparency; it's a reflection of our deeper commitment to ethical stewardship and care for all creation.

By making the statement accessible to clients, suppliers, residents, staff, and the wider public, we aim to broaden awareness of our dedicated efforts against Modern Slavery.

This publication underscores our journey towards sustainability and ethical responsibility. We are committed to creating a culture and an environment where every member of our community is respected, protected, and valued.

Modern Slavery self-attestation statement

SCC has taken a proactive stance in our commitment to integrity and care for the global community by creating a Supplier Attestation Statement against Modern Slavery. This document serves not only as a declaration of our unwavering opposition to Modern Slavery but also as an invitation

for our suppliers to align with our ethical standards, echoing the integral connection between respect for human dignity and the stewardship of our world.

In 2023, we extended this commitment by distributing the Modern Slavery Self-Attestation Statement to our top 50 suppliers, urging them to review, complete, and endorse the document. This collaborative effort marks a significant step forward in our joint mission to promote a just and ethical global community, resonating with the holistic approach to care for all individuals and our common home.

Training and education program

SCC has embraced a robust educational initiative on Modern Slavery, underscoring our dedication to cultivating a workplace where awareness, compassion, and ethical practices are at the core of our operations.

This commitment to enlightenment and action is reflected in the comprehensive training provided to our Board, Executive Team, and all employees, ensuring a unified understanding and approach to combating Modern Slavery across all levels of our organisation.

In 2023, we enhanced our educational framework, integrating a Modern Slavery e-learning module for our workforce, which

has been systematically incorporated into the orientation process for all new recruits. This strategic approach not only aligns with our evolving initiatives but also provides a platform for continuous learning, open dialogue, and constructive feedback through updates to the Modern Slavery content on our intranet.

SCC's robust Modern Slavery training program has achieved an impressive 87% completion rate among our Executive Management and Head Office staff, with our Board and Executive members leading by example with a 100% completion rate. Meanwhile, Head Office members accomplished an 88% rate, and the initiative for new recruits has also taken a strong hold, with a 79% completion rate among new starters. These figures highlight our collective commitment to combating Modern Slavery throughout our organisation.

The spotlight on Modern Slavery continued at our annual conference in November 2023, where the issue's global repercussions and our targeted efforts to mitigate these challenges were thoroughly examined. This segment not only educated but also engaged our senior management and facility managers, fostering a collective commitment to change.

Through these varied yet cohesive educational strategies, SCC is setting a precedent in the fight against Modern Slavery, embodying our commitment to

global stewardship and ethical responsibility. This holistic approach not only aligns with our core values but also strengthens our resolve to ensure the dignity and safety of all individuals impacted by our operations.

Grievances and remediation of modern slavery

SCC firmly encourages all employees, suppliers, and individuals within our supply chain to voice any concerns related to Modern Slavery, guaranteeing confidentiality and the option of anonymity. We provide a dedicated channel for anyone to report breaches of our Supplier Code of Conduct confidentially to our Procurement team. In the event of such a breach, we commit to engaging with the concerned supplier within 24 hours to collaboratively address and rectify the issue, with the support of the Australian Catholic Anti-Slavery Network (ACAN).

Recognising the complex nature of remediation, SCC leverages the expertise and support of ACAN to ensure that individuals affected by Modern Slavery receive the best possible care and assistance. This partnership enables us to facilitate meaningful recovery and rehabilitation processes, ensuring that our efforts are transparent and accountable.

While the year 2023 saw no reported cases of Modern Slavery grievances within SCC, our commitment to vigilance remains unwavering. We continue to stand ready to support and assist any individuals affected by Modern Slavery, reinforcing our pledge to ethical practice and the protection of human rights across all aspects of our operations and supply chain.

Assessing our effectiveness

The mechanisms and initiatives SCC has instituted to gauge the effectiveness of our strategies in combating Modern Slavery risks are multifaceted and comprehensive. Our Procurement team, in collaboration with the Modern Slavery Working Group, spearheads our due diligence efforts and engagement strategies, assessing the impact and efficacy of our actions both within our operations and throughout our supplier network. This dedicated team also takes on the critical role of reviewing feedback from suppliers and addressing any queries or concerns related to Modern Slavery.

In addition, the progress and findings of the Modern Slavery Working Group are regularly communicated to our Senior Executive team, ensuring that those at the highest level of our organisation are informed and involved in our anti-Modern Slavery efforts. The Board of Directors, too, stays updated on all Modern Slavery-related developments through briefings from our Chief Executive Officer.

Despite not identifying instances of Modern Slavery within our operations or supply chains in 2023, we understand that this does not confirm the total absence of such issues. As a result, we continue to scrutinise the efficiency of our key mechanisms and continually evaluate the training and education provided to our staff and suppliers, ensuring that our collective understanding and vigilance regarding Modern Slavery are both current and effective.



Key actions

In alignment with commitment to the dignity of all people and the stewardship of our global community, SCC is dedicated to continuing and enhancing our efforts against Modern Slavery in 2024. Our approach is holistic, emphasising care for people and the planet, and includes the following focused objectives:

	SCC Goals	Target	Date	Responsibility
1.a	Build on and expand on Modern Slavery information on the SCC intranet.	Update and enhance Modern Slavery content on the intranet.	2024	Procurement
1.b	Attend monthly Modern Slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Procurement
1.c	Continue to educate and train SCC staff to understand and recognise the signs of Modern Slavery.	Deliver ongoing training programs.	2025	People & Culture, Procurement
1.d	Remind SCC staff about SCC's commitment and obligations under the Modern Slavery Act.	Conduct regular awareness sessions.	Bi-annually	People & Culture, Procurement
1.e	Include a Modern Slavery segment in the annual SCC conference.	Include Modern Slavery segment in the conference agenda.	Annual	Care Operations, Procurement
1.f	Attend quarterly Modern Slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Procurement
1.g	Ask our top 75 suppliers by spend to review and sign SCC's Modern Slavery Attestation Statement.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2026	Procurement
1.h	Develop a strategic partnership with a current vendor for a joint initiative to help combat Modern Slavery.	Form a strategic partnership and initiate a joint project.	2025	CEO, Procurement
1.i	Include relevant SCC stakeholders in vendor reviews and include Modern Slavery as an area of discussion.	Incorporate Modern Slavery topics into vendor reviews.	2025	Procurement

Website. sccliving.org.au

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Phone. 1800 632 314

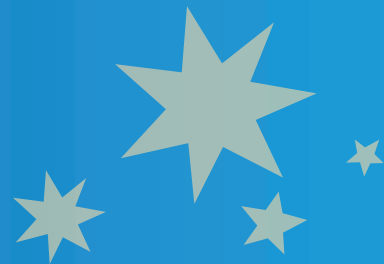
Southern Cross Care (NSW & ACT) Limited

ABN: 76 131 082 374





TO GROW COMMUNITIES WHERE
BEST LIVES ARE LIVED



Modern Slavery Statement 2023

sccqld.com.au



INTRODUCTION

Southern Cross Care (QLD) Ltd [SCCQ] takes a firm stand against the persisting issue of modern slavery. As a leading organisation committed to enhancing the lives of SCCQ's residents, clients and greater community, SCCQ recognise the requirement of addressing the complex challenges posed by modern slavery in today's interconnected world.

This Modern Slavery Statement serves as a testament to SCCQ's unwavering dedication to eradicating all forms of exploitation, forced labour, and human trafficking from not only SCCQ's own operations but also from the broader supply chains SCCQ engages with. With a legacy of caring deeply for the well-being of individuals, SCCQ believe that upholding human rights and ethical practices is not only SCCQ's moral imperative but also integral to SCCQ's identity as a Catholic organisation.

In this statement, SCCQ will outline the strategies, policies, and initiatives aimed at preventing and mitigating the risk of modern slavery within SCCQ's operations and supply chains. By transparently sharing SCCQ's approach, progress, and ongoing challenges, SCCQ aims to foster accountability, engage stakeholders, and inspire collective action in the fight against modern slavery.

This statement has been developed with assistance of, and in consultation with, the Australian Catholic Anti-Slavery Network and SCCQ's partner Southern Cross Care organisations.

1. About Southern Cross Care Queensland

Southern Cross Care Queensland (SCCQ) is a not for profit organisation with a Catholic ethos, established by the Knights of the Southern Cross over 40 years ago. The Knights saw a need to provide compassionate care and inclusive service to some of the most vulnerable, the ageing population, in the community.

Since then, SCCQ has grown to employ over 1000 staff caring for and supporting more than 2000 people across 13 residential aged care homes, 5 retirement villages, 28 social houses, the National Disability and Insurance Scheme (NDIS) and home care services in metropolitan and rural Queensland.

SCCQ are passionate about growing communities where best lives are lived, and serving the needs of our residents and clients with compassion and care is, as always, at the heart of what we do.

2. SCCQ Structure, Operations and Supply Chains

With a Support Centre located in Upper Mt Gravatt, Queensland, SCCQ is an Australian public company registered with the Australian Not-for-profits Commission.

SCCQ directly employs a workforce of over 1,000 individuals, spanning diverse roles including full-time, part-time, and casual positions. Additionally, a supplementary group of volunteers also contribute their efforts across various facets of our operations.

To effectively address the requirements of our residents and clients, SCCQ engage the services of around 700 active suppliers. With a FY23 Turnover amounting to \$120.3M and an annual market expenditure of approximately \$27.5M across a wide array of sectors encompassing facilities management, medical supplies, PPE, professional services, allied health, information technology, building and construction, maintenance, handyman services, and domestic assistance, SCCQ remains steadfast in

our commitment to utilise our market presence and influence to raise awareness within industries and communities about the perils of contemporary slavery.

3. Assessing SCCQ's Operations and Supply Chains

In the lead up to becoming a reporting entity for the purposes of Modern Slavery, SCCQ undertook a learning journey to better understand its obligations and the methods we could utilise in order to meet those obligations.

Joining the Australian Anti-Slavery Network (ACAN) in July of 2022, SCCQ committed to using our influence in our communities as a collective with 52 other Catholic entities.

Through peer consultation and expert advice from ACAN and its members, SCCQ is committed to providing a Modern Slavery Statement together with other members in the form of a group compendium, which ACAN will submit to the Modern Slavery Public Registry on behalf of all of its member entities.

4. How SCCQ are Addressing Modern Slavery Risks

SCCQ have embarked on number of initiatives to assist us in addressing risks within our supply chains. To this end, SCCQ have completed the following actions:

a. SCCQ Joined ACAN

Becoming a member of the Australian Catholic Anti-Slavery Network in July 2022 has allowed SCCQ to partner with likeminded organisations, learn and receive feedback from others within our industry and consolidate our efforts in combatting Modern Slavery.

b. Modern Slavery Policy and Guideline

Approved in December 2023, SCCQ created and published our new Modern Slavery Policy and associated guideline with this being made available to the entire SCCQ business.

c. A Robust New Supplier Process

SCCQ decided to take a base level approach to assessing our supply chains by implementing a new process for onboarding new suppliers into SCCQ's operations.

Moving from a manual system to an automated workflow where suppliers are asked pertinent Modern Slavery trigger questions, allows us to assess the risk profile of a supplier at the time of onboarding, meaning SCCQ can take pro-active steps with the supplier from the first interaction.

d. Modern Slavery Risk Matrix

A Modern Slavery risk matrix was developed allowing SCCQ's Procurement Team to better assess any flagged new supplier by industry and location.

Utilising this risk matrix enables the team to make informed decisions and offer further information, education, guidance and to set expectations with a potential supplier at the beginning of the commercial relationship.

e. New Contract/Agreement Terms and Conditions

After reviewing SCCQ's contractual terms and conditions, we noted that SCCQ had no Modern Slavery clause or mention within our agreements.

With this in mind, SCCQ engaged with our third party legal provider to have SCCQ's agreements updated to include Modern Slavery and include resource links within this agreement in order to provide further education and context for SCCQ's supply partners.

SCCQ has embarked on issuing new contract documentation to all new suppliers and has begun sending letters of variation to its existing contracted supply base.

Our online Terms and Conditions, referenced in all of SCCQ's Purchase Orders, have also been changed to reflect our Modern Slavery stance, along with referencing and links on SCCQ's public facing web page allowing suppliers to better understand SCCQ's commitment.

5. Assessing the Effectiveness of SCCQ's Modern Slavery Actions

SCCQ Procurement Team

The SCCQ Procurement Team are responsible for the assessment and engagement of all suppliers within the SCCQ Operations and Supply Chains, from initial setup to periodic surveys and questionnaires. This team will also respond to all supplier feedback, questions and concerns related to Modern Slavery.

ELT and the Board

All Modern Slavery initiatives will be reported to the Board via the SCCQ ELT, specifically the CFO or appropriate delegate.

Whilst no cases of Modern Slavery have been detected within SCCQ's operations or Supply Chains, we remain aware that continuous improvement and diligence are required as SCCQ progress in this space.

6. Where to From Here

With a solid base from which to work, SCCQ's plans for 2024 are already underway. We are determined to mature our approach and further assess SCCQ's Supply Chains and train our people.

a. Training

In January 2024, SCCQ intends to roll out an internal education program for all staff that have an involvement with our suppliers.

This training will be delivered as part of our annual compulsory training packages and delivered via SCCQ's internal Learning Management Systems.

Further to this, SCCQ in collaboration with ACAN, will also be looking to initiate video-based training for our largest supply partners based on risk.

b. Survey of Supply Chain

SCCQ, in collaboration with ACAN, will be undertaking a survey of our top 80% of spend

to gain insight into where key risks lie. This will help steer our training and education initiatives. During the course of this survey, ALL suppliers will be sent an electronic copy of SCCQ's commitment to Modern Slavery.

c. Updated Procurement Page

At the time of writing, SCCQ were making changes to its public facing Procurement web page. This page is available to all persons and potential new suppliers, and changes include a link to the Modern Slavery Act 2018 Cth, a short statement of SCCQ's commitment to the Act and expectations of our suppliers, as well as a copy of SCCQ's Supplier Code of Conduct.

d. Internal

Internally, SCCQ will be adding a Modern Slavery guide to SCCQ's Intranet site giving staff access to further information about Modern Slavery, SCCQ's commitment to the Act and our plans towards tackling the issue.

e. Stakeholder Engagement

SCCQ's Procurement Team will include additional stakeholders when undertaking Supplier reviews in order to grow an open and communitive culture around the requirements of modern slavery within SCCQ's business.

f. Laudato Si

SCCQ's commitment and contributions towards the Modern Slavery Act have been prepared with consideration to the 7 *Laudato Si* Goals, particularly Goal 2, 'Response to Cry of the Poor'. With the aim of eradicating all forms of exploitation, forced labour and human trafficking, this is a clear example of promoting awareness to defend human life through actions and special attention focused on vulnerable at-risk groups.

SCCQ recognises the alignment between the encyclical letter *Laudato Si* ("Praised Be") by Pope Francis and Modern Slavery with *Laudato Si* being the most comprehensive Vatican document to date on environmentalism, ethics, and Christian faith. The document is not solely intended for Catholics but all peoples, regardless of race or religion with its arguments founded in theological conviction. (https://bit.ly/Laudato_si_240515)

This Modern Slavery Statement was approved on the 13 of December, 2023 by the principle governing body of Southern Cross Care (QLD) Ltd as defined by the Modern Slavery Act 2018 (Cth) ("the Act")

This Modern Slavery Statement is signed by a responsible member of Southern Cross Care (QLD) Ltd as defined by the Act.

A handwritten signature in black ink, appearing to read 'Francis Price', is positioned above the printed name.

Francis Price
Chair

CONTACT US

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 Southern Cross Care (Qld) Ltd
2078 Logan Road
Upper Mt Gravatt Q, 4122





St Vincent de Paul Society
NSW
good works



MODERN SLAVERY

STATEMENT

1 JANUARY – 31 DECEMBER 2023

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Disclosure Note

This Statement has been made on behalf of the St Vincent de Paul Society NSW (ABN 91 161 127 340) and the Trustees of the Society of St Vincent de Paul (NSW) (ABN 46 472 591 335) and St Vincent de Paul Housing (ABN 41 158 167 483).

This Statement does not apply to the St Vincent de Paul Society entities outside of NSW.

Reporting period: 1 January 2023 to 31 December 2023



ACKNOWLEDGEMENT OF COUNTRY

We acknowledge Aboriginal and Torres Strait Islander peoples, as the Traditional Custodians of this land, with deep respect. May Elders, past and present, be blessed and honoured. May we join together and build a future based on compassion, justice, hope, faith and reconciliation.

FOREWORD

Modern slavery is an issue that touches us all through the goods and services we buy every day. Today, there are more than 41,000 people who experience modern slavery in Australia - increasing from 15,000 in 2018. The 2023 Global Slavery Index indicates that over 50 million people are currently experiencing modern slavery, with over half of these people in forced labour.

Modern slavery poses a significant challenge to justice worldwide and fundamentally conflicts with the values and principles upheld by the St Vincent de Paul Society NSW. The scope of modern slavery, both in Australia and internationally, requires increased awareness and targeted action by all of us. At St Vincent de Paul Society NSW we have continued to enhance our understanding and strategies to address this injustice.

As an organisation working towards a more just and compassionate society, we are committed to alleviating the needs of victims and survivors of modern slavery and dismantling the structures that cause it.

The St Vincent de Paul Society members give priority to the poorest of the poor and to those who are most rejected by society, as is required of us by the Rule. Our aim is to accompany people on their journeys to security, stability, and community connection to effectively reach the most disadvantaged and hard to reach communities.

Internally, the Society's obligations and commitments to this 2023 Modern Slavery Statement are a key focus for our members, volunteers and staff. In New South Wales, we have over 12,000 pairs of eyes and ears to see the victims of modern slavery and hear their cries. We have expanded our engagement with suppliers to assess and address modern slavery risks and continued our participation in the Australian Catholic Anti-Slavery Network (ACAN) to support this most important work.

In the spirit of charity and justice, we are all summoned to remain vigilant against modern slavery in Australia and across the globe. Let us be keenly aware of any indicators of modern slavery we may encounter so we can effectively aid victim survivors and prevent any further exploitation. By fostering an environment of awareness and intervention, we contribute to a collective effort that ends these practices and restores dignity to those affected.

Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of the St Vincent de Paul Society NSW as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 2 May 2024.

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society NSW as defined by the Act.



A handwritten signature in black ink, appearing to read 'John Adams'.

John Adams

Acting President of The Trustees of the Society of St Vincent de Paul (NSW)



A handwritten signature in black ink, appearing to read 'Richard Stewart'.

Richard Stewart

Chair of the Board
St Vincent de Paul Society NSW



A handwritten signature in black ink, appearing to read 'Denis Walsh'.

Denis Walsh

Chair of the Board
St Vincent de Paul Housing

REPORTING CRITERIA 1

About the St Vincent de Paul Society NSW

ABOUT US

The St Vincent de Paul Society is a member and volunteer-based organisation that has been assisting people experiencing disadvantage and hardship in NSW for almost 140 years.

The Society was founded by a 20-year-old man named Frederic Ozanam in 1833 who, with a group of friends, wanted to alleviate the poverty and disadvantage that he saw around him in post revolution France. Leading by example and, with boundless energy, Frederic started what is now a worldwide movement in just 20 short years.

The St Vincent de Paul Society NSW currently has more than 12,000 members and volunteers across the state, who give tirelessly of their time. In total, we have over 360 local member networks, referred to as Conferences, present in communities across NSW.

Our members, volunteers and staff help people experiencing disadvantage with resources including food parcels and vouchers, financial assistance, help with energy bills and other debt, budget counselling, school items for children, and the provision of other material items such as furniture, clothing, bedding and any other household items.

Importantly, we also provide vital emotional support and referral services as needed. The St Vincent de Paul Society NSW is also a leading provider of frontline services, with 100 local services across the state. These deal with a range of issues including homelessness, domestic and family violence, disability, mental health, youth wellbeing, refugee and migrant inclusion, rehabilitation and addiction.

Head office:

2C West Street, Lewisham NSW 2049

www.vinnies.org.au/nsw

OUR MISSION

The St Vincent de Paul Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.



OUR VISION

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

OUR ASPIRATION

An Australia transformed by compassion and built on justice.

OUR KEY VALUES

Commitment – Loyalty in service to our mission, vision and values.

Compassion – Welcoming and serving all with understanding and without judgement.

Respect – Service to all regardless of creed, ethnic or social background, health, gender or political opinions.

Integrity – promoting, maintaining and adhering to our mission, vision and values.

Empathy – Establishing relationships based on respect, trust, friendship and perception.

Advocacy – Working to transform the causes of poverty and challenging the causes of human injustice.

Courage – Encouraging spiritual growth, welcoming innovation and giving hope for the future.

HIGHLIGHTS OF 2022/23



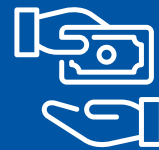
**OUR MEMBERS SUPPORTED
MORE THAN 87,000 PEOPLE**

with food, clothing, household items,
cost of living expenses and emotional support



\$3 MILLION WAS RAISED

through Vinnies CEO Sleepout events in NSW



**\$13.7 MILLION IN FINANCIAL
AND MATERIAL AID**

was distributed by our members



\$5.5 MILLION

in direct financial assistance was provided to
communities impacted by floods



28,250 PEOPLE WERE SUPPORTED

by our Vinnies Services across Homelessness
and Housing, Health, and Disability and Inclusion



Our network of Vinnies Vans provided more than

**70,000 INSTANCES OF
ASSISTANCE ACROSS THE STATE**



We celebrated 100 years of Vinnies Shops in NSW;

**OUR NETWORK OF 221 SHOPS
RAISED \$78 MILLION**

to support our programs and services

Our Annual Consolidated Revenue for the period 1 July 2022 to 30 June 2023: \$206,785,190.

REPORTING CRITERIA 2

Our Organisational Structure, Operations and Supply Chains

ORGANISATIONAL STRUCTURE

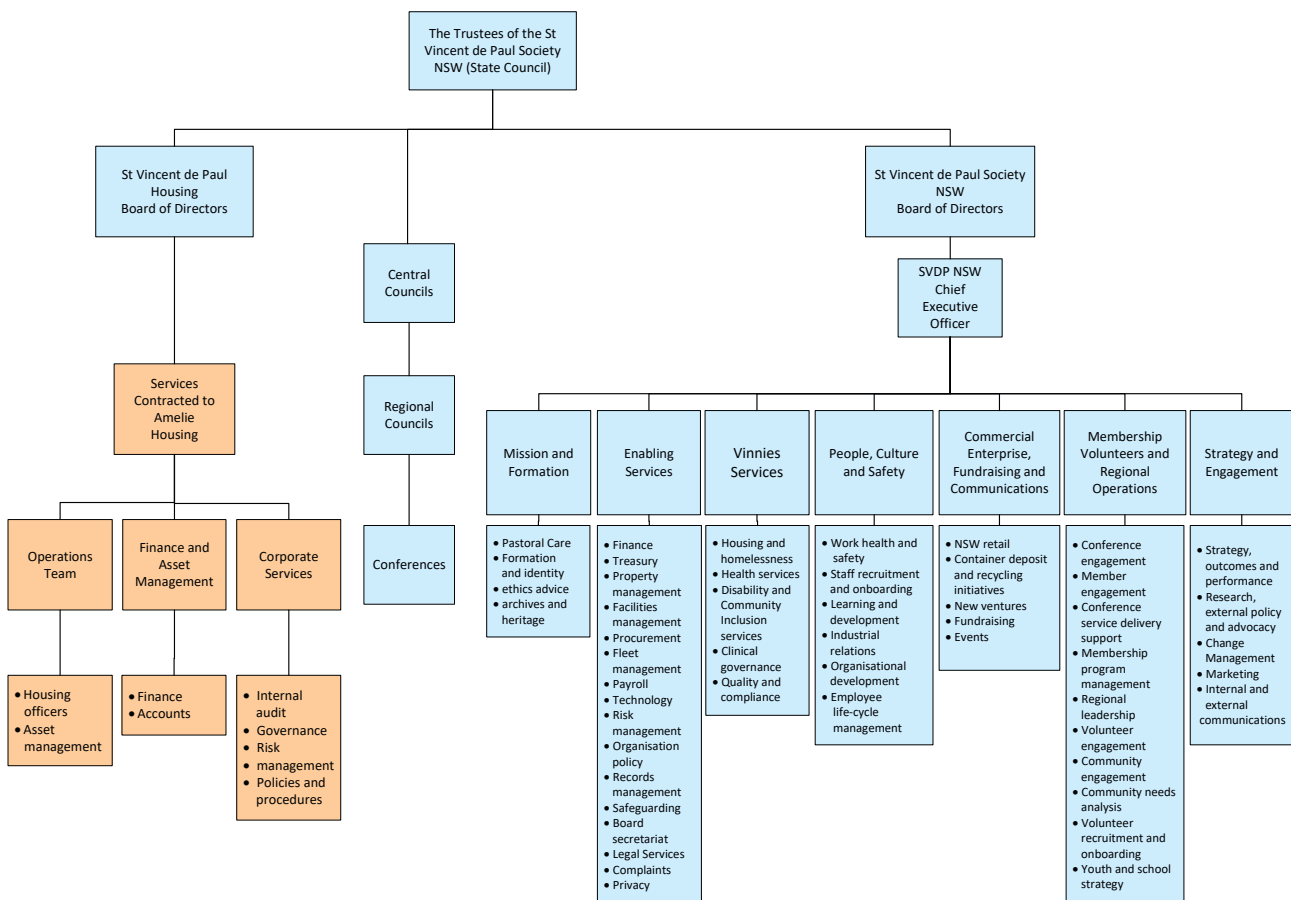
The St Vincent de Paul Society in NSW is comprised of three separate but related legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW). The Trustees are elected by the members and appoint the Board of Directors of the Company.
- **The St Vincent de Paul Society NSW** is a public company limited by guarantee.
- **St Vincent de Paul Housing** is also a public company limited by guarantee. It is a special purpose vehicle through which we manage the maintenance and service provision of over 500 social and affordable housing units constructed through the NSW Government's Social and Affordable Housing Fund.

The Trustees of the Society of St Vincent de Paul (NSW), The St Vincent de Paul Society NSW and St Vincent de Paul Housing are registered charities with the Australian Charities and Not-for-profits Commission (ACNC) and are regulated by the ACNC. The three entities form a reporting group for financial reporting to the ACNC.

This Modern Slavery Statement does not apply to:

- the international body of the St Vincent de Paul Society, the International Consul General, or any entities owned or controlled by the International Consul General
- the National Council of the St Vincent de Paul Society
- St Vincent de Paul Societies in other Australian states and territories, or any entities owned or controlled by these Societies.





- that governance policies and procedures are current and compliance, including in relation to modern slavery
- Executive Directors are responsible for ensuring their staff comply with the organisations policies and practices.
 - The MSWG meets six times per year and its progress is reviewed by Board Committees of The St Vincent de Paul Society NSW and St Vincent de Paul Housing and consists of the following roles:
 - Chief Financial Officer
 - Finance
 - Procurement and Fleet
 - People and Culture
 - Property and Facilities
 - Members, Volunteers and Regional Operations
 - Legal
 - Risk Management
 - Vinnies Services

Policies relevant to modern slavery include:

SVDP NSW

- Modern slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework

OUR GOVERNANCE FRAMEWORK

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the company. The Board is supported by four advisory committees.

The Board of Directors of St Vincent de Paul Society NSW, through its Audit, Risk and Finance Committee has oversight of the modern slavery risk management program. It is responsible for:

- overseeing the development of the annual Modern Slavery Statement
- monitoring any identified risks and advising the Board on the mitigation of such risks
- providing updates to the Board, in accordance with the Risk Management Framework.

Responsibility for implementing modern slavery obligations is:

- The Chief Financial Officer has overall responsibility for the organisation's Procurement Policy and procedures and ensuring that the organisation's procurement practices have the necessary risk mitigation controls and chairs the cross-functional Modern Slavery Working Group (MSWG) which drives the modern slavery work in the Society in NSW
- The Director Governance, Risk and Safeguarding is responsible for organisational governance and ensuring

Trustees of the Society of St Vincent de Paul (NSW)

St Vincent de Paul Society NSW also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its compliance with the Modern Slavery Act 2018 (Cth).

St Vincent de Paul Housing Board

The St Vincent de Paul Housing Board is assisted, by its Governance and Risk Committee, to maintain compliance with corporate governance standards. The Board has responsibility for modern slavery oversight.

The St Vincent de Paul Housing Board has engaged Amélie Housing to manage the portfolio of St Vincent de Paul Housing. This work is carried out by a staff of 40 (65% female and 35% male) whose roles are in the provision of specialist corporate services, housing service and tenancy management. Amélie Housing a National Tier 1 Community Housing provider created by SVDP member councils, operating in NSW, ACT, SA & TAS.

Amélie Housing's Chief Executive Officer (CEO) and Chief Operations Officer (COO) have contractual responsibility for procurement in respect of St Vincent de Paul Housing. The Chief Operations Officer is responsible for organisational governance and ensuring that governance policies and procedures are current, including the modern slavery Policy.

OUR FOOTPRINT

We are an organisation focused on serving the most disadvantaged, including people at risk of modern slavery.

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our employees and volunteers are organised into five regions: West, North West, North East, Metropolitan and South.

Conference Work

Our members are the face of the Society in communities across NSW and work in Conferences, which are mostly connected to Catholic parishes. Conference members visit people in their homes, nursing homes and hospitals. Members connect with people where they live, providing practical assistance such as food and shopping vouchers, furniture and clothing, and help with other living costs such as medical bills or back-to-school costs. Importantly they accompany people through their times of hardship.

Emergency Response

Our broad geographic reach across the State means we are well placed to respond quickly to natural disasters, such as drought and bushfires, and deliver emergency assistance.

Vinnies Services

Our professional services include social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol recovery programs.

Advocacy

Through our advocacy work we promote policies and initiatives to lift people out of poverty and homelessness. We have well established partnerships with other organisations to achieve our joint objectives.

Retail

The Society operates 221 Vinnies Shops and six distribution centres across NSW. Our retail network remains a vital source of revenue to enable programs and services operated by the Society; the Vinnies Shops network raised \$78.314 million in sales revenue for the 2022/23 financial year.

Commercial Enterprise and Fundraising

We are a NSW Return and Earn Scheme collection partner for eligible containers and operate eight sites. Vinnies re/Cycle collection is an eco-friendly range of blankets, throws, rugs, and cushions made from recycled textiles and materials and sold in Vinnies stores.

Social and Affordable Housing

As a provider under the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing provides 357 units for social housing and 145 - affordable housing tenants.

CENTRAL COUNCIL MAP



WEST

Wilcannia-Forbes Diocese

NORTH WEST

Armidale Diocese
Bathurst Diocese

NORTH EAST

Lismore Diocese
Maitland/Newcastle Diocese

METROPOLITAN

Parramatta Diocese
Broken Bay Diocese
Sydney Diocese

SOUTH

Wollongong Diocese
Wagga Wagga Diocese



OUR SUPPLY CHAIN

In support of St Vincent de Paul Society NSW Vision to assist people within our community who need ‘a hand up’, and our Mission to shape a more just and compassionate society, we engage with many suppliers to provide a diverse range of goods and services. Building collaborative and transparent relationships with our suppliers is critical to ensuring the best outcomes in our work and our commitment to identifying and addressing modern slavery.

An assessment of modern slavery and its associated risks forms a part of our procurement processes when engaging with any large new or potential suppliers. We are continually refining our procurement processes to ensure that this is consistently applied across our diverse organisation.

Consistent with previous reporting periods, St Vincent de Paul Society NSW and Amélie Housing’s supplier base remains diverse. For the 2023 reporting year, we have continued to procure goods and services from the following 12 main categories:

- building and constructions services
- cleaning and security services
- events and event management (fundraising agency, digital and creative services)
- facility management and property maintenance
- food and catering
- furniture, office supplies and other consumables
- linen, laundry, and textile products
- motor vehicles and fleet management services
- professional services
- skilled labour hire
- technology services – hardware and software, and network services
- waste management services

REPORTING CRITERIA 3

Modern slavery risks in operations and supply chain

MODERN SLAVERY RISK MANAGEMENT INITIATIVES

Operational Risk

Our core purpose is the provision of support and assistance to people in need by offering a hand up, rather than a handout. We comply with labour, employment, work health and safety and whistle-blower laws. Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020 and ongoing review, we consider our operations do not cause or contribute to modern slavery. However, having regard to the nature and location of our suppliers we do have some areas of vulnerability, such as: cleaning and security services, waste management services, building and construction, facility management and property maintenance.

Our People

The work of the Society de Paul Society NSW is carried out by approximately 12,000 members and volunteers supported by approximately 1,400 employees. We have a predominately female workforce, 59% of members, 76% of volunteers and 65% of employees are women. New employees complete an induction that includes our Code of Conduct, Respectful Workplace and Anti-Discrimination and Equal Opportunity while existing employees undertake refresher training. The eLearning module, *My Introduction to Modern Slavery* is available to employees.

The majority of the Society's employees are covered by awards and are paid at or above the pay rate for their award classification. Managers or professionals not covered by any award are protected by the National Employments Standards regarding their pay and hours worked. Compliance with awards and statutory entitlements is checked each year. Any employee is free to join a union. A small number of employees holding visas were employed in 2023 and their visa status is noted during the recruitment process.

Where we engage agency staff who are not employees of the Society, we require those companies to have a modern slavery Policy and other policies relating to fair employment conditions to minimise the risk of unlawful treatment and ensure the wellbeing of their staff.



SUPPLY CHAIN RISKS

St Vincent de Paul Society NSW is aware that modern slavery can occur in any industry and in any country and can take many forms. Common forms of modern slavery include human trafficking, forced labour, debt bondage, child slavery, forced marriage or domestic servitude.

Mapping our suppliers and analysing our supply chain to determine our risk has continued to be a priority for 2023 taking into consideration:

- **Industry risk:** Specific industry sectors deemed as high risk in international and national guidance documentation. For example: industrial cleaning, textiles, construction.
- **Commodity/product risk:** Specific products and commodities deemed as high risk by the US Department of Labor's 2022 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials. The products and commodities would be assessed as high risk due to the way they are produced, processed or used and include sugarcane, cotton, coffee, tobacco, cattle, rice and fish.
- **Geographic location:** Based on estimated prevalence of modern slavery and the government responses as outlined in the 2023 GSI. Most of our suppliers are Australian based; however, we acknowledge that a number of suppliers have an international presence and may in turn purchase goods and services or conduct activities from regions other than those of suppliers' headquarters.

- **Workforce profile:** In undertaking our supplier analysis we 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).

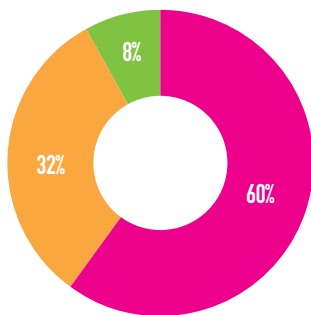
The graph illustrates the modern slavery risk ratings by our highest spend categories.

Of the 10 supplier categories that represent our greatest spend, food and catering, building and construction, finance and investment, facility and property maintenance, cleaning and security, furniture and office supplies categories are considered high-risk.

60% of the total spend analysed is considered high risk, and comprises more than 357 suppliers from 10 supplier categories:

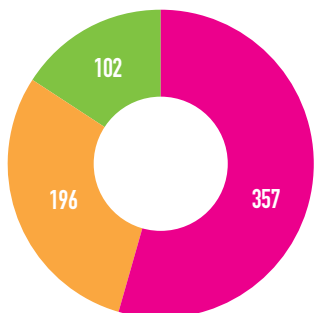
- property and facility maintenance
- cleaning and security
- waste management
- furniture and office supplies
- food and catering
- finance and investment
- building and construction
- linen, laundry and textile products
- medical devices and supplies
- events and event management

RISK BY SPEND



■ High risk ■ Medium risk ■ Low risk

SUPPLIERS BY RISK CATEGORY



■ High risk ■ Medium risk ■ Low risk

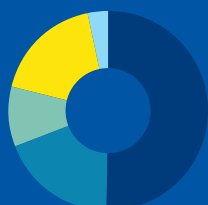
RISK RATINGS BY HIGHEST SPEND CATEGORIES



MEMBER SNAPSHOT

Gender of Members

● Female	2,292
● Male	1,587
● Unknown	32



Members by Region

● Metropolitan	1,972
● North East	735
● North West	386
● South	696
● West	122

Age of Members

0-17	54
18-29	381
30-39	173
40-49	221
50-59	339
60-69	797
70-79	1344
80-89	538
90+	35
Unknown	29

OUR PEOPLE

Members

The Society has more than 4000 members serving people in need in local communities throughout the state. Our members live and work in these communities and meet regularly as part of Conferences, which are primarily associated with Catholic parishes or other institutions such as universities or schools.

Members are at the forefront of our work performing visitations to the homes of people we assist, providing household items, food vouchers and parcels and taking the time to listen and be present with people during times of hardship. Many of our members see their work as an opportunity to live out their faith by doing good works.

Volunteers

Volunteers play an invaluable role in enabling the Society to make a difference in the lives of people every single day. We are incredibly grateful for the time and effort that our volunteers devote and hope that they find purpose and communal spirit in their work.

Over 7,000 volunteers help raise vital funds for our services and programs through our network of Vinnies Shops, while more than 2,500 additional volunteers support our good works across other functions, such as preparing and serving meals on our food vans and at our services





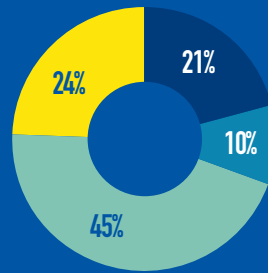
Employees

The Society employs over 1,400 people in various roles across our services in homelessness, health, community development, disability support and more, as well as providing essential administrative functions including fundraising, commercial enterprise, pastoral care, human resources, governance and policy, finance and communications.

We greatly value the commitment and dedication of our employees and aim to create a working environment that encourages people to make an impact over many years, such as our nearly 250 employees who have worked as part of the Society for more than a decade. We are proud to have a diverse workforce with a spread of ages, genders and cultures.

We are committed to providing our employees with safe and respectful workplace that allows them to contribute directly to our mission of shaping a more just and compassionate society for all.

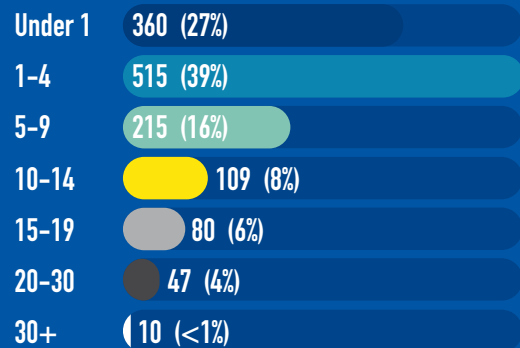
EMPLOYEE SNAPSHOT



Employment Type

Casual	280
Fixed Term	130
Full-time	602
Part-time	324

Years of Service



People Who Joined Us



YEAR	2022/23	2021/22
Total	507	453

People Who Left



YEAR	2022/23	2021/22
Total	445	366

REPORTING CRITERIA 4

Actions taken to assess and address risk



At St Vincent de Paul Society NSW we are committed to making continuous improvement with our practices to identify and address modern slavery. Our primary focus throughout 2023 has been on continuing to develop and embed actions initiated in previous years.

We welcomed three new members to the working group from our Vinnies Services and Members and Volunteers directorates. The inclusion of these representatives to our MSWG will provide us with opportunities to raise awareness among our frontline employees, members and volunteers about modern slavery. This will enable people across the Society to readily identify those we assist who may be at risk of or are experiencing modern slavery and provide them with the right support and referrals.

We participated in ACAN events and leveraged their professional support and advice including:

- 10 monthly ACAN meetings
- ACAN and SEDEX Audit Forum 2023
- ACAN supplier webinar series

Within our operations, our actions included engaging with other organisations and internal stakeholders to boost collective efforts to combat modern slavery:

- Staff from our Housing and Homelessness Service participated in a project of the Sydney Catholic Archdiocese Australian Catholic Anti-Slavery Network (ACAN) to undertake an environmental scan of ACAN entities in health care, education and community services focused on their approach to identification and response to modern slavery across their patient/client populations
- We led an information session on modern slavery at a Charitable Recycling Australia (CRA) meeting. CRA is the national network of charitable purpose-driven reuse and recycling enterprises, and membership consists of over 20 charitable organisations across Australia and St Vincent de Paul Society NSW is a member in CRA because of our retail network
- Continued to increase awareness of modern slavery among our people, through ongoing training and communications with an increase in training among Amélie Housing staff
- Hosted an online launch of the 2022 Modern Slavery Statement in July 2023, in conjunction with our Social Justice Team, to align with the UN World Day Against Trafficking in Persons with an address by the St Vincent de Paul Society (NSW) State President and featured Alison Rahill from ACAN as guest speaker. The launch was also attended by members of our Social Justice Network, members and staff of the Society and representatives from CRA.
- The Executive Leadership Team and MSWG were represented at the *Modern Slavery: Leadership and Accountability for Social Change* hosted by the University of Notre Dame Australia (UNDA), this event brought together Catholic entities from diverse sectors, including education, health and the charitable sector and highlighted areas of cooperation with similar organisations outside the ACAN network.
- Participated in the Modern Slavery Sector Networking event in October 2023. The Anti-slavery Commissioner for New South Wales, Dr James Cockayne, was the guest speaker

We commenced a project to build a new Members and volunteers Management system to:

- Provide better oversight and efficiencies for our members and volunteers.
- Ensure regulatory compliance

- Ensure workforce compliance
- Better facilitate the rollout of learning and development training – e.g., code of conduct, modern slavery awareness, etc.

We commenced a project to build and implement a new Human Resources Information Management System (HRIS). This will:

- Provide better oversight and efficiencies for our employees
- Ensure regulatory compliance
- Ensure workforce compliance
- Better facilitate the rollout of learning and development training – e.g., code of conduct, modern slavery awareness, etc.
- For our Supply Chain, actions included:
 - Increased organisational awareness of our obligations under the Modern Slavery Act 2018 (Cth)
 - Increased capability to oversight and track a suppliers' risk and monitor anti-modern slavery terms and commitments
 - Engaged and assessed the risk of existing and potential suppliers of textiles and textile processing in off-shore locations (India, China and the United Arab Emirates). In most instances these discussions are ongoing as we seek to understand more about the suppliers operations and treatment of their workers.
 - Aligned policies with our obligations under the Modern Slavery Act by introducing an updated Procurement Policy and associated procedures. The policy now includes key principles and required approaches to procurement activities such as assessment of risk, including the risk of modern slavery. It also provides detailed guidance with relation to conducting appropriate due diligence on suppliers.
 - Continued to ensure anti-modern slavery contract clauses are included in our supplier agreements. The clauses agreed with suppliers require a commitment from suppliers to have appropriate policies and procedures in place to assess and address risks of modern slavery within their own operations and supply chains.
 - Communication of our Supplier Engagement Principles, which set out our standard of behaviour for the third-parties we engage with, when engaging and onboarding new suppliers.

During 2023 we undertook significant procurement projects, particularly within the ICT category. Our tender documentation includes information about modern slavery and seeks relevant information from respondents, which is assessed as part of the tender evaluation process. The evaluation template we use to determine

the successful respondent includes a score for the respondent's approach to environmental, social and governance (ESG) management within their organisation, including modern slavery.

Although we are continuing to consolidate and conduct procurement activities centrally via the strategic procurement function, as our organisation footprint stretches across metropolitan, regional and remote New South Wales, a significant amount of operational spend and supplier engagement takes place throughout the organisation and across NSW without the involvement of the procurement team. Consequently, we continue to interact with a high volume and broad mix of suppliers with relatively low spend.

Given our diverse supplier profile, the necessity to increase awareness of modern slavery and our commitment to mitigate and address modern slavery within our operations and our supply chain remain an integral part of our program. We also continue to maintain a strong position on internal education by training key individuals responsible and accountable for our supplier relationships.

During 2023, our Finance directorate completed a project to introduce a new enterprise resource planning (ERP) system. This has enabled Procurement to access valuable supplier data and generate insights relevant to the analysis of our supply chain and supplier risk. The automation of a previously manual activity of supplier mapping to categories of spend provides efficiencies to the Procurement team and allows them to utilise the insights generated for more high-value activities.

Key activities in 2023 have included:

- Ongoing implementation of our centralised contract management register, with a focus on building internal awareness and implementation of consistent contract review, execution and storage processes
- Continued internal advocacy for the utilisation of contract templates that include modern slavery clauses.
- Conducting reviews and audits of some high-risk suppliers to understand their supply chains and how they are assessing, identifying, and mitigating their modern slavery risk. Through this process and gaining exposure to the auditing process we've developed a deeper understanding of the process and how to identify risks effectively.
- In support of continued growth and development, attending external training to participate in diverse conversations about suppliers and conducting effective social compliance audits. A highly valued aspect of the training included auditors describing the role they play in relation to modern slavery, the best ways to utilise and interpret audit results and how to monitor and close-out corrective actions.



We have previously assessed and identified that the modern slavery risk within our supply chain predominately sits within the following categories:

- facility management and property maintenance
- cleaning and security
- building and construction
- waste management
- linen and textiles

Suppliers within these high-risk industries are an ongoing focus. We have continued to engage with them, increasing their awareness throughout the process. We have several active procurement projects underway to consolidate and appoint preferred suppliers, particularly in the categories of labour hire, office supplies and security.

Consideration of the risk of modern slavery is now embedded into our standard procurement due diligence process when seeking new sources of supply. This was formalised with the introduction of the revised Procurement Policy. During 2023, when engaging with potential new suppliers, particularly those that operate in high-risk industries or regions.

As our supplier base is large and diverse, ranging from top tier banking and financial firms to family owned and operating cleaning companies, there is a broad spectrum of supplier awareness of the Modern Slavery Act 2018 itself and the intent of the legislation. Where suppliers

are not aware of the Modern Slavery Act 2018, we seek to provide them with educational material and work with them to understand the risks in their supply chain. Due to the volume of our suppliers, this activity will necessarily continue to take place over a number of years. We will continue to prioritise review and engage based on both the value and nature of the supplier engagement with the Society. This has included reviewing social audit documentation and having detailed discussions with suppliers about their supply chain and operations. Many of our suppliers have confirmed their awareness of the legislation and steps taken to address modern slavery including:

- Certifications e.g., Chain of Custody; ISO 9001:2015
- Grievance procedures, including whistleblower policies and hotlines
- Ethical sourcing policy and practices
- Memberships of organisations to help them achieve supply chain transparency, such as Suppliers Ethical Data Exchange (SEDEX)
- Modern slavery and Human Rights Policy
- Modern Slavery Statements
- Practices to reduce the risk of modern slavery
- Supplier code of conduct
- Training for their employees on modern slavery

Our supplier engagement activities during 2023 included:

- Assessing modern slavery risk each time we've onboarded a new supplier following a Request for Proposal process.
- Including anti-modern slavery clauses in contracts, for new contracts and contracts that are renewing as necessary.
- Encouraged our suppliers to join SEDEX
- Inviting our suppliers to attend ACAN webinar suppliers' sessions as appropriate
- Monitoring relevant government and industry advice in respect of modern slavery and best practice for mitigating operational and supply chain risk.

Modern slavery Risk Management Initiatives

As a values-based organisation, the St Vincent de Paul Society NSW has an ongoing commitment to further enhancing its practices to help combat modern slavery.

Initiatives we are undertaking in 2024 include:

- Development of a multi-year action plan including governance review and internal audit to enable us to better measure and track our progress and effectiveness
- Further internal training and awareness including development of Procurement training module
- Labour hire policy and review (joint People and Culture and Procurement)

Grievance Mechanism and Remediation

Through Domus 8.7, the Society has access to a remediation service. Domus 8.7 provides case assessment, management, coordination and referrals for people impacted by modern slavery. Domus 8.7 seeks to enable effective remedy and prevent future impacts by working with victim survivors and the businesses they are connected with to understand and address any business practices contributing to worker abuse.

St Vincent de Paul Society NSW and St Vincent de Paul Housing are committed to providing appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SVDP NSW or SVDP Housing is found to have caused or contributed to modern slavery.

Where SVDP NSW and SVDP Housing are directly linked to modern slavery by a business relationship SVDP NSW and SVDP Housing are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. We include remediation obligations and expectations in contracts with high-risk suppliers who must notify and consult with SVDP NSW and SVDP Housing to ensure victim centred remediation processes are implemented to the satisfaction of SVDP NSW or SVDP Housing.

The Society has an Internal Grievance Policy and Procedure which allows Society personnel to raise workplace-related concerns and a **Whistleblower Policy** under which they can report any suspected wrongdoing. There is a confidential Whistleblower hotline and email facility which is managed and staffed by an external independent third party.

Our website contains information on how to provide feedback and/or submit a complaint regarding any St Vincent de Paul Society NSW services and shops.

Through these policies and measures we aim to ensure the safety and wellbeing of all Society personnel and ensure they are not at risk of modern slavery. When indicators of modern slavery practices come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

SVDP NSW and SVDP Housing have deployed a "Grievance Mechanisms and Remedy Pathways" module in its modern slavery E-Learning course.



REPORTING CRITERIA 5

Effectiveness assessment

Following an organisational restructure in 2019, the St Vincent de Paul Society NSW has adopted a 'One Society' approach our work, enabling us to increase governance, risk and compliance capacity at an enterprise level. The ongoing work of the Society to identify and manage modern slavery risks will be enhanced by ongoing capacity building as we seek to measure the effectiveness of the progress that has already been made since the inception of our Modern Slavery Risk Management Program.

We have ensured that appropriate oversight of our responsibilities and commitment to addressing modern slavery is part of our governance framework. Our Modern Slavery Action Plan is reviewed by the Audit, Risk and Finance Committee and by the St Vincent de Paul Housing Governance and Risk Committee. We have modern slavery policies and, our Risk Management Framework which sets out the Society's approach to risk management, specifically addresses the risk of modern slavery.

We have improved the following aspects of our effectiveness in managing the risk of modern slavery:

- **Management Systems** – the implementation of two new business systems (for Members and our Human Resources Information System)
- **Risk Management** – risk assessments have been conducted before commencing new initiatives. We are implementing an Integrated Risk Management System. This has increased our capacity to manage risks, incidents and complaints, providing greater efficiency in our risk management processes and providing additional pathways through which concerns about modern slavery may be assessed
- **Procurement and Supply Chain** – we introduced a new Procurement Policy in 2023 which is a significant step in progressing our effectiveness to address modern slavery in our supply chains as it forms a strong foundation for our procurement activities. This has increased the development and adoption of contract templates incorporating modern slavery clauses and consolidation of purchasing patterns, particularly in high-risk categories, towards preferred suppliers. This is also enabling more effective risk management of suppliers.

REPORTING CRITERIA 6

Process of consultation with entities owned or controlled

Members of the cross-functional MSWG responsible for the Modern Slavery Risk Management Program include representatives from St Vincent de Paul NSW and St Vincent de Paul Housing. In 2023, regular meetings of the working group enabled an increase of momentum and allowed a more mature understanding of how modern slavery impacts our operations. Modern slavery risks are increasingly being considered in decision making and the assessment of new opportunities.

The entities work collaboratively to address modern slavery and have similar policies.

This Modern Slavery Statement was reviewed and approved by the cross-functional working group before presentation to the Board of St Vincent de Paul NSW and Board of St Vincent de Paul Housing for approval and signature.

REPORTING CRITERIA 7

Other

St Vincent de Paul Society NSW is engaged in responding to modern slavery beyond the scope of the Commonwealth Modern Slavery Act 2018:

- Since 2008, Vinnies NSW has operated **North Coast Settlement Services (NCSS)** in Northern NSW. NCSS assists humanitarian migrants and other selected visa holders including dependants of temporary migrant workers, who may be survivors or people at increased risk of modern slavery and severe labour exploitation, to build local connections and to access mainstream services and supports which include:
 - Emergency financial relief
 - Education, employment & housing assistance
 - Rights education
 - Referral to legal support
 - Consular assistance
 - Advice and advocacy

- Our members support various programs to help developing countries within our region. This includes the Twinning Program which establishes close working relationships with St Vincent de Paul Societies in developing countries. Projects generally are under AUD 2,000 in value and are designed to build capacity or assist community members to earn an income where the twinned conference operates.
- Projects may include cow and goat banks, water systems, tailoring and other small livelihood programs. Projects may also provide technical skills through education and training or support small enterprises in areas such as garment making, fishing, and food production through farming.
- The Assist a Student Program which helps disadvantaged primary, secondary or tertiary students in a partner country within the Asia Pacific region.
- Twinning and the Assist a Student Program help build capacity and resilience in developing countries and boost opportunity. These programs help to address the root causes of modern slavery and reduce vulnerabilities in the communities in which they operate.

APPENDIX

POLICY PRINCIPLES

(Extracted from our procurement policy)

All Procurement activities must align with the underlying principles of the Society as stated in its Mission, Vision, Values and Strategic Plan. In addition, the following principles apply to all procurement activities:

Value for money – Procurement decisions should be based on achieving the best value for money. This means considering not only the upfront costs but also the quality, whole of life costs, and long-term benefits of the goods or services being procured.

Fairness and equity – Society Personnel must ensure open and effective competition, impartiality, consistency and fairness of process, accountability, transparency, security and confidentiality. This includes the identification and management of any actual, perceived, or potential conflict of interest in accordance with the Conflict of Interest Policy, and application of segregation of decision making and duties where appropriate.

Safety – We aim to purchase safe goods and services. Potential safety implications must be a consideration in all procurement decisions.

Integrity – Procurement processes should be conducted with integrity, honesty, and ethical behaviour.

Efficiency and effectiveness – Procurement processes should be efficient and effective, aiming to streamline procedures, reduce unnecessary bureaucracy, and deliver timely and cost-effective outcomes.

Risk management – Society Personnel must identify, consider, and appropriately mitigate the risks (including safety risks) involved in any purchase or supplier engagement. Risk identification and assessment should be performed with reference to this policy and the Society's Risk Management Framework.

Compliance – Procurement activities and supplier engagements must comply with applicable laws, regulations, WHS measures and guidelines, and internal policies. Careful consideration should be given to supplier engagements which involve the use or disclosure of personal information relating to the Society's personnel, members, volunteers or people we assist, to ensure compliance with applicable privacy laws.

Sustainability – Sustainability and social responsibility must be considered in all procurement activities. This includes taking steps to identify, evaluate and minimise the risk of modern slavery in the Society's operations and supply chain. Purchasers should take steps to evaluate and select suppliers that support and strengthen the Society's social, ethical, and environmental commitments. This should include consideration of opportunities for First Nations people, people with disability, disadvantaged or other marginalised groups.

Continuous Improvement – Regular reviews, feedback mechanisms, and learning from past experiences can help identify areas for enhancement and drive better outcomes.



St Vincent de Paul Society
QUEENSLAND
good works



Modern Slavery Statement

1 January 2023 to 31 December 2023

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Acknowledgement

We acknowledge the Aboriginal and Torres Strait Islander peoples of this nation. We acknowledge the traditional custodians of the lands on which our organisation is located and where we conduct our business. We pay our respects to ancestors and Elders, past and present. We are committed to honouring Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters, and seas.

Disclosure Note

St Vincent de Paul Society Queensland is an entity incorporated by "Letters Patent" under the Religious, Educational and Charitable Institutions Act 1861 (Amended 1895) (QLD). The Statement was approved by the St Vincent de Paul Society Queensland State Council and St Vincent de Paul Society Queensland Housing Board.

Responsibility for this document rests with St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing.

Privacy statement

St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing respects the privacy and dignity of the people it assists, our members, volunteers, and employees. For more information about how the Society manages privacy information please refer to our Privacy Policy on our website.

- St Vincent de Paul Society Queensland ABN 14 211 506 904
- St Vincent de Paul Society Queensland Housing ABN 31 618 167 632

Version Number	Date	Description
FINAL	25 May 2024	Approved

Modern Slavery Statement Approval and Signature

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth) (“the Act”). It is submitted by St Vincent de Paul Society Queensland (SVDP QLD) and St Vincent de Paul Society Queensland Housing (Vinnies Housing), in this statement being referred to as “the Society”. It describes the steps taken by us to prevent, detect and respond to modern slavery risks in our operations or supply chain during the reporting year ending 31 December 2023.

It is submitted as a joint statement by the following reporting entity:

St Vincent de Paul Society Queensland

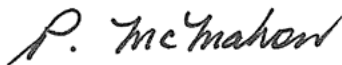
ABN: 14 211 506 904

St Vincent de Paul Society Queensland Housing

ABN 31 618 167 632

Ozcare, a special works of the Society, has issued its own modern slavery statement for year 2023.

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society Queensland and St Vincent de Paul Society Queensland Housing as defined by the Act.



Patricia McMahon, State President

St Vincent de Paul Society Queensland

Greg Coghlan, Chair

St Vincent de Paul Society Queensland
Housing

25 May 2024

Reporting Criteria 1: About St Vincent de Paul Society Queensland

St Vincent de Paul Society is an international, voluntary, lay Catholic organisation dedicated to tackling poverty and disadvantage by providing assistance to people in need.

The St Vincent de Paul Society Queensland (SVDP QLD) has been operating in Queensland since 1894 as an international, voluntary, lay Catholic organisation dedicated to supporting and assisting people in need. We exist as a member-first organisation, devoted to the prevention of poverty and homelessness, and work to holistically support those experiencing disadvantage to regain sustainable independence by providing them with a hand up, not just a handout.

Our Vincentians (Members belonging to community-based Conferences), Volunteers, and Staff work together to assist those in need with a variety of support services. Our support varies from in-home visits, housing and homelessness support, domestic violence assistance and welcoming people to our support centres, through to generous Government and Society-funded specialist services and programs.

Vinnies Housing is a wholly owned subsidiary of SVDP QLD whose mission is to relieve poverty, distress, and disadvantage through a renewed and strengthened focus on the provision of subsidised housing options and affordable housing and support services to people experiencing housing stress, who are homeless or at risk of homelessness.

Ozcare is another wholly owned subsidiary of SVDP QLD. Ozcare improves people's quality of life through the delivery of personalised health and aged care services, in the spirit of St Vincent de Paul Society Queensland.

Our Mission

We are a lay Catholic organisation aspiring to live the Gospel message by serving Christ in the poor with love, respect, justice, hope, and joy, and by working to shape a more just and compassionate society.

Our Vision

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

Our stakeholders

At the core of our work are the people we assist, our Vincentians, volunteer members, employees, and donors. These are the people who have enabled our good works to continue for the past 126 years. The commitment and compassion of our people empowers them to gain insight into local community needs and issues. Without the generosity of our loyal donors and customers the resources to provide required levels of assistance Queenslanders in need would not be available.

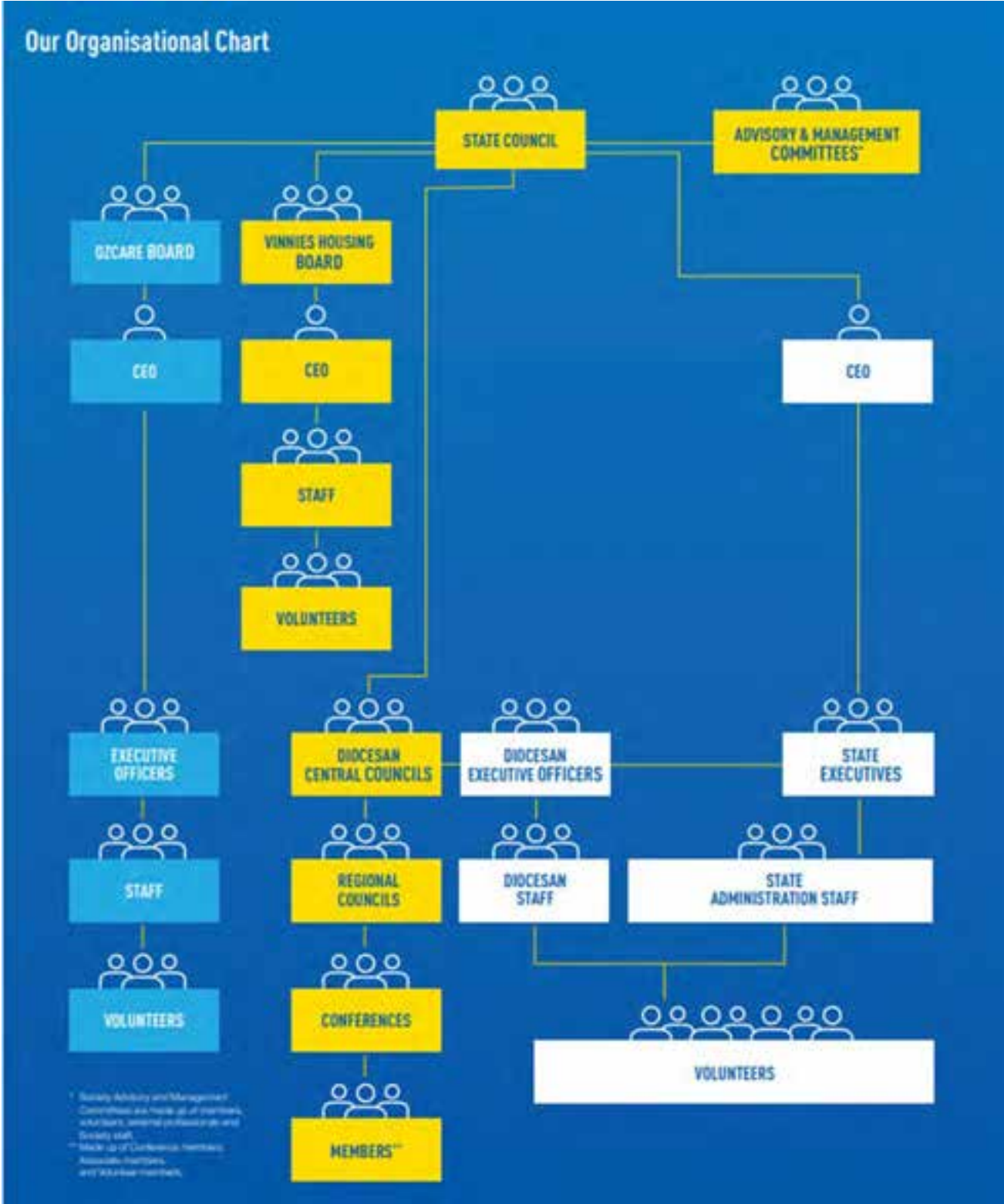
2023 Modern Slavery Risk Management Initiatives

In the reporting period, we continued developing our modern slavery framework, which includes developing our operation and supply chain risk management processes in line with industry best practice.

We have analysed our suppliers' data under different high-risk categories and assessed potential modern slavery risks in our operations and supply chain. This has helped us to begin planning what is required to bridge the gap in 2024 and beyond. The cornerstone of the reporting year was conducting the risk analysis on our significant supplier base.

We have also developed a high-level supplier engagement strategy and implemented key stakeholder training. Most importantly, we continued the conversation and brought awareness of modern slavery to key staff members and suppliers.

Reporting Criterion 2: Our Structure, Operations and Supply Chains



Our Governance Framework

We rely on our Boards to effectively govern the various activities and relationships that make up our organisation. Good governance is embedded in the practices and procedures that help our people do their work effectively and openly in an environment where their roles and responsibilities are clearly understood.

Legal Structure

St Vincent de Paul Society Queensland (SVDP QLD) is incorporated by Letters Patent pursuant to the Religious Educational and Charitable Institutions Act 1861. This entity is charged with responsibility for providing the organisational structure and support for its members to carry out our charitable work in Queensland.

Vinnies Housing is a wholly owned subsidiary of SVDP QLD incorporated under the Corporations Act 2001 (Cth). SVDP QLD holds reserve powers to ensure that at all times Vinnies Housing acts within the philosophy, mission and values of the Society. This includes SVDP QLD appointment of board members, the majority of which will be Vincentians and approval of the strategic direction of Vinnies Housing.

Membership

SVDP QLD has three categories of membership: Conference members (also called Vincentians) join in Conferences. They seek to live out their faith and voluntarily offer their time, expertise, and support for the delivery of our good works. Conferences may be established within a parish, town, suburb, school, workplace, or social group. Any person registered as a Conference member has voting rights in relation to the affairs of SVDP QLD. Associate members also live out their faith in action but do not attend Conference meetings nor have voting rights. Volunteer members are those who respect the ethos and mission of SVDP QLD and who volunteer in any of its works or programs.

Boards

The State Council of SVDP QLD consists of the President and Vice Presidents, Diocesan Central Council Presidents, State Treasurer, Youth Representative, Spiritual Advisor and State Secretary. The State Council established a State Administration Office, overseen by the Chief Executive Officer, to which it delegates various corporate and operational functions. To assist with decision-making, the State Council is also supported by advisory committees established to manage activities requiring specific capability and expertise. The State Council is ultimately responsible for the overall governance of SVDP QLD, its subsidiaries and all its Councils and Conferences. The President of State Council is SVDP QLD's representative on the National Council of The St Vincent de Paul Society in Australia.

The Board of Vinnies Housing consists of a Chair and Directors, with a majority being members of SVDP QLD. The Board is ultimately responsible for the overall governance of Vinnies Housing.

Remuneration

Our Board members do not receive payment for their services. Their positions are voluntary. However, some members are provided with the use of a fleet vehicle to facilitate travel and are reimbursed for costs they incur to attend meetings, or while performing the duties associated with their roles.

Risk Management

Our Boards oversee the establishment, implementation, and review of the organisational Risk Management Framework. The framework includes the following documents: Risk Management Policy; Risk Management Strategy and Risk Registers.

Our Risk Management Policy sets out the principles that all levels of our operations need to comply with in managing risk. The Audit and Risk Committee is the key advisory committee with oversight of our risk management practices.

Our Modern Slavery Governance Framework

Consideration of modern slavery risks will form part of our risk management framework which will be reviewed and managed accordingly.

We have appointed a Modern Slavery Liaison Officer (MSLO), who leads the modern slavery working group.

The working group consists of key stakeholders throughout the organisation, including:

- General Manager – CFO & Business Services
- General Manager – People & Safety
- General Manager – Programs
- General Manager – Operations
- General Manager – Governance and Risk
- CEO – Vinnies Housing
- Head of IT
- State Transport and Logistics Manager
- Procurement – Procurement Manager (MSLO)

Our Operation

We aspire to be recognised as a caring lay Catholic charity offering a hand up to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

In SVDP QLD, we provide a range of:

- family support centers to help build capacity for families dealing with cost of living and financial support needs.
- centres of charity, widely known as “Vinnies Shops”.
- housing solutions including homeless intervention and prevention services and crisis accommodation.
- drug and alcohol recovery.
- disaster relief for people impacted by disasters.
- aged and disability services to help people stay in their homes for as long as possible.
- financial wellbeing services.
- food distribution.
- child and family support services, focusing on intervention to families to improve the safety and wellbeing of children in their home.
- migrant and refugee services.
- youth services assisting disadvantaged young people; and
- education and employment, by providing people who have experienced homelessness or hardship the chance to complete vocational and tertiary certificates.

In addition, Vinnies Housing works to relieve poverty distress or disadvantage by:

- providing subsidised housing options to those in need including people requiring accommodation, people with complex and specific needs, people in disadvantaged target groups and those on very low household incomes.
- providing affordable housing and support services to people experiencing housing stress, homelessness or at risk of homelessness.

LOCAL SUPPORT ACROSS QLD



A Helping Hand... wherever you are

Our Members, Staff and Volunteers support communities all over Queensland, from major cities to remote towns. Our Society in Queensland consists of eight Dioceses who each service their own region of the state.

DIOCESAN CENTRAL COUNCIL	MEMBERS	CONFERENCES	VOLUNTEERS	VINNIES SHOPS	HOMELESS HOSTELS*	VINNIES HOUSING PROPERTIES	AGED CARE FACILITIES
Far North Queensland	115	10	192	13	1	19	2
Townsville	234	19	536	20	2	17	2
Rockhampton	225	27	404	25	3	85	2
Northern	514	25	499	20	0	74	3
Brisbane	491	37	576	14	1	44	1
Western	427	30	520	16	0	52	1
South Coast	377	27	662	23	0	74	5
Toowoomba	213	27	486	16	2	119	1
TOTAL	2,596	202	3,875	147	9	484	17

* Our Society operates several domestic violence shelters across Queensland. For privacy, their locations have been withheld from this table.

Our Supply Chain

We purchase the majority of our goods and services at a local level from Australian suppliers, however we do import some products from overseas. We have inspected manufacturing facilities from some of our overseas suppliers and have the ability to conduct audits.

Our key categories of spend are:

- Property and facility maintenance (FM)
- Building, construction, and fabrication services
- ICT Software, Hardware, and support services (ICT)
- Food and Assisted Accommodation
- Motor Vehicle Fleet (including maintenance and services)
- Furniture and Office Supplies
- Waste management
- Utilities
- Professional services

We have been categorising our supply chain to identify areas of higher risk and will continue to develop the taxonomy to allow for open and honest reporting.

We have more than 1,510 suppliers on our books ranging from tactical suppliers, through to cooperative, strategic and partners/alliances. Some suppliers have been providing services to us for a long period of time, with others being new to our operations.

Our key strategic suppliers are managed via informal performance management and relationship measurement tactics, giving our supply chain a good understanding on organisational culture similarity, corporate alignment, stability, and mutual understanding.

Our policies and procedures prescribed supplier onboarding processes and due diligence, including review, where appropriate, of the following:

- Business registration
- Insurance
- Licensing
- Safe work practices and systems
- Police checks (for those who might work onsite in the homes of vulnerable persons)
- Annual reviews
- Financial delegations
- Conflict of interest
- Whistleblower policy
- Modern Slavery statements and policies
- Modern slavery risk management capabilities and membership

We are also working to increase the transparency of our supply chain to increase visibility of emerging risks. We have visibility of our direct tier one suppliers but acknowledge there is a need to bridge the gap for other suppliers.

Our People

We have a diverse workforce to support the 'good works achieved through the organisation's services and programs in accordance with our mission.

Effective systems have been implemented to ensure fair and transparent policy and procedures are implemented to ensure we comply with industrial relation legislation and best practices.

Employees are engaged under an Employee Agreement that complies with relevant legislation. Senior Executive Managers are employed under contractual arrangements that have been reviewed by external legal consultants and bench marked by external providers. We also regularly review employee remuneration practices.

Our people are engaged in regular surveys and feedback process. Feedback process is outlined in the organisation Complaint and Compliment framework policy.

Our people are required to adhere to the organisation Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments,

Policy and procedures are reviewed regular to ensure best practices and compliance requirements are met. Staff are trained on policies and procedures though our Learning Management system.

2,596 OUR MEMBERS

Our 2,596 Vincentians are the backbone of our Society, operating statewide through Conferences, support centres, programs and committees across the state.

3,875 OUR VOLUNTEERS

Our 3,875 Volunteers give their time and expertise to support our good works through our Retail Shops, programs, youth support and offices.

656 OUR STAFF

Our 656 Staff Members (405 full-time, 219 part-time and 32 casual) provide expert support services to our Members, Volunteers, clients and customers. Committed to our values and mission, our employees are diverse and driven professionals who strive to support our good works and those we assist within our communities.

	SYSP/ VINNIES HOUSING	QZCARE
Employees	856	3,873
Volunteers	3,875	136
Members	2,596	N/A

Reporting Criterion 3: Modern slavery risks in operations & supply chain

During the reporting period, we extended supplier risk assessment to the most of our active suppliers in our supply chain vendor base. We have mapped out our *significant suppliers* by annual spend (>\$100k AUD), for category risk taxonomy assessments.

Our *significant suppliers* (109 suppliers in total) represent 60% of our total spend on procurement of Goods and Services from suppliers in the year 2023, with 45% of this spend being assessed as high risk, 31% as medium risk and 24% low risk.

The high-risk classified suppliers (49 suppliers) provide goods and services for the below categories:

- Construction and Building (4 suppliers)
- Property and facility maintenance (24 suppliers)
- Furniture and Office supplies (5 suppliers)
- Food and Accommodation (14 suppliers)
- Waste Management (2 suppliers)

	High Risk	Medium Risk	Low Risk	Total
Spend (\$AUD)	\$13,100,000	\$9,050,000	\$7,150,000	\$29,300,000
Number of suppliers	49	25	35	109
Number of categories	7	6	10	23

High-risk areas by value

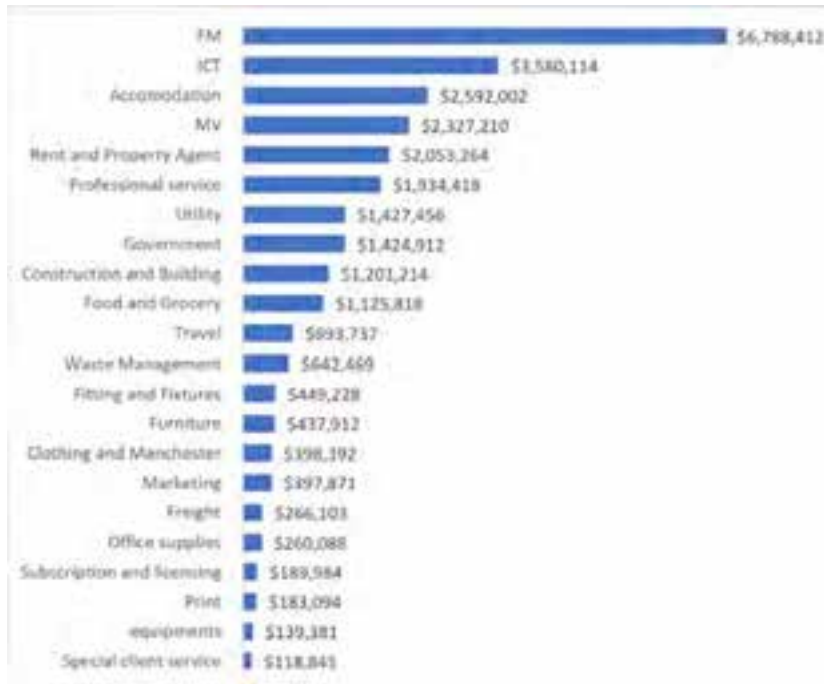


We are further investigating the suppliers' capabilities to mitigate the risk of modern slavery in their supply chain network.

Supply Chain Risks

Industry Sector

Our four highest spend categories are Facility maintenance services (FM), Communications Technology (ICT), Assisted Accommodation services and Motor Vehicle fleet.



ICT category is considered as a medium risk category because majority of our spend in ICT is related to software services. In the reporting year we appointed a new IT service provider through a structured procurement tendering process. This supplier has been assessed against modern slavery risk management capabilities and a modern slavery clause has been included in the service agreement.

Property and facility management, and Accommodation assisting services are considered high-risk categories and require focused attention for identifying and managing the modern slavery risk.

One of the main challenging areas in managing the modern slavery risk is facility management category. This is due to several reasons:

- supplier selection process is decentralized and is driven by local availability of the suppliers. Hence, most facility management service providers are small businesses that have never gone through the procurement due diligence process.

To address this issue, we are considering several options:

- Revisiting procurement operating model to become center led for high-risk spend categories.
- Enhance the modern slavery risk awareness across the Society's staff and managers who are involved in procurement and supplier selection.

Geographic location

While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

Supplier's Workforce Profile

In undertaking our supplier analysis, we 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). Based on these indicators, we identified that potentially high risk spend is within five spend categories:

- Property and facility maintenance services (FM)
- Building and construction
- Food, Groceries and assist Accommodation.
- Waste management
- Furniture and Office supplies

Operational Risks

Modern slavery represents a significant operational risk for our organization, which seeks to engage and promote social responsibility and ethical business practices. We have analysed the operational risks associated with modern slavery within the current economic and operating environment, considering factors such as inflationary risk, internal stakeholder pressures, decentralization of procurement. These risks are described below.

Inflationary Risk

Inflationary risk is a challenge for our organization, as it can affect the purchasing power of our budgets and make it harder to source goods and services. Inflationary pressures could lead to a focus on cost-cutting measures that may compromise the standards of procurement, including supplier due diligence.

Internal Stakeholder Pressures and Decentralised Procurement

Internal stakeholder pressure and decentralised procurement may increase the operational risks related to modern slavery. Where agility in sourcing goods and services is prioritised over proper supplier due diligence processes, there is a risk of lack of transparency and accountability in the supply chain, increasing the risk of modern slavery. Mitigating this risk is planned training, and for all relevant staff and stakeholders to have a clear understanding of the importance of ethical procurement practices and the risks associated with modern slavery.

Decentralisation of procurement is another operational risk that can increase the likelihood of modern slavery. When procurement is decentralised, it can be challenging to maintain consistent standards across the organization, and the risk of modern slavery may be greater. We are reviewing our policies and procedures for procurement to provide training and guidance to staff on ethical procurement practices.

Pressure on Suppliers to Get the Lowest Price

Pressure on suppliers to get the lowest price can also lead to operational risks related to modern slavery. When suppliers are forced to cut costs, they may resort to unethical practices, such as paying workers below the minimum wage or using forced labor. We have planned to work with our significant suppliers to ensure that they are aware of the risks associated with modern slavery and that they are committed to ethical business practices.

Reporting Criterion 4: Actions taken to assess and address risk

In the reporting period, we assessed our potential modern slavery risks in operations and supply chain and commenced planning to bridge the gaps identified. The cornerstone of the reporting period was conducting the modern slavery risk analysis on our supplier portfolio and expanding the analysis to larger supplier base (108 suppliers) compared to the previous reporting period (53 suppliers).

In the reporting year, we benefited from our collaboration with the Australian Catholic Anti-Slavery Network (ACAN) and used the resources with other like-minded entities and developed supplier selection processes in line with industry acceptable practice. The Modern Slavery Liaison Officer (MSLO) continued to lead the discussion and strengthen the approach by conducting internal modern slavery working group meetings and sought supplier selection panels for spends over \$200k per year.

Key Actions in 2023:

- progress on developing a modern slavery management policy.
- reviewed our supplier risk portfolio for significant suppliers.
- included modern slavery as a tender evaluation criterion for selecting suppliers for high-risk services
- established modern slavery provisions in new supply agreements and contracts.
- reduced the risk of modern slavery in our supply chain for ICT services and Imported products from overseas through:
 - selecting suppliers that have demonstrated a good understanding and compliance with Modern Slavery Act
 - Auditing supplier's manufacturing facilities overseas through direct visitation
 - develop supplier Modern Slavery Questionnaires to streamline the process for supplier hedging
 - conducted training on modern slavery risks.
 - developed a modern slavery training plan to extend the training to all managers and new staff
 - continued to utilise Sedex platform across our Procurement and Logistics as a risk assessment tool

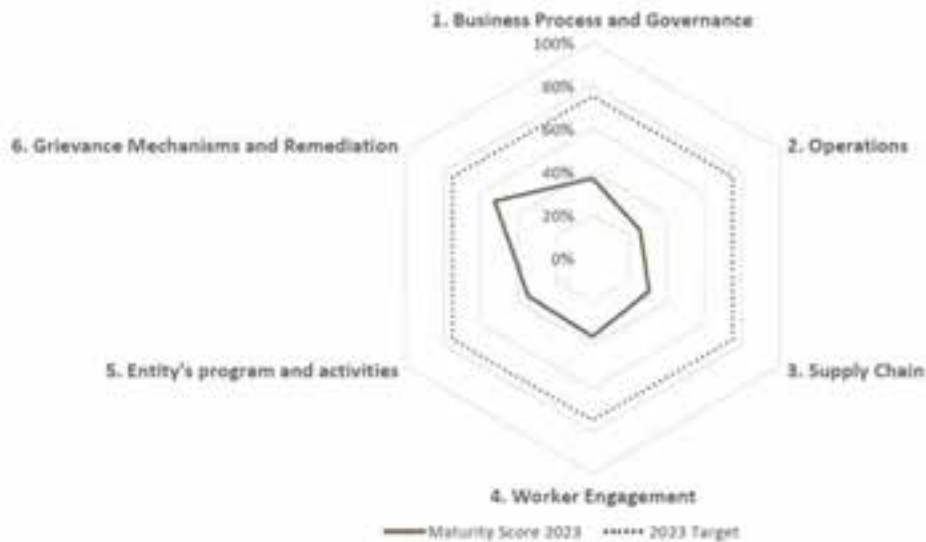
Modern Slavery Maturity Assessment

We completed a survey to provide an overall view of improvements and efforts across six key areas (pillars) of our operation:

- 1) Business Process and Governance,
- 2) Operations,
- 3) Supply Chain,
- 4) Worker Engagement
- 5) Grievance Mechanisms and Remediation, and
- 6) Entity's Program and Activities.

The focus of survey and analysis has been towards the maturity level of our modern slavery risk management capabilities. The maturity level of each 6 pillars of operation were assessed across four areas of Governance, Risk assessment, Risk management and Effectiveness of the efforts made to mitigate the modern slavery risk.

Overview of the maturity assessment in 2023 shows that our focus for improvement needs to be directed towards Operations, Supply Chain and Business Process and Governance.



As per the above chart, the two pillars of Grievance Mechanisms and Worker Engagement are considered more mature while Operation and Supply chain are considered less mature in dealing with modern slavery risk.

Remediation

To date, SVDP QLD has not identified any individuals impacted by modern slavery in its supply chains or operations. SVDP QLD is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if SVDP QLD is found to have caused or contributed to modern slavery.

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, SVDP QLD, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. SVDP QLD's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 SVDP QLD can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Reporting Criterion 5: Effectiveness of Actions

Analysis – Maturity Results for 2023

The maturity level across the six key areas of operation is different.

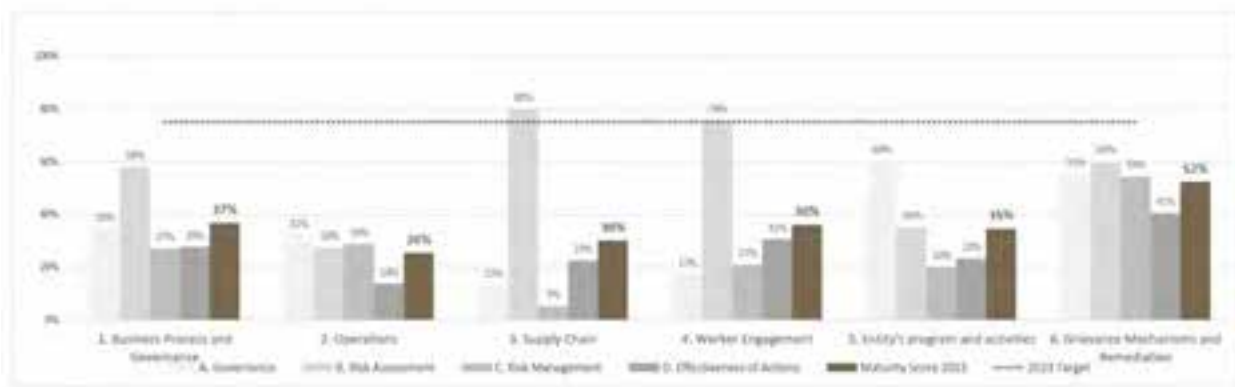
Governance: As per the survey, Supply Chain and Worker Engagement have the lowest maturity level while the entity's program and Grievance Mechanism have the highest maturity level.

Risk Assessment: the highest maturity level across the operation is related to risk assessment. Operations require additional effort to improve the maturity level of risk assessment.

Risk Management: Risk management has the lowest maturity level across the six pillars of operation. Supply chain and Entity's programs obtained the lowest maturity scores.

Effectiveness of Actions: the positive impact of our Anti-Slavery efforts across Operations supply chain and Entity's program needs to be improved. This means that more mature and comprehensive approach required for ongoing improvement initiatives to ensure the effectiveness of our effort to eradicate modern slavery.

Maturity Score 2023 comparative to target and maximum scoring, by Pillar



Maturity Score 2023: comparative individual scoring by pillar and sub-pillar

SVDP QLD will assess its implemented actions on a regular basis. The following process key performance indicators were considered for 2023 assessments:

- Number of training modules completed by Senior Management, Executive Officers, and procurement (10 staff completed the training)
- Number of suppliers engaged in Sedex risk assessment (4)
- Number of supplier contracts with modern slavery clauses (3)
- Review of category risk taxonomy assessments; (completed)
- Modern Slavery Capability Maturity Assessment; (completed)
- Implementation of supplier risk assessments for the spends above \$200k.
- Increased members and board awareness and engagement.

Modern slavery action plan and road map

In 2024 and beyond, we plan to:

- set Modern Slavery risk management key objectives for the year and communicate them across the business, ensure achieving the objectives through regular monitoring and reporting to the senior executives and the board
- increase the awareness about the modern slavery risk through implementation of a mandatory training course on modern slavery for all the Senior Management, Modern Slavery Working Group team and staff who are responsible for purchasing and sourcing.
- implement supplier engagement strategy and negotiate with our *significant suppliers* to include modern slavery provisions in the existing and future supply agreements.
- monitoring our implemented actions and reviewing maturity level of governance, risk assessment, risk management and effectiveness of continuous improvement initiatives across Operation, Supply chain and Business process and governance

The following four key actions areas have been prioritised as part of our modern slavery risk management approach:

Governance:

- Ensure clear governance framework for managing modern slavery risks and assign responsibilities for managing modern slavery risks.
- Restructure and form an effective modern slavery working group with representatives from key operation areas to oversee and implement the action plans
- Establish board level targets and KPIs for Environmental and Social Governance ('ESG') that includes Modern Slavery risk management targets
- Incorporate modern slavery requirements into procurement policies and procedures
- Develop & Implement process to review adequacy and effectiveness of modern slavery risk management program

Risk Management:

- Take a risk-based approach on categories of spend to engage procurement in sourcing and supplier selection activities
- Implement a due diligence process to continuously identify, manage, and mitigate modern slavery risks
- Develop procedures to effectively report and act where modern slavery risks are identified
- Incorporate modern slavery awareness into induction and staff training
- Incorporate modern slavery risk management specific responsibilities into position descriptions
- Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts
- Integrate modern slavery risk management into supplier review processes
- Include general clauses on modern slavery in all high-risk supplier contracts
- Develop targeted communications & engagement programs for high-risk supplier
- Run pilot project worker voice program for high-risk suppliers

Reporting Criterion 6: Process of consultation with entities owned or controlled

This statement covers St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was approved by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

The other wholly owned subsidiary of SVDP QLD - Ozcare has issued its own Modern Slavery Statement which can be accessed on the ACAN website <https://www.acan.org.au/acan-modern-slavery-statements>

Reporting Criterion 7: Other

- Not applicable

Modern Slavery Statement

1 January to 31 December 2023



A Special Work of St Vincent de Paul Society Queensland

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About Us

Ozcare is a leading organisation in the provision of health care, residential and community aged care, retirement living and disability support. We operate across the state of Queensland, employing over 4,000 individuals to deliver our services to those who need assistance.

Ozcare operates 18 residential aged care services, a hospital, five day respite centres and eight retirement living services across Queensland. In addition, we provide support and health care services to thousands of people in their own homes. Each year, we typically provide care and support for over 30,000 people in Queensland. We are a not-for-profit Australian resident company limited by guarantee and are headquartered in Brisbane – our services are provided solely within Australia.

Ozcare purchases products to meet our business and service delivery needs – ranging from staff uniforms, fresh food and produce, office products, household and cleaning items, medical products and consumables, and trades and professional services. We also regularly engage construction companies in our building programs.

Guiding Principles

Ozcare was established as a special work of St Vincent de Paul Society Queensland. The Society, as a lay Catholic organisation, aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

Mission

Inspired by the Vincentian spirit, Ozcare commits to supporting our clients to live their best lives through the provision of compassionate, professional and personalised, aged care, community and health services.

Values

Our values form the basis of our culture and guide everything we do. We are committed to embedding these values throughout Ozcare.

Integrity - The courage to do what is right for our clients, colleagues and our organisation.

Respect - Serving all regardless of belief, ethnic or social background, health and gender.

Empathy - Enhancing the lives of our clients through the delivery of personalised care and support.

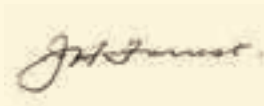
Compassion - Welcoming and serving all with care and understanding, and without judgement.

Endorsement

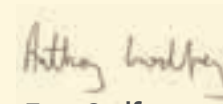
The Board of Ozcare believe that the steps being taken now to reduce the risk of modern slavery and those planned for the future are aligned with our guiding principles and values.

This Modern Slavery Statement was approved by the principal governing body of Ozcare as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 23 May 2024.

This Modern Slavery Statement is signed by a responsible member of Ozcare as defined by the Act.



John Forrest
Chairman



Tony Godfrey
Chief Executive Officer

How We Make a *Difference*



3,689
Home Care
Packages
Serviced

1,173
NDIS
Participants
Supported

94
Hospital
Beds



369
Retirement
Living Units



6
Retirement
Villages



55,261
Calls handled by
1800 Ozcare



708
QCSS Clients
Helped

525
Day Respite
Centre Clients
Cared For



2,539
Residential
Aged Care
Clients



16
Residential Aged
Care Facilities



14,272
CHSP Clients
Assisted

84,743
Immunisations
Administered

1,982

Bed Licenses
(Operational)



442
Service Award Milestones
(2022-2023)



1
Private
Hospital



53.23%
Concessional
Ratio

136
Volunteers



3,873
Employees



Brand Map

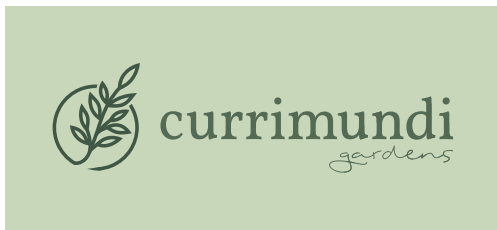


Oxley Hospital

- 18 Aged Care Facilities
- 15 Community Care Branches
- 8 Day Respite Centres
- 8 Retirement Villages
- 1 Hospital



Retirement Villages



Sunshine Coast



Kedron



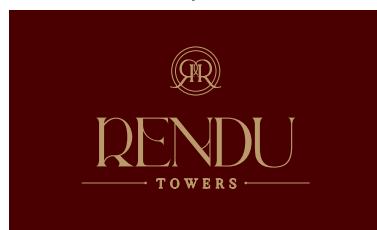
Gold Coast



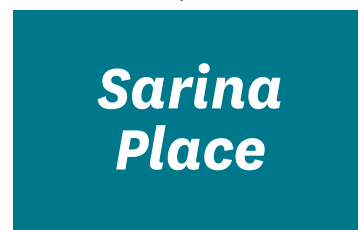
Hervey Bay



Oxley



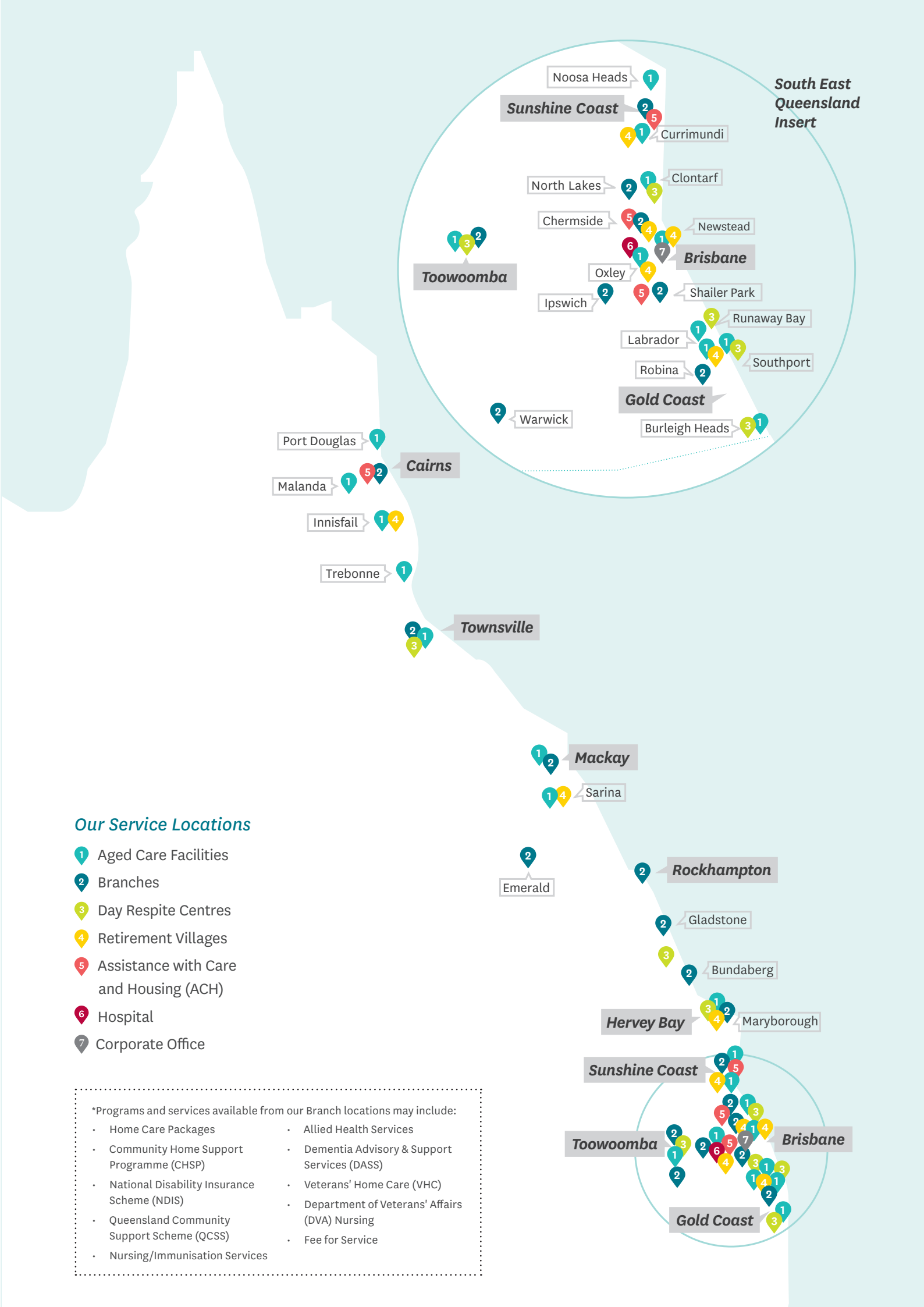
Newstead



Sarina



Innisfail



South East Queensland Insert

Sunshine Coast

Brisbane

Gold Coast

Toowoomba

Cairns

Townsville

Mackay

Rockhampton

Sunshine Coast

Toowoomba

Brisbane

Gold Coast

Our Service Locations

- 1 Aged Care Facilities
- 2 Branches
- 3 Day Respite Centres
- 4 Retirement Villages
- 5 Assistance with Care and Housing (ACH)
- 6 Hospital
- 7 Corporate Office

*Programs and services available from our Branch locations may include:

- Home Care Packages
- Community Home Support Programme (CHSP)
- National Disability Insurance Scheme (NDIS)
- Queensland Community Support Scheme (QCSS)
- Nursing/Immunisation Services
- Allied Health Services
- Dementia Advisory & Support Services (DASS)
- Veterans' Home Care (VHC)
- Department of Veterans' Affairs (DVA) Nursing
- Fee for Service

Port Douglas 1

Malanda 1 5 2

Innisfail 1 4

Trebonne 1

Warwick 2

North Lakes 2 1 3

Chermside 5 2 4 1 4

Oxley 4

Ipswich 2

Shailer Park 5 2

Labrador 1 3 1 3

Robina 2

Burleigh Heads 3 1

Runaway Bay 3

Southport 4 3

Noosa Heads 1

Currimundi 4 1 5

Clontarf 1 3

Newstead 4 1 4

Shailer Park 5 2

Labrador 1 3 1 3

Robina 2

Burleigh Heads 3 1

Runaway Bay 3

Southport 4 3

Emerald 2

Sarina 1 4

Emerald 2

Gladstone 2

Bundaberg 2

Hervey Bay 3 4 2

Maryborough 1 2

Sunshine Coast 2 1 5 4 1

Toowoomba 2 3 1 2

Brisbane 2 1 3 2 4 1 4 7 2 3 1 3 1 4 1 2 1

Gold Coast 3

Commitment to Minimising Modern Slavery

Modern Slavery is defined as a “situation where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.” The Modern Slavery Act 2018 defines serious exploitation as trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services and the worst forms of child labour. The nature and extent of modern slavery like practices means there is a risk that it may be present in an organisation’s supply chains.

Ozcare’s mission is to support our clients to live their best lives through the provision of compassionate, professional and personalised, aged care, community and health services. Our organisational values of acting with integrity, respect, empathy and compassion are the antithesis of modern slavery. Ozcare is committed to taking steps to minimise the risk of modern slavery like practices in our supply chain.

We commit to further develop and refine our governance practices that relate to modern slavery in coming years.

Our Modern Slavery Governance Practices

Our efforts to mitigate and action the effects of modern slavery are underpinned by our governance approach to our modern slavery framework, which includes policies, procedures and practice that is supported by targeted training. These include:

Our **Risk Management Framework**, which identified key risks to Ozcare, and outlines the risk management and mitigating strategies used to reduce the potential exposure to slavery like practices in our supply chains. This year, our risk mitigation approach included the commencement of implementation of Sedex for supply chain management and oversight.

The **Whistleblower Protection** policy which supports high standards of behaviour and conduct, and outlines how a whistleblower can disclose instances of concern, whether that be within our organisation or by any of our contractors, organisations connected with Ozcare or within our supply chain.

Our **Ethical Investment Policy** which outlines how we will invest ethically. The policy specifically identifies Modern slavery risk and prohibits investment in companies or organisations that can be linked to modern slavery like practices. The policy also forbids investment in any company that has been involved in any serious inhibition of human rights whether in Australia or overseas - such as exploitation by providing wages and working conditions below that which is acceptable in Australia or any overseas nation. The policy prohibits investment in activities that damage human health or industries involved in the production of armaments.

Our **Human Rights Policy** which empowers and supports our clients to exercise their human rights, but also requires employees to take a proactive approach to prevent any form of neglect or abuse. In 2024, we will be introducing Human Rights training for staff to support this approach.

The **Purchasing Policy** which outlines how to deal with suppliers in a fair and impartial manner. The policy requires purchasing staff to seek probity advice if there are instances of concern in regards to the relationship with a

supplier. The policy requires purchasing staff to only source from reputable suppliers who demonstrate compliance with legislation and acceptable business practice.

The **Code of Conduct** which outlines the standards of ethical conduct and behaviour expected of our staff. The code requires staff to take reasonable steps if they believe a person is being subjected to exploitation or abuse.

Modern Slavery Training and skills development for key staff involved in modern slavery governance practice, including the Modern Slavery Liaison Officer, some Executives and key procurement staff. Membership and participation in the Australian Catholic Anti Slavery Network facilitates our access to resources, materials and modern slavery expertise to support our practice. The network also allows us to benefit from the learnings and initiatives taken by other members.

Criterion 1 & 2 - Business Structure & Operations

Structure

Ozcare is a provider of health and human services that operates in the state of Queensland. We are a not-for-profit incorporated company limited by guarantee. Our registered office is located at 66 River Terrace, Kangaroo Point, Brisbane.

Ozcare is a charitable work of the Society of St Vincent de Paul Queensland.

Operations

The services we provide include residential aged care, community based care, service provision to NDIS participants, retirement living, and a small hospital. Our operations are in the state of Queensland, and we employ in the vicinity of 4,300 people to provide those services.

Our Suppliers

Ozcare is committed to purchasing locally where we can. The significant majority of Ozcare suppliers are based in Australia, and particularly in Queensland, with only a small number of overseas suppliers engaged. We also try to employ suppliers in the communities in which we deliver services, as engaging in our local communities is important to us.

We engage our suppliers on service agreements which can vary in terms of duration of the agreement, but in the majority of instances last for two years. Typically, across the organisation we will engage in the vicinity of 1,900 suppliers per annum.

Ozcare is a growing organisation, with a significant capital works program that will deliver the buildings and facilities we need to deliver our health and human services into the future. That growth shapes the nature of our procurement activities and supply chain. In terms of risk taxonomy, our top five major spend categories (in order) for 2023 were:

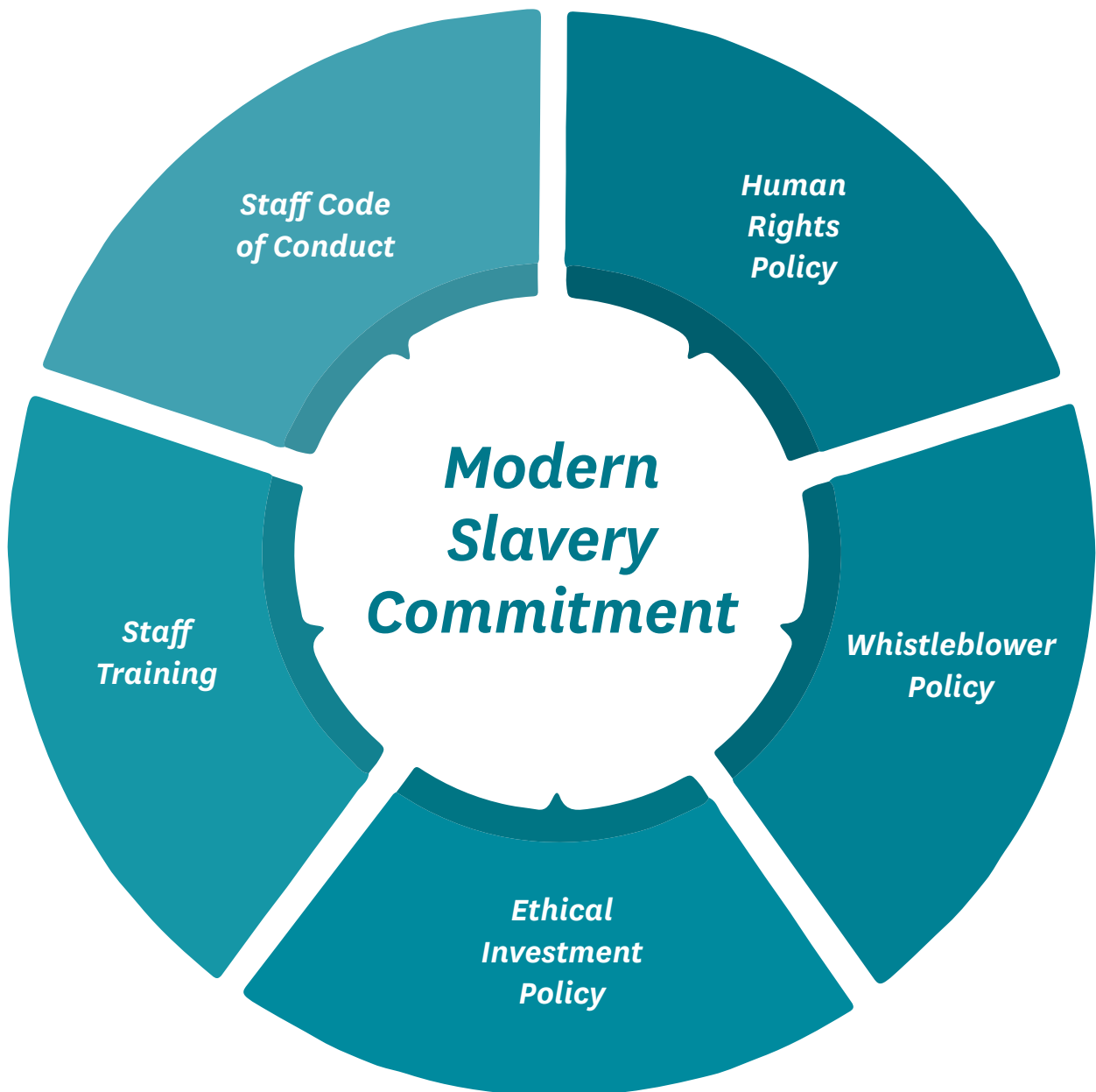
1. Building and construction
2. Agency staff - nursing and EN/carers
3. Food and catering
4. Cleaning and security
5. Facility and property maintenance

Labour hire contractors are engaged, for security service provision and also for short term nursing, allied health and in some instances for cleaning, and garden maintenance. In these instances, we have engaged companies that are Queensland based, and employ their staff under award conditions.

Criterion 3 - Modern Slavery Risks

Slavery, servitude, forced labour, debt bondage, human trafficking and other slavery like exploitation is a world wide issue, and Ozcare recognises that Australia and companies that operate in Australia are not immune to these issues. Some specific industries, geographical regions or nations can present a higher risk of modern slavery or exploitative practices.

In 2020, Ozcare developed a Modern Slavery Policy that guides our practice in how we will manage risks to modern slavery in our supply chain. However, to be effective, this policy needs to be supported and supplemented by other practices, and in Ozcare these are:



We anticipate that we will be reviewing our Modern Slavery Policy and associated work practices when the anticipated changes to legislation occur.

Risk Assessments

While companies can manage and be confident in their own business practices, an element of modern slavery risk can be present through a company's own supply chain. This statement sets out Ozcare's actions to identify and address the risks of modern slavery practices within our operations and supply chains.

Since the introduction of the Modern Slavery Act, Ozcare has commenced a program of work to identify and address any risks of modern slavery in our operations and supply chain. We have in the vicinity of 1,900 suppliers, but of those the top 100 suppliers constitute the very significant amount of our procurement expenditure. A significant number of suppliers are small businesses, sometimes run by a sole trader such as a tradesperson. We have assessed the risk of our top suppliers.

Our major procurement categories, expenditure data and suppliers for 2023 is as follows :

Procurement Category	Expenditure	Number of Suppliers
Building and construction	\$86,900,926	207
Agency staff - nursing and EN/carers	\$15,354,224	39
Food and catering	\$13,184,606	125
Cleaning and security	\$5,500,497	244
Facility and property maintenance	\$5,241,449	525
Furniture and office supplies	\$4,587,235	185
Medical devices and supplies	\$3,389,131	116
Linen and laundry	\$2,238,535	24
Waste management services	\$1,043,891	33
Uniforms and PPE	\$185,330	15
ICT hardware	\$177,589	18

Understanding our risks - knowing what we purchase and our suppliers

As a large organisation that is growing, we recognise that our modern slavery risk profile is not static and will evolve as we grow. Our expenditure categories (as outlined above) have changed from our previous statement in terms of both total expenditure but also changes in where we are spending – some categories that have potential for modern slavery risks have seen a significant rise in the total expenditure. This is a contributor to how we will address modern slavery risk in the future – see below for more detail.

In order to understand the greater specifics of the nature of the goods and services we are procuring we have grouped the types of products we purchase. This aids in the modern slavery risk taxonomy. A number of these products are manufactured overseas but supplied by Australian domiciled companies. Some of the products are classified as being sourced from countries or industries that are at risk of modern slavery like practices, and in 2024 we intend to consider additional measures for suppliers in those higher risk procurement categories via the Sedex supply chain management system.



Client from Ozcare's Mozart Program at Ipswich

What do we buy – significant goods and services obtained by value

In 2023, we reviewed our purchasing practices and agreements to understand the nature of the products we are purchasing, in order to better inform how we could manage Modern slavery risk when implementing the Sedex system.

Building and facility management

- Furniture, fixtures and equipment
- Cleaning supplies
- Pest control
- Airconditioning maintenance
- Waste management
- Hardware and trade supplies
- Cleaning and domestic services
- Trades services
- Security services
- Grounds and gardens maintenance
- Fire systems maintenance
- Water treatment
- Electricity
- Gas – non medical and medical
- Building maintenance services

Business services

- Advertising and promotion services
- Audit and certification services
- Various insurances
- Legal services
- Subscriptions and memberships
- Stationery supplies
- Printing services
- Recruitment services
- Consultancy, such as engineering, architects
- Training and education
- Travel and accommodation
- Document management
- IT systems and support

Aged care and hospital consumables

- Food and beverages
- Catering supplies
- Food service consumables
- Housekeeping supplies
- Linen and laundry services
- Food and nutrition supplements
- Clinical consumables
- Medication and drug supplies
- Personal hygiene products
- Medical aids
- Medical consumables and PPE
- Pathology and radiology services
- Prosthetics
- Sanitising and sterilising products
- Surgical supplies
- Dressings and wound management supplies

Assets and Equipment

- Airconditioning equipment
- Fleet vehicles
- Fire prevention and management systems
- Office equipment
- Biomedical equipment
- Mobility aids
- Aged care / hospital beds and mattresses
- Nurse call systems
- Client / patient record systems
- IT equipment
- Diagnostic equipment and systems
- Various equipment leases and rentals
- Biomedical equipment servicing services
- Client / patient management systems
- Construction works for major projects

Staffing, volunteers and human resource related

- Uniforms
- Temporary staff – eg nurses, admin, allied health
- Employee Assistance Scheme services
- Staff training packages and systems

Some of the products above are sourced from industries that are considered to be at risk of modern slavery like practices, and produced or manufactured within countries that are known to have instances of modern slavery like conditions. We have identified the following products as being areas that we wish to place particular emphasis upon in our management practices, and particularly as we mature our use of Sedex:

Uniforms / textiles	China, Bangladesh & Indonesia
Security services	Australia
Waste management	Australia
Contract / temporary staff	Australia
Stationery & office supplies	China
Furniture	Australia & South-East Asia
Medical Consumables	Australia, South-East Asia & China

Criterion 4 – Steps Taken

Our Employment Practices

Our staff are employed under our own enterprise agreement, which is periodically revised based on negotiations with employees and their representative unions. Our direct employment of our staff lowers modern slavery risks within our own organisation, so our future focus will be on organisations that we enter into supply agreements with and our external contractors.

All of our employees are free to associate with and be represented by a union. Union staff periodically attend our sites to meet with their members. All staff employed by Ozcare enjoy terms and conditions above and beyond those required by the relevant industrial award obligations.

Training of Employees

Training and awareness is a key control in addressing the risk of modern slavery and human trafficking. We recognise the need to build the modern slavery risk understanding of our employees, particularly our staff in procurement roles. Key management and individuals involved in the procurement process have been provided with training in our modern slavery approach and associated business practices.

All Ozcare employees are required to be familiar with and observe organisational policy and procedures related to their role. Our modern slavery policy and procedures are accessible by all Ozcare staff. All new staff must familiarise themselves with our Code of Conduct upon commencement, which advises how to raise any concerns they might have in regards to our operations, which includes any modern slavery risks.

In 2022, we introduced the modern slavery training packages into our on-line staff training system. It is a requirement for staff in the procurement functions to complete that training. In 2024, human rights training will also be introduced into our staff training package suite.

Reporting of Concerns

Our modern slavery organisational procedure includes information on who employees can go to if they are concerned about modern slavery risks in our supply chain. It also outlines who they can go to if they want any advice in regards to modern slavery risks.

Alternatively, our whistleblower procedure provides an alternative pathway for the confidential notification of any concerns by employees and key stakeholders.

While we have not had any concerns raised directly with us, Ozcare did participate in meetings with one of our suppliers via our participation in the Australian Catholic Anto Slavery Network – see below for more details.

Our Supply Chain and Stakeholders

Ozcare's service provision requires us to obtain supplies of goods and services from a range of suppliers and stakeholders, from very small sole operators to large and complex organisations. Accordingly, there are varying levels of understanding and practices with some suppliers having just begun their journey, and others having the benefit of mature supply chain management processes and sophisticated modern slavery identification practices in place.

We know that modern slavery like behaviours are unlikely to thrive where core human rights are respected. Australia has an international reputation for upholding such rights – and when measured by dollar value, the vast majority of our supplier payments are made to suppliers that are based in Australia and particularly in Queensland. Aside from valuing our ability to give our business to local suppliers in our own community, it is a good risk based decision to do so knowing that doing so reduces the possibility of modern slavery in our supply chain. However, we do source products that have been sourced from overseas, and indeed from geographical areas that present modern slavery like concerns.

Ozcare undertakes due diligence assessment when engaging suppliers. In order to understand our modern slavery risk through our supply chain, we have written to our suppliers to gauge their levels of understanding of modern slavery – we also asked them what specific actions they may be taking to address modern slavery risks in their own supply chain. We specifically asked our suppliers to advise us of the following :

- The nature of their business, and where they operate
- Whether they would agree to comply with our Modern Slavery Statement and intent
- Who are their subcontractors and how are they managing subcontractors
- What policies or practices they have to address modern slavery, human rights, ethical trading or whistleblowing
- How often they review their supply chain, and what steps they may have taken to mitigate the risk of modern slavery in their supply chain
- Whether they use seasonal or contract workers in their own workforce or supply chain
- Has there been any concerns raised in regards to modern slavery in their business or supply chain

The information obtained has allowed Ozcare to be better informed about our suppliers and take a risk based approach to our relationship considering factors such as the industry they are in and the geographical locations of their own supply chains.

Implementation of Sedex

In 2023, we implemented the Sedex supply chain management system in order to improve our supply chain risk assessment processes. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.

When introducing the system, we have targeted companies that are engaged for significant amounts of our expenditure, or are within industries or have supply chains located in countries that are considered to be higher risk. We intend to gradually increase the use of Sedex as existing service agreements expire and new ones are created.

Criterion 5 - Assessing the Effectiveness of our Actions

Our survey of suppliers' business practices and steps taken to identify and mitigate potential modern slavery practices in their own supply chains resulted in some further discussions with a small number of suppliers due to their responses. We believe that process in itself has resulted in changing attitudes and practices amongst our suppliers in regards to modern slavery.

All of our suppliers are subject to an annual review of their performance, part of which examines their conduct and behaviour. Our supplier code of conduct establishes an expectation for our suppliers to conduct their business in a responsible manner, and also accept the possibility of an audit of their operations should Ozcare become aware of any potential modern slavery risks in their organisation or supply chain.

The level of modern slavery risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. In 2021, we assessed that of all of the products and services we procure, those within the categories of textiles, office products and fresh food present an elevated risk of modern slavery. In our 2023 review, we have identified that contract waste management, contract temporary staff, furniture supply and medical consumables also may present risk.

The risk assessments of our major suppliers have indicated a maturing level of modern slavery awareness amongst these suppliers. Some have provided evidence of steps they have taken to remove risks in their own supply chain, including audits of their own operations and those of their suppliers.

We do believe that we can further improve on these processes. In 2023, we implemented Sedex which we gives us greater confidence in our ability to oversight our suppliers' actions to address modern slavery risk in their own organisation and supply chains, thus giving us greater confidence in assessing the efficacy of our actions. Please refer to Criterion 7 for further information on the steps we will be taking in the future to improve the efficacy of our processes.

In 2022, we implemented modern slavery training for key staff to raise awareness of modern slavery risks in our procurement functions.

Ozcare is an organisation with service outlets throughout Queensland - each of those outlets can enter into supply agreements with suppliers, meaning that our decentralised nature could present a heightened risk of exposure to modern slavery through our supply chain. In 2023, we centralised some supply agreements on a whole-of-organisation level, which will facilitate closer monitoring of modern slavery risks. Some of those suppliers have been required to participate in the Sedex assessment system. We will be aiming at establishing supply agreements in industries that have been known to have modern slavery risks - ie construction, waste disposal, security services, cleaning and textiles / uniform supply (see criterion 6 for more information).

Criterion 6 – Internal Consultation

In 2022, we consulted further within Ozcare in regards to how our procurement operations function and could we change the way we engage suppliers in order to address our own modern slavery risk. Being an organisation that has operations spread across a large geographical area, we found that many Ozcare outlets had some degree of procurement function. This in itself presented a risk, in that it was difficult to train all of those staff in modern slavery awareness and the requirements that are necessary to address those.

Therefore, a decision was taken to significantly reduce the number of Ozcare services that have delegations to enter in procurement arrangements, and more emphasis was placed on procurement being initiated from a centralised or whole-of-organisation perspective. In 2023, we introduced a dedicated Contracts Manager role overseeing supply contracts - we believe that oversight of suppliers will enhance our management of supply chain risks. The person appointed to the role has been trained in modern slavery risk assessment and management, and also participates in the Australian Catholic Anti Slavery Network (see below). This role oversees our suppliers use of the Sedex assessment functions.

Modern slavery requirements are periodically discussed at senior leadership meetings to maintain the awareness of the senior leadership of the requirements, and our Board are advised at least once per annum of our steps taken. Our Board must consider, be satisfied with and approve our annual Modern Slavery Statement.

Other Engagement and Consultation

Cooperation with our suppliers, our business partners and relevant government agencies to effect change is a key feature in our strategy to eradicate modern slavery. We are committed to collaborating with government and other businesses to eradicate modern slavery. We recognise the need for and support a coordinated approach to address human rights issues, including the risk of modern slavery in our collective supply chains.

The Group Manager Risk & Compliance is the organisation's executive that has been tasked with overseeing modern slavery risks within Ozcare. This role will monitor developments in this space, and has joined modern slavery working groups, including the Department of Home Affairs subscription service.

Ozcare is a member of the Australian Catholic Anti-Slavery Network (ACAN). Membership of this group allows us to access anti-slavery resources and expertise. The monthly network meetings typically involve discussion around emerging issues or themes, and usually highlight the work being done by a particular entity. The group has also heard from unions in regards to workers at risk, and workers who have been exposed to modern slavery. It was ACAN that facilitated the engagement with one of our suppliers in regards to issues in their own supply chain – see the case study below for detail.

Case Study – International supplier of medical and other gloves

On August 24, 2022, an article was published on ABC alleging that a manufacturer had knowingly profited from slave labor at one of its Malaysian suppliers. The article described how a Bangladeshi migrant worker and 12 other workers were exploited and subjected to conditions that amounted to slavery, including having their identity papers taken, paying excessive recruitment fees to agents, physical punishment, long working hours, exposure to dangerous substances, poor food and accommodation and more. The US Customs and Border Protection found 10 out of 11 United Nations indicators of forced labor and slavery present at the supplier.

This raised concerns with Ozcare as this company is a supplier. As a member of the Australian Catholic Anti-slavery Network (ACAN), it was decided to engage the company in a unified approach. ACAN met with representatives from the company twice in 2022 on September 7 and December 8, with further meetings scheduled for 2023, the first of which is to be held on February 21.

The engagement aims to foster collaboration with the company to enable progress and ultimately remove the risk of slavery in the supply chain. ACAN first sought to understand the baseline, including past actions and plans moving forward, and how ACAN could help drive progress in a direction that works for the victims, the company, and the entities participating in ACAN.

Discussions covered supplier compliance programs, capacity building, recruitment fees in migrant worker departure countries, wages, accommodation, grievance mechanisms, victim support, and consequences.

Among other issues and ideas discussed were regular update meetings, establishing a joint commission/working group to oversee progress, ACAN requesting an observer seat at the Responsible Glove Alliance meetings, invitations to attend some human rights due diligence/social audits on-site, development of joint capacity building projects, and alternative sources for materials, production locations, and reshoring.

Criterion 7 – Other Information

Ozcare is committed to conducting its business and operations responsibly, and over time refining our systems and processes to reduce the risk of modern slavery in our business and supply chain. We will continue to review and modify our modern slavery processes over time.

In the coming year, we plan to:

- Continue participation in the Australian Catholic Anti-Slavery Network (ACAN), in order to become part of a network of like minded organisations, and also have access to the ACAN series of resources that we can implement in our own organisation. We believe this will enable us to:
 - o Improve our staff awareness of modern slavery risks via the ACAN training packages and other resources
 - o Learn about the approaches taken by other organisations, and consider if these are transferable to our environment
 - o Respond as a collective group when instances of modern slavery risk present from a supply source utilised by the whole ACAN group.
- Implementation of SEDEX, in order to improve our supply chain oversight and management processes. We anticipate taking a risk based approach to it's utilisation:
 - o Requiring major expenditure suppliers participate in the Sedex process
 - o Requiring higher risk profile suppliers participate in the Sedex process
- At the same time as implementing SEDEX, we would take the opportunity to review our other key modern slavery management strategies :
 - o Review the Supplier Code of Conduct and align that to the SEDEX functions
 - o Review Service Agreements to incorporate the use of SEDEX as a requirement for high expenditure/higher risk suppliers
- Monitor the actions of the Modern Slavery Commissioner, and any changes to legislation that will impact upon reporting entities

Future actions we are considering

In the coming years, we intend to further develop and mature our modern slavery management practices. The initiatives and strategies we will undertake to reduce the potential for modern slavery like practices in our supply chains include:

- Increasing the use of Sedex for supplier screening, assessment and ongoing management.
- Utilising the capabilities of Sedex to better understand our supplier's supply chain, and obtaining enhanced understanding of our risk taxonomy
- Further refining our supplier supply agreements as they are renewed, particularly in regards to modern slavery requirements and clauses in regards to our expectations, accompanied by a Supplier Code of Conduct
- Formalising the internal Modern Slavery Working Group to be chaired by a member of the Executive staff, and including the Contracts Manager as a member, and other key staff as and when required. Assign roles and responsibilities for aspects of our modern slavery approach to these members.
- Joining the Catholic Negotiating Alliance, a network of Catholic health care facilities that engage with suppliers on procurement and contract management purposes.
- Maintaining our membership and participation in the Australian Catholic Anti Slavery Network.

*Resident and nurse from Ozcare
Toowoomba aged care facility*



Call us
1800 Ozcare
(1800 692 273)
or visit
ozcare.org.au

aspire

Ozcare's wide range of services to support Queenslanders are made possible by funding from a diverse range of programs from the Australian and Queensland Governments.

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Ozcare is a quality certified organisation and has met the requirements of the International Standards Organisation (ISO 9001:2015)





Catholic
Cemeteries +
Crematoria

Modern Slavery Statement

1 January 2023 – 31 December 2023



Disclosure Note

This statement has been made on behalf of Catholic Metropolitan Cemeteries Trust trading as Catholic Cemeteries + Crematoria. This Statement covers all entities owned or controlled by Catholic Metropolitan Cemeteries Trust.

Head Office:

Catholic Cemeteries + Crematoria
Level 2, 11 Murray Rose Ave
Sydney Olympic Park NSW 2127

Website: <https://catholiccemeteries.com.au>

Contact for Modern Slavery: Andy CAO
Email: andyc@catholiccemeteries.com.au

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CEO Statement, Approval & Signature by Board Chair

At Catholic Cemeteries + Crematoria (CCC) we strive to live our values in everything we do. These values include faith, respect, compassion, collaboration, and integrity. Central to our ethos is a profound respect for the dignity of every individual, recognising each person as an invaluable creation, mirroring the image of God. This fundamental belief underpins our commitment to social responsibility, community engagement, and ethical conduct across all levels of our organisation.

Our dedication to upholding the dignity of the human person drives us to advocate for the vulnerable and marginalised, ensuring that our corporate practices contribute positively to society. It is this core belief that drives us to take decisive action against any form of modern slavery within our sphere of influence. Therefore, we have chosen to voluntarily comply with the *Modern Slavery Act 2018* and are pleased to submit our fourth modern slavery statement to the Australian Government via the Australian Catholic Antislavery Network Compendium of Modern Slavery Statements.

Our commitment reflects our dedication to ethical business practices and our resolve to embody the compassion, respect, and love central to our Catholic faith.

CCC will continue to work with our board, staff, suppliers, ACAN and our broader stakeholders to evaluate, monitor, and enhance our anti-slavery initiatives. Together, we strive towards a future where our collective efforts create a world that values freedom and dignity for everyone.



Lauren Hardgrove
Chief Executive Officer



The Hon Greg Smith SC
Chair



Lauren Hardgrove, Chief Executive Officer



The Hon Greg Smith SC, Chair

This Modern Slavery Statement was approved by the principal governing body of Catholic Metropolitan Cemeteries Trust as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 17th April 2024.

This Modern Slavery Statement is signed by a responsible member of Catholic Metropolitan Cemeteries Trust as defined by the Act.

Criteria 1: About us

1

This statement involves the Catholic Metropolitan Cemeteries Trust (ABN 85 744 325 709), trading as Catholic Cemeteries + Crematoria (CCC), a Trust constituted under the *Crown Lands Act 1989* (NSW) and currently transitioning to a Crown Land Manager pursuant to the *Crown Land Management Act 2016* (NSW). It is not controlled by any other entity.

It is registered as a charity with the Australian Charities and Not-for-Profits Commission. It has been serving the Sydney community for over 150 years, commencing operations in 1867 at Rookwood Catholic Cemetery.

CCC believes that everyone has the right to a dignified funeral and enduring, future care of the family's resting place. CCC believes that cemeteries are sacred and historical places in our society for the preservation of memories, and that the funeral is just the beginning of our role.

While it is not required to comply with the mandatory reporting of the *Modern Slavery Act 2018* (Cth) as our turnover is less than \$100m, the Board is committed to an antislavery risk management program through practical measures such as anti-slavery supply chain strategies and procurement, as well as anti-slavery education and engagement initiatives.

CCC's 2023 audited financial statement highlights a \$31.4m operating revenue and \$15.8m investing income generating \$16.2m surplus.

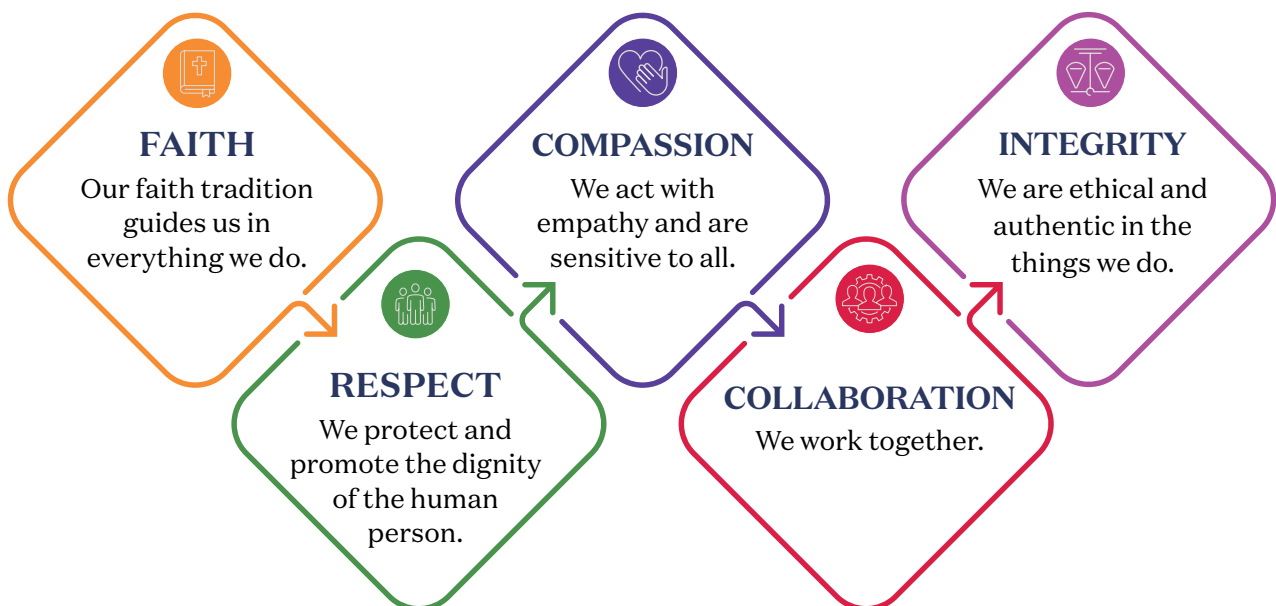
Our Vision + Mission

Together our mission and vision statements provide a roadmap for CCC's direction, motivation, and inspiration. They serve as a touchstone for all decision-making and help ensure we stay focused on our core purpose and long-term goals.



Values

Values have been at the heart of CCC's identity from its inception. At CCC, we strive to live our values in our work, decision making and engagement. As we face the future, CCC remains committed to these values, which have been part of our fabric for decades.



Criteria 2: Operations and Supply Chain

2

Our Organisational Structure

CCC is an independent not-for-profit organisation and one of the largest cemetery trusts in NSW, managing and delivering high quality cemetery services to a diverse range of communities and families across Western Sydney.

Its Head Office is located at: Level 2, 11 Murray Rose Ave, Sydney Olympic Park NSW 2127.

The Board meets bimonthly and has established the following sub-committees to assist in performing its duties:

- Finance, Investment & Remuneration
- Audit, Corporate Governance & Risk Management
- Community Advisory
- Project Development

CCC has obligations under legislation and guidelines including, but not limited to:

- *Cemeteries and Crematoria Act 2013* (NSW)
- *Crown Land Management Act 2016* (NSW)
- *Public Health Act 2010* (NSW)
- *Australian Charities and Not-for-profits Commissions Act 2012* (Cth)

Our Governance Framework

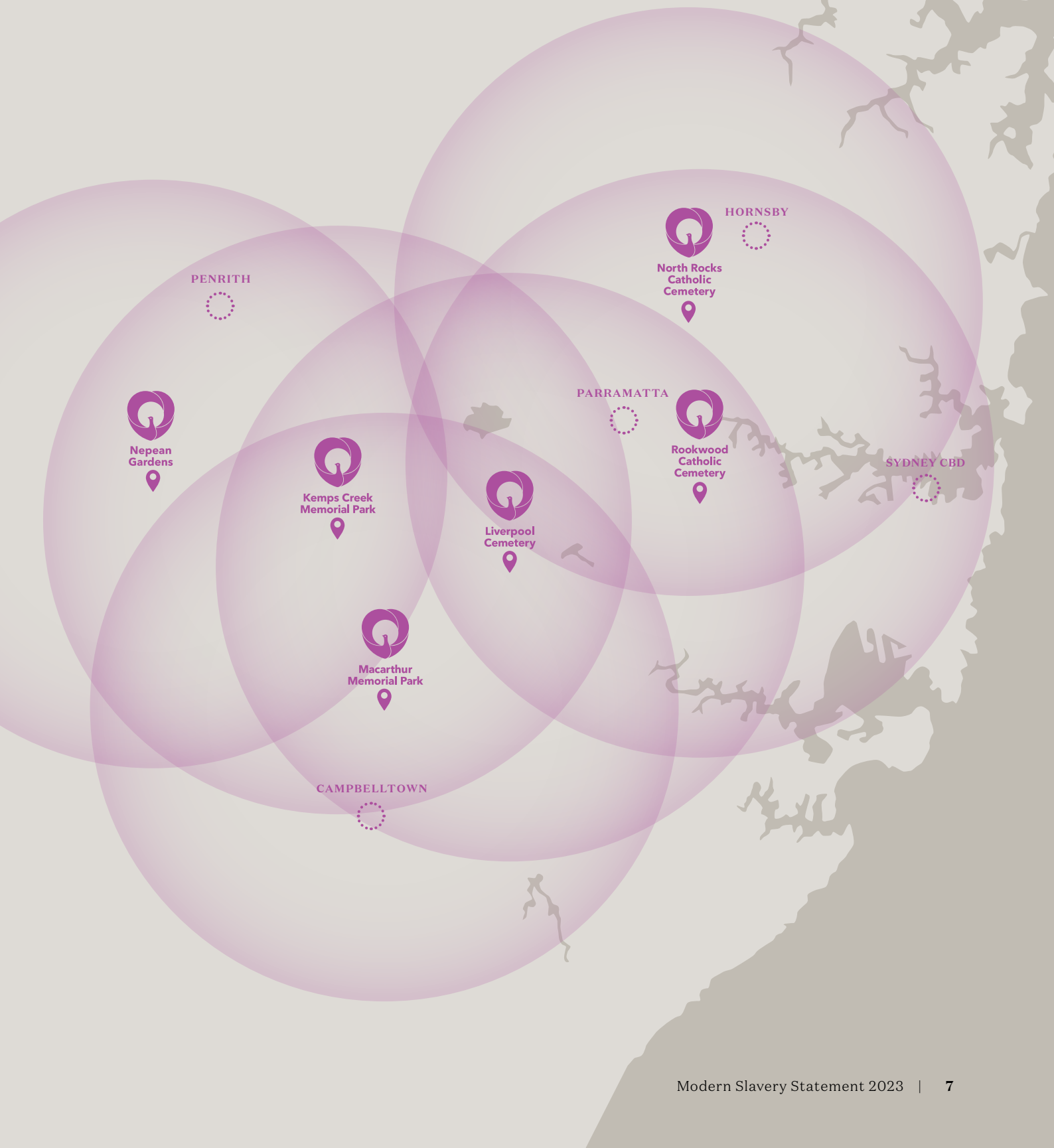
Modern Slavery initiative has the following governance framework in CCC:

- (b) Board,
- (c) Audit, Risk Management & Corporate Governance Committee (ARMCGC)
- (d) CEO
- (e) Modern Slavery Working Group
- (f) CFO

The Board approved the Procurement Strategy Plan in February 2020 which incorporated ACAN's Modern Slavery Risk Management Program tools and resources. The CFO is responsible for the procurement function and participates with the respective Directors of Human Resources and Marketing Departments in the Modern Slavery Working Group (MSWG), that periodically reports to the CEO and the ARMCGC. In 2023 the MSWG met twice.

Our Operations

CCC currently operates three cemeteries in the Western Sydney area. These cemeteries are located at Rookwood, Kemps Creek, and Liverpool. In addition, we have commenced construction of MacArthur Memorial Park and received Development Approval for Nepean Gardens Memorial Park. CCC also maintains the operation of North Rocks Catholic Cemetery.



Our Organisation

CCC has a clearly defined organisational structure comprising six departments reporting to the CEO:

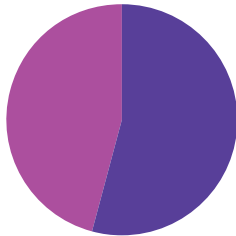




Our Team

96

members of staff

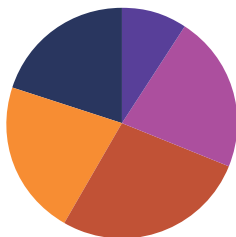
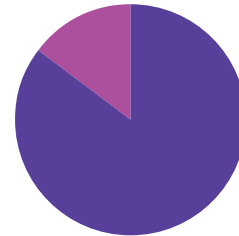


Staff Diversity

● Male	52
● Female	44

Employment Mix

● Permanent	82
● Part-time & Casual	14

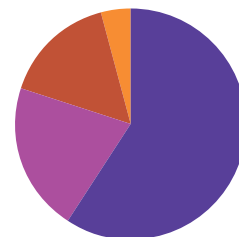


Age Diversity

● 20's	9
● 30's	21
● 40's	26
● 50's	21
● 60's	19

Length of Service

● 0-5 years	57
● 6-10 years	20
● 11-20 years	15
● 21+ years	4



Sourced from CCC's 2023 Annual Report, highlights a profile of our employees and services.

Workforce Profile

Current supplier relationships are a combination of short and long-term engagements. For the supply of goods, contractual terms are generally dictated to us while supply of services involves a negotiation process. Other than suppliers, CCC's key business relationships are with Community Groups and Funeral Directors. There are no joint ventures.

The Procurement Strategy has been fully implemented as of 1 April 2022 with the establishment of an appropriately resourced 'center-led' procurement function and going live with a 'one-stop-shop' procurement portal. An important outcome of the Procurement function is organising and managing "common use" contracts covering a substantial proportion of OPEX and CAPEX. This reduces the risk of CCC inadvertently being linked or connected to modern slavery. CCC is developing longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Only those suppliers who can meet our standards are appointed.

Our Supply Chain

Over 12 months ending Dec 2023, CCC purchased over \$61.54m of goods and services mainly from 228 direct suppliers. Our suppliers range from construction, stone masons, cleaners, security, legal, landscaping, labour hire, IT advisors, and waste service providers. All procurement was sourced from Australian suppliers.

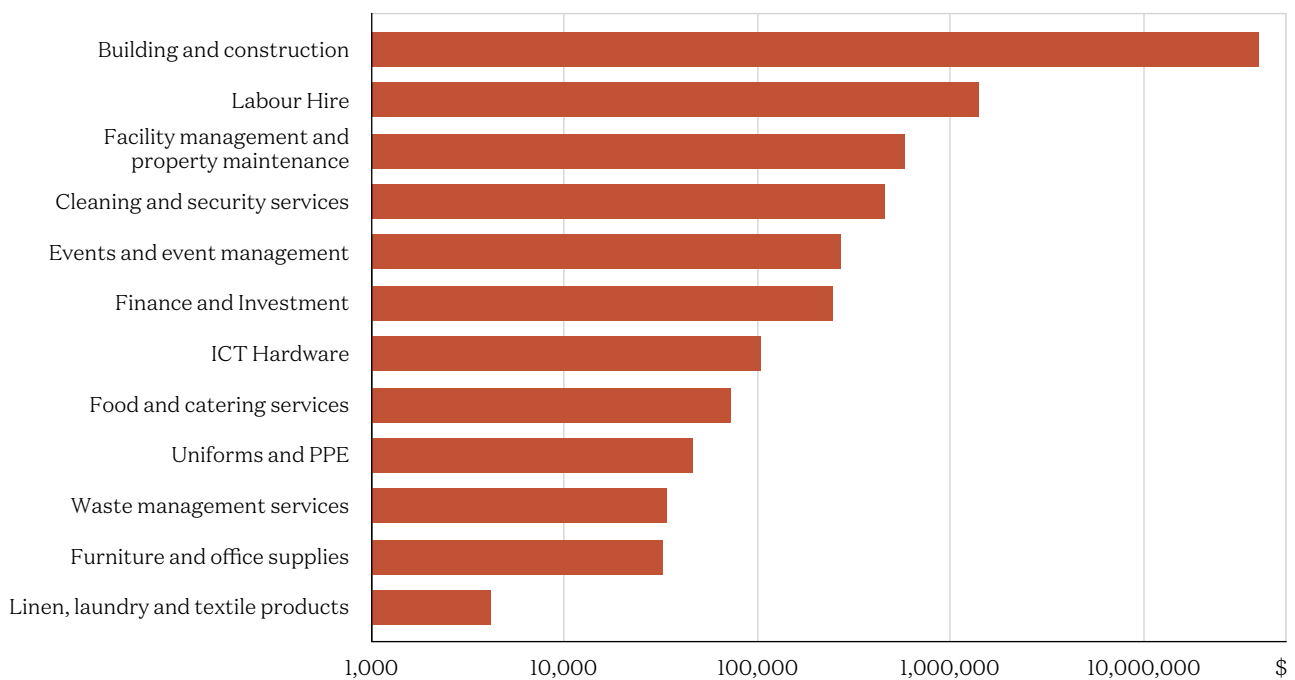
Criteria 3: Modern Slavery risks in Operations and Supply Chain



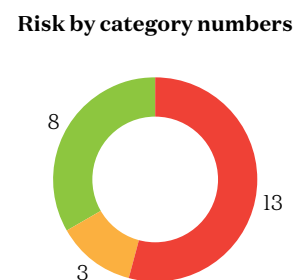
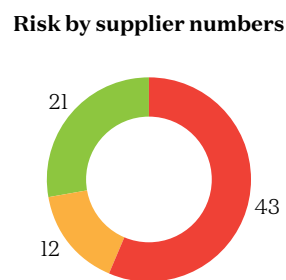
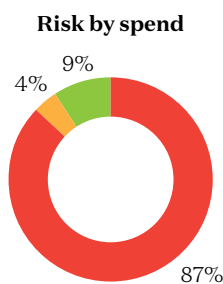
In 2023, we identified the potential highest risk suppliers according to the ACAN Category Risk Taxonomy. This formed the basis of below supplier dashboard. It provides an overview of the scope and scale of potential modern slavery risk within CCC’s supply chain and is the first step in developing robust risk management systems. The information was sourced from the 2023 calendar year and the indicators of potential risk are based on the best available information as disclosed by ACAN.

Supplier	2023 \$
Linen, laundry, and textile products	4,144
Furniture and office supplies	32,263
Waste management services	33,918
Uniforms and PPE	45,933
Food and catering services	73,917
ICT Hardware	103,552
Finance and Investment	246,844
Events and event management	273,277
Cleaning and security services	461,832
Facility management and property maintenance	575,832
Labour Hire	1,423,402
Building and construction	40,170,199

Spend on High Risk categories



Risk	■	■	■	
Spend risk (\$)	\$44,679,036	\$2,065,866	\$4,610,863	\$51,355,765
Supplier risk (No.)	43	12	21	76
Category risk (No.)	13	3	8	24



The Dashboard does not attempt to determine actual risk to the organisation, or the modern slavery risk presented by individual suppliers. Determining actual risk requires detailed information, analysis and investigation from multiple sources and stakeholders.

For example, “Graves & Monuments” may have the risk with materials imported from overseas. “Construction” and “Facilities” may represent a risk due to migrant workers from many overseas countries.

The graph above highlights CCC has 13 potential high-risk categories involving 43 suppliers that constitutes 87% of the overall spend.

13 potential high-risk categories refer to Construction, Grave & Monuments, Landscaping, Facilities, Cleaning, Security, Information and Communications Technology, Uniforms, Catering & Venue Hire, Waste, Stationery & General Office Supplies, Laundry Services and Furniture.

The key area of potentially-risk suppliers is in Construction, Grave & Monuments, Landscaping services and Facilities Management totaling \$43.9m. This has increased from \$7.3m in 2022 due to the civil infrastructure and building construction projects in MacArthur Memorial Park.

The next major areas of potentially high-risk suppliers are with Cleaning and Security totaling \$462k.

CCC is confident that our risk to modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. These include Human Resource policies which are intended to ensure that all staff are paid at above award rates according to their role and qualifications. All employment information is captured through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details.

The key points are:

- Employment – as per our Recruitment and Selection procedure, selection is based on merit, equal employment opportunity and relevant Federal and State Legislation.
- Rates of pay are checked annually to ensure they meet minimum standards.
- Labour hire agencies inclusive of apprentices are also governed by legislation ensuring minimum award rates of pay to all employees. All agencies are engaged on the basis that they reflect pay rates based on Catholic Cemeteries relevant instruments and provide us with pay rates to labour hire personnel.
- Anti-Discrimination is outlined in our Code of Conduct – we value the diversity of our people, and as such have employees from a wide diverse.
- Protection of individuals who disclose information about illegal or improper conduct occurring within CCC is outlined in our Whistleblower policy.

Criteria 4: Actions taken to assess and address risk

4

The focus in 2023 was to promote employees and suppliers' awareness, risk monitoring and ongoing procurement action to address modern slavery.

Category Summary

Management Systems

CCC has policies, processes, and a plan of action. Our Board understands the risk of Modern Slavery and the Leadership team exercises due diligence and ensures our system for managing Modern Slavery risk is effectively implemented, reviewed, and improved where necessary. We have an enterprise grade business system in place to identify, manage and report on modern slavery risks, incidents, and corrective actions. Our governance framework is clear, and we have a team specifically dedicated to driving modern slavery mitigation efforts.

Risk Management

The CCC risk management framework is actively used and has a dynamic feedback loop to incorporate new learnings. We use the software Risk Wizard to capture incidents, grade the severity, map a course of action and track progress in mitigating the risk. We review and engage our operational staff to identify additional issues, beyond wage compliance. Our system is developed to monitor risk and enables us to actively manage and prioritize areas where our resources need to be applied.

Human Resources and Recruitment

CCC has commenced incorporating modern slavery issues into our employee or contractor training and awareness programs. In 2023 our aim is hiring and onboarding processes that reference modern slavery risk management. We have policies and systems in place to identify and mitigate the risk of modern slavery in recruitment, payment of wages, etc.

A training module for modern slavery will commence deployment to relevant staff members. In addition, CCC are implementing specific policies and processes to assist in the induction of labour hire companies and/or outsourcing of jobs to subcontractors.

Procurement and Supply Chain

Our procurement framework is actively used and has a dynamic feedback loop to incorporate learnings into better decision making and risk management. Our contract management and tender process takes modern slavery parameters into account and is used for decision making when awarding tenders. We investigate instances and suppliers regarding adverse information. We do not monitor performance regularly, except for quality and delivery issues.

We have progressed with our supplier engagement strategy by communicating our intent to all suppliers on this matter and surveying all potentially high-risk suppliers on awareness and actions to MS. In addition, we subscribe to SEDEX to identify risk in the supply chain of our potentially high-risk suppliers.

Stakeholders

CCC has communicated our commitments and values to the stakeholders and setting accountability for how to drive the improvement of this issue. Through our whistle blower policy (staff and labour hire contractors) and complaints policy (customers), we have an active, anonymous, and efficient grievance mechanism. However, it does not target workers in our supply chains.

Grievance Mechanism

CCC has developed Whistleblower Policy and Grievance Procedure to promote a culture of honest and ethical behaviour by encouraging stakeholders of CCC to report concerns of any actual or suspected unethical, illegal, corrupt, or fraudulent practices involving CCC's business. CCC is building capacity of its direct employees and stakeholders to recognise and respond to indicators of poor labour practices, unsafe working conditions and modern slavery in its operations and supply chains and raise these concerns to management.

Remediation

CCC is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the *United Nations Guiding Principles on Business and Human Rights*, *Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities*, relevant Australian laws, and best practice guidance regarding informed consent of those impacted. This also includes providing for, or cooperating in, actions to address harm to people and root causes to mitigate future risks if CCC is found to have caused or contributed to modern slavery.

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

As an ACAN participating entity, CCC has access to guidance and support from Domus 8.7, an agency of the Catholic Archdiocese of Sydney which focused on providing support, advice on how to respond to suspected or actual situations of modern slavery.

Our Investments

CCC seeks to invest as a responsible community member, and to ensure that the investments are consistent with its specific mission, the values of the Catholic Church and the broader arena in which the Trust operates.

The Ethical Statement within the CCC Investment Policy requires investment managers of managed funds to monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviors in the areas of Human Rights, Labour, Environment and Corruption.

In addition, on an annual basis we receive a proxy voting report from our Investment Advisor, currently Russell Investments, as well as a report on those companies with their main businesses that engage in unethical or undesirable practices.

Modern Slavery Action Plan

Achieved in 2020–2023	Plan for 2024
<ul style="list-style-type: none">› Established the Modern Slavery Policy.› 2020, 2021 & 2022 Annual Statements are published on CCC website & Procurement Portal.› Incorporated Modern Slavery risk into CCC's operations and supply chain.› Established a Modern Slavery Working Group (MSWG).› Promoted employees' MS awareness via Newsletters.› Implemented anti-slavery clauses in Purchase Orders.› Included Modern Slavery requirements in tendering processes.› Surveyed 60 high-risk suppliers to understand their awareness and approach.› CCC continued to participate in the Australian Catholic Anti-Slavery Network (ACAN)	<ul style="list-style-type: none">› Prepare 2023 Modern Slavery Statement.› Review Modern Slavery Risk annually.› MS awareness Presentation to all staff in Townhall meeting.› Continuously promote employees' MS awareness.› Utilise social media to promote MS awareness among communities.› Renew ACAN participation

Criteria 5: Effectiveness Assessment



Effective assessments include, but not limited to:

- Three MS Newsletters were sent to “All Staff”.
- 582 Purchase Orders were issued with Anti-Slavery clause incorporated in the T&C.
- 713 suppliers’ details were shared with ACAN & Sedex to understand their awareness and approach.
- Partnered with Sedex to create more socially and environmentally sustainable businesses and supply chain.

2023	Activity	Catholic Cemeteries + Crematoria
Internal / staff	Hours spent on modern slavery activities	120
	E-learning modules completed	25
External / supplier engagement	Total number of suppliers	622
	Number of suppliers across high-risk categories	35
	Purchase orders include modern slavery clause	582
	Number of ACAN Supplier Surveys completed	75
	Supplier staff attending capacity building webinars	26
	Invited to join Sedex	12
	Joined Sedex	4
	Sedex SAQ completed	2
	Social audits	1
Corrective actions	0	
Domus 8.7 External referrals	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Criteria 6: Consultation with Owned or Controlled Entities

6

CCC does not own or control any other entities therefore the criteria are not applicable.

Criteria 7: Any Other Relevant Information

7

No other relevant information to report.



Modern Slavery Statement 2023

REPORTING PERIOD
1 JAN 2023 - 31 DEC 2023



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Disclosure Note

This statement has been made on behalf of Catholic Church Insurance. This Statement covers all entities owned or controlled by Catholic Church Insurance.

ABN 76 000 005 210

Approval and signature

“ I am proud of the work that CCI has done to assess and address the risk of modern slavery in daily business operations.”



I am pleased to present the CCI 2023 Modern Slavery Statement.

In FY2019, CCI began our assessment of modern slavery risks within our organisation. It led us to establish a Supplier Code of Conduct for all of the organisation's procurement activities.

In FY2023, CCI has worked with experts within the Australian Catholic Anti-Slavery Network (ACAN), and has been able to drive stronger staff awareness, leadership training and engagement around the risk of modern slavery in our business.

During 2023 we have continued to reinforce our strong foundations to ensure compliance with Modern Slavery Act obligations have been met.

CCI enterprise risk reporting systems, both internally and through our Whistleblower policy and practice, have been enhanced to enable the proper reporting of modern slavery concerns.

The 2023 Modern Slavery Statement will be the last statement submitted by CCI, due to CCI entering a run-off state on 30th May 2023. CCI will not meet the reporting threshold for submitting a Modern Slavery Statement from 2024 onwards.

Modern slavery in any form is unacceptable, and I am proud of the work that CCI has done to assess and address the risk of modern slavery in daily business operations.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Joan Fitzpatrick". The signature is fluid and cursive.

Joan Fitzpatrick
Chairman

This Modern Slavery Statement was approved by the principal governing body of Catholic Church Insurance as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22nd of May 2024. This Modern Slavery Statement is signed by a responsible member of Catholic Church Insurance as defined by the Act.

About CCI

CCI was one of the oldest insurance companies in Australia, set up by the Catholic Church to service the Catholic community in 1911.

On 30 May 2023, the Board of CCI decided to voluntarily place CCI into 'run-off'. Effective from this date, CCI ceased writing new insurance business and renewing expiring policies.

CCI remains solvent and as a claims management company, continues to manage and pay claims on all valid policies in accordance with policy terms.

Based on estimates of claims as at 31 May 2023, CCI currently has sufficient assets to meet its liabilities as they fall due. However, the claims situation will continue to develop and is subject to a high degree of complexity and uncertainty. CCI has implemented a Scheme of Arrangement as a precaution to ensure an orderly run off and certainty into the future.

CCI's Scheme of Arrangement pursuant to section 411 of the Corporations Act 2001 (Cth) became effective and binding on all Scheme Creditors on 3rd November 2023 after Scheme Creditors voted unanimously to approve the Scheme and it was later endorsed by the Federal Court at the second court hearing.



Modern Slavery and Human Rights in Supply Chains

Companies and their investors are exposed to risks arising from the exploitation and mistreatment of people as workers, contractors or suppliers.

In Guadium et Spes, 27 – Second Vatican Council, the Catholic Church reaffirmed its historic concern about forced labor, stating that “slavery, prostitution, the selling of women and children and disgraceful working conditions where people are treated as instruments of gain rather than free and responsible persons” are “infamies” and “an affront to fundamental values...values rooted in the very nature of the human person.”

Where CCI directly invests, CCI seeks to identify and exclude investment in companies that do not have a risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services, as per the requirements of the Australian Modern Slavery Act 2018 (Cth).

Where funds are externally managed, CCI will engage with its investment partners to ensure that Modern Slavery risks are incorporated within the ESG assessment of their investment activities.

Source: CCI Catholic Values Policy

2023 Modern Slavery Risk Management Initiatives

Since its enactment, CCI has complied with the Modern Slavery Act 2018. In the past year CCI has focused on initiatives that are reflected below:

- ◆ Inclusion of a Modern Slavery category on the CCI website
- ◆ Extending the rollout of Modern Slavery training to all of the Senior Leadership Team at CCI.
- ◆ Development and publication of a Modern Slavery Fact Sheet to develop further awareness on Modern Slavery Principles for all staff.
- ◆ Conducted a review of current CCI suppliers to assess which ones will still be required during run-off planning and beyond – post run off announcement.
- ◆ Conducted a sample audit on Modern Slavery compliance post review of suppliers required in run-off planning and beyond.

Structure, operations and supply chain

CCI has gone through significant structural changes in 2023 as it transitions to a run off claims management company.

Our Organisational Structure

CCI is an APRA-regulated claims management company in run off, managing claims from the Catholic and broader Christian community across the Church, aged care, healthcare, welfare and education sectors.

CCI operates under an APRA conditional run off license. CCI no longer issues or renews policies and is managing claims on policies issued prior to 16 June 2023.

CCI organizational structure post run off (confirmed 2023 – effective March 2024) is reflected in Figure 1.

Figure 1. Organisational Structure



*Information Security has been outsourced to third party provider Lynden from October 2023.

**Workers compensation claim management will be outsourced to third party provider Employers Mutual Limited (EML) from April 2024.

Our Governance Framework

Modern Slavery Act compliance fits within the overall Board Risk Management Framework, with delegation of authority/ accountability to the Board Risk Committee to govern and oversee organisational response. This delegation is documented in the Board Risk Committee Terms of Reference.

Reporting of activity regarding modern slavery comes to the Board Risk Committee through the Corporate Risk function.

The Chief Risk Officer is responsible for MSA governance and oversight.

Structure, operations and supply chain continued

Our Operations

Prior to entering run off (May 2023) CCI was a General Insurance and Workers Compensation insurer, and has transitioned to a claims management company.

CCI is located and operates exclusively in Australia with Head Office in Melbourne, and staff in other states across Australia. .

CCI employs ~200 FTE (in 2023) across its various offices.

CCI typically engages suppliers on short- term commercial arrangements including, but not limited to:

- ◆ Professional Advisory Services
- ◆ Reinsurance
- ◆ Technology Services
- ◆ Claims Adjusters and Repairer services
- ◆ Legal Services

In October 2023 CCI entered a 12-month contract with Lynden Cyber for outsourcing security services. This contract is deemed a material outsourcing arrangement and included a comprehensive due diligence review and confirmation of no offshoring of services. Notification was also provided to APRA on the arrangement.

Catholic Church Insurance’s (CCI) funds under management is approximately -A\$680 million managed by CCI’s investment department under Catholic Church Insurance Limited.

The CCI investment portfolio is overseen by CCI Board and CCI Asset & Liability Committee that ultimately delegates authority to CCI Management to act in accordance with daily operation of investments.

CCI operations include internally managed asset classes of cash, fixed income and Australian equities that have a strong bias towards passive investing.

Other asset classes that include Global Equities and Unlisted Property, are managed externally, and are considered as part of CCI supply chain.

Figure refers to employed staff in 2023, noting that as CCI progresses with run off this number will continue to reduce.

Our Supply Chain

As a claims management company, CCI modern slavery supply chain risk is assessed as low. CCI third party expenditure predominantly consists of professional and IT services sourced from Australian firms.

Procurement at CCI has primarily focussed on suppliers that directly provide goods or services. These suppliers are actively managed by the business and include suppliers that represent CCI’s highest commercial risk and/or most significant expenditure. We understand that the risk of modern slavery is also present within our sub-suppliers. In some instances, the risks with these suppliers may be higher.

During a risk mapping exercise that was completed in consultation with the Australian Catholic Anti-Slavery Network (ACAN), some facilities categories (such as cleaning) were identified as potential risks. These services are provisioned through the landlord of our corporate tenancies and as such are not directly sourced, sourced, contracted or managed by CCI.

CCI’s operations include the internally managed asset classes of cash, fixed income, and Australian equities that are conservatively managed with a strong bias towards passive investing.

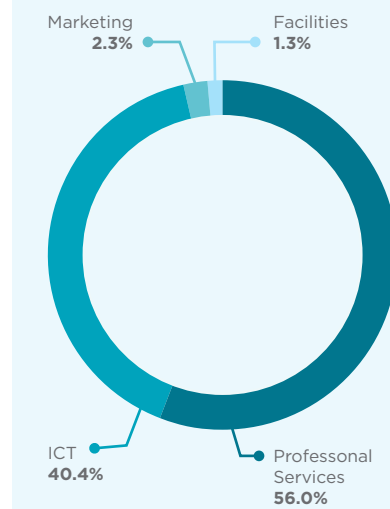
CCI also partners with external fund managers to invest in asset classes such as global equities and property via unit trusts.

Through these investment managers, CCI has exposures to various developed countries and across key sectors of the global economy where CCI have direct and indirect exposures to the underlying company’s supply chains.

CCI endeavours to invest in a socially responsible manner in accordance with the Investment Policy Statement that is guided by the Catholic Values Policy (CVP). The CVP includes references to, and considerations of, the Modern Slavery Act 2018 (Cth):

- ◆ CCI Investment Policy Statement (updated annually) that includes due diligence on direct investments and externally managed funds
- ◆ CCI Catholic Values Policy (last updated Jan 2021) that stipulates negative screening of companies that do not have risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services.

Figure 2.
CCI Spend by Category



Modern slavery risks in operations & supply chain

CCI recognises its obligations in respect to human rights extends beyond its own operations to suppliers and the supply chain.



We expect that all suppliers abide by the Modern Slavery Act 2018 which prohibits any form of modern slavery or forced labour. CCI suppliers are screened as part of our supplier onboarding process. We work with suppliers by asking them to describe the risks of modern slavery practices in their operations, and what actions they take to assess and address those risks. In addition, we ask all CCI suppliers to comply with our standard contract clauses in relation to modern slavery. These include:

- (a) conduct your business in a manner that is consistent with the principles of the Modern Slavery Act 2018, and have never been convicted of any offence related to modern slavery;
- (b) have made all reasonable enquiries to ensure, and will continue to take all reasonable steps (including appropriate due diligence procedures) to ensure, that there is no modern slavery in your own or in your sub-contractors' supply chains, or in any other part of your business (and will provide us with evidence of this upon request); and

- (c) will notify us immediately upon becoming aware of any actual or suspected Modern Slavery in any supply chain in connection with this Agreement, and will provide us with all details requested by us relating to the Modern Slavery and take all reasonable steps to mitigate any damage caused by it, at your own cost.

Our People

Recruitment and labour hire practices are managed in line with the Banking and Finance Industry Award, recruitment & background check policies and procurement standards. All staff are employed within Australia either as a direct employee or through Australian based employment agencies. The employment agencies are engaged under contract via the procurement process.

CCI employs ~200 staff (in 2023). Leadership gender diversity is reported to the SLT and Board along with other diversity metrics such as place of birth, ethnicity, religion, language spoken, disability, age and length of service. Gender diversity for leaders is currently within the acceptable range.

CCI established clear whistleblower policy and process in 2019, in compliance with The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Cth).

A key element of the whistleblower policy was the establishment and education of all CCI staff in the availability, access and reporting through our third-party managed Whistle Blower hotline. All reporting through the hotline is provided to the Chief Risk Officer and reported appropriately and where required to the CCI Board.

Actions taken to assess and address risk

The focus for CCI in 2023 was strengthening our governance and monitoring of potential modern slavery risks in operations and supply chain in light of entering run off.

In 2023, CCI completed the following actions in relation to managing risks of Modern Slavery:

- ◆ Inclusion of a Modern Slavery category on CCI's webpage with the publication of CCI's Modern Slavery Statement
- ◆ Members of the Senior Leadership Team completed ACAN Modern Slavery E-Learning
- ◆ General awareness training for staff through the creation, publication and communication of a Modern Slavery Fact Sheet
- ◆ Sample monitoring of standard contacts for inclusion of requirements for suppliers to comply to Modern Slavery Act.



Remediation

CCI is committed to ensuring it provides appropriate and timely remedies to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CCI is found to have caused or contributed to modern slavery.

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, CCI is a founding partner of Domus 8.7 - a program to provide remedy to people impacted by modern slavery.

CCI remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 CCI will continue to help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CCI is directly linked to modern slavery by a business relationship, CCI is committed to working with the entity that caused the harm 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 CCI to ensure victim-centred remediation processes are implemented to the satisfaction of CCI.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

Additional information about Domus 8.7 and the process applied can be found on www.domus87.org.au

Effectiveness assessment, consultation & other relevant information

In 2023, CCI implemented a monthly review of the progress of all Modern Slavery actions, encompassing compliance, training and education within the business around Modern Slavery legislation through its ESG Committee.



This review process was supported by embedding Modern Slavery education through an annual presentation as part of the regular all staff Snapshot program and promotion of online resources.

Quarterly updates are provided through the Senior Leadership Team Risk Deep Dive process as necessary, as well as through Board Risk Committee reporting process.

Criteria 6

Consultation

CCI does not own or control any other entities, therefore this criteria is not applicable.

Criteria 7

Other Relevant Information

- not applicable



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