



AUSTRALIAN CATHOLIC  
**ANTI-SLAVERY  
NETWORK**

ACAN COMPENDIUM OF CATHOLIC  
**MODERN SLAVERY  
STATEMENTS**

1 JANUARY TO  
31 DECEMBER 2024



ACAN COMPENDIUM  
EXECUTIVE SUMMARY

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"I am proud to be part of the Australian Catholic response to modern slavery. As part of the ACAN Program, Catholic organisations are ready to respond when they find people with modern slavery indicators in their operations and supply chains..."



Facilitated by the  
Catholic Archdiocese  
of Sydney

**ACAN.ORG.AU**

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Published in June 2025

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MOE TURAGA, LIVED EXPERIENCE ADVISOR  
ACAN AND DOMUS 8.7 REMEDIATION SERVICE



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# 1 About ACAN

## 1.1 Catholic member organisations

### NSW

Catholic Archdiocese of Sydney  
Catholic Cemeteries + Crematoria  
Catholic Diocese of Maitland-Newcastle  
Catholic Education Diocese of Bathurst  
Catholic Education Diocese of Wagga Wagga  
Catholic Education Diocese of Wollongong  
Catholic Education Network  
Catholic Schools Armidale  
Catholic Schools Broken Bay  
Catholic Schools NSW  
Catholic Schools Parramatta Diocese  
CatholicCare Sydney  
Diocese of Lismore Catholic Schools  
Diocese of Maitland-Newcastle Catholic Schools  
Sydney Catholic Schools  
St Vincent de Paul Society NSW

### QLD

Catholic Archdiocese of Brisbane  
Catholic Education Brisbane  
Catholic Education Diocese of Rockhampton  
Mercy Community  
Ozcare  
Southern Cross Care QLD  
St Vincent de Paul Society QLD

### SA

Catholic Archdiocese of Adelaide  
Catholic Education South Australia

### TAS

Catholic Archdiocese of Hobart  
Catholic Education Tasmania

### VIC

Catholic Archdiocese of Melbourne  
Catholic Education Sandhurst  
Diocese of Ballarat Catholic Education  
Diocese of Sale Catholic Education  
Melbourne Archdiocese Catholic Schools  
St Vincent de Paul Society Victoria  
Victoria Catholic Education Authority  
Villa Maria Catholic Homes

### WA

Catholic Archdiocese of Perth  
Catholic Education Western Australia  
MercyCare  
Southern Cross Care WA

### ACT

Catholic Education Canberra Goulburn

### NT

Catholic Education Northern Territory

## MULTI-STATE

Australian Catholic University

Cabrini

Calvary Health Care

Catholic Healthcare

Dominican Education Australia

Edmund Rice Education Australia

MacKillop Family Services

Marist Schools Australia

Mater

Mercy Education

Mercy Health

Southern Cross Care NSW & ACT

St John of God Health Care

St Vincent de Paul Society

Canberra Goulburn

St Vincent's Health Australia

University of Notre Dame Australia





## 1.2 Introduction

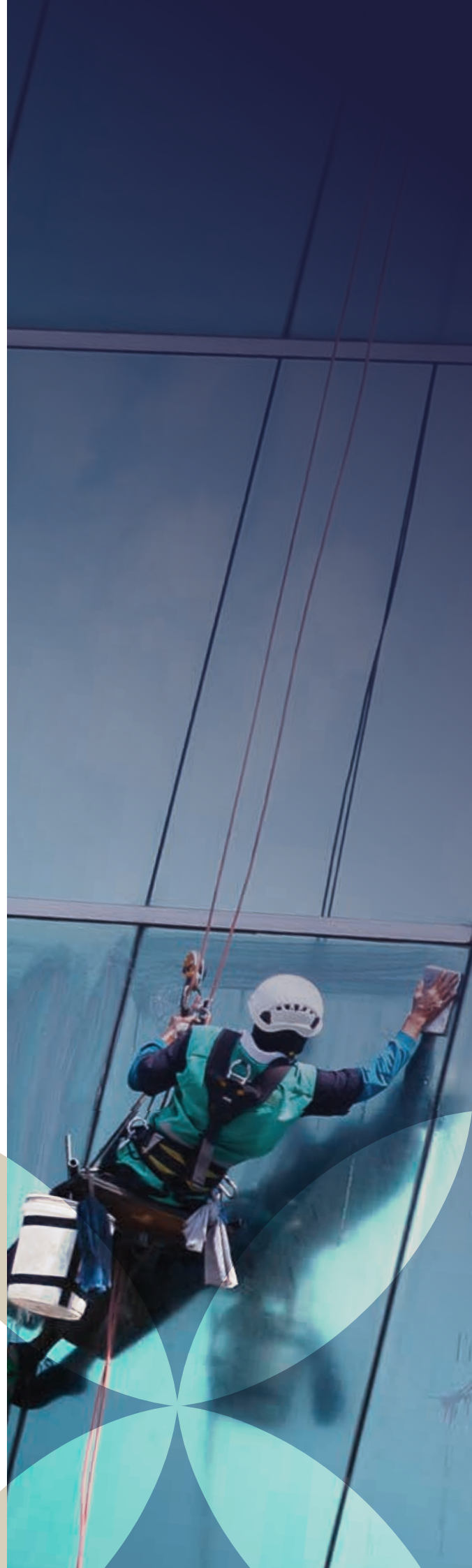
### Modern Slavery Act 2018

The 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).

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 tools and resources, training, action planning and awareness-raising in their respective organisations.

ACAN Program Managers undertake supplier engagement activities on behalf of Catholic entities.

### **Catholic Modern Slavery Statements**

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

Each Catholic entity completes an annual entity profile survey. The 2024 survey contained 134 questions that assess the maturity of each entity's modern slavery risk management program.

The results of the survey are 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 2024 Compendium consists of 44 individual Statements submitted to the Australian Government Online Register on 30th 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.



**221,833\***

**Staff** employed  
across **264** entities



**36,317**

**Volunteers**



**712,161**

**Students** educated  
in **1,577** Schools



**68,405**

**Social Care Clients**



**11,040**

**Beds** across **71**  
Hospitals



**43,570**

**University** students  
across **11** Campuses

\*Increase from reporting year 2023 linked to additional Catholic entities joining ACAN

**\$29.7B**

ANNUAL  
REVENUE

**\$9.5B**

ANNUAL  
PROCUREMENT  
SPEND

**184,131**

TOTAL NUMBER  
OF SUPPLIERS



**2,138,807**

Meals served



**16,570**

Aged Care Beds across  
207 Facilities



# 3 Modern Slavery Risks

## 3.1 Risk Assessment

Of the \$9.5 billion aggregated procurement expenditure by Catholic entities in 2024, \$5.5 billion was spent with 57,764 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
- Information gathered by Domus 8.7 remediation service.

The categories align with the United Nations Standard Products and Services Code (UNSPSC), facilitating integration and equivalency to a range of procurement systems used by Catholic organisations.

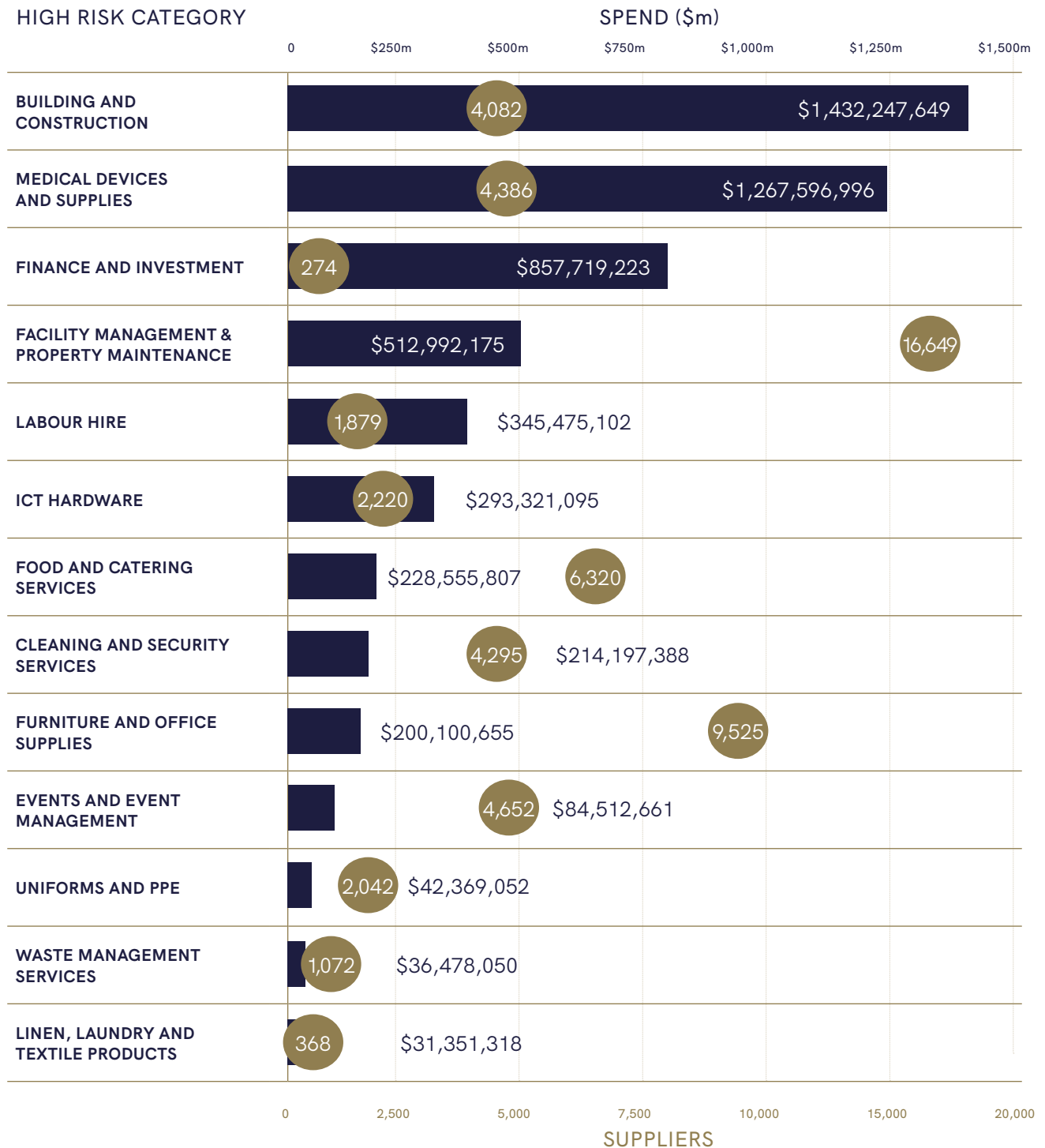






## 3.2 Risk Categories

### Total spend and number of suppliers in high risk categories





## 3.3 Risk Profile



**\$9.5B**

### 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
- ✕ Finance and Investment
- ✕ Facility management & property maintenance

Over 59.64% of total spend is in categories with inherent high risk of modern slavery



**57,764**

### TOTAL NUMBER OF SUPPLIERS IN HIGH RISK SPEND CATEGORIES ACCOUNT FOR \$5.5B EXPENDITURE

The total number of suppliers increased in the reporting period: decentralised procurement systems accounts for a higher number of suppliers declared.



# 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.

### 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 supplier revenue, number of employees, countries of origin for goods sourced overseas, workforce contractual arrangements and Sedex membership status
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 mechanisms and remediation
4. Onboarding suppliers to Sedex requires 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 supplier alignment with local laws and worker wellbeing standards
7. ACAN Prequalified Supplier Directory - a list of preferred suppliers accessible to Catholic entities



### ACAN RISK TAXONOMY

57,764 Suppliers in high-risk categories

### ACAN SUPPLIER SURVEY

3,255 Supplier surveys completed

### SUPPLIER EDUCATION

669 Suppliers attended webinars and forums

### SEDEX ONBOARDING

817 Suppliers Invited and  
318\* joined Sedex

### SEDEX SAQ

213\* SAQs completed

### AUDITS

38\* SMETA Audits visible in Sedex

### ACAN PREQUALIFIED SUPPLIER DIRECTORY

147 Suppliers

The ACAN Program analyses supplier self-declarations (ACAN Supplier Survey and the Sedex Self Assessment questionnaire) to identify:

- suppliers willing to participate in modern slavery risk management
- key modern slavery contacts in the supplier's business
- business structure
- gaps in knowledge, understanding and controls in supply chains



\* removal of duplication across suppliers saw a reduction in comparison with 2023



## 4.2 ACAN PREQUALIFIED SUPPLIER DIRECTORY

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

Over time, the Prequalified 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 2025.

### WHAT CAN SUPPLIERS DO?

1. Designate a staff contact for modern slavery engagement and actions
2. Enrol key staff in ACAN e-learning
3. Complete ACAN Supplier Surveys and Questionnaires, as requested
4. Become a Supplier Member on the SEDEX platform, if requested
5. Collaborate on desktop reviews and site audits, if requested
6. Register for the Prequalified Supplier Directory via Consent Form
7. Join Domus 8.7 Remediation Service to access site-based grievance tools and support when modern slavery concerns are identified



## 4.3 Future Actions

As one of the largest employers in Australia outside the public service sector, Catholic entities have significant collective potential to impact modern slavery. The capacity building activities of the ACAN Program help to improve Catholic entities' management controls, procurement and governance functions.

Management of supply chain risk continues through supplier education with e-learning modules, digital resources, live webinars, the ACAN Prequalified Supplier Directory, analysis of SAQ results and Social Compliance Audit reports.

In 2025, ACAN will complete the transition of program activities, resources and data to Rota, a customised digital platform. Rota provides each Catholic entity with a user dashboard, providing visibility of supplier engagement metrics, data insights, internal escalations, critical alerts, insights into industry and category risk, access to online training and webinars.

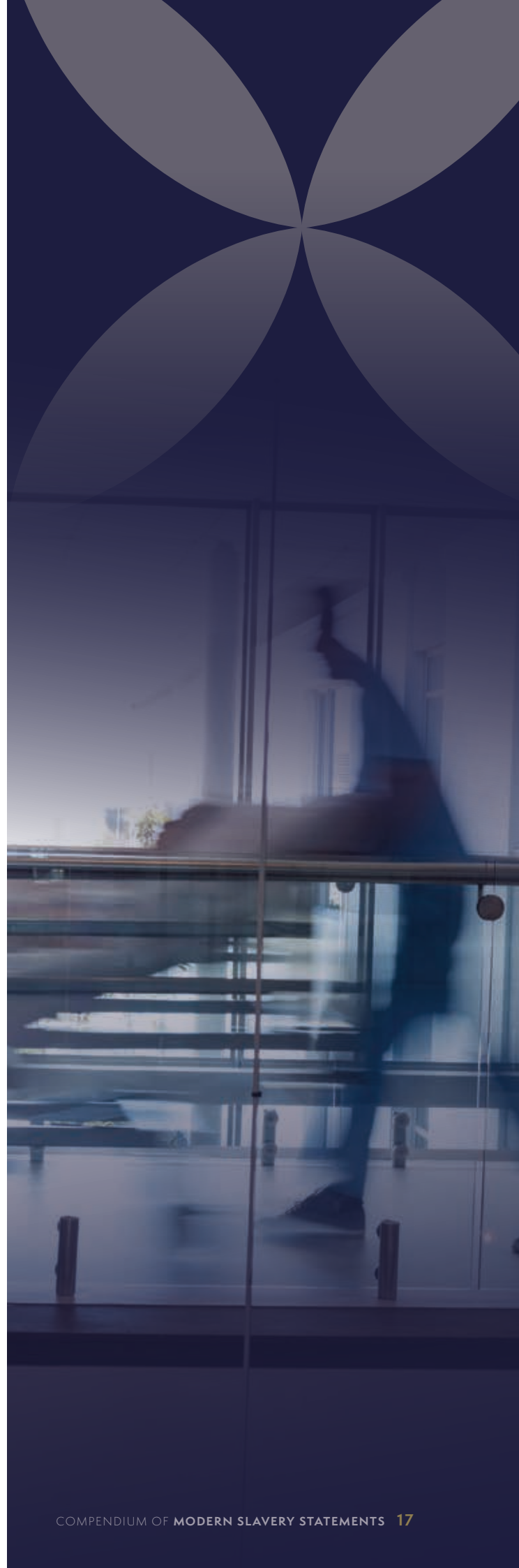
Rota also integrates the Domus 8.7 case management system, grievance mechanism, worker voice surveys, outreach tools and resources, remediation outcome and future risk mitigation reports.

### **ACAN e-learning and online resources**

The operations of Catholic entities range from large scale centralised operations in metropolitan areas to small footprint community engagement in regional areas, with equally variable supply chains. Building the capacity of teams and suppliers, regardless of the size and type of operation remains a core value of ACAN.

### **e-Learning**

In 2025, new and updated ACAN e-Learning modules will be launched and made available on Rota.







## 4.4 Domus 8.7 - Modern Slavery Remediation Service

### Purpose

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced.

Domus 8.7 provides direct support to victim survivors and provides guidance to Catholic entities participating in the ACAN Program.

Domus 8.7 also provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery.

Domus 8.7 is guided by the principles of collaboration, flexibility, and ethical standards.

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020. Catholic entities participating in the ACAN Program are the founding members of Domus 8.7.

### Remediating Modern Slavery – An Organisational Imperative

The Act mandates proactive efforts to identify, prevent, mitigate and address the impacts of modern slavery.

When an organisation encounters instances of people impacted by modern slavery, the organisation has a responsibility to provide effective remediation.

This involves steps to restore the victim survivors to their pre-exploitation state as much as possible.

### Forms of Remedial Actions

Remedial actions vary on a case-by-case basis, and may include:

- Transport, accommodation and crisis support
- Services to address psychological and physical impacts
- Financial or non-financial compensation
- Offering alternative employment opportunities
- Payment of wages and entitlements
- Reimbursement of unfair recruitment and other fees
- Training to support new employment opportunities



**DOMUS**  
8.7

## Investing in Remedy

Comprehensive modern slavery remediation is a multifaceted process, demanding diverse strategies and a dedicated team of experts.

Domus 8.7 offers the necessary expertise and support to assist Catholic entities in this complex undertaking, providing specialised services to address the challenges and responsibilities outlined by the Act.

A thorough analysis is essential to determine the appropriate remedial actions.

This includes assessing the entity's connection to the impact on victim survivors, measures taken to prevent future harm, and understanding the needs of people impacted by modern slavery.

Domus 8.7 has a multidisciplinary team skilled in social and legal services, business and human rights, supply chain management, stakeholder engagement and community outreach.

Domus 8.7 Advisory Committee Members include slavery survivor advocate Moe Turaga, Australia's most experienced legal experts on modern slavery and business leaders.

Domus 8.7 is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC) and is endorsed Public Benevolent Institution with Deductible Gift Recipient (DGR) status. ABN 244 72497189



**SCAN THE QR  
CODE TO VISIT  
THE WEBSITE.**





# 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	2022	2023	2024
INTERNAL/ STAFF	Entities participating in ACAN	50	50	52
	Hours spent on modern slavery activities	23,955	25,681	22,237
	Individual staff completed e-learning	6,809	5,430	6,402
	E-learning modules completed	7,106	9,938	9,580
EXTERNAL SUPPLIER ENGAGEMENT	Total number of suppliers	156,433	166,215	180,178
	Number of suppliers across high-risk categories	46,369	45,534	56,612
	Number of ACAN Supplier Surveys	1,235	2,181	3,255
	Suppliers attending webinars	430	1,228	669
	Invited to join Sedex	1,535	1,403	817
	Joined Sedex	364	909	318
	Sedex SAQ completed	97	245	213
	Social audits	9	50	38
	Corrective actions	220	194	138
	ACAN Newsletter total opens	15,282	24,433	44,821
	ACAN Newsletter total engagement	4,309	8,008	17,885

# Cumulative Metrics (2020 to 2024)

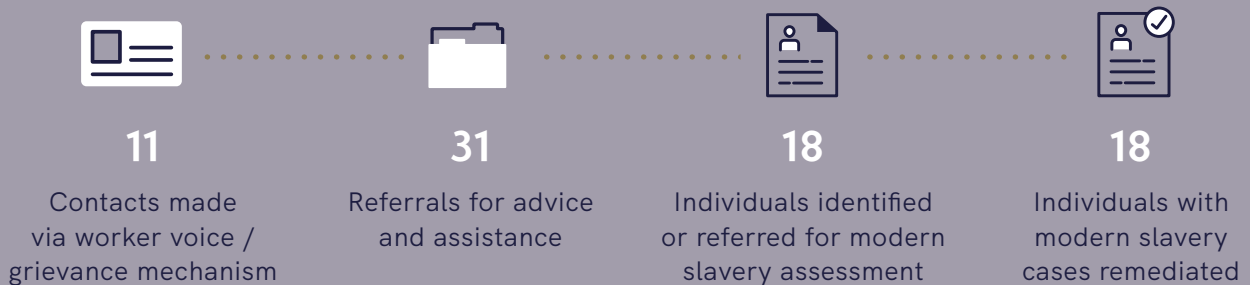
## INTERNAL STAFF



## EXTERNAL SUPPLIER ENGAGEMENT



## DOMUS 8.7 EXTERNAL REFERRALS





# 6 Index of Modern Slavery Statements

ENTITY NAME		ABN
1	St John of God Health Care Inc	21930207958
2	Catholic Healthcare Ltd	69064946318
3	Mater Misericordiae Ltd	83096708922
4	Little Company of Mary Health Care Ltd	11079815697
5	Cabrini Australia Ltd	42624828306
6	St. Vincent's Health Australia Ltd	75073503536
7	Australian Catholic University Ltd	15050192660
8	Dominican Education Australia	54610124322
9	MacKillop Family Services Ltd	79078299288
10	Marist Schools Australia	76654014794
11	Mercy Education Ltd	69154531870
12	Mercy Health Australia Ltd	89614115856
13	MercyCare Ltd	31098197490
14	Ozcare	58072422925
15	Southern Cross Care NSW & ACT	76131082374
16	Southern Cross Care QLD	65104033471
17	Southern Cross Care WA	55046572944
18	St Vincent de Paul Society NSW	91161127340
19	St Vincent de Paul Society QLD	14211506904
20	The University of Notre Dame Australia	69330643210
21	Trustees of Edmund Rice Education Australia	96372268340



	ENTITY NAME	ABN
22	Catholic Archdiocese of Melbourne	64047619369
23	The Corp of the Trustees of the Roman Catholic Archdiocese of Brisbane	25328758007
24	Catholic Archdiocese of Sydney	72823907843
25	Catholic Archdiocese of Adelaide	29608297012
26	Roman Catholic Church Trust Corporation of The Archdiocese of Hobart	24097986470
27	Trustees for Catholic Education Office Archdiocese of Canberra & Goulburn	47824127996
28	Catholic Education Western Australia Ltd	47634504135
29	Victorian Catholic Education Authority	92119459853
30	Catholic Schools NSW Ltd	46619593369
31	The Roman Catholic Trust Corporation for the Diocese of Rockhampton	21528592597
32	Diocese of Lismore Catholic Schools Ltd	93638070836
33	Armidale Catholic Schools	90702916776
34	Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle	62089182027
35	Catholic Education Diocese of Bathurst	15679442089
36	Catholic Education in the Diocese of Wagga Wagga	36345537994
37	Catholic Schools Parramatta Diocese Ltd	66661001798
38	Trustees for the Wollongong Diocese Catholic School System	67786923621
39	Catholic Metropolitan Cemeteries Trust	54281755117
40	Catholic Education Sandhurst Ltd	94643894384
41	Diocese of Ballarat Catholic Education Ltd	94493967364
42	Diocese of Sale Catholic Education Ltd	91621266993
43	Villa Maria Catholic Homes Ltd	32004364103
44	Catholic Education Northern Territory	22616685167



AUSTRALIAN CATHOLIC  
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**P: 02 9307 8464**







Courageously  
committing  
to the future

**Modern Slavery Statement**

Statement for period 1 January 2024 to 31 December 2024



**ST JOHN OF GOD**  
Health Care





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## Disclosure notes

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 Hawkesbury handed back to NSW on 1 July 2024)

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)

Marillac (ACN 050 463 717) together, for the purposes of this statement “St John of God Health Care”.

**St John of God Health Care Inc**  
ARBN: 051 960 911  
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Perth WA 6000  
[www.sjog.org.au](http://www.sjog.org.au)  
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[anton.vanheerden@sjog.org.au](mailto:anton.vanheerden@sjog.org.au)

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# Statement from St John of God Health Care Board Chair and Group CEO

At St John of God Health Care, our commitment to compassionate care and the inherent dignity of every person is deeply rooted in the tradition of the Sisters of St John of God.

We stand unequivocally against modern slavery and all forms of exploitation.

We understand that modern slavery often exists in hidden and complex ways, especially within supply chains. That's why we work closely with our suppliers and contractors to uphold human rights and embed transparency and fairness into our practices.

Over the past year, we've continued to strengthen our approach. We've undertaken comprehensive audits and risk assessments across a broad network of suppliers and embedded anti-modern slavery provisions into both existing and new contracts. These actions reflect our values, supported by strong corporate governance and an organisational culture that prioritises ethical, responsible conduct.

Collaboration remains key. Our partnerships with the Australian Catholic Anti-Slavery Network (ACAN), Catholic Health Australia (CHA), and the Catholic Network Australia (CNA) have been instrumental in helping us identify and reduce modern slavery risks more effectively.

We are proud to report measurable progress, and in 2024 we achieved a 9% improvement in our modern slavery maturity index, reaching 91% against a target of 50%. This growth reflects progress across every assessment area and reinforces our commitment to continual improvement.

Tackling modern slavery requires a united front. We are dedicated to working alongside government, industry, and our partners to drive systemic change.

Tackling modern slavery requires a united front. We are dedicated to working alongside government, industry, and our partners to drive systemic change.



This is our fifth Modern Slavery Statement, formally reviewed and endorsed by the St John of God Health Care Board. It reaffirms our unwavering commitment to ending modern slavery and protecting the dignity and rights of all people.

**Hon Kerry Sanderson AC CVO**  
Board Chair

**Bryan Pyne**  
Group CEO

*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 30 May 2025. This Modern Slavery Statement is signed by a responsible member of St John of God Health Care Inc as defined by the Act.*

# Roadmap

Strengthening accountability,  
protecting human dignity

At St John of God Health Care, we recognise that addressing modern slavery is not just a legal obligation but also a moral imperative. Our commitment to strengthening accountability ensures that we continually refine our processes, enhance transparency and take decisive action to mitigate risks within our supply chain and operations. At the heart of our efforts lies our unwavering dedication to protecting human dignity, ensuring that every person, whether a caregiver, supplier or community member, is treated with respect, fairness and justice.

This Modern Slavery Roadmap outlines our journey from awareness to action, marking key milestones as we deepen our impact, strengthen compliance and embed ethical practices that drive meaningful and lasting change. Together, we continue to uphold the values of compassion, integrity and social responsibility in the fight against modern slavery.

## Initial awareness and mobilisation

Engaged with catholic peer and industry groups

Undertook due diligence activities.

## 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 procedures

Engaged with high priority Tier 1 suppliers

Established a working group

Launched awareness and communication campaign.

2019

2020

## Extend and involve

Updated supplier agreement and RFX templates to include modern slavery clauses

Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories)

Reviewed ACAN Modern Slavery 101 training program and added all available modules to St John of God Health Care's 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

Partnered with ACRATH to communicate the impact of modern slavery in our supply chains.

## Effectiveness review and monitoring

Updated supplier agreement and RFX templates to include modern slavery clauses

Embedded modern slavery clauses into new Tier 1 supplier agreements, specifically within ICT and PPE categories

Reviewed all ACAN modern slavery training modules and integrated them into SJGHC Learning and Development platform

Reviewed and updated Business Maturity Assessment

Evaluated and refined the modern slavery framework and approach

Conducted a review of the change impact assessment framework

Invited top 50 suppliers to join the Sedex platform to improve supply chain transparency

Reviewed and updated relevant policies and procedures

Expanded taxonomy risk assessment to cover all active suppliers

Reviewed goals, targets and KPIs related to modern slavery initiatives

Partnered with ACRATH, CAN, ACAN, Catholic Health and Catholic Missions to communicate the potential impact of and collaborate with them on modern slavery risks in our supply chains.

2021

2022



## Operationalisation: Continue effectiveness review and monitoring

Enhanced campaigns to improve communication and awareness on Modern Slavery

Refined our supplier engagement and communication strategies

Rolled out modern slavery training to 89 caregivers with key supply chain responsibilities at SJGHC

Continued to add modern slavery clauses into Tier 1 commercial agreements across key categories

Mandated "Modern Slavery 101" training as compulsory for procurement, supply chain, facilities management and selected teams via the Learning and Development platform

Reviewed and updated the Business Maturity Assessment

Evaluated and further refined our modern slavery framework

Reviewed our modern slavery policies and procedures

Enhanced supplier engagement across high-impact categories

Collaborated with ACEN, CAN and Health care Forum peers to leverage insights and improve visibility into supply chain risks.

2023

## Enhancing Maturity and Effectiveness

Strengthened our commitment to ethical supply chain practices and modern slavery prevention, we will continue refining our approach in key areas:

### Communication and Awareness

Enhanced and expanded our awareness campaign to improve stakeholder engagement and understanding

### Strengthened Supply Chain Risk Management

#### Supplier Engagement:

- Engaged with 638 suppliers to review, assess and develop risk mitigation plans where necessary

#### Supplier Ethical Data Exchange (Sedex)

#### Platform Integration:

- Expanded supplier onboarding via Sedex, with 121 new suppliers joining
- Support 122 suppliers in completing Self-Assessment Questionnaires (SAQs)

#### Social Audits and Corrective Actions:

- Conducted 18 supplier social audits to assess compliance and ethical practices
- Implemented 81 corrective actions based on Sedex assessments and self-audits

### Contract Review and Compliance

Integrated modern slavery terms into 298 contracts and variations, including 50 ethical sourcing declarations under blanket purchase agreements

### Governance and Risk Alignment

Reclassified our assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring

### Training and Capability Building

Provided modern slavery awareness training to 120 suppliers' staff

Maintained internal training for 93 caregivers to provide ongoing awareness and compliance

### Continuous Improvement

Maintain and expand existing activities to drive maturity and effectiveness across our ethical sourcing and modern slavery prevention efforts.

## Setting new standards

Embed modern slavery practices into Strategy

Implement monitoring tools to assess supplier risks using AI and data analytics

Expand direct supplier mapping, training and capacity building beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers

Expand direct supplier audits beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers

Strengthen collaborations with ethical sourcing organisations to enhance responsible procurement

Develop remediation protocols for suppliers found in breach of ethical labour standards.

Pilot ethical procurement certifications for high-risk supplier categories

Introduce modern slavery awareness modules in caregiver onboarding and professional development programs.

2025 &  
Beyond

2024

# About us

St John of God Health Care is a ministry of the Catholic Church.

St John of God Health Care is one of Australia's largest Catholic not-for-profit health care providers, delivering high-quality health and community services across Australia and New Zealand.

Founded in 1895 by the Sisters of St John of God in Western Australia, our organisation has a long-standing tradition of compassionate care. Today, we operate 26 facilities and number of national services and employ over 16,500 dedicated caregivers.

As a mission-driven organisation, we reinvest all surpluses into the communities we serve, enhancing our services, expanding and modernising facilities, adopting advanced medical technologies, developing new programs, and supporting people in need through our social outreach initiatives.

Our comprehensive services include:

- Acute private hospitals
- Specialist mental health care
- Rehabilitation services
- Public-private partnerships
- Social outreach and community programs.

## 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 in which the group operates.

St John of God Health Care is a wholly owned and controlled entity of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry previously sponsored by the Sisters of St John of God.

The directors of St John of God Australia Ltd are the Trustees, who are also the members of St John of God Health Care. The Trustees appoint members of the Board.

The Board provides direction and guidance to the Group Chief Executive Officer and through him the Executive Committee, which oversees performance in line with organisational priorities.



## Our symbol

The pomegranate symbol represents our heritage – as the original symbol of the Sisters of St John of God – and our Vision for the future. The cross is the symbol of Christianity, reminding us of Jesus' suffering and our call to follow in His footsteps. Our five Values are reflected in the five seeds of the pomegranate, which is open to allow the seeds to scatter, providing new life and symbolising the generosity of self-giving to people in need.

## 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.



## Service Ethos

Service is central to how we bring the Mission to life at St John of God Health Care. Our development programs aim to support and equip our caregivers with contemporary and best in class capability in providing exceptional service.

The key tenets of our Service Ethos are:

- Our Mission inspires our service – we are continuing a great story of service entrusted to us by our founders.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.
- Relationships are central – every encounter is an opportunity and can have far-reaching effects.
- The way we work together as a community, in our own teams and with other teams, is integral in our effectiveness.
- Governance and management of resources are key to our success.
- Feedback and evaluation about how well we are doing is crucial.

# Services

St John of God Health Care provides a comprehensive range of health care services across multiple locations in Australia, including:



## Medical and Surgical Services

High-quality medical and surgical treatments across various specialties.

## Mental Health Care and Therapy

Inpatient and outpatient mental health services, including psychology, psychiatry and counselling.

## Rehabilitation

Comprehensive rehabilitation programs to support recovery from injury, illness or surgery.

## Community and Youth Services

Programs and outreach initiatives supporting youth and community health and wellbeing.



## Disability Support Services

Assistance and services tailored to individuals with disabilities to enhance independence and quality of life.

## Home Nursing

Professional nursing care provided in the comfort of patients' homes.

## Self-Funded Health Care

Flexible health care options for patients who choose to self-fund their medical treatments.

## Cancer Care

Comprehensive oncology services, including chemotherapy, radiation therapy and supportive care.



## Cardiac Service

Specialised heart care, including interventional cardiology and cardiothoracic surgery.

### Emergency Medicine

24-hour emergency departments providing immediate care for acute illnesses and injuries.



### Palliative Care

Compassionate support for patients with life-limiting illnesses, focusing on comfort and quality of life.

### Allied Health Services

A range of services, including physiotherapy, occupational therapy, dietetics and speech pathology.

### Pastoral Services

Spiritual and emotional care for patients and their families, respecting diverse beliefs and traditions.



### Maternity

Expert maternity care, including pregnancy, birth and postnatal services.

### Telehealth Services

Remote medical consultations and health care support through digital platforms.

We are committed to delivering the highest quality care to meet the diverse health care needs of the communities we serve.



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# Reporting Criteria 1 & 2

## About St John of God Health Care

### Governance and organisational structure

St John of God Health Care operates under a robust governance and corporate structure that ensures strategic oversight, accountability and ethical leadership. As a not-for-profit Catholic health care provider, St John of God Health Care is governed by a Board of Trustees, who uphold the organisation's Mission, Values and adherence to the principles of Catholic health care.

The Board delegates operational responsibilities to the Group Chief Executive Officer and an Executive Committee, who oversee the day-to-day management of the organisation. St John of God Health Care maintains strong governance frameworks, policies and risk management processes to ensure compliance with regulatory requirements, uphold clinical and corporate excellence, and drive continuous improvement. The organisation also engages with key stakeholders, including caregivers, patients, government bodies and the broader community, to align its services with emerging health care needs while maintaining financial sustainability and social responsibility.

### Our governance framework

St John of God Health Care operates within a two-tiered governance structure, comprising Trustees and a Board, ensuring robust oversight, ethical leadership and compliance with regulatory and industry standards.

The Trustees hold canonical responsibility for St John of God Health Care and safeguard the organisation's Mission, Values and adherence to Catholic health care principles. They appoint and evaluate the performance of Board members, ensuring governance structures support the organisation's long-term sustainability and strategic direction.

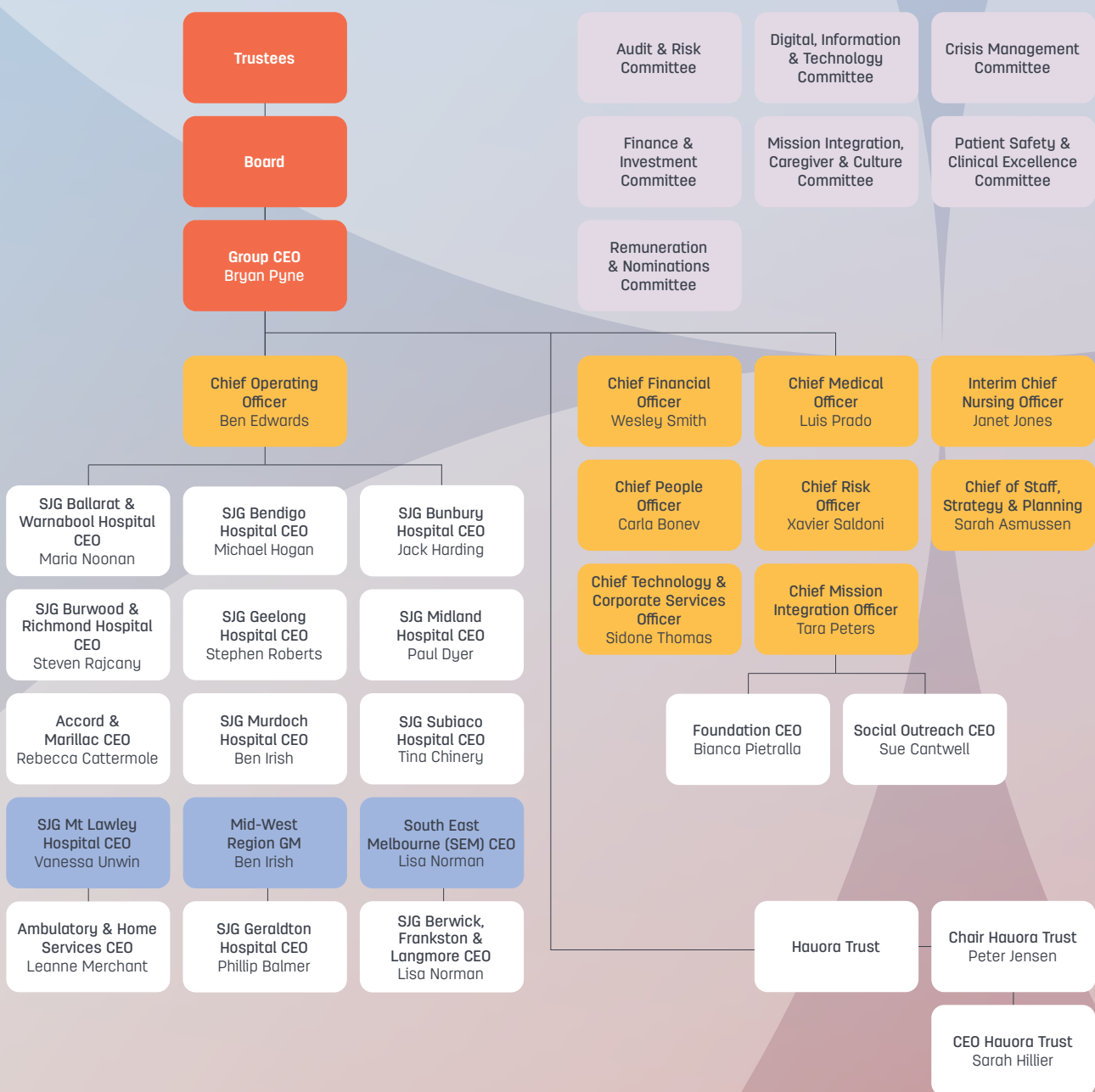
The Board is accountable for stewardship and strategic development, overseeing St John of God Health Care's operations, financial sustainability and risk management. The Board is supported by Board committees, including the Audit and Risk Committee (ARC), which plays a critical role in financial governance, risk management and regulatory compliance. The ARC provides independent oversight of the organisation's financial reporting, internal and external audit processes, risk mitigation strategies and internal controls, ensuring transparency and accountability in decision making.

St John of God Health Care applies principles of good corporate governance and best practices, drawing from recommendations by the Corporate Governance Council of the Australian Stock Exchange (ASX) and other leading governance bodies. The organisation integrates transparent decision making, ethical procurement, financial integrity, patient safety and workforce accountability into its governance approach.

The roles and responsibilities of the Trustees, Board and management are formally outlined in the St John of God Health Care Inc. Constitution. Delegated responsibilities to management are further detailed in the Governance Authority Matrix and Management Authority Matrix, ensuring clarity in leadership, decision making and accountability across all levels of the organisation.

**This framework underpins St John of God Health Care's commitment to delivering high-quality, sustainable health care while maintaining its duty of care to patients, caregivers and the broader community.**

# Our organisational structure





## Our locations

### Head Office Location

St John of God Health Care's head office is located at Level 1, 556 Wellington Street, Perth, Western Australia, 6000.

### Australian Operations

#### Western Australia

##### Perth Metropolitan Area

- St John of God Subiaco Hospital
- St John of God Murdoch Hospital
- St John of God Mt Lawley Hospital
- St John of God Midland Public and Private Hospitals

##### Regional Areas

- St John of God Bunbury Hospital
- St John of God Geraldton Hospital

#### Victoria

- St John of God Ballarat Hospital
- St John of God Bendigo Hospital
- St John of God Berwick Hospital
- St John of God Geelong Hospital
- St John of God Warrnambool Hospital
- St John of God Frankston Rehabilitation Hospital

#### New South Wales

- St John of God Burwood Hospital
- St John of God Richmond Hospital
- Hawkesbury District Health Service (handed back to NSW on 1 July 2024)

### New Zealand Operations

- St John of God Halswell (Christchurch)
- St John of God Wellington

# Year in review



Established in 1989 by the Sisters of St John of God, who first came to Western Australia in 1895

16,500<sup>1</sup>

Caregivers  
employed throughout Australia and New Zealand

68,641<sup>1</sup>

patient visits  
delivered at home in Victoria and Western Australia



Third largest private hospital operator in Australia and the second largest not-for-profit Catholic health care provider in the country

402,054<sup>1</sup>

Patients  
Treated overnight and same day

54,433

cancer admissions



26<sup>1</sup>

Facilities  
comprising 3,367 beds in Western Australia, Victoria, New South Wales and New Zealand

80.3

Patient Net Promoter Score  
which measures patient experience and satisfaction at our acute hospitals.

11,108

babies born in our hospitals

\$30.3m

Social outreach investment  
to assist people experiencing disadvantage

18,690

community mental health care visits

>\$2b<sup>1</sup>

Revenue

910

surgeries performed daily

18,306

admissions for mental health services

<sup>1</sup> Includes Hawkesbury District Health Service. Operating contract with St John of God Health Care ceased on 30 June 2024

## Our people

St John of God Health Care employs more than 16,500 caregivers across Australia and the Asia-Pacific region. We are a values-driven and inclusive organisation that recognises and celebrates the diverse skills, experiences, and perspectives of our caregivers.

### Composition of our Workforce

48%

of our workforce are professional nurses and midwives

80%

of caregivers are female

50%

of our Senior Executive are female

5,015

accredited specialist doctors provide care in our hospitals

878

volunteers support patients and visitors, contributing to a welcoming and compassionate environment

### Diversity and Inclusion

We are committed to fostering a workplace where everyone feels safe, respected, and that they truly belong.

40

40 caregivers identify as Aboriginal

34

caregivers have disclosed a disability

We actively support and engage with Aboriginal and Torres Strait Islander peoples in our workforce and broader community

Our commitment to diversity and inclusion is embedded across all levels of the organisation, helping ensure that every caregiver can thrive and contribute meaningfully.

The employment of people with disability is a growing feature of the organisation's recruitment and selection process and a critical component of our Disability Access and Inclusion Plan.

St John of God Health Care is committed to fostering caregiver wellbeing and wellness, recognising that the health and satisfaction of caregivers is integral to delivering exceptional patient care. In 2024, St John of God Health Care implemented several initiatives to support and enhance caregiver wellbeing:

- **Professional Development:**

A total of 68 caregivers across St John of God Health Care were awarded scholarships to support their professional development and career aspirations.

- **Recognition Programs:**

The Living Values Award was introduced to recognise and celebrate the exceptional efforts of caregivers who exemplify the Mission and Values of St John of God Health Care.

- **Cultural Engagement:**

The Innovate Reconciliation Action Plan 2024–2026 was launched, reflecting St John of God Health Care's commitment to cultural engagement and support for Aboriginal and Torres Strait Islander communities.

These initiatives underscore St John of God Health Care's dedication to creating a supportive and enriching environment for caregivers, ensuring they are well equipped and motivated to provide high-quality care to patients and the community.



# Our operations

## Hospital Operations and Nursing:

- **Facilities and Services:** The organisation operates 14 private hospitals across Western Australia, Victoria and New South Wales, specialising in acute care with renowned services in maternity, oncology and orthopaedics. This includes 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 dedicated rehabilitation hospital, St John of God Frankston Rehabilitation Hospital in southeast Melbourne. Additionally, the organisation manages St John of God Midland Public Hospital in Western Australia under a public-private partnership. Collectively, these 14 hospitals offer 3,367 beds.
- **Patient Care:** In the 2023-24 fiscal year, the hospitals treated over 402,054 overnight and same-day patients, delivered more than 11,108 babies and maintained their status as the largest provider of private maternity services in Western Australia. The organisation also operates various public and community health care contracts across all three states.

## St John of God Social Outreach Services:

- **Scope and Reach:** 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. Delivered by St John of God Social Outreach, these services are offered across 53 locations in Australia, either for free or at a low cost, and funded through allocations from hospital revenues.

- **Services Provided:** In 2023-24, Social Outreach supported 4,087 individuals and provided 48,487 nights of stable accommodation. Its services aim to build capacity and support the physical, mental and emotional wellness of vulnerable and disadvantaged communities in Western Australia, Victoria, New South Wales and the Asia-Pacific region. Offerings include community mental health counselling and support through 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, assistance for individuals with drug and alcohol dependence through the South West Community Alcohol and Drug Service and the Drug and Alcohol Withdrawal Network, and accommodation services for young people and adults experiencing or at risk of homelessness at St John of God Horizon House and Casa Venegas. Internationally, its health team collaborates with governments and health care providers in the Asia-Pacific region, notably supporting workforce capability development in Timor-Leste and operating the first drop-in centre for mental health issues in Papua New Guinea.

## St John of God Accord:

- **Disability Support:** For over 65 years, St John of God Accord has made a difference in the lives of people with disabilities, specialising in supporting individuals with intellectual disabilities across all metropolitan regions of Melbourne. Services include support coordination, therapy services, individualised support, school leaver employment supports, disability employment services, short-term accommodation, supported independent living and Accord Plus (after-hours programs). In 2023-24, Accord supported 1,036 clients across 40 accommodation houses and 45 sites in Melbourne's northern, eastern, western and southern suburbs.

## St John of God Health Care at Home:

- **At-Home Services:** This service provides compassionate and timely health care from 10 service delivery centres to individuals in their own homes following hospital stays, allowing them to continue receiving expert assistance while benefiting from familiar surroundings and the support of loved ones. In 2023-24, the service delivered more than 68,641 episodes of care. Services, available in metropolitan and regional Western Australia and Victoria, include after-hospital clinical care at home, postnatal home assistance for families who have recently welcomed a new baby, and rehabilitation in the home provided by therapists to help patients regain strength and endurance after treatment or surgery.

## St John of God Foundation:

- **Philanthropic Efforts:** St John of God Health Care's fundraising and philanthropic arm, the St John of God Foundation, supports advancements in medical technology and research conducted at their hospitals. From the profound personal impact of tailored treatment to the far-reaching effects of leading medical research, the Foundation helps transform both individual patient experiences and community health outcomes across Australia.

## Group Services and Corporate Functions:

- **Administrative Offices:** The organisation's corporate functions are primarily managed from its office on Wellington Street, Perth, with some functions overseen from Collins Street, Melbourne.

# Our supply chain

St John of God Health Care continues to strengthen its commitment to maintaining a comprehensive and ethical supply chain to support its extensive health care and community services operations across Australia and New Zealand.

In 2024, St John of God Health Care continued to focus on supply chain resilience, ethical sourcing, operational efficiency and sustainability to ensure the delivery of high-quality patient care.

## Supplier Expectations and Compliance

St John of God Health Care requires its suppliers and vendors to implement robust policies and processes that prevent modern slavery, uphold human rights and ensure ethical sourcing across all levels of the supply chain. As part of its ongoing commitment to ethical procurement, St John of God Health Care released an updated Code of Conduct, which extends its expectations to all third-party partners, reinforcing the organisation's zero-tolerance approach to modern slavery and unethical practices.

The organisation's Modern Slavery Statement outlines enhanced due diligence measures, comprehensive risk assessments and proactive supplier engagement strategies to ensure compliance. These measures include strengthened contractual requirements, mandatory supplier declarations and ongoing monitoring to identify and address potential risks.

## Financial and Operational Overview

- **Financial Performance**
  - **Total Revenue:** The organisation reported a total revenue of approximately \$2.16 billion for the 2023-24 fiscal year, reflecting a 7% increase from the previous year.
- **Strategic Supply Chain Initiatives - Alignment with Strategic Plan:** St John of God Health Care's supply chain initiatives are integrated into its 2023–2025 Strategic Plan, emphasising sustainable procurement practices, high-quality service delivery and adherence to national best practices.
- **Operational Resilience**
  - **Adaptation to Challenges:** The organisation has implemented business continuity measures and risk management strategies to maintain uninterrupted services amidst challenges such as regulatory shifts, rising costs and fluctuating patient demand.

## Key Sourcing Categories

St John of God Health Care procures a diverse range of products and services to support its hospital, community and disability services operations. The key procurement categories include:

### Medical and Clinical Supplies

Pharmaceuticals and Medications

Medical Consumables (e.g., syringes, gloves, PPE, wound care products)

Surgical Instruments and Equipment

Diagnostic and Imaging Equipment

Patient Monitoring Systems

### Health Care Technology and Digital Solutions

Medical Software and Patient Administration (PAS)

Clinical Decision Support Systems

Telehealth Platforms

Cybersecurity and Data Protection Solutions

Network and Infrastructure Services

### Hospital and Facility Management

Medical Waste Management Services

Cleaning and Hygiene Products

Hospital Catering and Nutrition Services

Laundry and Linen Services

Utilities (Water, Energy, HVAC Systems)

### Capital Equipment and Infrastructure

Hospital Beds and Patient Furniture

Building Construction and Maintenance

Facility Upgrades and Refurbishments

Medical Transport and Logistics

### Corporate and Professional Services

Legal and Compliance Services

Human Resources, Recruitment and Labour Hire

Financial Services and Insurance

Marketing and Communication Services

Education and Training Providers

### Social and Community Services Procurement

Community Mental Health Services

Aged Care and Disability Support Equipment

Emergency Response and Outreach Support

Housing and Accommodation Services for Vulnerable Populations

## Sustainability and Ethical Procurement

St John of God Health Care is committed to sustainable sourcing, supplier diversity and responsible procurement practices by:

- Engaging with local and ethical suppliers to support social impact initiatives
- Reducing environmental footprint through eco-friendly hospital supplies and sustainable infrastructure solutions
- Ensuring fair wages and ethical labour practices across the supply chain.

By strengthening supply chain governance, enhancing risk management and prioritising sustainability, St John of God Health Care continues to deliver excellent health care while upholding the highest ethical and operational standards.

Over the past five years, St John of God Health Care has demonstrated steady growth in its procurement activities, contract management and supplier engagement. The data highlights key trends in procurement spend, supplier relationships and contract expansion.

### Increase in Active Contracts:

The number of active contracts has steadily increased from 153 in 2020 to 476 in 2024, reflecting a strengthened approach to supplier engagement and long-term procurement strategies.

### • Growth in Non-Payroll Procurement Spend:

Procurement expenditure has shown an upward trend, peaking at \$1.089 billion in 2022 before stabilising at \$987 million in 2024. This reflects a focus on strategic supplier partnerships and optimised procurement efficiencies.

### • Supplier Engagement and Concentration:

The number of suppliers has gradually decreased from 4,800 in 2020 to 3,918 in 2024, indicating a more streamlined and focused supplier base. Despite the reduction in supplier count, the organisation continues to maintain long-term relationships, with most of its procurement spend (95-98%) remaining within Australia.

### • Supplier Consolidation for Key Spending:

The top 179 to 190 suppliers account for 80% of total procurement spend each year, demonstrating a reliance on high-value, strategic supplier partnerships.

These trends reinforce St John of God Health Care's commitment to ethical and sustainable procurement, supplier resilience and operational efficiency, while maintaining a robust supply chain to support its health care operations.

Year	Active Contracts	Added Modern Slavery Terms To new and existing contracts (Cumulative)	Non-Payroll Procurement Spend (\$M)	Total Suppliers	Percentage of Spend in Australia (%)	Suppliers with 80% Spend
2020	153	-	760	4,800	98	179
2021	201	55	808	4,300	98	175
2022	284	65	1,089	4,266	97	175
2023	376	91	949	4,093	95	190
2024	476	298	987	3,918	95	180

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# Reporting Criteria 3

## Modern slavery risks in our operations and supply chain

### Operational risks

In 2024, St John of God Health Care identified and addressed several operational risks and implemented mitigation actions to maintain the quality and safety of its services.

#### Our Workforce

As a large and diverse organisation, we prioritise fostering a positive culture and investing in our caregivers to enhance their wellbeing, support their career development and enable delivery of outstanding patient care.

In May 2024, we proudly launched our Innovate Reconciliation Action Plan (RAP) 2024-2026, reaffirming our commitment to making a meaningful impact as a major health care provider in Australia. This RAP reflects our dedication to closing the gap in health outcomes for Aboriginal and Torres Strait Islander peoples while also enhancing their employment opportunities within our organisation.

Our Organisational Health, Safety and Wellbeing Strategy guides our efforts to support our caregivers. This year, we focused on:

- Developing a psychosocial risk management program to address the top five risks at each hospital or service, including a mental health strategy and a critical incident trauma response toolkit
- Continuing the rollout of the OHS risk program
- Enhancing support for caregivers returning to work after an injury or illness

- Implementing the Solv injury management system to support best practice injury management processes.

We place a strong emphasis on Formation across the organisation to ensure our culture aligns with our Mission and that we continue to deliver excellent and compassionate care. Formation enhances our caregivers' abilities to embody our Mission, Vision and Values in their interactions with one another and with those we serve.

#### Communication System Vulnerabilities

St John of God Health Care recognised potential risks associated with communication disruptions, which could affect service delivery. To mitigate this, the organisation implemented robust and automated call forwarding measures to ensure business continuity during both planned and unplanned network outages.

#### Compliance and Quality Assurance

An assessment of St John of God Health Care Hospitals revealed non-compliance with seven regulations, three of which were rated as critical risks. This highlighted the need for ongoing monitoring and improvement in compliance and quality assurance processes.

### Data Transparency and Clinical Governance

To enhance transparency and clinical governance, St John of God Health Care improved the quality and safety data published on its website. This initiative aimed to align with national public reporting standards and provide detailed, hospital-level information across key clinical indicators.

### Leadership in Risk Management

The appointment of a new executive leader for risk, safety, assurance and legal operations underscored St John of God Health Care's commitment to strengthening its risk management framework. This role involves collaboration across the organisation to enhance safety and compliance.

### Financial Pressures

St John of God Health care faced financial challenges due to inflationary pressures and new IT investments, which required careful financial management to maintain operational stability.

### Resource Constraints

Workforce shortages, particularly in specialised units like maternity wards, posed operational risks. For example, St John of God Geelong Hospital had to implement a temporary "birth bypass" due to several birth suite team members calling in sick, leading to a temporary halt in admissions to ensure patient safety.



By proactively identifying and addressing these operational risks, St John of God Health Care demonstrated its commitment to maintaining high standards of patient care and organisational resilience in 2024.

## Supply chain risks

In 2024, St John of God Health Care identified several supply chain risks that could impact its operations.

### Migrant Workers

Supply chain risks in Australia are increasingly tied to the challenges faced by displaced and migrant workers. Many workers, particularly those in agriculture, construction and hospitality, face exploitation through poor wages, unsafe conditions and lack of job security. Displacement, exacerbated by factors like automation and global market shifts leaves workers, especially those on temporary visas, vulnerable to job loss with limited access to social welfare. Migrant workers often face discrimination, isolation and uncertainty regarding their future in Australia, while employers exploit their vulnerabilities due to insufficient labour protections. Addressing these risks requires stronger policy reforms, better enforcement of labour rights and increased accountability from companies within the supply chain.

SJGHC addresses these challenges by having an expectation that our organisations will act as guided by our **Corporate citizenship** statement. As a responsible corporate citizen, we recognise that we do not and should not act in isolation of communities within which we operate. We therefore try to ensure our operational success goes hand in hand with embracing broader community and social wellbeing.

### Global Supply Chain Disruptions

International events, such as slowdowns in major shipping routes like the Red Sea and Panama Canal, strained trade relations and ongoing geopolitical conflicts have led to significant global supply chain disruptions. These challenges have resulted in fluctuating fuel and material prices, intermittent product availability and overall uncertainty in the timely delivery of goods. Such disruptions pose risks to St John of God Health Care's procurement of essential medical supplies and equipment.

### Ethical Sourcing and Compliance

St John of God Health Care is committed to ensuring that its suppliers operate without the use of slavery or forced labour. This commitment requires continuous monitoring and verification of suppliers' labour practices to maintain ethical standards across the supply chain.

### Digital Transformation and Cybersecurity

The integration of digital technologies to improve hospital efficiency introduces risks related to data security and system reliability. Ensuring that digital systems are secure from cyber threats is crucial to maintaining operational integrity.

### Supplier Negotiation Challenges

The St John of God proactively addresses supply chain risks to maintain resilience and ensure the continued delivery of high-quality health care services.

In 2024, we identified our highest risk suppliers according to the following risk indicators.





## Industry Sector Risk

Certain industries have an inherently higher risk of modern slavery due to labour-intensive production, weak labour regulations and reliance on low-skilled or vulnerable workers. High-risk sectors include:

- Healthcare and medical supply chains (e.g., gloves, PPE, pharmaceuticals)
- Construction and building materials
- Cleaning and facility management services
- Textiles and uniforms
- Electronics and IT hardware
- Food and catering services.

## Commodity/Product Risk

Some products and raw materials are more susceptible to modern slavery due to sourcing practices and labour exploitation.

High-risk products include:

- Medical gloves and PPE (e.g., sourced from high-risk labour regions)
- Surgical instruments and medical devices (e.g., metals and components from high-risk regions)
- Uniforms and textiles (e.g., cotton from countries with forced labour issues)
- Electronics and IT (e.g., computers, servers, smartphones – linked to forced labour in mining for raw materials)
- Rubber, palm oil, seafood and cocoa (commonly associated with forced or child labour).

## Geographic Location Risk

The country of origin of a supplier or product is a major determinant of modern slavery risk. Key risk factors include:

- Weak labour laws and enforcement
- Prevalence of forced labour and child labour
- Lack of corporate transparency and accountability

High-risk regions include:

- Asia-Pacific (e.g., China, Malaysia, Bangladesh, India, Thailand, Myanmar)
- Middle East and Africa (e.g., UAE, Qatar, Democratic Republic of the Congo)
- Latin America (e.g., Brazil, Mexico, Peru).

## Workforce Profile Risk

St John of God recognises social economic and cultural aspects that could increase a worker's vulnerability, including but not exclusive to:

- Dangerous and hazardous work, isolation (work completed out of standard office hours with little or no supervision or engagement with direct workforce)
- Sham contracting, undeclared contracting, and subcontracting arrangements (lack of clarity on layers between principal employer and workers), low wage, little training, and competency threshold (also referred to as low-skill and/or unskilled work)
- Insecure work (with high levels of casual and zero hours contracts and low coverage of sick leave and support for injured workers)
- Workers with English as a second language (with low awareness of entitlements and rights;

these include students on visas, migrant workers and instances of Australian residents with Centrelink benefits working for cash in hand)

- Labour intensive work (quotas and work demand is often too high for the allocation of time and number of people), lack of transparency and consistency.

These vulnerabilities are present in operations and supply chains, with protection of workers central to our risk management program.

## Recruitment and Labour Hire Risk

Modern slavery risks increase when recruitment practices are opaque or exploitative. Key risk factors include:

- Charging of recruitment fees (leads to debt bondage)
- Unclear contracts and lack of employment documentation
- Retention of passports or work permits by employers
- Restrictions on worker movement or freedom.

## Supply Chain Complexity Risk

Modern slavery risks increase with greater supply chain complexity and lack of transparency. Key risk indicators include:

- Use of multiple subcontractors (higher risk of illegal subcontracting)
- Lack of traceability in supplier tiers (beyond Tier 1 suppliers)
- Limited supplier due diligence and reporting mechanisms.

## Supplier Due Diligence and Compliance Risk

The effectiveness of supplier governance and compliance directly affects modern slavery risks. Key risk indicators include:

- No supplier code of conduct addressing modern slavery
- No independent social audits or third-party certifications
- Failure to remediate identified labour rights issues
- Lack of worker grievance mechanisms.

## Publicly Reported Incidents and Whistleblower Risks

A supplier's track record in ethical labour practices is a strong risk indicator. Key risk factors include:

- Previous reports of labour violations or forced labour incidents
- Legal actions or fines related to worker exploitation
- Negative media coverage or NGO investigations.

The total spends for the 3,918 suppliers for whom the taxonomy risk assessment was completed amounts to \$987 million.

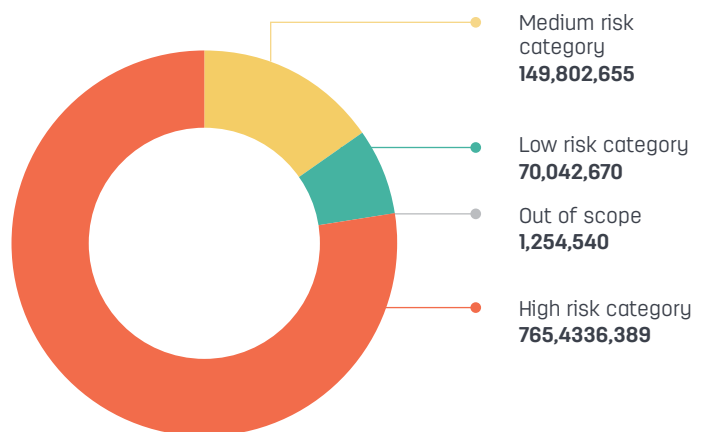
## The category review and assessment presented the following for 2024:

We identified 27 high-risk spend categories that comprise 2,018 out of 3,918 suppliers.

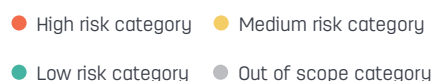
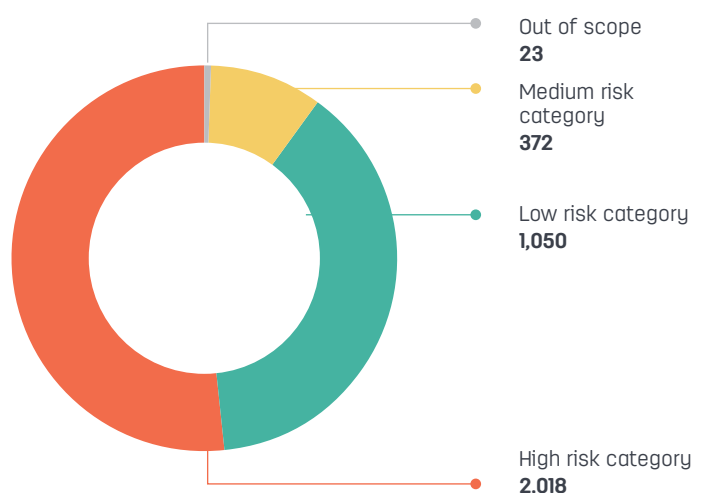
The 9 medium risk spend categories are comprised of 372 suppliers, and the 3 low risk spend categories comprise 1,050 suppliers.

One spend category is out of scope.

## Annual spend by risk



## Suppliers by risk



# Donations to St John of God Foundation

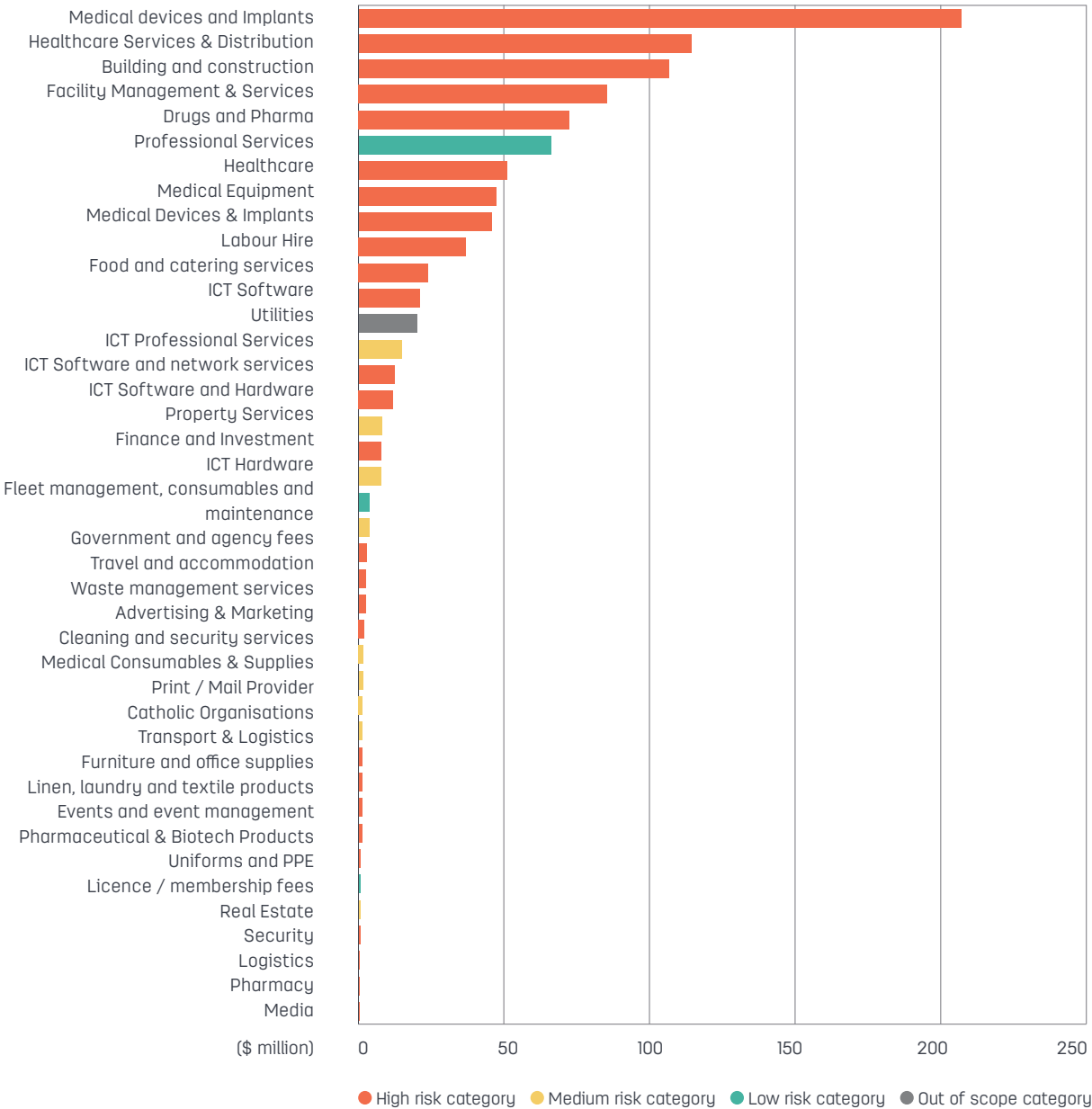
St John of God Health Care receives donations from members of the community and undertakes fund raising through St John of God Foundation.

We have a written procedure in place governing the acceptance, recording and acknowledgement of gifts. In addition to other things,

this outlines responsibilities if 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.

## Modern slavery risk by spend category



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# Reporting Criteria 4

## Actions taken to assess and address risk

### Modern slavery working group

St John of God Health Care maintains a dedicated Modern Slavery Working Group, comprising 11 representatives from key functional areas, including procurement and supply chain, workforce, legal, international health, corporate affairs, compliance, policy, and risk. This cross-functional collaboration ensures a comprehensive and integrated approach to addressing modern slavery risks across our operations and supply chains.

The group initially convened bi-monthly to establish governance structures and drive early-stage initiatives. As the program has matured, the meeting frequency has transitioned to an as-needed basis to allow flexibility while maintaining momentum. To enhance structure and accountability, we plan to implement a quarterly meeting schedule in the upcoming reporting period.

### Partnered with other catholic health care and education providers

St John of God Health Care has actively engaged in several key partnerships to combat modern slavery:

- Australian Catholic Anti-Slavery Network (ACAN): We continued our collaboration with ACAN, leveraging their expertise to strengthen our anti-slavery initiatives. This partnership enhances our ability to assess and address modern slavery risks within our operations and supply chains.
- Catholic Network Australia (CNA) Joint Procurement Network (JPN): Our ongoing collaboration with the CNA JPN allows us to engage suppliers collectively, promoting ethical sourcing and procurement practices across the Catholic health and education sectors.
- Australian Catholic Religious Against Trafficking in Humans (ACRATH): Through our Formation team, we maintained our partnership with ACRATH, participating in events and initiatives to raise awareness about modern slavery and human trafficking within our communities.
- Catholic Mission: We continued our collaboration with Catholic Mission, contributing to their Christmas Reflection programs to highlight our anti-slavery efforts and support their community awareness initiatives.

These partnerships underscore our commitment to eradicating modern slavery and promoting ethical practices within our organisation and the broader community.

### International day for abolition of slavery

As part of our ongoing commitment to raise awareness and foster a culture of ethical responsibility, St John of God Health Care marked the International Day for the Abolition of Slavery by reaffirming our zero-tolerance stance on modern slavery and reinforcing our dedication to ethical practices.

We shared this message across our social media platforms, underscoring our identity as a Catholic ministry that upholds the values of personal freedom and the intrinsic dignity of every person. Our communications acknowledged the often hidden and complex nature of modern slavery, particularly within supply chains, and highlighted our ongoing commitment to applying strong governance principles to identify and mitigate these risks.

To further support this message, we launched a video campaign outlining the actions we are taking to protect human rights and ensure that modern slavery prevention is embedded across our supply chains and partnerships.

Through continued education, awareness, and governance initiatives, we are cultivating an organisational culture rooted in ethical practice and committed to driving meaningful, lasting change.

## Supplier Surveys and Engagement

As part of our continued commitment to modern slavery risk mitigation, St John of God Health Care actively engages with suppliers through surveys, assessments and capacity-building initiatives.

In collaboration with ACAN and CNA JPN, we expanded our previous supplier survey efforts to better understand procurement and sourcing practices across our supplier network. In 2024, we received 638 comprehensive responses, an increase from 427 in 2023. This increase demonstrates our enhanced supplier engagement efforts and a growing awareness of modern slavery risks.

Responses provided to the ACAN supplier survey identified that our suppliers buy products from 31 countries, 4 of those classified as high risk according to the Sedex country/region and sector pre-assessment tool.

In addition to sourcing profile information, in 2024 we gained visibility over our suppliers through undertaking a total of 18 SMETA audits through Sedex, which identified 81 non-conformances. The SMETA (Sedex Members Ethical Trade Audit) 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.

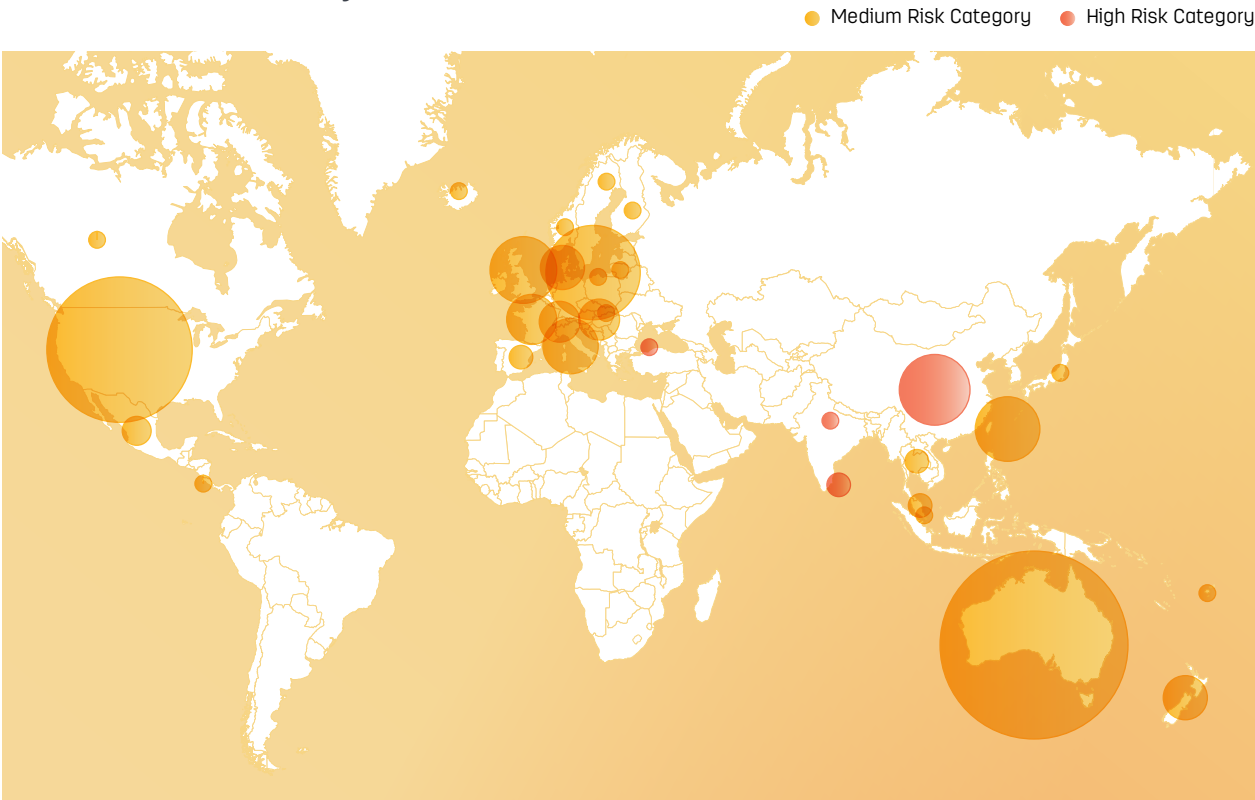
Audits provide an initial window into the real-world operations of suppliers, offering a preliminary but revealing view into their business practices. Audits can help us to understand how a supplier operates beyond what is promised or presented in formal documents and agreements by systematically evaluating 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. While 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.

We are planning the integration of audits into the risk management program during FY26.

Additionally, we increased our focus on high-risk categories, resulting in a significant rise in identified suppliers from 532 in 2023 to 2,018 in 2024. Our engagement through Sedex has also strengthened, with 143 suppliers invited to join, 121 joining and 102 completing Sedex Self-Assessment Questionnaires (SAQs) – a significant improvement from previous years.

## Risk across the country





Through these efforts, St John of God Health Care continues to collaborate closely with suppliers to ensure ethical sourcing, transparency and alignment with best practices in modern slavery prevention.

### Risk management and framework

As part of our ongoing commitment to strengthening modern slavery risk management, St John of God Health Care has continued to refine its risk assessment framework, now aligned to our entire supplier base of 3,918 suppliers.

#### Enhanced Risk Analysis

Following the extension of our risk assessment program, we undertook a more detailed analysis to improve visibility of supply chain risks. Key developments include:

- 638 suppliers provided detailed feedback via the ACAN Supplier Survey, up from 427 in 2023

- 2,018 suppliers were assessed within high-risk categories, a substantial increase from 532 in 2023

We also reviewed and updated our taxonomy risk assessment, which evaluates the full supplier base. This continuous improvement enables us to segment suppliers by risk level, informing targeted mitigation strategies and more focused supplier engagement.

#### Sedex Platform Engagement

To enhance transparency and collaboration, we continued to invite Tier 1 suppliers to engage via the Sedex platform. In 2024, 119 suppliers joined Sedex, a notable rise from 37 in 2023. While the majority now engage through Sedex, we maintain a flexible approach, with three key suppliers engaging with us outside the platform.

### Supplier Risk Insights

122

Supplier sites have completed the Sedex Self-Assessment Questionnaire (SAQ)

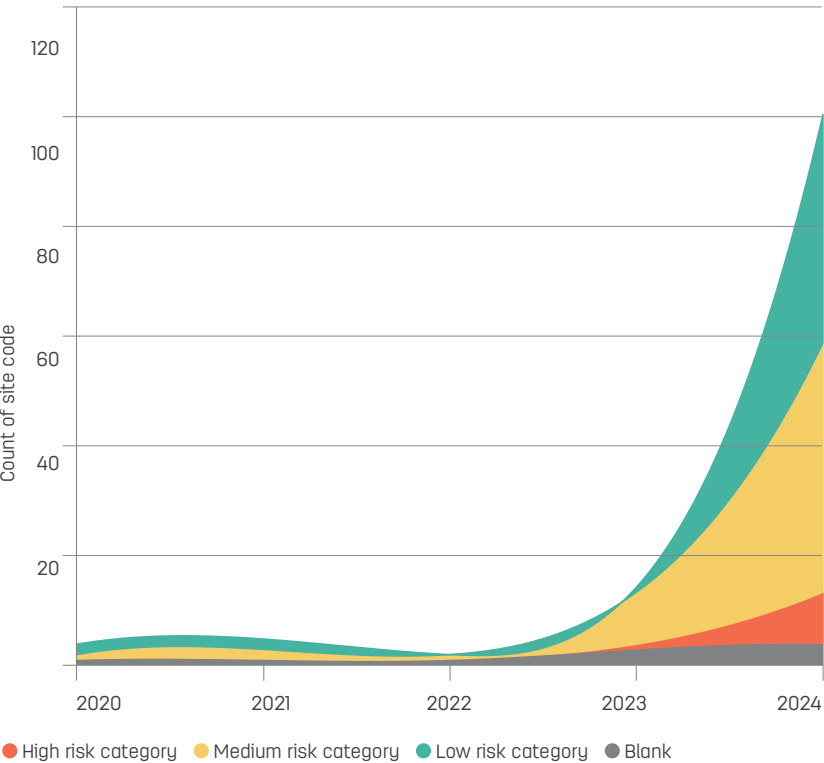
11

Suppliers have been flagged as high-risk, including those sourcing from high-risk countries, and will undergo desktop review

An additional 111 sites have been classified as low or medium risk on Sedex

We will continue to review and triangulate supplier data—including SAQ responses, audit results, and broader engagement activities—to ensure a robust, risk-informed approach to supplier management and modern slavery mitigation.

Count of Site code and First Country/Region by Year and Combined risk category



# Case Study

## Modern slavery response through desktop reviews

**Overview:** In 2024, the Hospitals Working Group commenced joint desktop reviews to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven on enhancing worker protection. The desktop review process validated supplier responses, resolved inconsistencies, identified areas of high risk, and enabled co-design of the next steps with the aim of strengthening worker protection.

The desktop reviews identified:

- Inconsistent reporting on the use of indirect labour – with undertakings to clarify labour hire practices and put in place appropriate protections for workers
- Determination of high-risk product and service categories – with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual
- Gaps in governance and public disclosures – with suppliers being requested to update documentation to include current anti-modern-slavery requirements and make verification of training data and due diligence outcomes available
- While grievance mechanisms were in place, their effectiveness was in doubt, and this led to calls for improved metrics and access
- Inconsistencies in remediation procedures were addressed through dialogue, and this led to commitments to develop or update frameworks to improve access and effectiveness of remediation.

### Next Steps and Ongoing

**Improvement Actions:** Following the desktop reviews, suppliers were requested to clarify high-risk practices, increase worker participation through voice programs and grievance access, improve metrics and reporting on the success of actions implemented, and increase transparency and public disclosure to make sure that in-house practices and public statements are consistent. Ongoing collaboration in 2025 between suppliers and Catholic hospitals will focus on long-term, sustainable capacity building and knowledge sharing centred on risk mapping. The desktop reviews offered constructive dialogue and tailored subsequent steps, resulting in a better mechanism for managing risks of modern slavery and keeping workers' interests at the centre of approved activities.

### Key Metrics

21

Desktop reviews scoped, 7 completed

5

Supplier meetings completed

20

Additional historical assessments shared with the Hospitals Working Group

By enhancing our risk assessment methodology and strengthening supplier collaboration, St John of God Health Care continues to advance its modern slavery risk mitigation strategy, ensuring a transparent, responsible and ethical supply chain.

#### Contract management

We executed new contracts and variations to existing contracts, including anti-slavery clauses for 298 of our 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 compliance with modern slavery provisions.

#### Ethical sourcing guidelines

During the reporting period, we extended our ethical sourcing guidelines to 50 suppliers under blanket purchase order agreements, encompassing \$17.3 million of non-payroll expenditure. This initiative reinforces our commitment to responsible procurement practices and aligns with our dedication to ethical standards across our supply chain.

#### Environmental sustainability: Anaesthetic agent ban

In a significant move towards environmental sustainability, St John of God Health Care became the first Australian private health care organisation to cease the purchase of desflurane, a commonly used anaesthetic agent known for its substantial environmental impact. Desflurane

has a global warming potential 2,540 times greater than carbon dioxide. This decision, effective from March 2024, is projected to reduce our carbon dioxide emissions by approximately 260 tonnes annually.

This action aligns with our Environmental Sustainability Strategy, demonstrating our commitment to reducing our carbon footprint and promoting sustainable practices within the health care sector. Our collaboration with anaesthetists to transition to environmentally friendly alternatives underscores our dedication to both patient care and environmental stewardship.

These initiatives reflect our ongoing efforts to integrate ethical sourcing and environmental sustainability into our operational framework, ensuring that our practices benefit both the communities we serve and the planet.

### Code of conduct

In 2024, St John of God Health Care reaffirmed its commitment to ethical business practices and human rights by enhancing its Code of Conduct. The updated Code reinforces the expectation that caregivers, suppliers and stakeholders uphold the highest standards of integrity, ethical behaviour and compliance with modern slavery prevention measures. This revision strengthens our dedication to transparency, accountability and responsible practices across all aspects of our operations and partnerships.

#### Regular Review and Accessibility

The Code of Conduct is reviewed regularly to reinforce expectations around ethical behaviour, sustainability and human rights compliance. It is available on both internal and external platforms, ensuring transparency and accessibility for caregivers, suppliers, patients and community members engaging with St John of God Health Care.

#### Enhancements in Ethical Governance

The latest update to the St John of God Health Care Code of Conduct includes provisions focused on providing care and services for children, young people and adults at risk. This update strengthens our commitment to safeguarding vulnerable individuals within our organisation and the communities we serve.

#### Guiding Principles and Responsibilities

The Code of Conduct outlines the minimum standards and behaviours required of all St John of God Health Care caregivers. It promotes fairness, respect and ethical decision making while aligning with our Mission, Vision and Values. The Code eliminates ambiguity regarding acceptable workplace and procurement practices, reinforcing compliance with modern slavery prevention measures and ethical governance across all areas of operation.

#### Commitment to Transparency and Continuous Improvement

The Code of Conduct is publicly available on our website, ensuring transparency and accountability for all stakeholders. As a living document, it undergoes regular review and updates to reflect evolving risks, best practices and emerging regulatory requirements in ethical governance and human rights protection.

#### Zero-Tolerance Approach to Exploitation and Abuse

At St John of God Health Care, we maintain a zero-tolerance approach to all forms of exploitation, abuse, and unethical labour practices. This principle is embedded across our operations and forms a cornerstone of our ethical commitment.

All caregivers and stakeholders are expected to familiarise themselves with and uphold our Code of Conduct, which outlines clear responsibilities in preventing abuse and ensuring ethical behaviour. The latest updates to the Code emphasise our duty of care to Aboriginal and Torres Strait Islander peoples, individuals with disabilities, culturally and linguistically diverse (CALD) communities, those experiencing homelessness, and people of diverse sexuality and gender.

Through the consistent application of our Code of Conduct, we continue to embed strong ethical standards, reinforcing our commitment to human rights, ethical sourcing, and social responsibility across all levels of the organisation.

### Modern slavery policy

As part of St John of God Health Care's commitment to combating modern slavery, an annual review of the Modern Slavery Policy was completed in December 2024. This review ensured that the policy remains aligned with evolving regulatory requirements, industry best practices and organisational priorities.

The Modern Slavery Policy consists of a comprehensive framework that includes:

- **The Policy:** Outlining St John of God Health Care's commitment to eradicating modern slavery, ethical sourcing expectations, and compliance with relevant laws and regulations
- **Procedures:** Providing clear guidance on risk assessment, due diligence and reporting mechanisms to identify, manage and mitigate modern slavery risks within the organisation and its supply chain
- **The Modern Slavery Toolkit:** Equipping caregivers and stakeholders with practical tools, templates and resources to support compliance, risk identification and supplier engagement.

During the 2024 review period, updates were identified and incorporated to align the policies with organisational changes.

### Ongoing Modern Slavery Training and Awareness

To maintain awareness and compliance with modern slavery standards across key areas of St John of God Health Care, we have continued our comprehensive training program throughout 2024. In total, 93 key members from procurement and supply chain, facilities management, and other identified departments participated in this program.

The five Modern Slavery eLearning modules remain available on our Learning and Development platform (LMS), providing ongoing access for caregivers to engage in training as part of their professional development.

For new members joining the Modern Slavery Working Group, essential training modules, including Modern Slavery 101, Business Readiness, and Grievance Mechanisms and Remedy, were completed via Workday LMS. This ensures that all working group members are equipped with foundational knowledge and practical skills to address modern slavery risks effectively.

Additionally, Modern Slavery 101 has been made a mandatory course for all caregivers within the organisation. This foundational training, delivered via LMS, ensures that all caregivers understand how to identify, manage, and mitigate modern slavery risks, further reinforcing our commitment to ethical standards and compliance across all operations.

### Capacity building

The Australian Catholic Anti-Slavery Network (ACAN) actively engages suppliers through regular webinars aimed at enhancing awareness of modern slavery risks and compliance requirements. These webinars cover topics such as the mission and vision of Catholic entities, identifying risks

within supply chain operations, understanding relevant modern slavery legislation, and clarifying supplier expectations from Catholic customers and buyers.

One hundred and twenty staff members from our invited suppliers participated in the capacity-building webinars hosted by ACAN.

### Governance and reporting

St John of God Health Care continued to enhance its governance and reporting mechanisms to effectively identify and address modern slavery risks within its operations and supply chain.

Key initiatives included:

- **Reporting Framework:** We maintained standardised, regular reporting to the Board Audit and Risk Committee (ARC), ensuring rigorous scrutiny and oversight. Our reporting framework provides detailed insights into expenditure, risk assessments and contract management, by supplier and category. We are committed to further refining this framework to enhance its effectiveness in identifying and mitigating modern slavery risks.
- **Risk Identification:** We proactively highlighted and addressed specific risks as they were identified within our supply chain, reinforcing our commitment to ethical practices.
- **Grievance and Whistleblowing Mechanisms:** Aligned with our zero-tolerance stance on modern slavery, we actively monitored our grievance and whistleblowing platforms. This approach ensured that concerns raised by internal or external parties were addressed promptly, providing a safe and confidential avenue for individuals to report issues, thereby upholding the highest standards of ethical conduct across our operations.

These measures underscored our dedication to ethical governance and our proactive approach to combating modern slavery.

### Vendor onboarding

As part of our transition to a new Enterprise Resource Planning (ERP) system, we revisited and refined our vendor onboarding process to strengthen compliance, risk management and transparency in supplier engagement.

- **Enhanced Onboarding**

**Processes:** We re-assessed and refined the documentation and workflows for onboarding new vendors. The onboarding process now links to the St John of God Health Care Supplier Code of Conduct and our standard terms and conditions for supplying to St John of God Health Care, reinforcing our commitment to ethical sourcing and responsible procurement.

- **Stronger Supplier Commitments**

**Enhancements:** Modern slavery commitments will form an integral part of our supplier onboarding process, ensuring alignment requirements for suppliers to adhere to ethical sourcing and human rights obligations. All new suppliers will be required to acknowledge and comply with St John of God Health Care's modern slavery commitments as a required condition of onboarding. This ongoing review will further strengthen our ability to identify, assess and mitigate risks across our supply chain while reinforcing compliance with national regulatory expectations.

- **Risk Identification and Mitigation:**

As part of our business-as-usual operational review activities, we identified and addressed potential risks associated with vendor management and took proactive measures to mitigate

them. During this process, we identified one vendor that posed a risk to the organisation. This risk was swiftly addressed through engagement and direct discussions, leading to appropriate actions being taken to ensure compliance with our ethical standards. These ongoing risk assessments and mitigation efforts reinforce our commitment to responsible procurement practices and help strengthen our supply chain governance.

- **Improved Compliance Tracking:**

We are refining the storing and tracking of certifications and relevant compliance documentation within the new ERP system to enhance data accuracy, accessibility and due diligence measures.

These enhancements ensure that modern slavery considerations remain embedded in our procurement processes, further strengthening our supply chain governance and ethical sourcing framework.





# Modern slavery action plan and roadmap

## Action plan

We have a multi-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	Focus Area	Key Actions & Progress
2025 & Beyond (Year 7 – Setting New Standards)	Sustaining Change	<ul style="list-style-type: none"> <li>– Embed modern slavery practices into Core Business Strategy</li> <li>– Implement monitoring tools to assess supplier risks using AI and data analytics</li> <li>– Expand direct supplier mapping, training and capacity building beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers</li> <li>– Expand direct supplier audits beyond Tier 1 suppliers to include Tier 2 and Tier 3 suppliers</li> <li>– Strengthen collaborations with ethical sourcing organisations to enhance responsible procurement</li> <li>– Develop remediation protocols for suppliers found in breach of ethical labour standards</li> <li>– Pilot ethical procurement certifications for high-risk supplier categories</li> <li>– Introduce modern slavery awareness modules in St John of God Health Care’s caregiver onboarding and professional development programs.</li> </ul>
2024 (Year 6 – Maturity & Effectiveness Improvement)	Strengthening Governance & Risk Mitigation	<ul style="list-style-type: none"> <li>– Strengthened our commitment to ethical supply chain practices and modern slavery prevention. We will continue refining our approach in key areas.</li> <li>– Communication and awareness</li> <li>– Enhanced and expanded our awareness campaign to improve stakeholder engagement and understanding</li> <li>– Strengthened Supply Chain Risk Management</li> </ul> <p>Supplier Engagement:</p> <ul style="list-style-type: none"> <li>– Engaged with 638 suppliers to review, assess and develop risk mitigation plans where necessary</li> </ul> <p>Sedex Platform Integration:</p> <ul style="list-style-type: none"> <li>– Expanded supplier onboarding via Sedex, with 121 new suppliers joining</li> <li>– Support 122 suppliers in completing Self-Assessment Questionnaires (SAQs)</li> </ul> <p>Social Audits and Corrective Actions:</p> <ul style="list-style-type: none"> <li>– Conducted 18 supplier social audits to assess compliance and ethical practices</li> <li>– Implemented 81 corrective actions based on Sedex assessments and self-audits</li> <li>– Contract Review and Compliance</li> <li>– Integrated modern slavery terms into 298 contracts and variations, including 50 ethical sourcing declarations under blanket purchase agreements</li> <li>– Governance and Risk Alignment</li> <li>– Reclassified our assessment taxonomy to align with ACAN recommendations, now covering 40 spend categories for better risk assessment and monitoring</li> <li>– Training and Capability Building</li> <li>– Provided modern slavery awareness training to 120 suppliers’ staff</li> <li>– Maintained internal training for 93 caregivers to provide ongoing awareness and compliance</li> <li>– Continuous Improvement</li> <li>– Maintain and expand existing activities to drive maturity and effectiveness across our ethical sourcing and modern slavery prevention efforts.</li> </ul>

Year	Focus Area	Key Actions & Progress
2023 (Year 5 - Effectiveness Review & Monitoring)	Continuous Improvement & Supplier Risk Management	<ul style="list-style-type: none"> <li>– Improved and enhanced campaigns to improve communication and awareness</li> <li>– Refined our supplier engagement and communication approach</li> <li>– Continued to rollout modern slavery training to 89 caregivers at St John of God Health Care</li> <li>– Continued to add modern slavery clauses into new agreements (Tier 1 supplier, across key categories)</li> <li>– Set the Modern Slavery 101 training as compulsory for key procurement and supply chain, facilities management and selected teams via the Learning and Development platform</li> <li>– Reviewed and updated Business Maturity Assessment</li> <li>– Reviewed approach/framework</li> <li>– Reviewed our modern slavery policies and procedures</li> <li>– Improved supplier engagement across the high impact categories</li> <li>– Collaborated and leveraged the knowledge gain from engaging with ACAN, CNA and our Healthcare Forum peers to improve visibility of supply chain risks.</li> </ul>
2022 (Year 4 - Effectiveness Review & Monitoring)	Operationalisation & Risk Monitoring	<ul style="list-style-type: none"> <li>– Improved supplier agreement and RFx templates to include modern slavery clauses</li> <li>– Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories)</li> <li>– Reviewed all ACAN modern slavery training program modules and added all available modules to St John of God Health Care Learning and Development platform</li> <li>– Reviewed and updated Business Maturity Assessment</li> <li>– Review approach/framework</li> <li>– Reviewed Change Impact Assessment</li> <li>– Invited top 50 suppliers to the Sedex platform</li> <li>– Reviewed policies and procedures</li> <li>– Extended Taxonomy Risk Assessment to all active suppliers</li> <li>– Reviewed goals, targets and KPIs</li> <li>– Partnered with ACRATH, CAN, ACAN, Catholic Health and Catholic Missions to communicate the potential impact of and collaborate with them on modern slavery risks in our supply chains.</li> </ul>
2021 (Year 3 - Extend & Involve)	Implementation & Supplier Engagement	<ul style="list-style-type: none"> <li>– Updated supplier agreement and RFx templates to include modern slavery clauses</li> <li>– Added modern slavery clauses into new agreements (Tier 1 supplier, ICT and PPE categories)</li> <li>– Reviewed ACAN Modern Slavery 101 training program and added all available modules to St John of God Health Care Learning and Development platform</li> <li>– Reviewed and updated Business Maturity Assessment</li> <li>– Reviewed approach/framework</li> <li>– Reviewed Change Impact Assessment</li> <li>– Added the top 25 suppliers to the Sedex platform</li> <li>– Reviewed policies and procedures</li> <li>– Extended risk assessment beyond Tier 1 suppliers</li> <li>– Reviewed goals, targets and KPIs</li> <li>– Partnered with ACRATH to communicate the impact of modern slavery in our supply chains.</li> </ul>
2020 (Year 2 - Approach Development)	Framework & Policy Development	<ul style="list-style-type: none"> <li>– Conducted a risk assessment and gap analysis</li> <li>– Developed the Modern Slavery Policy and aligned it with existing policies (investment, donations, whistleblower)</li> <li>– Initiated supplier contract reviews, focusing on top 50 suppliers.</li> <li>– Integrated Modern Slavery commitments into vendor onboarding processes</li> <li>– Added modern slavery clauses to agreement and procurement templates.</li> </ul>
2019 (Year 1 - Awareness & Mobilisation)	Establishing Foundations	<ul style="list-style-type: none"> <li>– Formed a Modern Slavery Working Group</li> <li>– Reviewed obligations under the Modern Slavery Act</li> <li>– Engaged with Catholic peer and industry groups</li> <li>– Launched the first communication and awareness campaign</li> <li>– Identified top-tier suppliers and commenced supplier engagement</li> <li>– Published the Supplier Code of Conduct on the St John of God Health Care website</li> <li>– Prepared and submitted the first Modern Slavery Statement.</li> </ul>

# Reporting criteria 5

## Effectiveness assessment

At St John of God Health Care, we continuously strengthen our governance, risk management, and due diligence processes to mitigate modern slavery risks. Our Audit and Risk Committee (ARC) plays a key role in reviewing identified risks, ensuring compliance and overseeing mitigation measures across our operations and supply chain.

To ensure continuous improvement and accountability, we assess our actions against key performance indicators (KPIs) and external supplier engagement metrics. This structured approach enables us to track progress, enhance supplier engagement and refine our risk assessment frameworks.

These enhancements reflect our proactive approach to supplier engagement, enabling us to strengthen governance, transparency, and risk management in addressing modern slavery concerns across our supply chain.

### Supplier Survey Engagement & Key Metrics

ACTIVITY	2023	2024
Total number of suppliers	4,095	3,918
Number of suppliers with visible contact information and ABN	2,753	3,918
Number of suppliers across high-risk categories	532	2,018
Number of ACAN Supplier Surveys completed	427	638
Supplier staff attending capacity-building webinars	122	120
Corrective actions identified	1	81
Individual staff completed e-learning	89	93
E-learning modules completed	202	97
Invited to join Sedex	25	159
Joined Sedex	37	121
Sedex SAQ completed	14	122
Social audits	5	18
Corrective actions as result social audits	1	81
Individuals identified or referred for modern slavery assessment	0	0

For this reporting period, we assessed the effectiveness of our actions against the following key process indicators:

## 2024 Key Performance Indicators (KPIs) & Supplier Engagement

Indicator/Target	Achieved
Total number of suppliers	✓
Number of suppliers with visible contact information and ABN	✓
Number of suppliers across high-risk categories	✓
Re-assessed business maturity using ACAN's proposed maturity scoring methodology	✓
Extended the Supplier Risk Assessment across the spend range of suppliers and categories	✓
Included modern slavery contractual terms across all new and renewed supplier contracts	✓
Number of ACAN Supplier Surveys completed	✓
Supplier staff attending capacity-building webinars	✓
Invited to join Sedex	✓
Joined Sedex	✓
Sedex SAQ completed	✓
Conducted social audits	✓
Corrective actions implemented	✓
Continued partnership with ACRATH to enhance awareness on modern slavery	✓
Renewed partnership with ACAN and CNA for a further term	✓
Reviewed and updated modern slavery policies and procedures	✓
Expanded partnerships with University of Notre Dame, Catholic Mission, and Health on key initiatives	✓
Conducted a detailed risk assessment across key suppliers	✓
Improved spend and taxonomy category spend visibility	✓
Maintained and communicated awareness on modern slavery principles and key events during the period	✓
202 eLearning modules completed by staff	✓
Invited new members to join the modern slavery working group	✓
Supplier Management Mitigation Action 1 – Engaged directly with high-risk suppliers to implement corrective actions and compliance measures	✓
Added modern slavery terms to existing and new contracts	✓

## ACAN introduce new maturity score methodology

The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

- **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
- **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
- **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
- **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
- **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- **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 across governance, risk assessment, risk management and effectiveness measures.

St John of God overall maturity has improved by 9% for 2024.

The analysis by pillar for the 2024 maturity assessment using the maturity scorecard is presented below:

Pillar	A	B	C	D	2024	
	Governance	Risk Assessment Operations	Risk Management Supply Chain	Effectiveness of Actions	Maturity Score	Improvement by Pillar
1. Business Process and Governance						3%
2. Operations						19%
3. Supply Chain						Achieved
4. Worker Engagement						8%
5. Entity's program and activities						2%
6. Grievance Mechanisms and Remediation						-3%
<b>Grand Total</b>						
Maturity Overall Improvement	-4%	8%	17%	16%	9%	9.20%





## Remediation

St John of God Health Care provides several avenues for individuals to raise grievances or provide feedback to the organisation, both internally and externally focused. These channels are designed to ensure that concerns are addressed effectively and in a timely manner. The channels extend to feedback forms, online feedback surveys and a comprehensive whistleblowing policy to foster a culture of integrity and accountability.

St John of God Health Care is committed to addressing all feedback with seriousness and urgency, aiming to resolve concerns efficiently and improve the quality of care provided.

## Domus 8.7 - A Modern Slavery Remediation Service

### Purpose

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced. Domus 8.7:

- Provides direct support to victim survivors and provides guidance to Catholic entities participating in the ACAN Program
- Provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery
- Is guided by the principles of collaboration, flexibility and ethical standards, designed to support Catholic entities and victim survivors.

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020. Catholic entities participating in the ACAN Program are the founding members of Domus 8.7.

## Remediating Modern Slavery – An Organisational Imperative

The Modern Slavery Act mandates proactive efforts to identify, prevent, mitigate and address the impacts of modern slavery. When an organisation encounters instances of people impacted by modern slavery, the organisation has a responsibility to provide effective remediation. This involves steps to restore the victim survivors to their pre-exploitation state as much as possible.

### Forms of Remedial Actions

Remedial actions vary on a case-by-case basis, and may include:

- Transport, accommodation and crisis support
- Services to address psychological and physical impacts
- Financial or non-financial compensation
- Offering alternative employment opportunities
- Payment of wages and entitlements
- Reimbursement of unfair recruitment and other fees
- Training to support new employment opportunities.

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# Reporting criteria 6

## Process of consultation with owned or controlled entities

St John of God Health Care emphasises a comprehensive consultation process to ensure effective communication and collaboration across all levels of the organisation. This structured engagement ensures that key stakeholders actively contribute to decision making, governance and strategic direction.

### Key Consultation Channels:

- **Executive Committee:**  
Regular meetings are held to review organisational strategies, operational performance and risk management initiatives to maintain alignment with St John of God Health Care's Mission and objectives.
- **Audit and Risk Committee (ARC):**  
The ARC conducts in-depth reviews of risk management approaches, compliance measures and internal controls, ensuring governance best practices are upheld.
- **Board of Directors and CEOs of Affiliated Entities:**  
Engagement with leadership teams ensures that strategic decisions align with St John of God Health Care's Mission, Vision and Values, fostering consistency across the organisation.
- **Key Operational Teams:**  
Consultation with procurement, supply chain, legal, frontline caregivers and other operational units ensures that policies and procedures are practical, effective and aligned with industry standards.

- **Controlled Entities:**  
Regular meetings, working groups and review sessions with stakeholders from controlled entities facilitate collaboration, ensuring shared concerns, updates and continuous improvement initiatives are addressed.
- **Mission Integration Unit:**  
The Mission Integration Unit ensures that all consultation processes are rooted in St John of God Health Care's Mission, Values and Catholic identity. This unit plays a vital role in:
  - Embedding mission-driven decision making across governance and operational processes
  - Providing ethical guidance in strategic and policy discussions
  - Ensuring that consultation efforts reflect the principles of human dignity, social justice and respect in line with St John of God Health Care's core Mission.

This structured consultation process fosters a unified approach to decision making, ensuring that strategies and initiatives are comprehensive, well-informed and effectively implemented across all entities within St John of God Health Care.

In 2024, St John of God Health Care reinforced its unwavering commitment to combating modern slavery through several key initiatives that focused on awareness, advocacy, and collaboration.

### Public Commitment to Ethical Practices

On 2 December 2024, coinciding with International Day for the Abolition of Slavery, St John of God Health Care publicly reaffirmed its zero-tolerance stance against modern slavery. The organisation emphasised its ongoing dedication to upholding ethical practices across all aspects of its operations, including within supply chains and community engagements. This commitment highlights the organisation's foundational values of human dignity and social responsibility.

### Engaging Stakeholders and Building Awareness

St John of God Health Care actively engaged with key stakeholders in efforts to raise awareness and drive systemic change. A significant event was the gathering hosted by the Archdiocese of Perth and the West Australian Catholic Migrant & Refugee Office, in partnership with the Australian Catholic Anti-Slavery Network (ACAN). The event featured survivor advocate Moe Turaga, whose personal testimony underscored the importance of strengthening support pathways for those affected by modern slavery.

### Collaborative Efforts with ACAN

In 2024, St John of God Health Care contributed to the creation of the 2023 Compendium of Modern Slavery Statements, published by ACAN. This compendium provides a comprehensive overview of procurement spending across Catholic organisations and serves as a critical tool for identifying and addressing modern slavery risks within operations and supply chains.

### Advocacy for Policy Change

The organisation actively supported several advocacy efforts aimed at influencing public policy to improve support for

modern slavery survivors. One notable initiative was endorsing a manifesto that provided practical recommendations for the incoming government to enhance safety, services, and long-term support for victims of modern slavery and human trafficking.

### Support for the Australian Anti-Slavery Commissioner

In collaboration with ACAN, St John of God Health Care expressed strong support for the establishment of the Australian Anti-Slavery Commissioner role. This role is seen as critical to advancing national efforts to combat modern slavery. ACAN endorsed the Modern Slavery

Amendment (Australian Anti-Slavery Commissioner) Bill 2023, calling for the Commissioner to be endowed with adequate budget, authority, and functions to enforce modern slavery reporting requirements across government, business, and not-for-profit sectors. As an active member of ACAN, St John of God Health Care fully aligned with this advocacy, supporting the establishment of the Commissioner.

These initiatives reflect St John of God Health Care's steadfast commitment to ethical leadership and proactive engagement in combating modern slavery within its operations and the broader community.



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# Reporting criteria 7

## Other Information

In 2024, St John of God Health Care reinforced its unwavering commitment to combating modern slavery through several key initiatives that focused on awareness, advocacy, and collaboration.

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ST JOHN OF GOD  
Health Care





# MODERN SLAVERY STATEMENT 2024

Reporting Period 1 January 2024 – 31 December 2024



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This Statement has been produced on behalf of:

**Catholic Healthcare Limited**

ABN 69 064 946 318

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W: [catholichealthcare.com.au](http://catholichealthcare.com.au)



# Criterion 1

## ORGANISATIONAL STRUCTURE

### 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 contributing to a more compassionate and humane society, including Australia's Modern Slavery Laws.

Our organisation firmly rejects modern slavery and is dedicated to employing all reasonable measures available to ensure we do not engage in any modern slavery activities.

We focus on providing care and support for seniors through our residential aged care homes, retirement living communities, and home and community services.

Catholic Healthcare collaborates with a diverse range of suppliers for goods and services. We strive to raise awareness about the risks of modern slavery and ensure that our supply chains consist of reputable providers. Catholic Healthcare is committed to educating employees about the issue of modern slavery and continuously improving our procurement practices. Our focus is on the ethical production and supply of goods and services.

We are proud to present Catholic Healthcare's fifth Modern Slavery Statement and commend the officers of our organisation for their zealous embrace of the cause of eradicating modern slavery.



A handwritten signature in dark ink that reads "Stephen Teulan".

**Stephen Teulan,  
Board Chair**



A handwritten signature in dark ink that reads "J. McFarlane".

**Josh McFarlane,  
Chief Executive Officer**

#### Catholic Healthcare Limited

This Modern Slavery Statement was approved by the principal governing body of Catholic Healthcare as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 7th May 2025.

This Modern Slavery Statement is signed by a responsible member of Catholic Healthcare as defined by the Act.



## ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care and retirement living in New South Wales and Southeast Queensland. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities for 30 years.

We are passionate about enriching our residents' and clients' lives and offer services to nurture the body, mind and spirit. Our model of care is based upon relationships using a person-centred, holistic approach that focuses on the wellbeing of older people, with a continuum of care that is tailored, flexible and covers every stage of life's journey. Catholic Healthcare operates 41 residential aged care homes and 13 retirement living communities and provides home and community services to 6,500 clients.

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, and retirement living across New South Wales and Southeast Queensland. Catholic Healthcare has been operating for 30 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:

<b>Operations</b>	<ul style="list-style-type: none"><li>• Residential aged care homes</li><li>• Retirement living communities</li><li>• Social housing for seniors</li><li>• Home Care Packages</li><li>• Commonwealth Home Support Services</li><li>• Homelessness services</li><li>• Hoarding and squalor services</li><li>• Assessment services for seniors</li></ul>
<b>Corporate Services</b>	<ul style="list-style-type: none"><li>• Mission</li><li>• Human Resources</li><li>• Information Technology</li><li>• Finance</li><li>• Property</li><li>• Strategy and Growth</li><li>• Practice, Quality and Risk</li><li>• Company Secretariat</li><li>• CEO Office</li></ul>

**Modern slavery oversight**

Catholic Healthcare’s Modern Slavery Taskforce comprises Modern Slavery Liaison Officers from Finance (Procurement), Human Resources, Mission, Property and Practice, Quality and Risk. These roles report to the Chief Financial Officer.

## Criterion 2

# OPERATIONS AND SUPPLY CHAIN

### Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned with the welfare of all persons, particularly the most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

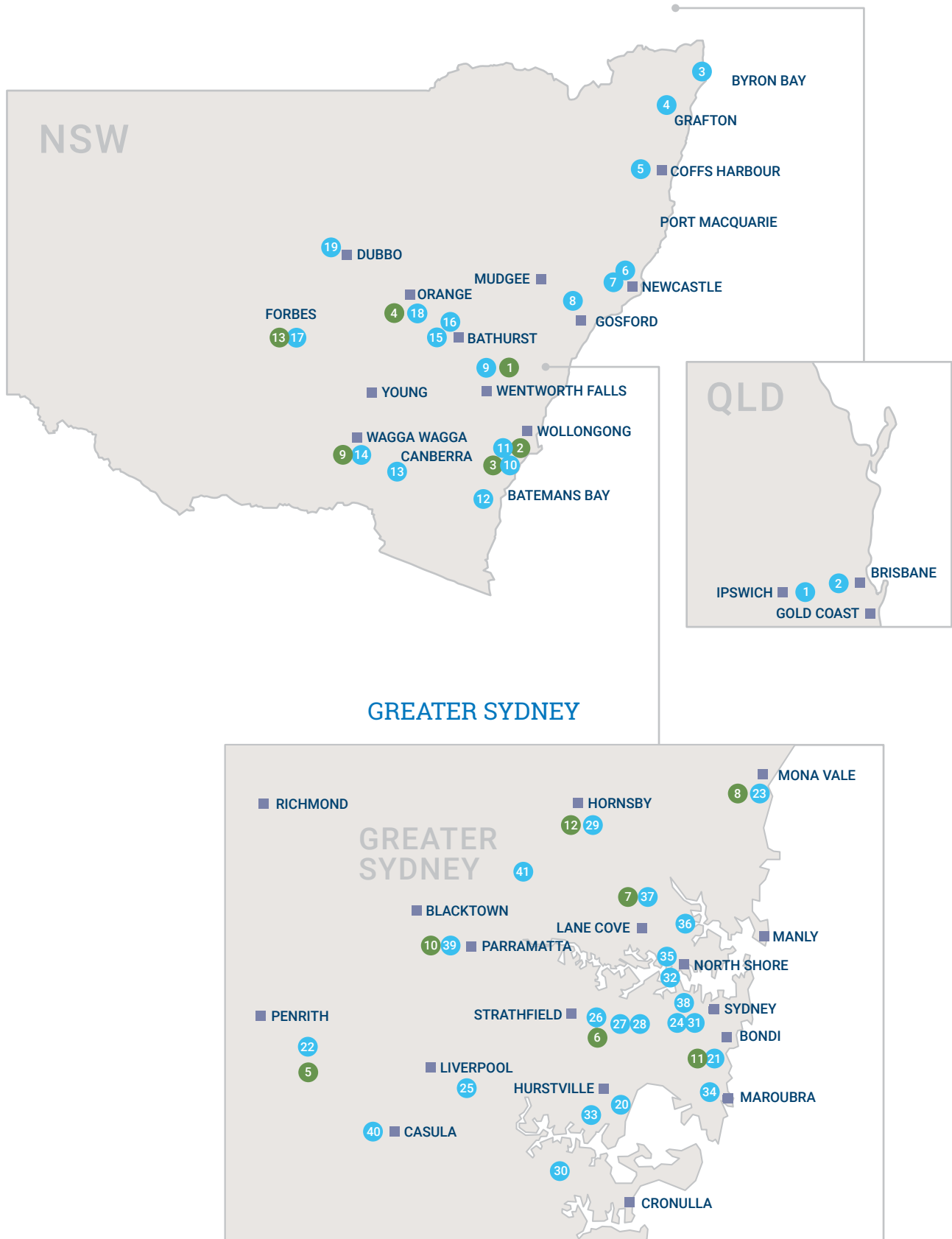
Our Trustees and Board, who both have oversight and governance of Catholic Healthcare's mission, are conscious of the risks of modern slavery infiltrating supply chains and, as a result, actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

### AT A GLANCE

As at 31 December 2024.



# 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 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 retirement 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 Act 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 2024, we maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practices from our organisation.

### Operational Risks

#### Our People

Catholic Healthcare employs close to 5,500 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 coming from many nationalities including Australian, European, Asian, North and South American and African continents.

Catholic Healthcare has invested in a Human Resources Information System, which now allows 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 services divisions are employed under individual contracts of employment. Agency workers, when required, such as registered nurses (RN), enrolled nurses (EN), assistants in nursing (AIN) 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 allow for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category. To address this, we have updated our standard agency contracts to include robust anti-slavery clauses. These clauses ensure contractors comply with our Modern Slavery Policy and require them to report instances of modern slavery to Catholic Healthcare. To date, no contractors have raised any issues with these standard clauses.

## Supplier Risks

In 2024, 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.

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
- Medical devices and supplies
- 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.

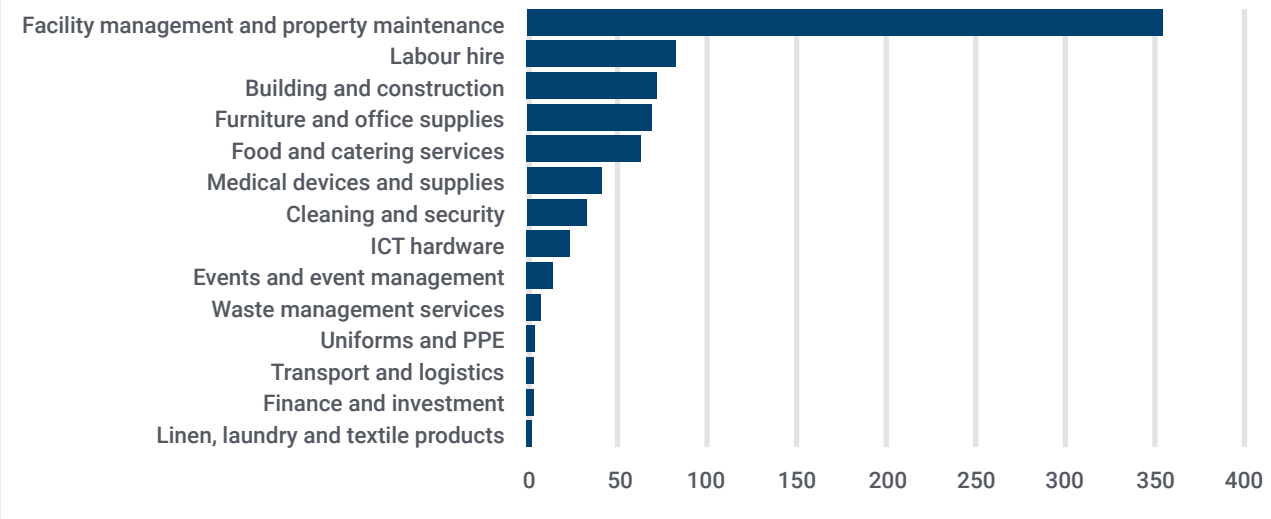






In 2024, we identified 782 suppliers in high-risk categories, 45% of which are in Facilities Management and 11% in Labour Hire.

SUPPLIERS BY CATEGORY





## Criterion 4

# STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK

## 2024 Modern Slavery Risk Management Initiatives

### Achievements

#### Highlights include:

- Continuation of a transition to in-house cleaning services in our residential aged care homes, with the last home transitioning in November 2024.
- A reduction in the use of outsourced nursing agency staff while continuing a comprehensive review and consolidation of the use of nursing agencies including a third-party risk assessment of agencies engaged, improved controls via a booking platform and all agencies subject to Catholic Healthcare's standardised contracts (including modern slavery clauses).
- 83% of uniform purchased from 3 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.
- In 2024, Catholic Healthcare's Modern Slavery Liaison Officer (MSLO) group was expanded to incorporate all main business units to focus on action plans specific to each unit.

Catholic Healthcare continued to make progress in addressing modern slavery risks within our operations during the 2024 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 also made further improvements to organisational policy and procedures.

### Our plans for 2025 and beyond

In 2025 and beyond, Catholic Healthcare intends to continue extending modern slavery training throughout the organisation, strengthening our policies and procedures, promoting further supplier involvement in anti-modern slavery actions, and reducing 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.



## Baseline Data

This dataset provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points reflect supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

	ACTIVITY	2023	2024
<b>INTERNAL / EMPLOYEES</b>	Hours spent on modern slavery activities	240	210
	Individual employees completed e-learning	157	175
	E-learning modules completed	298	316
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	2373	2226
	Number of suppliers with visible contact information and ABN	128	2218
	Number of suppliers across high-risk categories	128	782
	Number of ACAN Supplier Surveys completed (cumulative)	62	271
	Supplier employees attending capacity-building webinars	69	41
	Invited to join SEDEX (cumulative)	31	66
	Joined SEDEX (cumulative)	15	72
	SEDEX SAQ completed (cumulative)	22	64
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	Contacts made via the worker voice/grievance mechanism	0	33
	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

This data serves as a baseline for monitoring supplier compliance and engagement, allowing for evidence-based decision-making in ethical procurement strategies.

The increase in the number of external suppliers engaged reflects a change in focus from the top 128 in 2023 to whole spend data in 2024.

- Catholic Healthcare continues to consolidate its policies and procedures concerning modern slavery and to evolve practices that prevent modern slavery in our organisation or supply chains.
- Catholic Healthcare identified outsourced cleaning at our residential aged care homes as a high-risk activity and commenced a program to bring this in-house in 2023, which continued in 2024. Cleaning is now under the direct control of Catholic Healthcare management in 100% of homes.
- To support our in-house services, we have engaged the support services of an Indigenous-owned cleaning contractor, Killara Services. Killara Services backfills roles for Catholic Healthcare employees on annual leave and when positions become vacant until they are refilled.
- Catholic Healthcare continues to comprehensively review and consolidate agencies used for nursing services. In 2024, this included a third-party risk assessment of agencies for modern slavery risk, the introduction of a booking platform process and 100% engagement under standardised contracts (which include modern slavery clauses). Catholic Healthcare has further reduced the associated risk by reducing the number of shifts booked with agencies in 2024 by 40% compared to 2023.

## Case Study: Risk Assessment of Nursing Agencies Used in 2024

In 2024, Catholic Healthcare undertook a modern slavery risk assessment of the nursing agencies engaged within its supply chain, using an independent third-party consultant. The assessment, completed by 29 out of 42 invited nursing agencies (69% participation rate), aimed to identify potential risks of modern slavery and evaluate the effectiveness of existing controls.

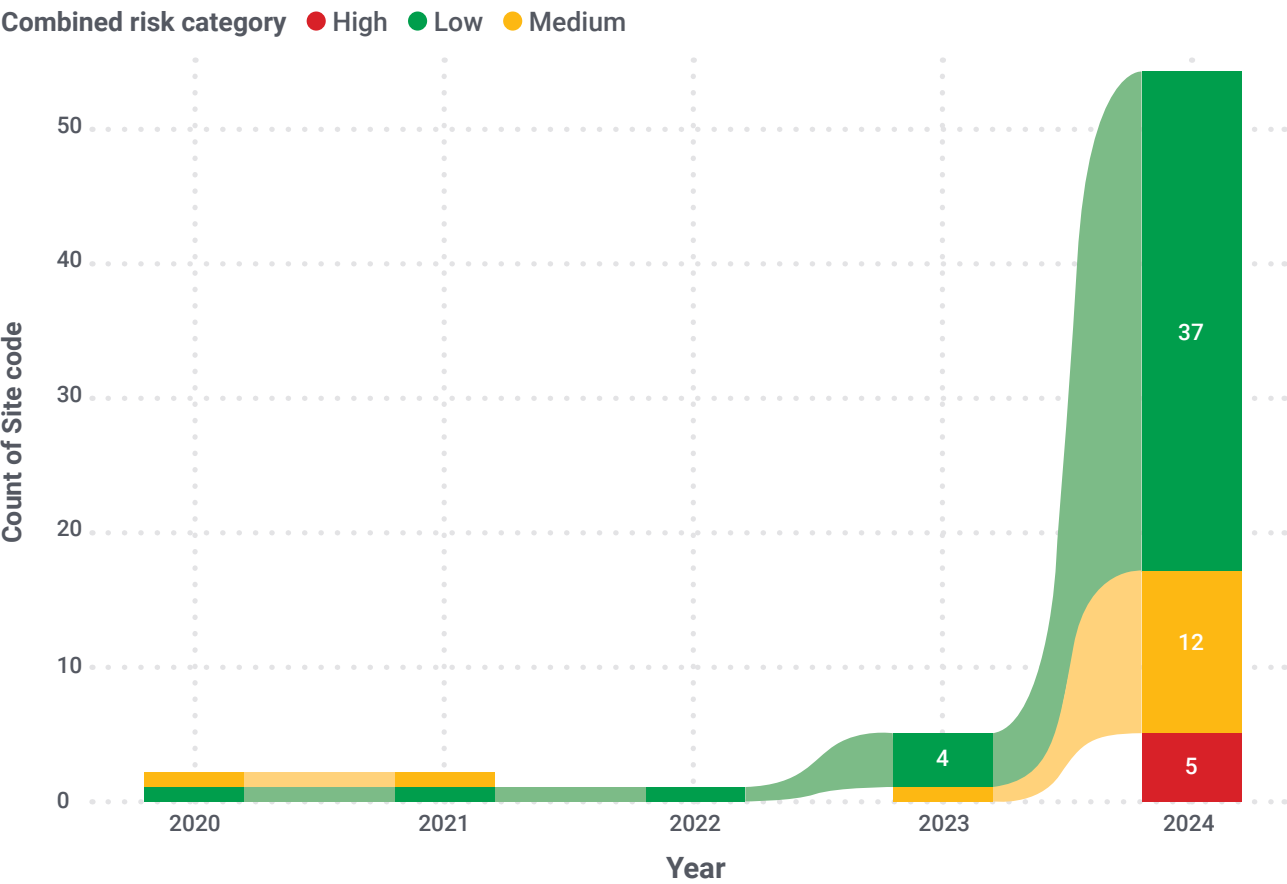
The survey results included an aggregated inherent risk score across all agencies of 39.5 out of 100, reflecting the moderate level of structural risk within this industry sector. However, through existing policies and procedures, the unmitigated risk score was reduced to 11.6 out of 100, demonstrating some effective mitigation efforts across the nursing agencies surveyed.

Nevertheless, areas for improvement were identified, such as some suppliers not having formal vulnerability assessments of their workers, which limited their capacity to identify exploitation risks. Additionally, some suppliers did not have policies prohibiting the use of non-compliant recruiters and lacked policies ensuring return transportation for migrant workers to safeguard against forced labour.

In 2025, Catholic Healthcare will complete a detailed contract renewal process with nursing agencies and including strengthening modern slavery risk management, by requiring modern slavery policies, annual risk assessments, and worker vulnerability assessments. By embedding these measures into its nursing agency selection process Catholic Healthcare aims to continually improve transparency, protect vulnerable workers, and ensure modern slavery risks are mitigated in its supply chain.

- Catholic Healthcare continues to purchase uniforms from one Australian distributor with the supply chain limited to three overseas manufacturers now covering 83% of purchases. Both the 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 are invited to attend ACAN contractor training. In 2024, 54 of our suppliers' sites have completed the SEDEX Self-Assessment Questionnaire, bringing the total of assessments completed to 64. Five of these sites have a high-risk inherent and site practices score, which will be included in our 2025 desktop review activities.

Count of Site code by Year and Combined Risk Category



## SEDEX

The Supplier Ethical Data Exchange (SEDEX) is a global membership organisation providing organisations with tools to manage and share information about ethical sourcing and supply chain transparency. SEDEX helps organisations assess, track, and improve their supply chain practices related to labour standards, health and safety, environment, and business ethics, aiming to reduce risks like modern slavery.

The core service of SEDEX is its platform, which allows businesses to store and share audit data, conduct self-assessments, and collaborate with suppliers on ethical practices. Suppliers can register on SEDEX to disclose key information about their operations, including compliance with labour rights, working conditions, and environmental impact.

As an example, Catholic Healthcare's preferred supplier for uniforms is Uniformity, which is a registered SEDEX member linked to Catholic Healthcare and whose SEDEX self-assessment questionnaire is 100% complete. The uniform supply chain then includes three manufacturers (producing 83% of our uniforms), all of which are also registered with SEDEX and also have a monitoring/completion score of 100%. In addition, the factories are WRAP-certified, meaning they are independently audited to ensure compliance with ethical labour standards.

By engaging with SEDEX in this way, Catholic Healthcare fosters a more transparent, compliant, and ethical supply chain, ultimately reducing the likelihood of contributing to modern slavery practices.

- Wages for internal employees are defined by a legally recognised collective bargaining agreement and are based on job skills and experience. Other HR-related actions Catholic Healthcare has taken in 2024 to improve the working conditions of its employees include: increasing pay rates, increasing upskilling and learning opportunities; shift bidding software to give workers more flexibility in the hours they work and the location they work; assisting some employees with Nominations for Employer Sponsored Permanent Residency and recognition programs.
- 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 used its resources, including ACAN educational tools, to 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.





## Remediation

Catholic Healthcare is committed to providing appropriate and timely remediation to individuals affected by modern slavery in accordance with the needs 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.

In future, Domus 8.7 will 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 are 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 2024, Catholic Healthcare did not find any cases of modern slavery in its operations and supply chains.



## Criterion 5

# EFFECTIVENESS OF STEPS TAKEN

No instances of modern slavery have been reported or found within our operations or associated with our supply arrangements. However, we appreciate that this does not necessarily mean that we do not 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 and employee and supplier awareness training.

Monitoring 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.

We will continue to use goal setting/action plans and assessment of completion against these as our primary metric for measuring the success of modern slavery initiatives. We will also continue to review and evaluate our performance.

Future actions planned are highlighted in CRITERION 7. Catholic Healthcare has incorporated training for its key employees and as at 31 December 2024, the following training has been conducted:

- Modern Slavery 101 Training – Procurement employees, Leadership team and all Board Members, completed by 170 employees.
- Modern Slavery Business Relevance Training – completed by 146 employees.



# *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 5.



# Criterion 7

## ANY OTHER RELEVANT INFORMATION

The risk of modern slavery has been identified as a continual high-priority area and embedded in our broader Environmental, Social and Governance (ESG) action plans for 2025. Working with our Risk Management team our ESG team will ensure the Enterprise Risk Management Framework incorporates processes to continuously identify, manage and mitigate modern slavery risks.

### **Planned future actions to further mitigate modern slavery risks include:**

- Continue transitioning to bring cleaning services inhouse for residential aged care homes.
- Investigate the opportunities to bring linen services inhouse.
- Work towards implementing a supplier and contract management system to streamline communications and process supplier data on modern slavery activities.
- Continue to arrange ACAN modern slavery training for new contractors and an expanded group of existing suppliers via an 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.
- Update and disseminate a Supplier Code of Conduct.
- Reinforce with all high-risk vendors the importance of publishing Modern Slavery Statements and/or policies by requiring these to be shared with Catholic Healthcare as part of pre-qualification via a new ERP and supplier on-boarding system commencing November 2025.
- Update our supplier preferred lists regarding 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 as part of supplier onboarding with the new system.
- Complete a detailed contract renewal process with nursing agencies, including strengthening modern slavery risk management by requiring modern slavery policies, annual risk assessments, and worker vulnerability assessments.

### **Specifically in connection with Property:**

- Continue the project to ensure all Property contracts and agreements include relevant modern slavery clauses and review as part of the 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 employees and key suppliers.



[catholichealthcare.com.au](http://catholichealthcare.com.au)









# Modern Slavery Statement 2024



[mater.org.au](https://mater.org.au)

# The Heart to Heal, The Strength to Grow.

Our spirit is strong, it thrives as we embrace those whom we must always care for.

Our journey has been long, and we will continue to flourish as we open our hearts to those who walk with us. **Always.**

Mater acknowledges that our services are provided on Aboriginal and Torres Strait Islander lands and pays respect









This Modern Slavery Statement was approved by the principal governing body of Mater Misericordiae Ltd as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 20 May 2025.

This modern slavery statement is signed by a responsible member of Mater Misericordiae Ltd Board as defined by the Act.



**Patrick Brady**

Chair, Mater Misericordiae Ltd. Board of Directors

#### Disclosure Note

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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 2023/2024 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 2024 to 31 December 2024.

#### 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 affecting millions of people worldwide, Mater remains steadfast in its commitment to ethical and responsible business practices. We continuously strive to ensure that all aspects of our operations, including our supply chain, align with our vision to honour and uphold the dignity of human life.

As a key contributor to the Catholic healthcare sector, Mater is dedicated to making a meaningful impact beyond compliance. We actively collaborate with the Australian Catholic Anti-Slavery Taskforce to address the growing inequalities that contribute to modern slavery.

This is Mater's fifth Modern Slavery Statement, covering the period from January to December 2024.

The latest Global Estimates of Modern Slavery, published in 2022, revealed that approximately 50 million people were living in modern slavery in 2021—an increase of 10 million since 2016. It continues to be an imperative that we work closely with our suppliers and contractors to uphold our standards and values.

We continue to drive awareness of our policies and corporate objectives, ensuring that our people, suppliers, contractors, and service partners share and uphold our values and ethical principles.

## 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 2024 - 31 December 2024.

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 2024, Mater continued its program of work to mitigate the risk of modern slavery within its operations and supply chain, aligning with reporting criterion 1–5 outlined in this statement. As part of this effort, Mater is collaborating with the Australian Catholic Antislavery Network through the Aged Care and Health Working Group to identify key risks and engage with suppliers in addressing these challenges.

# Reporting criterion 1 and 2

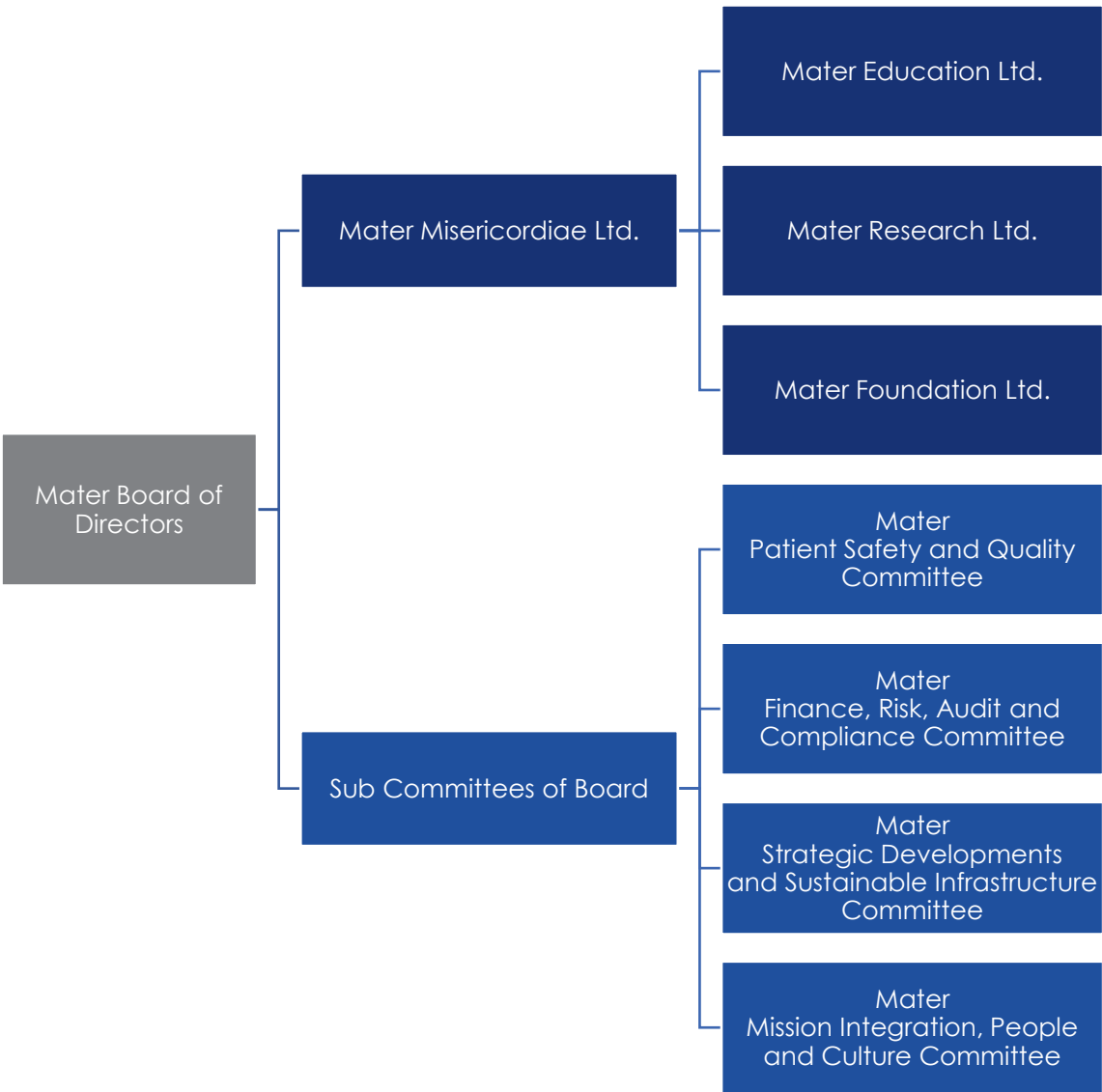
## About Mater

### Our organisational structure

Mater's organisational structure reflects our commitment to the strategic 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](https://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 the community to partner with Mater to improve the health of Queenslanders through fundraising and philanthropic opportunities.

## Mater at a glance



Figure 1: Mater locations across Queensland



**670,527**

Patients seen



**11,610**

Babies born



**109,394**

Emergency  
attendances



**10,432**

Mater People



**60,000+**

Volunteer hours



**4,073**

Mater Education  
students



**\$28.2 million**

Mater Research  
funding



**\$37.4 million**

Mater Foundation  
distributions

Figures sourced from Mater's 2023/24 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.

Our procurement policies and procedures establish a robust governance framework, embedding due diligence processes to identify and mitigate risks related to modern slavery, human rights violations, and environmental impact. These principles are integrated into all tendering and contracting activities to ensure compliance with legislative and ethical standards. Mater engages in procurement across a wide range of categories, including clinical, non-clinical supplies and services, and information communication and technology supplies and services. In addition, key areas such as Development and Property oversee the procurement of construction, asset management, and maintenance services, while Mater Foundation manages the ethical sourcing of equipment and fundraising materials.

We apply risk-based sourcing strategies and contracts tailored to the complexity and value of each procurement activity, ensuring stringent supplier vetting and contractual obligations. All suppliers and contractors must adhere to Mater's contractual terms, which explicitly reference modern slavery prevention, ethical labour practices, environmental sustainability, and our Supplier Code of Conduct.

By prioritising ethical sourcing and supplier accountability, Mater remains steadfast in its commitment to eradicating modern slavery and fostering a socially responsible supply chain.

The below information provides a snapshot of Mater's business and procurement activities.



**\$625 million**

Total addressable spend in FY23/24



**37**

Suppliers engaged through CNA\* contractual engagements



**\$1.7 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 \$625 million across two procurement categories and 13 broad procurement sub-categories.

## Category spend FY 2023/24

Our largest supply category and spend is clinical, covering medical devices and supplies. As provided in the below table, the clinical category comprises medical and surgical consumables, prostheses, pharmacy and medical equipment.

### What we buy – clinical

Clinical / Direct			
Medical and surgical consumables	Pharmacy	Prosthesis	Medical equipment
<ul style="list-style-type: none"> <li>Anaesthesia consumables</li> <li>Cardiovascular consumables</li> <li>Custom sterile</li> <li>Dental consumables</li> <li>Dialysis consumables</li> <li>Hygiene care and products</li> <li>IV and arterial administration</li> <li>Medical aids consumables</li> <li>Medical consumables</li> <li>Medical operator protection</li> <li>Medical research</li> <li>Needles and syringes</li> <li>Nutrition and feeding</li> <li>Orthopaedic consumables</li> <li>Pathology consumables</li> <li>Miscellaneous consumables</li> <li>Examination/monitoring</li> <li>Radiology and x-ray</li> <li>Respiratory consumables</li> <li>Resuscitation consumables</li> <li>Surgical consumables</li> <li>Sutures</li> <li>Wound care</li> <li>Burrs and blades</li> <li>Sterile instruments</li> </ul>	<ul style="list-style-type: none"> <li>Pharmaceuticals and drugs</li> <li>Cytotoxic pharmaceuticals</li> <li>Pharmacy consumables</li> </ul>	<ul style="list-style-type: none"> <li>Prosthetics - Cardiovascular</li> <li>Prosthetics - Craniofacial</li> <li>Prosthetics - ENT</li> <li>Prosthetics - General</li> <li>Prosthetics - Gynaecology</li> <li>Prosthetics - Maxillary-Facial</li> <li>Prosthetics - Neurosurgery</li> <li>Prosthetics - Ophthalmic</li> <li>Prosthetics - Orthopaedic</li> <li>Prosthetics - Orthotics</li> <li>Prosthetics - Plastics</li> <li>Prosthetics - Spinal</li> <li>Prosthetics - Urology</li> <li>Prosthetics - Vascular</li> <li>Prosthetics - Gastroenterology</li> <li>Loan kit service fees</li> </ul>	<ul style="list-style-type: none"> <li>Medical bed and mattresses</li> <li>Diagnostic equipment</li> <li>Radiology and x-ray equipment</li> <li>Infant and maternity care</li> <li>Infusion pumps</li> <li>Monitors and monitoring systems</li> <li>Patient and shower trolleys</li> <li>Dental equipment</li> <li>Pathology equipment</li> <li>Resuscitation equipment</li> <li>Respiratory equipment</li> <li>Other medical equipment</li> </ul>

The non-clinical categories include facilities management, business services, utilities, hospitality and medical equipment and repairs.

## What we buy – non-clinical

An overview of the products and services within the non-clinical category is listed below.

Indirect				
Facilities management	Business services	Utilities	Hospitality	Medical Equipment and Repairs/Mtce
<ul style="list-style-type: none"> <li>Furniture, fixtures and equipment</li> <li>Equipment hire (non-clinical)</li> <li>Facilities supplies</li> <li>Health and safety</li> <li>Pest control</li> <li>Airconditioning and heating</li> <li>Equipment</li> <li>Signage</li> <li>Waste management</li> <li>Hardware supplies</li> <li>Painting supplies</li> <li>Plumbing supplies</li> <li>Electrical supplies</li> <li>Fire safety supplies</li> <li>Landscaping supplies</li> <li>Cleaning and domestic services</li> <li>Pest control services</li> <li>Electrical services</li> <li>Plumbing services</li> <li>Carpentry services</li> <li>Flooring services</li> <li>Security services</li> <li>Painting services</li> <li>Window and door services</li> <li>Automatic door services</li> <li>Landscape and ground services</li> <li>Fire services</li> <li>Lift services</li> <li>Swimming pool maintenance</li> <li>Locksmith services</li> <li>Water treatment services</li> <li>Facilities/buildings and other engineering services</li> </ul>	<ul style="list-style-type: none"> <li>Administration expenses</li> <li>Advertising and promotions</li> <li>Audit fees</li> <li>Business expenses</li> <li>Fleet</li> <li>Freight and courier</li> <li>Insurance</li> <li>Interpreter services</li> <li>External legal services</li> <li>Newspapers and journals</li> <li>Subscriptions and memberships</li> <li>Office equipment</li> <li>Stationery supplies</li> <li>Patient ambulance transport</li> <li>Printing</li> <li>Recruitment</li> <li>Temporary labour, including admin, nursing, medical, IT and other.</li> <li>Consultants (excluding Engineers, Architects, IT, etc.)</li> <li>Training and education</li> <li>Travel and accommodation</li> <li>Uniforms</li> <li>Printing services</li> <li>Postage</li> <li>Taxi/ride share.</li> <li>Salary packaging</li> <li>Document management and storage</li> <li>Allied Health</li> <li>HR services (Police checks)</li> </ul>	<ul style="list-style-type: none"> <li>Electricity</li> <li>Coal</li> <li>Gas – clinical</li> <li>Gas – non-clinical</li> </ul>	<ul style="list-style-type: none"> <li>Beverages</li> <li>Catering services and supplies</li> <li>Food</li> <li>Food service and consumables</li> <li>Housekeeping</li> <li>Consumables</li> <li>Linen</li> <li>Laundry services</li> <li>Chemicals</li> <li>Supplements</li> </ul>	<ul style="list-style-type: none"> <li>R&amp;M Medical equipment</li> <li>R&amp;M Radiology</li> <li>R&amp;M Pathology</li> <li>Equipment lease and rental</li> <li>M&amp;S lease and hire equipment.</li> </ul>



## What we buy – Information, Communication & Technology

An overview of the products and services within the Information, Communication and Technology category is listed below.

Information, Communication & Technology				
Networks & Communications	Hardware	Software	Services	
<ul style="list-style-type: none"> <li>▪ Mobile voice and data</li> <li>▪ Mobile phones</li> <li>▪ Mobile phone maintenance and support</li> <li>▪ Fixed Data (WAN) services</li> <li>▪ IT network, infrastructure and hardware</li> <li>▪ Hardware maintenance and support</li> <li>▪ Cloud and Cloud storage</li> </ul>	<ul style="list-style-type: none"> <li>▪ Desktop/laptop/tablets and computing, including support</li> <li>▪ Audio visual equipment</li> <li>▪ Audio visual equipment maintenance and support</li> <li>▪ Printers and multi-function devices (MFDs)</li> <li>▪ Printers and MFDs maintenance and support</li> </ul>	<ul style="list-style-type: none"> <li>▪ Software licensing – clinical</li> <li>▪ Software maintenance and support – clinical</li> <li>▪ Software licensing – non-clinical</li> <li>▪ Software maintenance and support – non-clinical</li> </ul>	<ul style="list-style-type: none"> <li>▪ Managed services</li> <li>▪ Professional services and consultancy</li> <li>▪ Infrastructure as a service</li> <li>▪ Platform as a service</li> <li>▪ Hardware as a service</li> <li>▪ Software as a service</li> </ul>	<ul style="list-style-type: none"> <li>▪</li> </ul>

## Code of Conduct

Mater is dedicated to the ethical and responsible engagement of suppliers, ensuring they align with our Values and uphold the highest standards of integrity. As part of this commitment, all suppliers must comply with Mater's Supplier Code of Conduct.

In 2022, we reinforced our Supplier Code of Conduct (Code) by strengthening its provisions and integrating it as a contractual requirement across our legal agreements. This further solidifies our expectation that suppliers not only adhere to the Code but also apply its principles throughout their own supply chains. The Supplier Code of Conduct is publicly available on our website, and new suppliers are assessed based on their compliance with Mater's ethical, legal, and quality standards. We expect our suppliers—and their entire supply chains—to reflect our Values and adhere to the following principles:

**Human rights compliance:** Upholding the standards outlined in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

**Modern Slavery prevention:** Proactively identifying and mitigating risks of modern slavery within their operations and supply chains.

**Legal and ethical labour practices:** Ensuring full compliance with all laws related to forced or involuntary labour, child labour, discrimination, and security practices. This includes safeguarding employees' rights to leave their workplace at the end of their shift and to resign with reasonable notice.

**Freedom of association and collective bargaining:** Respecting workers' rights to join trade unions of their choice and to engage in collective bargaining.

By embedding these principles in our supplier relationships, Mater reinforces its unwavering commitment to ethical sourcing, human rights, and sustainable business practices.



# Reporting criterion 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.

### Operations

Mitigating operational risks related to modern slavery is a priority for Mater, and we take a proactive, comprehensive approach to addressing these risks within our operations. This includes performing due diligence and working closely with suppliers to ensure compliance with ethical labour practices. Mater has established clear policies, training programs, and reporting mechanisms to empower both employees and suppliers to recognise and report any signs of modern slavery. Additionally, we include contractual obligations in our agreements with suppliers, manage areas of non-compliance, and offer support for remediation where necessary. Through these actions, Mater fosters an environment of accountability and transparency, ensuring that our operations and supply chain align with global human rights standards and demonstrate a strong commitment to the eradication of 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.

Mater remains dedicated to combating modern slavery by continuously monitoring and reporting on training and awareness efforts. Since the implementation of modern slavery training modules and the introduction of awareness initiatives for new employees at Mater, we have trained over 1200 key personnel. Over the past year, an additional 254 personnel in procurement and purchasing roles, including new senior managers and/or Directors have successfully completed training at a statewide level.

Further efforts to raise awareness and educate staff were undertaken by the Chief of Mission, including introducing a segment on modern slavery into the Welcome Day induction agenda for new starters. A total of 1,082 new starters in 2023 and 925 in 2024 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 chains.

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 criterion:

### 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.

In June 2023 an ACAN Aged Care and Health Working Group was formed. The establishment of this group enables members to collaboratively share information and undertake supplier risk assessments as a group activity. Members include Calvary, Cabrini, St Vincent's, an ACAN representative and Mater. During 2024, Mater participated in approximately 50 meetings with suppliers which included comprehensive discussion on supply chains risks.

Based on Mater's analysis of its procurement categories, it has identified suppliers across high, medium, and low-risk levels using the ACAN taxonomy. Mater, both independently and in collaboration with the ACAN health working group, conducts supplier assessments to promote ethical sourcing practices and to uphold social responsibility across its supply chain.

## 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. In 2024, a shift from the initial gap analysis to an in-depth maturity assessment of Mater's modern slavery risk management was introduced across the six pillars shown below.

This transition underscores the importance of assessing Mater'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:

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

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

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

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

**Mater's Action Plan and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.

**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 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 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 holds us accountable. While many such metrics are proxymeasures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

An analysis has been conducted, underscoring Mater's commitment to addressing modern slavery risks across all levels of the organization.

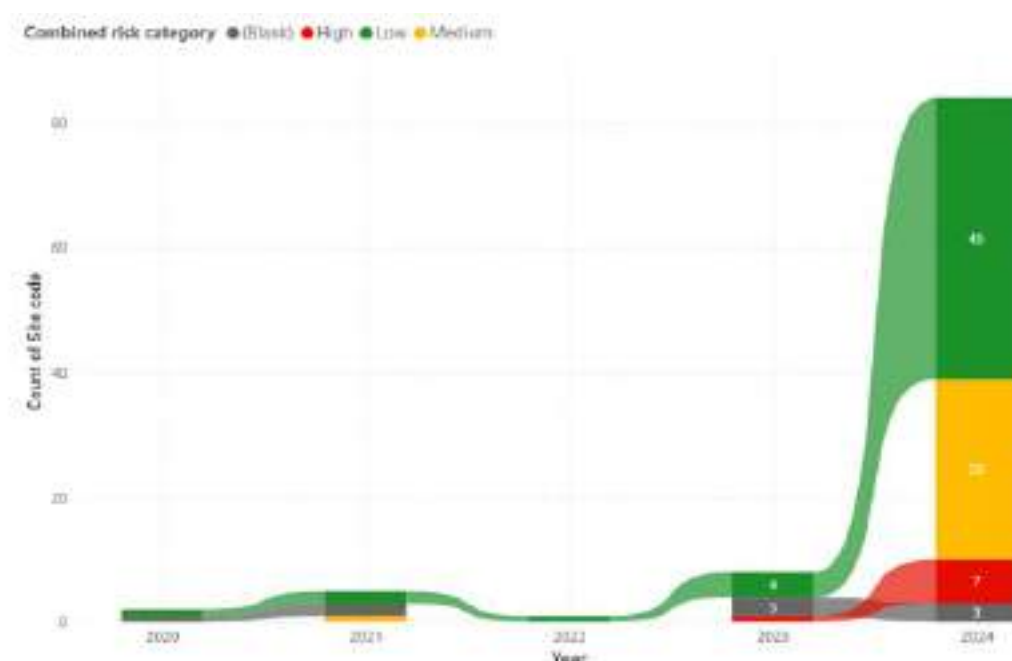


# Reporting criterion 4

## Actions taken to assess and address risk

Mater's approach to assessing and addressing risk has included the following actions:

- Modern slavery training and awareness promoted to Mater People and new starters
- 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
- Policies and procedures put in place to support a fair and safe working environment for our staff and suppliers, including a Whistleblower Policy.
- Procurement policies and procedures updated to include environmental and sustainability requirements of which Modern Slavery is incorporated.
- Access provided to Mater's Modern Slavery Statement on our procurement intranet pages.
- 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.
- 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.
- Engagement with suppliers to assess modern slavery risks and within procurement tenders, with environmental and social evaluation criterion included to ensure informed decisions in identifying risks.
- Suppliers now encouraged to complete a self-assessment of their operational and supply chains. In 2024, 84 suppliers participated in this activity, with seven suppliers identified in the high-risk category, 29 in the medium-risk category with the remainder falling into the low-risk category. Mater will continue to work with its suppliers to address any potential modern slavery risks.



## 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 was launched in April 2023. The site provides suppliers with access to Mater's Modern Slavery Statement, links to training and development, our Code of Conduct and other information.
- Mater's Procurement intranet site updated with the latest Modern Slavery Statement to ensure easy access for staff.
- During 2024, 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.
- A total of 254 personnel completed training in 2024 which covered awareness of modern slavery. A total of 924 people who commenced work with Mater in 2024 were made aware of the modern slavery training modules at their Welcome Day induction and encouraged to undertake this training.
- The ACAN Aged Care and Health Working Group performed supplier risk assessments to gain an understanding of their operational and/or supply chain risks. This body of work will continue to be undertaken and tracked via an online tool developed by ACAN.

# Reporting criterion 5

## Effectiveness assessment

Mater understands the importance of assessing the effectiveness of the actions we are taking to address modern slavery risks.

As we present our fifth modern slavery statement, we acknowledge the importance of continuous improvement and the need for a refreshed approach. In 2022, Mater established a cross-functional working group comprising representatives from MML and our ministries. This group convenes up to 10 times per year to drive progress on modern slavery initiatives, foster collaboration, and enhance our overall response.

Mater has worked closely and collaboratively with ACAN, which remains supportive of Mater's activities and progress.

# Reporting criterion 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.

To raise awareness of our efforts to combat modern slavery, a copy of Mater's Modern Slavery Statement is shared with the Archbishop of Brisbane and Bishops of Rockhampton and Townsville.

# Reporting criterion 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 2025-26

Over 2025-26, Mater will aim to embed supplier review assessments as part of its business-as-usual procurement and tender processes, as opposed to a stand-a-alone activity.

Training and awareness of modern slavery through Mater's online training platform and its Welcome Day induction of new starters will continue to encourage staff engagement and access of the online modern slavery training modules.



**Patrick Brady**

Chair, Mater Misericordiae Ltd. Board of Directors









# **Modern Slavery Statement 2024**

**1 January 2024 – 31 December 2024**







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The Little Company of Mary Health Care Limited (Calvary) head office is located at Level 15, 345 George Street, Sydney NSW 2000  
 ABN 11 079 875 687. Website: <https://www.calvarycare.org.au>. Contact email for Modern Slavery: [info@calvarycare.org.au](mailto:info@calvarycare.org.au)

## 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.



# Approval and Signature

## Statement from Martin Bowles, National CEO, Calvary Health Care and Jim Birch, Chair, Little Company of Mary Health Care Limited

**We are proud of Calvary's fifth Modern Slavery Statement, in line with the *Modern Slavery Act 2018*. This statement outlines the steps we have taken to identify and mitigate the risk of modern slavery in our supply chain and operations.**

Throughout 2024, supply chain issues continued to challenge us, compounded by significant workforce shortages, which will likely remain issues for businesses over the coming years. These present a significant risk to Calvary's mission, as the products and services that support Calvary's delivery of care 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 summarise 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 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 there is an unmitigated risk of possible harm to people working in our supply chains.



Martin Bowles, National CEO,  
Calvary Health Care



Mr Jim Birch AM, Chair,  
Little Company of Mary Health Care

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 26 June 2025 and is for the period 1 January 2024 to 31 December 2024. This modern slavery statement is signed by a responsible member of the Board of Directors as defined in the Act.

**Mr Martin Bowles AO PSM**  
National CEO, Calvary Health Care

**Mr Jim Birch AM**  
Chair, Little Company of Mary Health Care



# Reporting Criteria 1: About Calvary

## 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 and during 2024 we operated across five states and two territories in Australia with 13 public and private hospitals, 62 residential aged care homes, 17 retirement living villages, and 17 home care service 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 hospital, 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.

## 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.





# Reporting Criteria 2: Operations and Supply Chain

## Our Organisational Structure

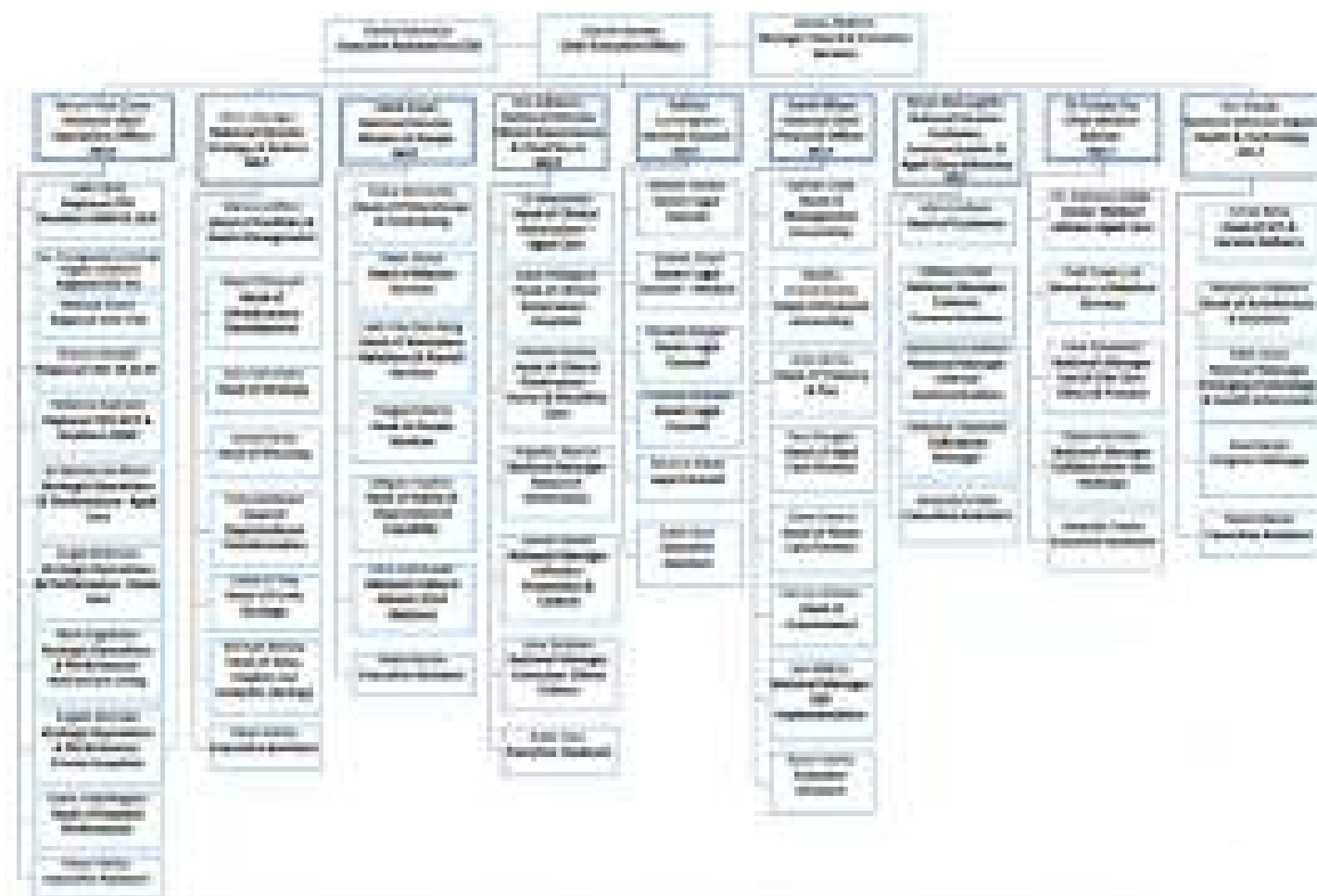
Little Company of Mary Health Care Limited (LCMHC) and its subsidiaries (trading as Calvary Health Care) are charitable not-for-profit public companies limited by guarantee, registered under the Corporations Act 2001.

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 wellbeing 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, retirement living and home care services as controlled entities.

### ORGANISATIONAL CHART – NATIONAL EXECUTIVE LEADERSHIP TEAM (NELT)





## 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 service 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 17,461 employees, in 2024 Calvary had 219,758 hospital admissions, conducted 143,077 surgical procedures, provided home care services to 18,598 clients and provided 5.7 million hours of care to aged care residents. In 2024, revenue from our operations was \$2,114,096.

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.

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 has been the continued incorporation of the "new Calvary" homes into the Calvary business. The additional homes were successfully acquired in 2021, with ongoing review and consolidation into the supply chain.

**Appendix 1:** Calvary Company Entity List

**Appendix 2:** Calvary Service Location Map

## Our Governance Framework

As a provider of health care to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2024 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of Mission & People, 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 2024 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, along with Mission and Ethics Committee of the Board, provided guidance and feedback to strengthen the governance process.

## Workforce Profile

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 directly employs the majority of our workforce, which significantly reduces the risk of modern slavery within our operations. However, we occasionally engage third-party labour hire. To further strengthen our commitment to ethical labour practices, we intend to introduce a Managed Service Provider (MSP) in 2025. This initiative aims to enhance oversight and reduce the risk of modern slavery within our third-party labour arrangements. As of December 2024, Calvary has 17,461 employees. Of our staff, 13,918 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 Talent Acquisitions team.

## Our Supply Chain

As a multi-faceted healthcare organisation operating throughout Australia, our supplier base is diverse and ranges from large multi-national organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2024 reporting period, Calvary transacted with 6,051 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 2024 was more than \$1.057 billion, which is managed by National Procurement.

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 United States.



# 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 2024, our efforts continued to be 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 2024 reporting period, Calvary renewed our membership of ACAN. We believe that combining our efforts with other like-minded organisations in the health and ageing sector will deliver the greatest impact in the shortest time.

Our continuous 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 Risk

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.

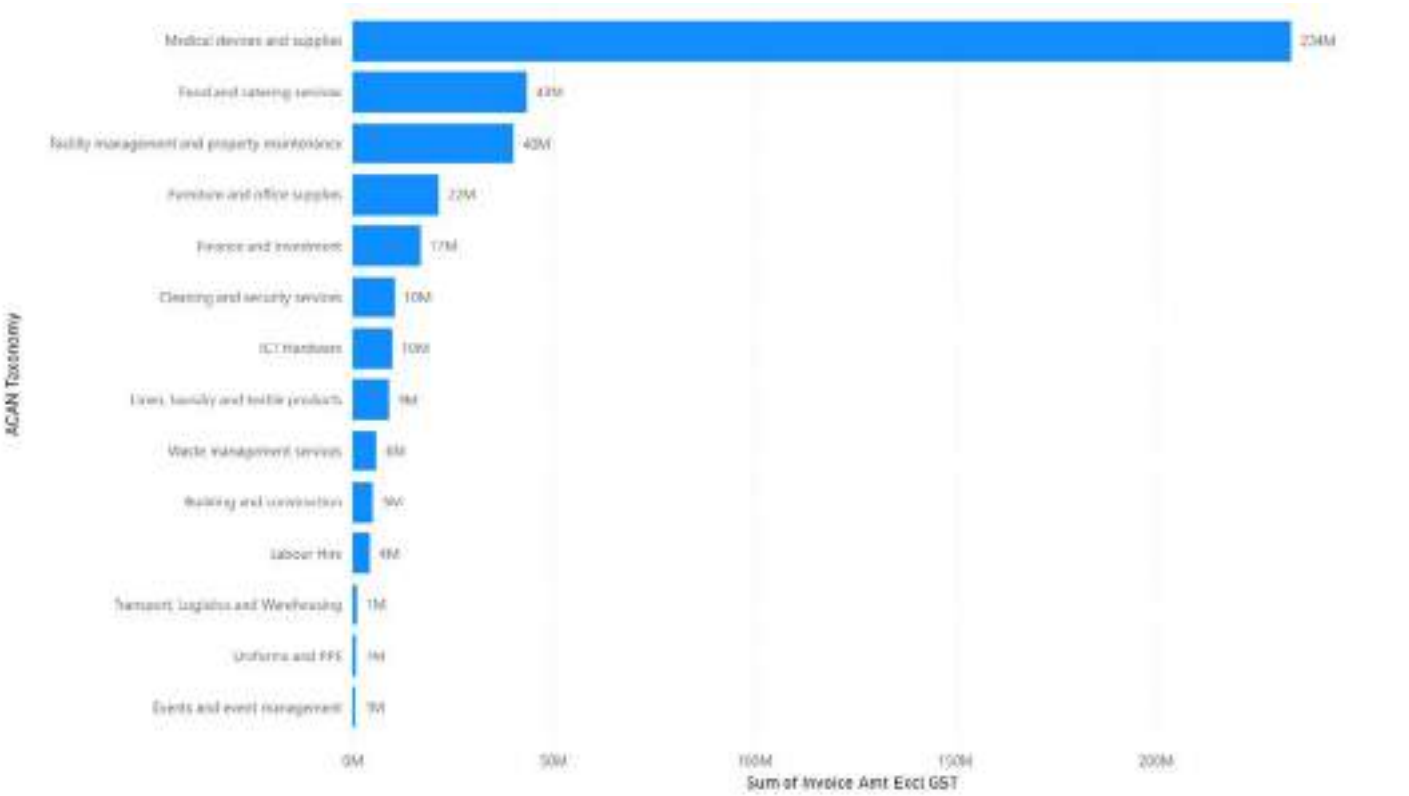
In line with best practice, Calvary with the support of ACAN, is committed to continuously improving our maturity across governance, risk management and risk assessment by identifying strengths and opportunities in Calvary's approach.

## Supply Chain Risk

The ACAN Health Working Group was established to coordinate the effort across all hospitals and aged care providers in ACAN. Throughout 2024, we continued 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 pre-competitive, and no information about individual pricing or volume is shared. All information is held and analysed by ACAN, not individual entities.

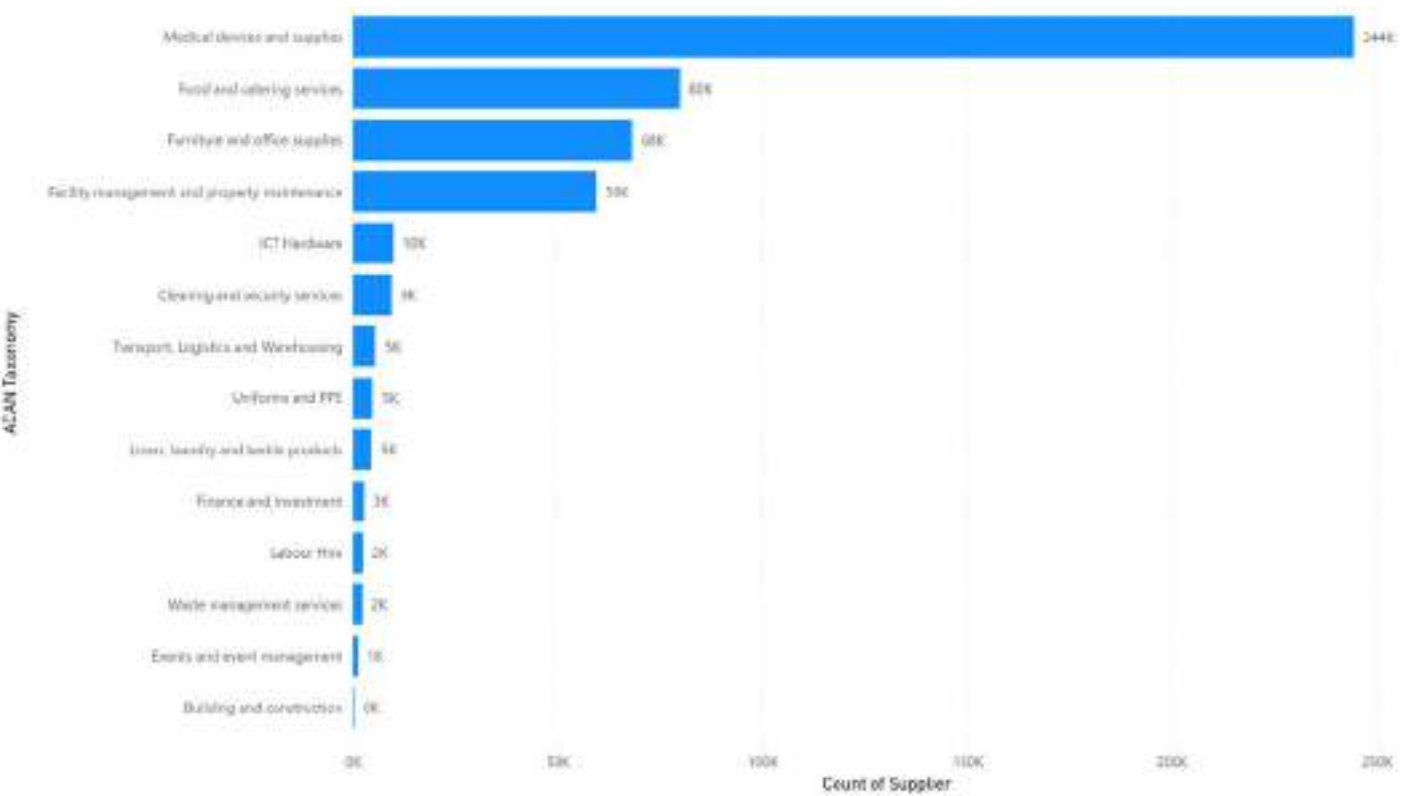
GRAPH: SPEND IN HIGH-RISK TAXONOMY CATEGORIES

Sum of Invoice Amt Excl GST by ACAN Taxonomy



GRAPH: NUMBER OF SUPPLIERS IN HIGH-RISK PROCUREMENT CATEGORIES

Count of Supplier by ACAN Taxonomy





# 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.

## 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.

A key achievement was the substantial increase in staff training, with 250 employees completing e-learning modules, up from zero in the previous year. This effort was complemented by a notable rise in the number of e-learning modules completed, from 34 to 250.

## Supplier Engagement via the ACAN Program

The ACAN Program provides structured support for supplier engagement and supply chain risk assessment. Updated in 2023, the program now includes enhanced supplier education and auditing components, and continues to evolve in response to emerging risks and best practices.

Entities are encouraged to refer to the official ACAN website for comprehensive information: <https://www.acan.org.au/>.

## Self-Declarations

The ACAN Supplier Survey and Sedex SAQ are used to:

- Identify suppliers willing to join ACAN's modern slavery supplier program.
- Determine key modern slavery contacts within the supplier's business.
- Understand business structures.
- Support desktop reviews, audits, and due diligence.
- As a combined data set, the SAQs identify gaps in knowledge, understanding, and controls in supply chains, guiding additional tools and resources for Catholic entities and their suppliers.

In 2024, procurement completed the risk taxonomy assessment for 6051 suppliers, with 454 supplier surveys completed, 72 suppliers joining capacity building webinars, 125 suppliers joining Sedex and 72 sites completing Sedex SAQ.

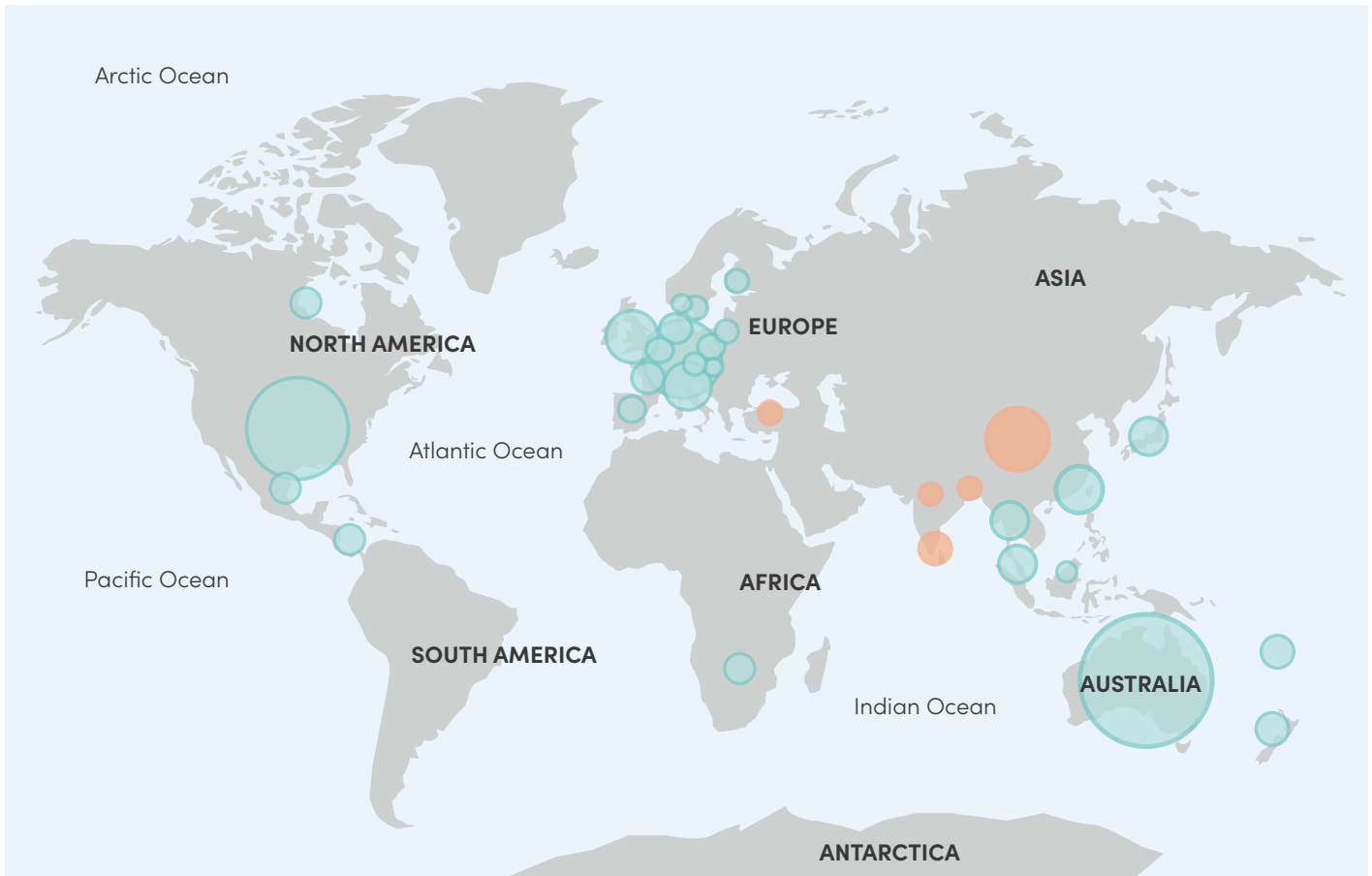
Through the ACAN supplier survey, 464 of our suppliers of goods have declared sourcing from 34 countries, including five countries with an inherent high risk according to the Sedex Pre-assessment Tool. This highlights the need for enhanced due diligence, targeted supplier engagement, and ongoing monitoring to mitigate modern slavery risks. These suppliers may be prioritised for audits, training, and closer collaboration to ensure ethical sourcing practices and compliance with legal obligations.



**SOURCING COUNTRIES AS DECLARED BY TIER 1 SUPPLIERS:**

Count of Business Number by In which Country or Countries are the good(s) made (i.e., where are your Tier 1 suppliers located) and Overall inherent risk category

Overall inherent risk category    ● high    ● medium



## DATA:

IN WHICH COUNTRY OR COUNTRIES ARE THE GOOD(S) MADE (I.E., WHERE ARE YOUR TIER 1 SUPPLIERS LOCATED)	COUNT OF BUSINESS NUMBER	OVERALL INHERENT RISK CATEGORY
Australia	171	medium
Austria	5	medium
Bangladesh	2	high
Belgium	4	medium
Canada	3	medium
China	25	high
Costa Rica	1	medium
Denmark	5	medium
Fiji	1	medium
Finland	1	medium
France	11	medium
Germany	39	medium
India	2	high
Italy	13	medium
Japan	3	medium
Lithuania	1	medium
Malaysia	1	medium
Mexico	4	medium
Netherlands	2	medium
New Zealand	5	medium
Norway	1	medium
Poland	1	medium
Singapore	3	medium
Slovakia	1	medium
South Africa	1	medium
Spain	2	medium
Sri Lanka	3	high
Sweden	2	medium
Switzerland	5	medium
Taiwan	12	medium
Thailand	3	medium
Turkey	2	high
United Kingdom	26	medium
United States	103	medium

Calvary has continued to communicate with all current suppliers on the steps we undertake to ensure we meet, and where possible exceed, our obligations with regard 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.

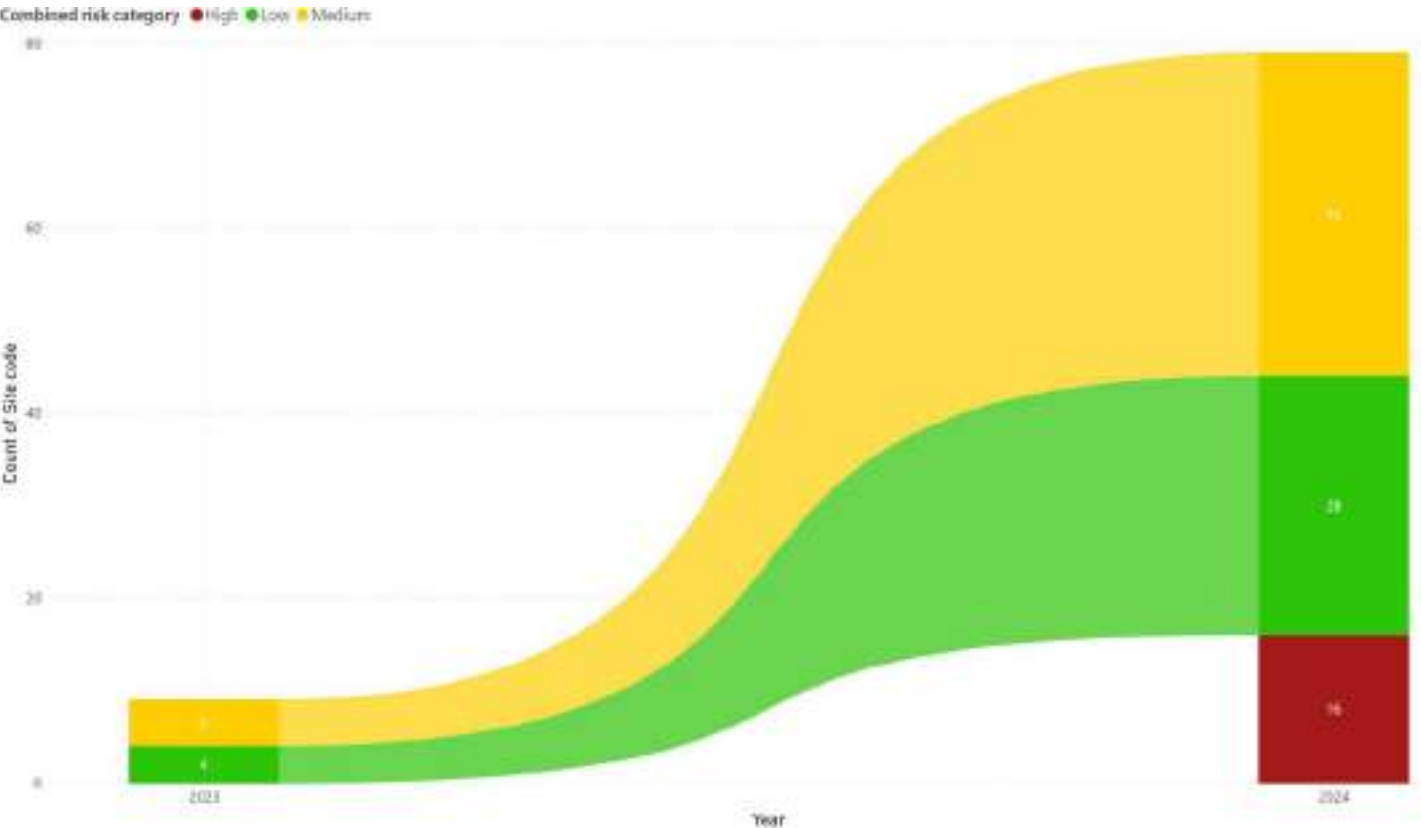
Calvary invited high-risk / high-volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in the SAQ, and a risk score is produced (site characteristics risk score).

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.

In 2024, 72 of our supplier’s sites have completed the Sedex SAQ, bringing the total of assessments completed to 88. Seven of these sites have a high-risk inherent and site practices score and, together with suppliers sourcing from high-risk countries, will be included in our 2025 desktop review activities.

SEDEX SAQ COMPLETED



## Our People

Calvary's third-party labour hire contracts have been updated to include modern slavery risk management requirements.

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 to agree to our Business Partner's criteria to be considered as a supplier to Calvary.

## Sector Collaboration

As a member of the ACAN, Calvary 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 also 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.

In 2024, the Hospitals Working Group commenced joint Desktop Reviews to enhance supplier engagement and management of modern slavery risk. The model introduced a clear review layer between supplier self-assessment and action planning to make supplier responses robust, risk-based, and outcome-driven, enhancing worker protection. The Desktop Review process validated supplier responses, resolved inconsistencies, identified areas of high-risk, and enabled co-design of the next steps with the aim of strengthening worker protection.

## Case Study: Desktop Review Key Findings and Results

The Desktop Reviews identified:

- Inconsistent reporting on the use of indirect labour: with undertakings to clarify labour hire practices and put in place appropriate protections for workers.
- High-risk product and service categories being determined: with suppliers being requested to outline risk reduction measures and make inclusion of workers' rights contractual.
- Gaps in governance and public disclosures: with suppliers being requested to update documentation to include current anti-modern slavery requirements and make verification of training data and due diligence outcomes available.

While grievance mechanisms were in place, their effectiveness was in doubt, and this led to calls for improved metrics and access.

Inconsistencies in remediation procedures were addressed through dialogue, and this led to commitments to develop or update frameworks to improve access and effectiveness of remediation.

### Next Steps and Ongoing Improvement Actions

Following the Desktop Reviews, suppliers were requested to:

- Clarify high-risk practices.
- Increase worker participation through voice programs and grievance access.
- Improve metrics and reporting on the success of actions implemented.
- Increase transparency and public disclosure to make sure that practices inside and public statements are consistent.

Ongoing collaboration in 2025 between suppliers and Catholic hospitals will focus on long-term, sustainable capacity building and knowledge-sharing centred on risk mapping. The Desktop Reviews offered constructive dialogue and tailored subsequent steps. This resulted in a better mechanism for managing risks of modern slavery, keeping workers' interests at the centre of approved activities.

## Case Study: Capacity Building in Social Compliance Auditing

In May 2024, a Calvary procurement officer, along with other supply chain practitioners and business partners such as SEDEX, completed a four-day Compliance Practitioners Initiative (CPI) Social Compliance Lead Auditor training course.

The CPI is a global qualification scheme tailored for supply chain practitioners across various industries and functions. The Social Compliance Lead Auditor accreditation equips Calvary with the expertise to perform both desktop and in-person social compliance audits of suppliers. This training is also recognised by the Association of Professional Social Compliance Auditors (APSCA).

Intertek, a renowned provider of quality assurance, testing, inspection, and certification, delivered the course. The training emphasised corporate social responsibility (CSR) audits, which are increasingly vital in the global supply chain. Participants gained skills to systematically and comprehensively evaluate CSR issues, including:

- Understanding CSR programs, their history, and significance.

- Grasping the CSR audit process, types of audits, auditor professionalism, safety, and security.
- Learning the components of CSR audits and common audit standards.
- Mastering the audit process, including preparation, opening and closing meetings, social management systems, business ethics, site tours, interviews, and reviews of worker records and payroll.
- Developing interview and worker file review sampling techniques.
- Handling special situations and sensitive cases.
- Applying risk management techniques.
- Writing CSR audit reports and corrective action plans.

After the course, the Calvary Procurement team, in collaboration with the Talent Solutions team, applied their new skills by conducting a desktop audit of labour hire service providers and sponsorship arrangements for vulnerable migrant workers in aged care. These areas continue to be monitored and managed to mitigate associated risks.

## Remediation

Calvary is committed to providing appropriate and timely remedies for individuals impacted by modern slavery, in alignment with the UN Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth), and other relevant legislation. Where Calvary is found to have caused or contributed to harm, it will cooperate in remediation efforts and take steps to prevent recurrence.

Where Calvary is directly linked to modern slavery through a business relationship, it is committed to working with the entity responsible to ensure effective remediation and prevent future harm.

Calvary has access to Domus 8.7 (<http://domus87.org.au/>), a not-for-profit initiative that provides independent, victim-centred remediation services and confidential advisory support. Domus 8.7 plays a key role in supporting organisations to respond to modern slavery incidents and uphold human rights.

Calvary has also implemented the following measures:

- Training staff and stakeholders to recognise the causes of modern slavery and understand how to escalate concerns such as poor labour practices, unsafe working conditions, and other risk indicators.
- Including remediation clauses in contracts with high-risk suppliers to ensure victim-centred processes are followed.
- Establishing protocols for engaging Domus 8.7 and law enforcement when modern slavery concerns are raised.

# Reporting Criteria 5: Effectiveness Assessment

**We are continuously monitoring our progress against our commitments in 2024, as well as identifying new opportunities to improve our modern slavery program.**

In 2024 we met all targets as detailed in this report, including:

- Calvary extended direct invitations to 89 suppliers to join Sedex. 125 suppliers have joined Sedex through our collaboration in the ACAN Health Working Group. This is because overlap in the supplier base has been identified resulting in additional suppliers, already on Sedex, being linked to us.
- A total of 72 suppliers have completed the Sedex SAQ, a substantial increase from just 16 the previous year.
- Calvary will monitor this in the future, using the ACAN risk taxonomy for those who do not engage, and complete further steps as requested.

Using the ACAN risk taxonomy, Calvary has identified 3,771 suppliers as having an inherent 'high' risk rating. We recognise this as an initial assessment and will continue to validate and refine this classification over time. In 2025 and future years, we will be establishing milestones centred around:

- Percentage of staff who have completed mandatory training.
- Number of supplier audits conducted.
- Number of supplier remediation programs completed

While we recognise the need to develop and evolve our targets and measurements, in 2024 we have taken steps to enhance our metrics (as seen in the Supply Chain Risk section of this statement).

We can provide the following data as a baseline for further reporting:

FOCUS	DESCRIPTION	2023	2024
Internal	Hours spent on Modern Slavery Activities	242 hours	300 hours
	eLearnings completed	56	250
External	Total number of suppliers	6,183	6,051
	Total number of high-risk suppliers	5,854	3,771
	Invited to join Sedex	38	89
	Joined Sedex	60	125
	Suppliers completing Sedex risk assessment SAQ	16	72
	Suppliers attending training	437	72
	Social audits (Supplier site audit)	6	18



## Modern Slavery Maturity Assessment

In 2024, Calvary partnered with ACAN to review maturity of its own organisation through the ACAN Maturity Assessment. The Assessment looks to shift from the initial Gap Analysis towards a focus on the maturity of Calvary's modern slavery risk management approach aiming for continuous improvement.

This transition underscores the importance of assessing the maturity of our approach to drive the impact against modern slavery. The maturity scorecard is designed to provide a comprehensive view of Calvary's efforts across different key areas of operation, presented as pillars:

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

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

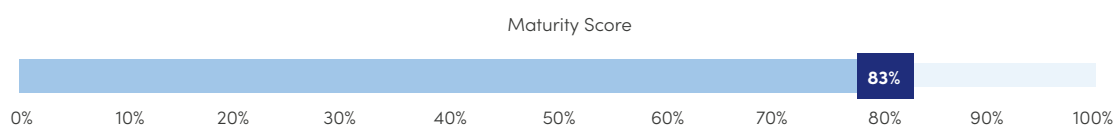
This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **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 Calvary 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 Calvary apply the mitigation actions, with mature efforts being proactive and adaptable to changing circumstances and driving 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.

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 2025 to Calvary's Modern Slavery program.

### LITTLE COMPANY OF MARY HEALTH CARE LIMITED - OVERVIEW



### LITTLE COMPANY OF MARY HEALTH CARE LIMITED - 2024 ANALYSIS BY PILLAR

PILLAR	A. GOVERNANCE	B. RISK ASSESSMENT	C. RISK ASSESSMENT	D. EFFECTIVENESS OF ACTIONS	MATURITY SCORE
1. Business Process and Governance	100%	100%	80%	100%	95%
2. Operations	72%	100%	85%	85%	86%
3. Supply Chain	100%	100%	85%	100%	96%
4. Workers Engagement	54%	100%	50%	48%	63%
5. Entity's program and activities	100%	80%	100%	53%	83%
6. Grievance Mechanisms and Remediation	100%	60%	78%	67%	76%
<b>Average</b>	<b>88%</b>	<b>90%</b>	<b>80%</b>	<b>76%</b>	<b>83%</b>

## Our Plans for 2025

In 2024, we have been building our automation capabilities, which 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.

Beyond 2025, Calvary is committed to continuously improving our due diligence in modern slavery risk management. We will encourage our suppliers to enhance their risk management programs and conduct random audits of high-risk suppliers to ensure compliance with our modern slavery policies. Our efforts to map our supply chain will be expanded, allowing us to update our risk profiles and adjust our modern slavery program accordingly.

Additionally, we will implement the CIA Supplier Module—an online platform that integrates our governance processes directly into supplier onboarding and management. This tool will enable us to systematically assess and monitor supplier risk, including modern slavery indicators, while also streamlining the onboarding process. By capturing a broader range of suppliers through this platform, we aim to enhance transparency, improve compliance, and strengthen our overall risk mitigation efforts.

To support these initiatives, ACAN updated all modern slavery training modules to include the latest information on modern slavery risks, signs to look for, and best practices for mitigation. The training is more streamlined, with feature interactive elements such as quizzes and scenario-based learning to enhance engagement and retention. It will be accessible on Calvary's Learning management System (LMS) with recommendation for MS 101 as a general learning for all staff and volunteers.

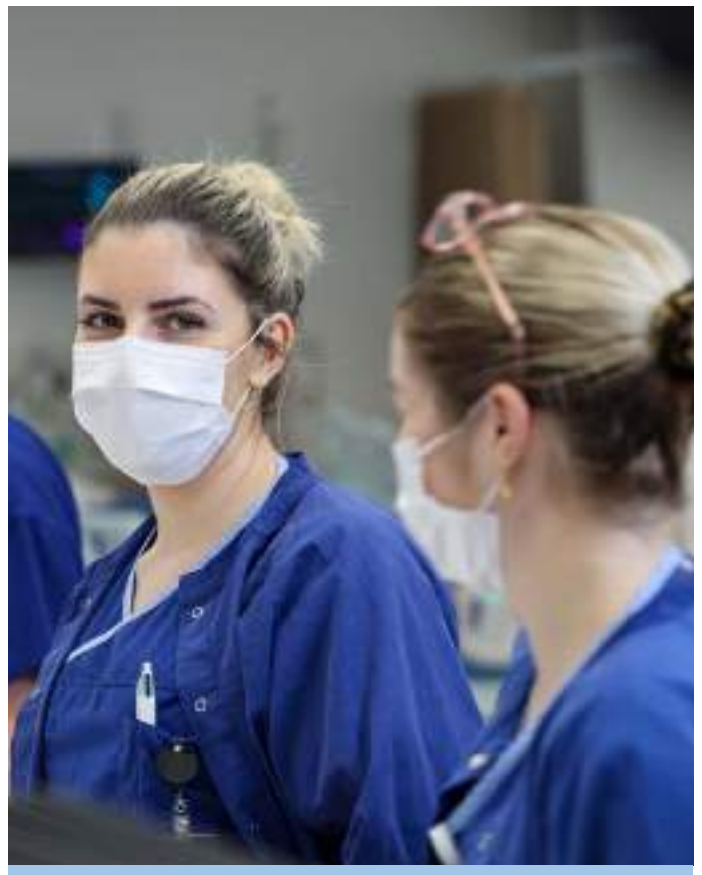
The other three modules are designed for targeted staff on the Modern Slavery Working Group, senior leaders and board members. This way, there is clarity around modern slavery risks and actions to support Modern Slavery Act compliance. Regular refresher courses will be implemented to ensure that everyone remains up-to-date with the latest developments and best practices in modern slavery risk management.

By implementing these comprehensive plans and updating our training modules, Calvary aims to lead the way in ethical sourcing and modern slavery risk management beyond 2025. We will continuously monitor adherence to our ethical sourcing policy, providing regular reports on our progress to ensure transparency and accountability.

## 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: Any Other Relevant Information

**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 in 2025, as addressing the risk of modern slavery involves long-term commitment.



# Appendices

## Appendix 1: Calvary Company Entity List as at 31 December 2024

COMPANY	ACN	ABN
Calvary Home Care Services Limited	118 225 559	44 118 225 559
Calvary Bruce Private Hospital Limited	129 801 378	67 129 801 378
Calvary Health Care Tasmania Limited	129 926 790	29 129 926 790
Calvary Health Care ACT Limited	105 304 989	74 105 304 989
Calvary Health Care Bethlehem Limited	105 303 704	81 105 303 704
LCM Calvary Health Care Holdings Limited	105 355 306	22 105 355 306
Calvary Health Care Sydney Limited	105 757 453	95 105 757 453
Calvary Health Care Riverina Limited	105 810 688	45 105 810 688
Calvary Retirement Community Ryde Limited (not active)	105 898 173	40 105 898 173
Little Company of Mary Health Care Limited	079 815 697	11 079 815 697
Calvary Private Health Care Canberra Limited	121 852 088	83 121 852 088
Calvary Health Care Adelaide Limited	106 314 229	85 106 314 229
Calvary Retirement Community Canberra Limited (not active)	106 452 402	17 106 452 402
Calvary Retirement Communities Limited	102 625 212	34 102 625 212
Calvary Health Care (Newcastle) Limited	081 149 126	75 081 149 126
Calvary Mary MacKillop Care SA Limited (not active)	052 973 387	83 052 973 387
Japara Healthcare Limited	168 631 052	54 168 631 052
Calvary Holdings Pty Ltd	110 466 889	18 110 466 889
Japara Property Holdings Pty Ltd	166 991 984	18 166 991 984
Japara Property Management Pty Ltd	113 425 086	53 113 425 086
Japara Developments Pty Ltd	110 645 773	92 110 645 773
Aged Care Services 39 (Noosa) Pty Ltd	009 991 020	76 009 991 020
Calvary Aged Care Services Pty Ltd	110 140 157	72 110 140 157
Calvary Retirement Living Pty Ltd	123 407 509	48 123 407 509
Calvary Administration Pty Ltd	110 281 760	32 110 281 760
Japara Home Care Pty Ltd	610 327 261	52 610 327 261
JD No. 3 (Lakes Entrance) Pty Ltd	122 943 408	52 122 943 408
JD No. 5 (Albury & District) Pty Ltd	120 220 313	16 120 220 313
Calvary Retirement Living 2 (Balmoral Mews) Pty Ltd	123 447 245	57 123 447 245
Calvary Retirement Living 4 (Cosgrove Cottages) Pty Ltd	123 447 263	61 123 447 263
Calvary Retirement Living 5 (Sydney Williams) Pty Ltd	123 790 358	66 123 790 358
Calvary Retirement Living 6 (Barongarook) Pty Ltd	127 055 565	90 127 055 565
Calvary Retirement Living 7 (The Homestead) Pty Ltd	131 357 983	18 131 357 983

## Appendix 2: Calvary Service Location as at 31 December 2024





**ACT**

- Calvary ACT Service Centre, Bruce
- Calvary Bruce Private Hospital, Bruce
- Calvary Haydon, Bruce
- Calvary John James Hospital, Deakin

**NSW – Albury**

- Calvary Albury & District, Glenroy

**NSW – Greater Sydney**

- Calvary Brighton-Le-Sands, Brighton-Le-Sands
- Calvary Corymbia, Belrose
- Calvary Health Care Kogarah, Kogarah
- Calvary Henley Manor, Doonside
- Calvary Ryde, Ryde
- Calvary Sydney Service Centre, Beverley Park

**NSW – Hunter/Newcastle**

- Calvary Cessnock, Cessnock
- Calvary Chiara Respite Cottage, Lakelands
- Calvary Cooina, Singleton
- Calvary Ephesus, Lambton
- Calvary Hunter Service Centre, Warrabrook
- Calvary Mid North Coast Service Centre, Forster
- Calvary Mater Newcastle, Waratah
- Calvary Mt Carmel, Maitland
- Calvary Muswellbrook, Muswellbrook
- Calvary Nazareth, Belmont North
- Calvary St Francis, Eleebana
- Calvary St Luke's, Cooks Hill
- Calvary St Martin de Porres, Waratah
- Calvary Tanilba Shores, Tanilba Bay
- Calvary Tours Terrace, Hamilton

**NSW – Mid North Coast**

- Calvary St Joseph's, Sandgate
- Calvary St Paul's, Cundletown
- Calvary Star Of The Sea Respite Cottage, Forster
- Calvary The Brelsford, Coffs Harbour
- Calvary The Mariner, South West Rocks

**NSW – Riverina**

- Calvary Riverina Hospital, Wagga Wagga
- Calvary Riverina Service Centre, Wagga Wagga

**NT**

- Calvary Darwin Service Centre, Winnellie
- Calvary Mulakunya Flexible Aged Care Nguu, Bathurst Island

**SA**

- Calvary Adelaide Hospital, Adelaide
- Calvary Adelaide Service Centre, Adelaide
- Calvary Brighton, South Brighton
- Calvary Central Districts Hospital, Elizabeth Vale
- Calvary Flinders Far North Service Centre, Port Augusta
- Calvary Flora McDonald, Cowandilla
- Calvary Kingswood, Kingswood
- Calvary North Adelaide Hospital, North Adelaide
- Calvary Oaklands, Oaklands Park
- Calvary Port Augusta Respite Cottage, Port Augusta
- Calvary St Catherine's, Berri
- Calvary The Homestead, Walkley Heights
- Calvary Trevu House, Gawler East

**TAS**

- Calvary Cosgrove Cottages, South Launceston
- Calvary Lenah Valley Hospital, Lenah Valley
- Calvary Tasmania Service Centre, Launceston
- Calvary Riverside Views, Riverside
- Calvary Sandhill, South Launceston
- Calvary St John's Hospital, South Hobart
- Calvary St Luke's Hospital, East Launceston
- Calvary St Vincent's Hospital, Launceston

**VIC – Melbourne's West, Geelong and the Surf Coast**

- Calvary Balmoral Grove, Grovedale
- Calvary Balmoral Mews, Grovedale
- Calvary Barongarook Gardens, Colac
- Calvary Cordelia Grove, Anglesea
- Calvary Elouera, Torquay
- Calvary Roccoco, St Albans Park
- Calvary Trugo Place, Newport
- Calvary Vonlea Manor, Norlane

**VIC – South-East Melbourne**

- Calvary Kingston Gardens, Springvale South
- Calvary Melbourne Service Centre, Mulgrave
- Calvary Scottvale, Dandenong
- Calvary Springvale, Springvale
- Calvary St Jude's, Narre Warren North
- Calvary The Highbury, Glen Waverley
- Calvary The Regent, Mt Waverley
- Calvary Viewhills Manor, Endeavour Hills

**VIC – Gippsland**

- Calvary Gippsland Service Centre, Morwell
- Calvary Lakes Entrance, Lakes Entrance
- Calvary Narracan Gardens, Newborough
- Calvary Strzelecki House, Mirboo North

**VIC – Shepparton**

- Calvary Shepparton Service Centre, Shepparton

**VIC – Melbourne East**

- Calvary Health Care Bethlehem – Kooyong Precinct, Caulfield South
- Calvary Huntly Suites – Kooyong Precinct, Caulfield South
- Calvary Hyson Apartments – Kooyong Precinct, Caulfield South
- Calvary Lower Plenty Garden Views, Lower Plenty
- Calvary Millward, Doncaster East
- Calvary Rosanna Views, Rosanna
- Calvary Sydney Williams, Doncaster East

**VIC – Goldfields**

- Calvary Mirridong, Bendigo
- Calvary Goonawarra, Sunbury
- Calvary Kelaston, Wendouree
- Calvary Kirralie, Ballarat

**VIC – Bayside**

- Calvary Bayview, Carrum Downs
- Calvary Capel Sands, Capel Sound
- Calvary Elanora, Brighton
- Calvary George Vowell, Mt Eliza
- Calvary Rye Sands, Rye
- Calvary Sandhurst, Carrum Downs

**CALVARY NATIONAL OFFICE**

Level 15 | 345 George Street | Sydney NSW 2000

**p:** 02 9258 1700 **w:** [calvarycare.org.au](http://calvarycare.org.au)

*In 1885, six courageous Sisters sailed into Sydney to continue the mission of Venerable Mary Potter and the Sisters of the Little Company of Mary to care for those in need. Thus began Calvary's enduring legacy of care in Australia. Today, we continue their mission, in our hospitals, home and virtual care services, retirement living and residential aged care homes across four states and two territories.*

To view our other locations visit  
**[calvarycare.org.au](http://calvarycare.org.au)**





Cabrini Australia Limited

# **MODERN SLAVERY REPORTING STATEMENT 2024**



Published June 2025



“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 2024 calendar 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 12 June 2025.

## 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 years.



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# STATEMENT FROM THE CHAIR AND THE CHIEF EXECUTIVE

As a leading healthcare provider, Cabrini Australia is committed to protecting the wellbeing and dignity of every person. This commitment extends to the ongoing prevention of modern slavery, forced labour and human trafficking across our operations and supply chains.

We strive to operate responsibly and ethically within all aspects of our business, guided by our core values of compassion, integrity, courage and respect to all we serve.

This year's Modern Slavery report outlines the continued actions we take to ensure our operations remain free from modern slavery. Our Modern Slavery Action Plan has been developed to confirm we are procuring goods and services from suppliers that share our commitment to ethical and transparent supply chains.

A key focus for the year ahead includes the further education of our staff involved in supplier engagement, to equip them with the knowledge to identify and respond to modern slavery risks.

As part of our commitment to transparency and accountability, this Modern Slavery Statement for the 2024 calendar year will form part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium. It outlines the progress achieved to date, as well outlining our commitments for 2025 and beyond.



**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. We continue to focus on educating and training staff who engage directly with suppliers. Cabrini is also ready to confront more urgent issues as they become apparent.

For more details on previous activities, please refer to previous statements.



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## 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)



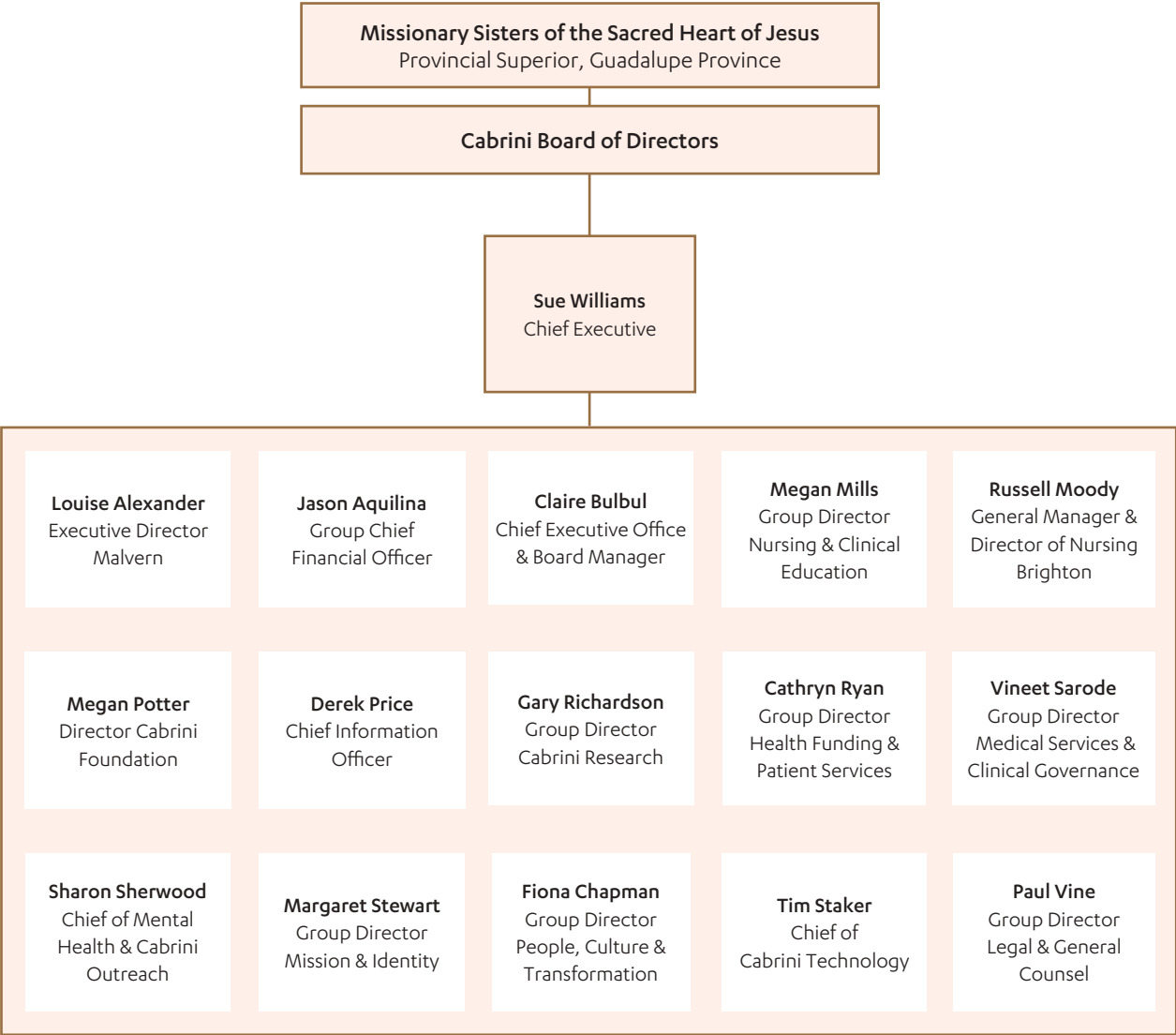


# OUR MANAGEMENT AND GOVERNANCE

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 May 2025:



# OUR OPERATIONS

Cabrini employs more than 4200 staff and engages more than 1100 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.

The Australian Private Health Sector continues to face a multitude of challenges and Cabrini has continued to provide a high level of service as part of our healthcare operations:

Indicator	2021-22	2022-23	2023-24
Inpatient care episodes	86,780	99,019	92,056
Surgical operations	49,013	51,830	54,203
Babies delivered	2061	1984	1911
Emergency department attendances	25,181	25,349	25,649
Medical images	133,441	142,322	136,497
Day oncology patient treatments	23,040	23,370	23,374





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## 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 2024, Cabrini had dealings with 1044 suppliers and transacted \$263,424,000 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 2024 calendar year, has been to:

- Work with suppliers on identified issues to steadily close the gaps, targeting a 5 per cent reduction in open self-reported issues,

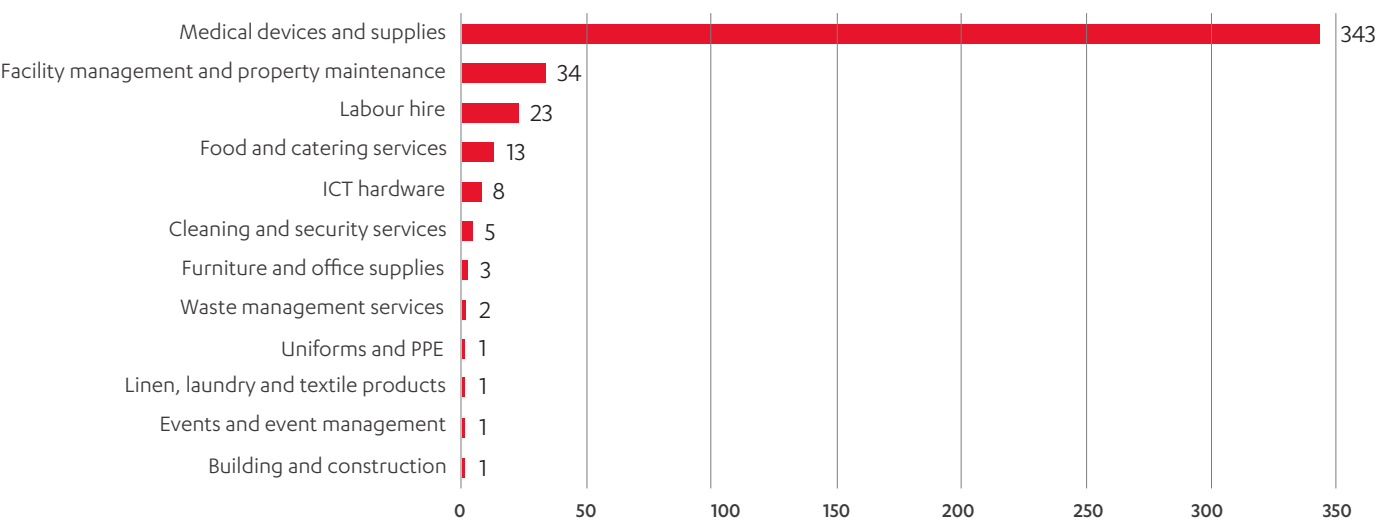
- Continue to expand surveying, and introduce modern slavery-related metrics into sourcing decisions,
- Maintain training with those directly interacting with the supply base while continuing to find ways to educate the employee base, and
- Respond to any urgent issues.

Our action plan is informed by our risk assessments, which revealed a high proportion of Cabrini’s supply chain has a high inherent risk<sup>1</sup> as shown in Figures 1, 2 and 3 below:

Figure 1 | MODERN SLAVERY RISK TAXONOMY OF SPEND

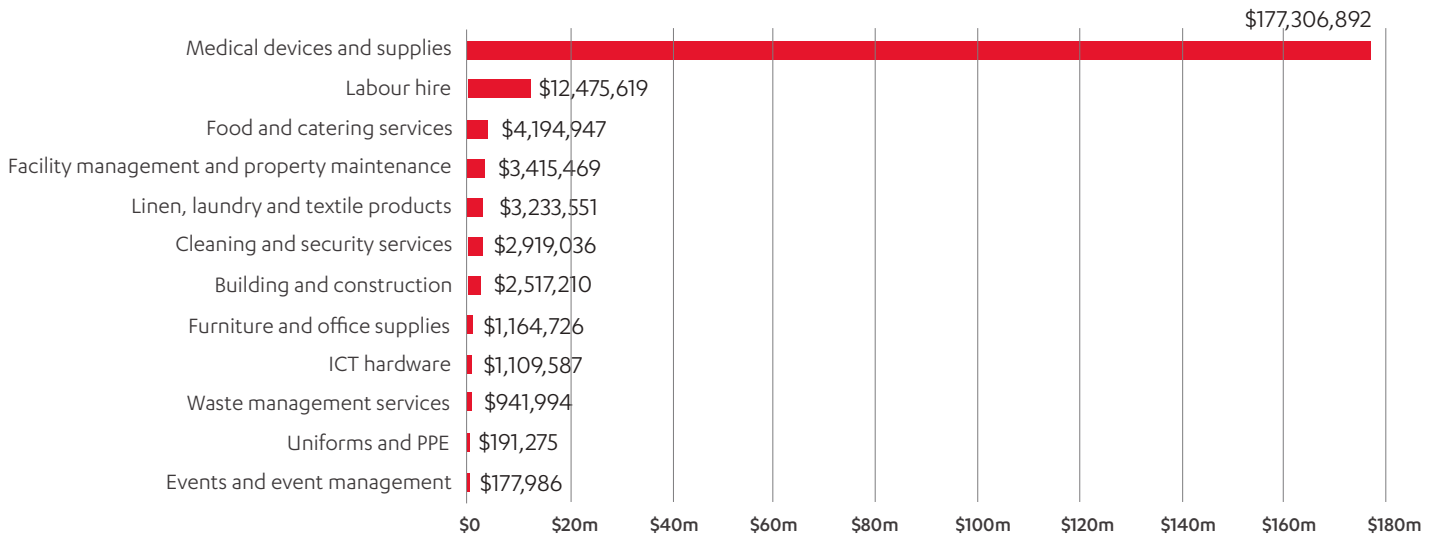


Figure 2 | NUMBER OF SUPPLIERS IN HIGH-RISK CATEGORIES FOR MODERN SLAVERY



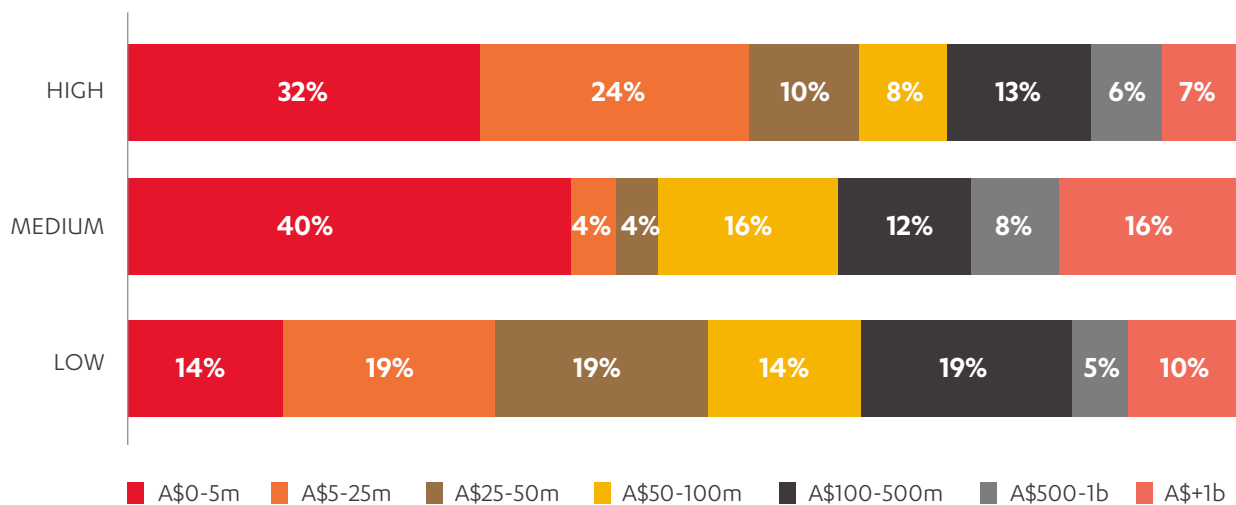
<sup>1</sup> From the ACAN Category Risk Taxonomy

**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 4 |** SUPPLIER PROFILE BY RISK CATEGORY



## OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Cabrini continues our commitment to address modern slavery risks within our Operations and Supply Chain through its engagement and work with ACAN. Our modern slavery maturity assessment in 2024 (78% v 45% in 2023) confirms our endeavors to enhance our efforts in engagement with our suppliers and ensure that whilst we continue to have a procurement supplier base that falls in high-risk categories, we have completed assessments that indicate our actual risk is lower than categorized. Suppliers in high-risk categories reduced in 2024 to 436 down from 797 in 2023.

In 2024, through the ACAN supplier surveys, there were 269 responses taking the cumulative responses to 431 suppliers. In addition, an additional 63 suppliers joined the Sedex platform and 80 new Self-Assessment Questionnaires (SAQ) were completed.

The hospital working group in 2024 commenced joint desktop reviews to further enhance supplier engagement and management of modern slavery risk. This engagement provided an additional layer of review beyond SAQ's and assisted in identifying:

- High-risk products and service groups with suppliers being requested to outline measures to protect the workers contractual rights
- Inconsistencies in reporting of indirect/contract labour
- Governance and public disclosure gaps with suppliers being requested to update documentation to include current modern slavery requirements
- Requirements for grievance mechanisms and remediation procedures to be reviewed and improvements to their effectiveness made.

These desktop reviews are allowing for next steps to form part of ACAN members future actions and improvements. The ongoing collaboration into 2025 between suppliers and Catholic Hospitals will focus on long-term collaboration with suppliers, offering constructive dialogue and tailored subsequent steps, resulting in sound management of modern slavery risk and protection of workers' rights.



# ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

Cabrini has had no significant modern slavery issues identified or referred. Through our ongoing reviews and engagement, in line with our good governance, we remain ready to respond immediately to any breach of policy that should arise.

Our baseline supplier engagement numbers in 2024, along with our maturity assessment score illustrate that our actions taken are resulting in positive progress.

	ACTIVITY	2023 Cabrini Health	2024 Cabrini Health
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2500	2106
	Number of suppliers with visible contact information and ABN	15	80
	Number of suppliers across high-risk categories	797	436
	Number of ACAN Supplier Surveys completed	404	431
	Supplier staff attending capacity building webinars	113	70
	Invited to join Sedex	119	92
	Joined Sedex	31	94
	Sedex SAQ completed	16	96
	Social audits	8	18
	Corrective actions	25	81
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

# MATURITY ASSESSMENT 2024

Cabrini Health | OVERVIEW



Cabrini Health | 2024 ANALYSIS BY PILLAR

PILLAR	Governance	Risk assessment	Risk management	Effectiveness of actions	Maturity score 2024
1. Business process and governance	100%	100%	100%	100%	100%
2. Operations	100%	100%	43%	67%	77%
3. Supply chain	52%	100%	74%	32%	65%
4. Worker engagement	54%	89%	60%	58%	65%
5. Entity’s program and activities	100%	30%	100%	93%	81%
6. Grievance mechanisms and remediation	100%	100%	74%	58%	83%
AVERAGE	84%	86%	75%	68%	78%

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# OUR MODERN SLAVERY COMMITMENT

In 2025 calendar year, Cabrini will:

- Mandate education and training for those engaging with our supply chain, both directly (sourcing, ordering) and indirectly (negotiating, contract management)
- Work with suppliers to complete desk top audits across high-risk categories or those that have been flagged through SAQ's
- Enhance our supply chain maturity rating through increased requirements and review at the point of supplier on-boarding and implementing of new agreements.





[cabrini.com.au](http://cabrini.com.au)







**ST VINCENT'S**  
Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES



# Modern Slavery Statement

1 January 2024 - 31 December 2024

## 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 Community Health Ltd**  
ABN 36 054 594 375

\*affiliated entity



**Reconciliation: Towards excellent health, happiness and equality, 2016**  
Bianca Beeton, 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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.....

**Contact for Modern Slavery:**  
SVHA Modern Slavery Liaison Officer  
[antimodernslavery@svha.org.au](mailto:antimodernslavery@svha.org.au)

Level 22, 100 William St  
Woolloomooloo NSW 2010

[svha.org.au](https://svha.org.au)







## A message from our Chair

Mr Paul McClintock AO

We are pleased to present our fifth statement, as we continue our journey to raise awareness about modern-day slavery within our health settings, the broader healthcare sector, and the community. This year, we have adopted a new format to showcase progress and challenges, referencing risks from previous statements, while providing updates on activities and related challenges.

Our review of practices and policies identified areas of improvement. Employee feedback indicated outdated training that lacked health-sector applications and required targeted development. We continue collaborating with the Australian Catholic Religious Against Trafficking Humans (ACRATH), Australian Federal Police (AFP), and the Office of Anti-Slavery Commissioner, NSW. These partnerships provide expert knowledge and opportunities for co-creation with individuals who have lived experiences and clinical expertise. Our new alliance with the University of Notre Dame helps enhance our offerings by developing healthcare-specific learning modules.

On the supply chain front, progress has been challenging, with only one-fourth of the high-risk suppliers onboard Sedex for risk assessment. Recognising the limitations of this single-platform approach, we continue to work with the Australian Catholic Anti-Slavery Network (ACAN) to implement a multi-platform strategy incorporating all high-risk suppliers. Further, we are developing direct relationships with suppliers to facilitate information exchange beyond surveys, without relying on platforms. Feedback

from key clinical suppliers is encouraging, and we plan to extend this initiative across high-risk supply chains by 2028.

With Commonwealth funding under the National Action Plan for Combatting Modern Slavery (Round 2, 2023-2025), we are training frontline staff across our facilities. The pilot program identified several slavery survivors, with a third previously unrecognised or misidentified as domestic violence victims. This highlights the crucial role of healthcare in survivor identification. We continue to address these challenges and share our findings with stakeholders across the anti-slavery sector, including the UN Special Rapporteur on Contemporary Forms of Slavery and the health-sector Community of Purpose initiative led by the Office of Anti-Slavery Commissioner, NSW.

To evaluate our progress in tackling modern slavery risks, we adopted new assessment methods, including a traffic light system and dashboards, to track supply chain screening activities. Our assessments indicate improvement but also the need for ongoing effort. We remain dedicated to improving our approach to combatting modern slavery.

A handwritten signature in black ink, appearing to read 'P. McClintock'.

**Mr Paul McClintock AO**  
Board Chair

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*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 22 May 2025.*

*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

St Vincent's has been a leader in Australia's health and aged care landscape for more than 167 years. What started with five Sisters of Charity who arrived in the colony of New South Wales in 1838 – and opened our first hospital in 1857 – is now a unique not-for-profit social enterprise that operates two major inner-city health networks in Melbourne and Sydney, 10 private hospitals, 25 aged care facilities, and a range of virtual and home care options across three states\*.

St Vincent's now comprises a team of over 30,000 people including employees, visiting medical officers (VMOs) and volunteers working from regional Queensland to Melbourne's western suburbs.

Each year across its services, St Vincent's has close to 2 million connections with patients and residents, including 1,300,000 outpatient appointments, 330,000 admissions, and 138,000 Emergency Department (ED) presentations.

Our integrated health innovation precincts in Sydney and Melbourne host 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.

Our services, clinicians and researchers have been behind some of Australia's most important medical breakthroughs. With more than 5,700 hospital, residential aged care and virtual beds, our public health networks 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 and lung transplantation, orthopaedics, neurosurgery, cardiothoracic and cancer care. We are national leaders in palliative care, diabetes, genomic medicine, aged care and bio-medical engineering.

Underpinning everything we do is our mission to provide care, first and foremost, to people who are experiencing social inequality. 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 correctional health patients.

The St Vincent's promise to its people, patients, residents, partners, and the broader community is to provide better and fairer care, always.

\* as at 31 December 2024

**2 major public  
hospital networks**

**10 private  
hospitals**

**25\***  
aged care facilities

**6**  
co-located research institutes

**3,172**  
hospital and virtual beds

**2,537\***  
residential aged care beds

**30,000**  
people

**2 million**  
connections with patients  
and residents

## Our mission

We express God's love through the healing ministry of Jesus. We are especially committed to people who are poor or vulnerable.

## Our vision

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 values



### Compassion

Our care is an act of love. We are present to and accompany people as they are, and as they need.



### Justice

Our pursuit of what is right and just empowers us to speak and act with courage on behalf of those in need.



### Integrity

Our actions and decisions are transparent and aligned with our values.



### Excellence

Our services are safe and evidence-based, and we continually seek to improve in everything we do.

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 is an affiliated hospital:

- St Vincent's Private Hospital Sydney

The parent company of the group is St Vincent's Health Australia Ltd ABN 75 073 503 536.

St Vincent's annual revenue for the financial year 2023-2024 can be noted at the [ACNC Register](#).

# 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 Limited 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 charism 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.

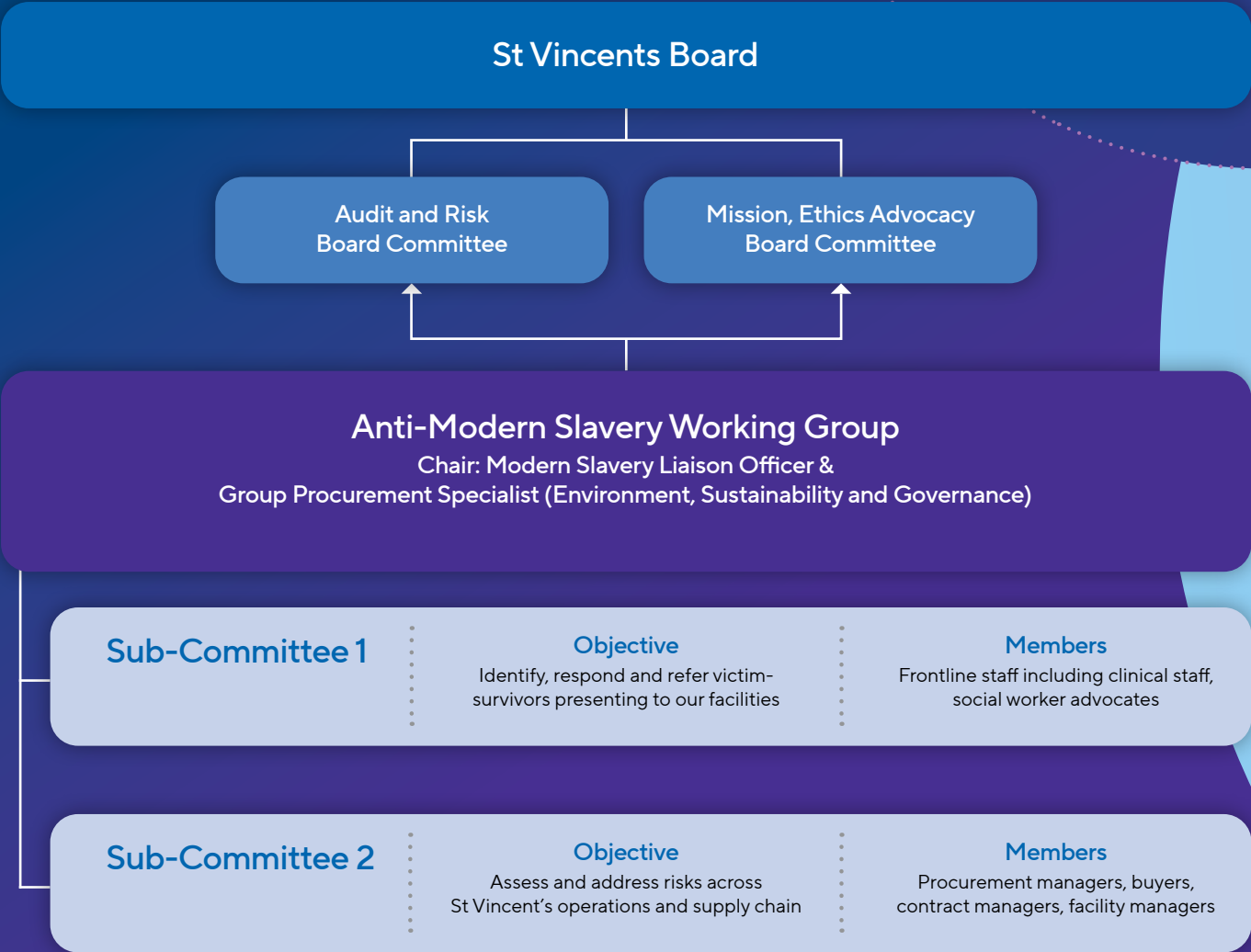
## The St Vincent's Modern Slavery governance framework

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.

The 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 Statement to the Board Audit and Risk Committee, and subsequently to the full St Vincent's Board.

This year, we restructured the MSWG subcommittees to better align with our organisation's evolving needs. Below, we present details of our revised MSWG framework. These subcommittees meet to progress specific projects or as needed.

# Our Modern Slavery Governance Framework



# 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, 25\* aged care facilities – with more than 5,700\* hospital and residential aged care beds – and a range of virtual and home care options across NSW, Victoria and Queensland.

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.

\* as at 31 December 2024





## Our locations



## 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



## Queensland

### Our private hospitals

- St Vincent's Private Hospital Northside
- St Vincent's Private Hospital, Brisbane
- St Vincent's Private Hospital, Toowoomba

### Foundations

- St Vincent's Foundation Queensland

### 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)\*

\* as at 31 December 2024





## 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

### Research

- Garvan Institute of Medical Research
- Victor Chang Cardiac Research Institute
- St Vincent's Centre for Applied Medical Research
- Nursing Research Institute

### Foundations

- St Vincent's Curran Foundation
- Friends of the Mater



## 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
- Berengarra
- Auburn House
- Prague House

### 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

### Research

- The Aikenhead Centre for Medical Discovery
- St Vincent's Institute of Medical Research

### Foundations

- St Vincent's Foundation (Victoria)

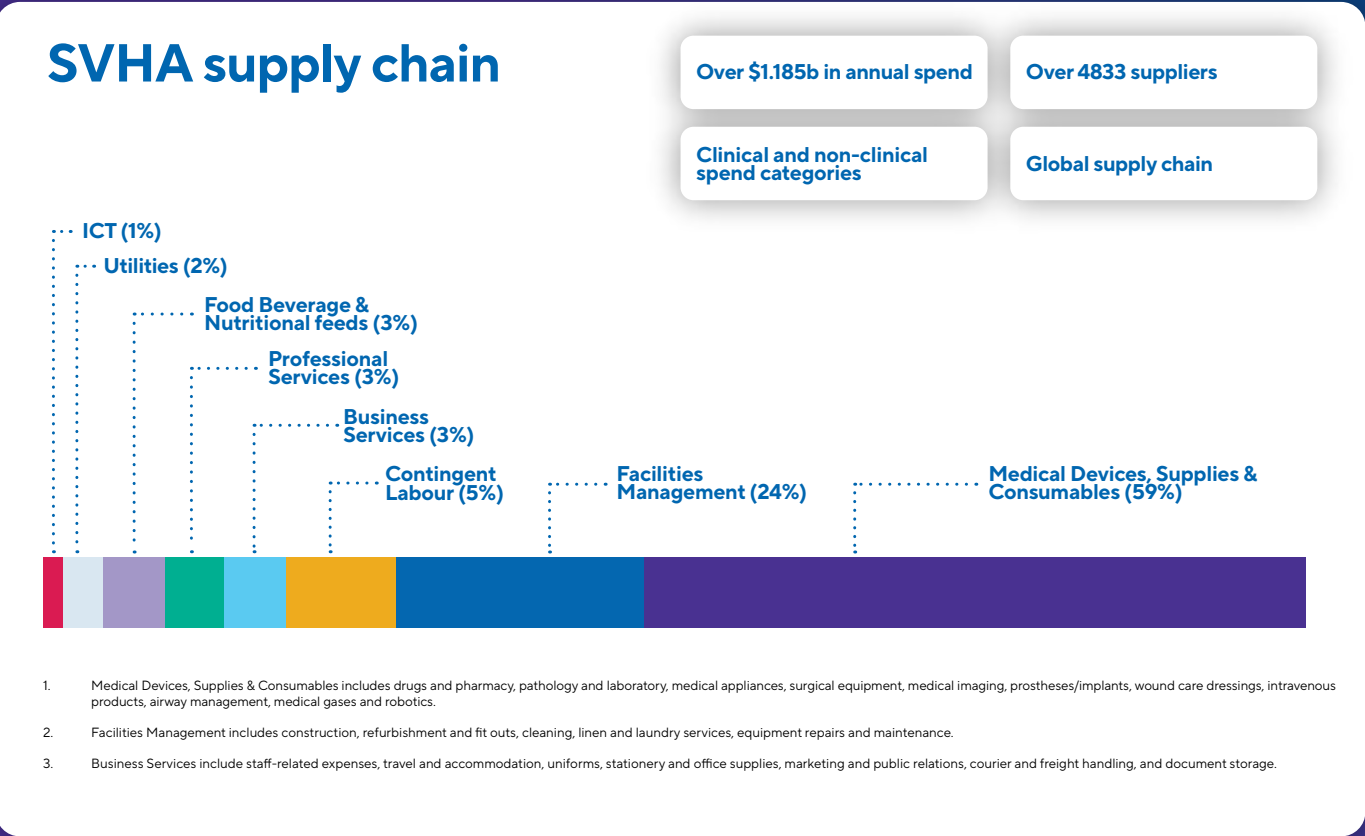
# Our supply chain

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 \$1.185 billion per annum in addressable spend across clinical and non-clinical goods and services from over 4833 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 932 formal commercial contracts.

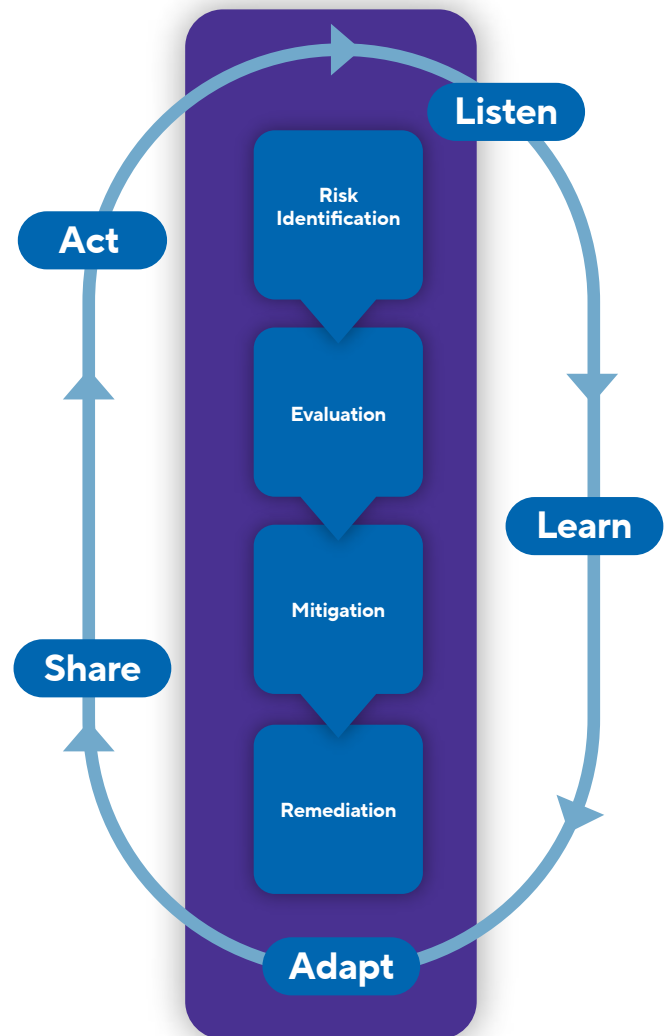


## Identification of modern slavery risks in our operations and supply chain

In the last reporting period, we announced the adoption of a continuous learning framework aimed at enhancing our processes for risk identification, evaluation, mitigation, and remediation.

We remain dedicated to implementing this approach across all 16 high-risk areas within our operations and supply chain, as outlined in our previous statements. This is based on evaluation of sector-based risks, commodity risks and geo-political risks, and guided by a literature review and expanded ACAN risk taxonomy.

Sector risk plays a vital role in identifying modern slavery issues, especially in industries that depend on low-wage labour, outsourced supply chains, and high-risk procurement categories. These sectors are vulnerable to exploitation owing to their prevalent operational structures and cost pressures. Commodity risk is also significant as certain products are prone to modern slavery because of labour-intensive production processes with limited oversight. Geographic risk pertains to regions with weak labour protection, large migrant populations, or documented instances of forced labour. These areas often feature unstable political regimes and lack legal frameworks to prevent exploitation, making them appealing to unethical operators seeking profit.



# Breakdown of risks across St Vincent's ecosystem



In addition to identifying high-risk spend categories, we also recognise certain segments within our operations that may be susceptible to modern slavery.

- Intersection with Survivors of Modern Slavery and Risks to Frontline Workers:** In our earlier statement, informed by a review of the healthcare literature, we recognised the crucial role that healthcare professionals play in identifying victim-survivors of modern slavery, who are often found in the emergency departments of public hospitals because of the nature of their exploitation. As we deepen our understanding, we have realised that frontline staff, who engage with victim-survivors of severe exploitation and complex trauma, are susceptible to experiencing trauma.
- Investments:** During the previous reporting period, we discovered that our investments might be vulnerable to modern slavery risks. We are actively working to reduce the risks associated with our investments, which amounts to \$344.87 million in FY 2024. This involves assessing how these risks are managed, coordinating with those responsible for risk management, such as external funds or asset

managers, and ensuring compliance when managed by external fund managers, as outlined by Investors Against Slavery and Trafficking Asia Pacific (<https://www.iastapac.org/>).

- Awareness of whistleblower policies and other grievance mechanisms:** It has been observed that our direct and indirect workforce, which encompasses employees, contractors, and the personnel of our suppliers, may not be fully aware of the various secure and confidential methods available to them to report any misconduct related to modern slavery.

The measures implemented for each of these high-risk areas are detailed in the subsequent section.

## Actions taken to assess and address risk

Action taken	Impact across St Vincent's	Spend categories or areas affected	Progress update
<b>Supplier surveys</b>	Supply chain	<ul style="list-style-type: none"> <li>Medical devices, supplies and consumables</li> <li>Property and construction</li> <li>Food, beverages and nutritional feeds</li> <li>ICT hardware and printers</li> </ul>	<ul style="list-style-type: none"> <li>Low completion rates, especially for large clinical suppliers;</li> <li>Continue to leverage ACAN Program for supplier surveys.</li> <li>Integrated into supplier lifecycle management process - new supplier onboarding process and annual compliance for existing suppliers</li> </ul>
<b>Supplier Due Diligence Program</b>	Supply chain	<ul style="list-style-type: none"> <li>ICT phones and communications</li> <li>Utilities</li> <li>Stationery, office supplies and uniforms</li> <li>Contingent Labour - nursing and non-nursing</li> <li>Facilities management</li> <li>Cleaning services and supplies</li> <li>Linen and laundry services</li> <li>Kitchen and housekeeping</li> </ul>	<ul style="list-style-type: none"> <li>Continuing to work with 141 high spend high-risk suppliers (~85% of addressable spend) in the Due Diligence Program.</li> <li>Slow progress with Identification of suppliers' Modern Slavery Liaison contacts both globally and locally.</li> <li>Developing a database of desktop audits on supplier's modern slavery efforts.</li> <li>Establishing collaborative communication channel with high-risk suppliers' Modern Slavery Teams to discuss audit findings and address gaps</li> <li>Continue collaboration as a member of ACAN's Hospital Working Group</li> </ul>
<b>Supplier risk evaluation platform</b>	Supply chain		<ul style="list-style-type: none"> <li>Continue subscribing to Sedex platform (via ACAN membership) for supplier risk evaluation</li> <li>Exploring multiplatform strategy to improve coverage of high-risk suppliers</li> </ul>
<b>Procurement practices</b>	Supply chain		<ul style="list-style-type: none"> <li>Conducted a comprehensive review</li> <li>Revised tendering procedures to</li> <li>Incorporate a mandatory criteria in supplier selection process.</li> <li>Exceptions for clinical products, as are chosen by doctors based on patient outcomes, not through tenders.</li> </ul>
<b>Contract clauses</b>	Supply chain		<ul style="list-style-type: none"> <li>Reviewing contracts and updating clauses</li> <li>Legal Counsel overseeing the process</li> </ul>
<b>Staff surveys</b>	Operations	<ul style="list-style-type: none"> <li>Frontline healthcare staff</li> <li>Hiring managers</li> <li>Migrant staff</li> </ul>	<p>Developed custom surveys to assess current understanding of modern slavery risks by staff.</p> <ul style="list-style-type: none"> <li>Frontline staff for survivor screening</li> <li>Hiring managers for recruitment practices</li> <li>Migrant workers (in partnership with Migrant Justice Institute, UNSW)</li> </ul>

Action Taken	Impact across St Vincent's	Spend Categories or Areas affected	Progress Update
<b>Generic Trainings</b>	Operations	All staff	<ul style="list-style-type: none"> <li>Existing training modules identified as outdated</li> <li>Lack practical application and job-specific guidance</li> <li>Necessitating development of targeted trainings</li> </ul>
<b>Targeted trainings</b>	Supply chain and operations	<ul style="list-style-type: none"> <li>Frontline staff</li> <li>Hiring managers</li> <li>Migrant staff</li> <li>Labour Hire Agencies</li> </ul>	<p>Launched program to create tailored training sessions. Training format: e-learning modules specifically designed for healthcare</p> <p>A. <b>For all staff</b> – foundational (x 1 module).</p> <p>B. <b>For clinical staff</b></p> <p>i. Building clinician confidence in identifying modern slavery survivors presenting to health facilities and responding in a trauma informed way (x 4 modules; simulated case studies).</p> <p>ii. Data Capture of survivor's modern slavery indicators; Embedded in family and domestic violence process (x 1 module).</p> <p>C. <b>For managers involved in hiring</b> and</p> <p>D. <b>For labour hire agencies supplying to St Vincent's</b></p> <p>i. Identifying modern slavery risks in recruitment of migrant workers (x 1 module).</p> <p>ii. Checklist to mitigate risks</p>
<b>Policy review</b>	Supply Chain & Operations	All staff, Suppliers	<p>Comprehensive review of current policies evaluating against local and international best practices within healthcare and anti-slavery sector.</p> <p>i. Modern Slavery Policy</p> <p>ii. Whistleblower Policy</p> <p>iii. Employee Code of Conduct</p> <p>iv. Supplier Code of Conduct</p> <p>Proposed amendments for review and presentation to St Vincent's Board in July 2025.</p>
<b>Grievance mechanism and remediation channels</b>	Supply Chain & Operations	All staff, Suppliers	<ul style="list-style-type: none"> <li>Staff lack sufficient awareness of grievance mechanism channels</li> <li>Collaborating with People &amp; Culture team to address gaps</li> </ul>



Action Taken	Impact across St Vincent's	Spend Categories or Areas affected	Progress Update
<b>Survivor screening and referral</b>	Operations	Frontline staff, Patients	<p>Staff surveys revealed that more than half of the frontline staff</p> <ul style="list-style-type: none"> <li>• Lack understanding of modern slavery</li> <li>• Uncertainty in identifying signs of exploitation.</li> </ul> <p>To address this, we are</p> <ul style="list-style-type: none"> <li>• Integrating modern slavery criteria into the existing family and domestic screening.</li> <li>• Collaborating with anti-slavery support services organisations for clinical referral pathway.</li> <li>• Building capacity – recruited eight additional clinical advocates across SVHA</li> </ul>
<b>Peer support for staff</b>	Operations	Frontline staff	<ul style="list-style-type: none"> <li>• Working with victim-survivors of severe exploitation and complex trauma could traumatize and affect staff</li> <li>• Hence, creating a peer support network for staff</li> <li>• Integrating modern slavery training into the existing Support Team Action Response (STAR) program.</li> </ul>
<b>Resource hub</b>	Supply Chain & Operations	All staff	<ul style="list-style-type: none"> <li>• Developing a centralised hub for modern slavery resources that all employees can access.</li> <li>• A comprehensive source for all training and materials related to modern slavery.</li> </ul>

# Case studies

## Risk domain: supply chain – supplier due diligence program

**Activity:** Engagement with second largest clinical supplier

**Spend category:** Medical devices, supplies and consumables

**Actions taken:**

- Conducted a comprehensive desktop review of supplier's efforts to combat modern slavery
  - Examined publicly available information:
  - Previous modern slavery statements
  - Submissions to global human rights legislations
  - Integrated sustainability reports
  - Supplier codes of conduct
  - Grievance mechanism policies
  - Other directly provided information
- Utilised data to identify best practices and gaps in operations/supply chain assessments
- Presented findings to supplier's modern slavery team
- Discussed strengths and areas for improvement
- Explored implementation of Uyghur Forced Labor Prevention Act (UFLPA) for supply chain transparency and potential lessons
- Addressed supplier's main priorities for upcoming years
- Identified challenges faced by the supplier
- Explored collaborative approaches to address identified challenges

**Outcome:** Feedback from this engagement, along with similar interactions with other major suppliers, has been very positive. We are eager to continue this exchange of information and build upon it in the next reporting cycle.

## Risk domain: both operations and supply chain

**Category:** Labour hire agencies (external) and Staff involved in recruitment (internal)

**Risks:**

- 20% of employees are working on visas
- Significant number from high-risk countries
- Migrant staff vulnerable to exploitation
- eg. deceptive recruitment practices and debt bondage

**Actions taken:**

- Conducted 2 separate surveys with hiring managers (internal) and labour hire agencies (external)
- Measured awareness of modern slavery risks
- Survey findings identify gaps in recruitment process for migrant employees

**Outcome:** Developing targeted training programs aimed at improving recruitment practices.

**Audience:** Internal staff and labour hire agencies

# Remediation

St Vincent's is committed to 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 St Vincent's is found to have caused or contributed to modern slavery.

St Vincent's is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. Our Board Chair is a Member of the Domus 8.7 Advisory Committee signifying our commitment. Where St Vincent's is directly linked to modern slavery by a business relationship, we are also committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

We are working on integrating Domus 8.7 through the assessment, investigation and implementation of a remediation process in instances where suspicions of modern slavery may come to our attention through whistle-blower or other channels.



## Assessing effectiveness

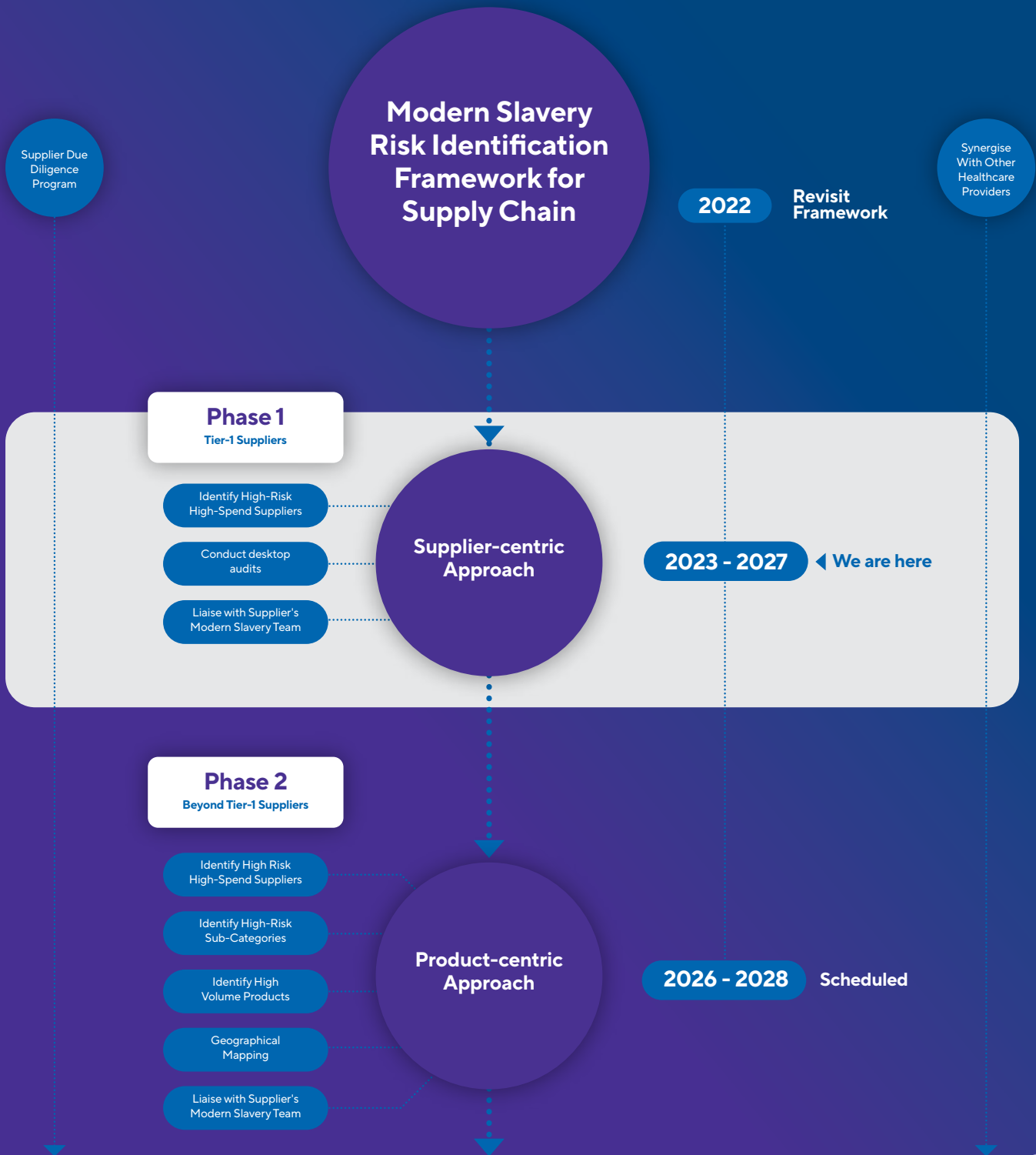
In our previous statement, we outlined the ongoing learning framework integrated into our current understanding of the issues and challenges related to addressing modern slavery, aimed at developing an effectiveness assessment framework. We have consistently employed this framework to discern what learnings we can replicate across the organisation. Furthermore, when certain aspects fail to perform as anticipated, we identify any gaps and explore ways to enhance and change our response to these challenges.

### Supplier Due Diligence Program

Recognising the intensive efforts required to implement our Supplier Due Diligence Program, we revised the previously communicated timeline. Establishing direct communication channels with modern slavery leads at high-risk suppliers, some of whom are globally based, takes longer than expected. Consequently, we extended the timeframe for completing Phase 1, which focuses on developing a supplier-centric approach until the end of 2027. Subsequently, we extended the timelines for Phase 2 to 2028, during which we plan to delve deeper into the supply chains of these direct tier 1 suppliers and conduct a high-risk product-centric due diligence.



# Supplier Due Diligence Program timeline

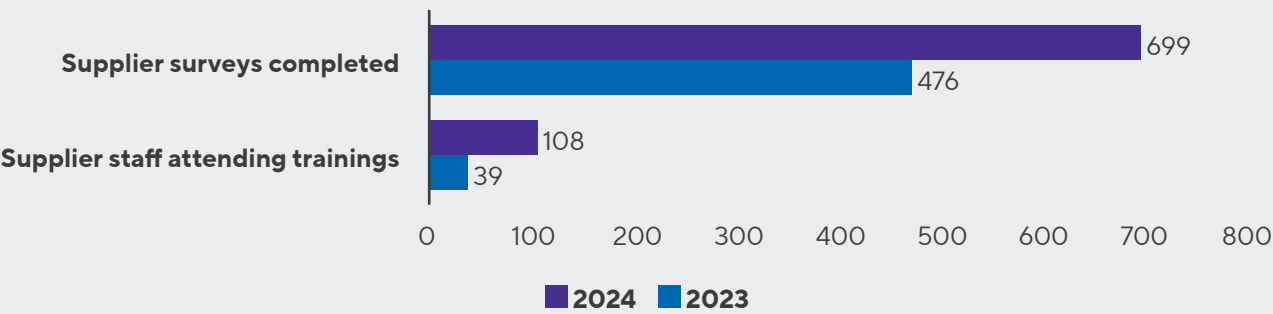




# Supplier Risk Assessment

Below we provide a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence. The data points included reflect both supplier visibility and compliance activities.

## ACAN facilitated surveys and trainings



## Sedex progress

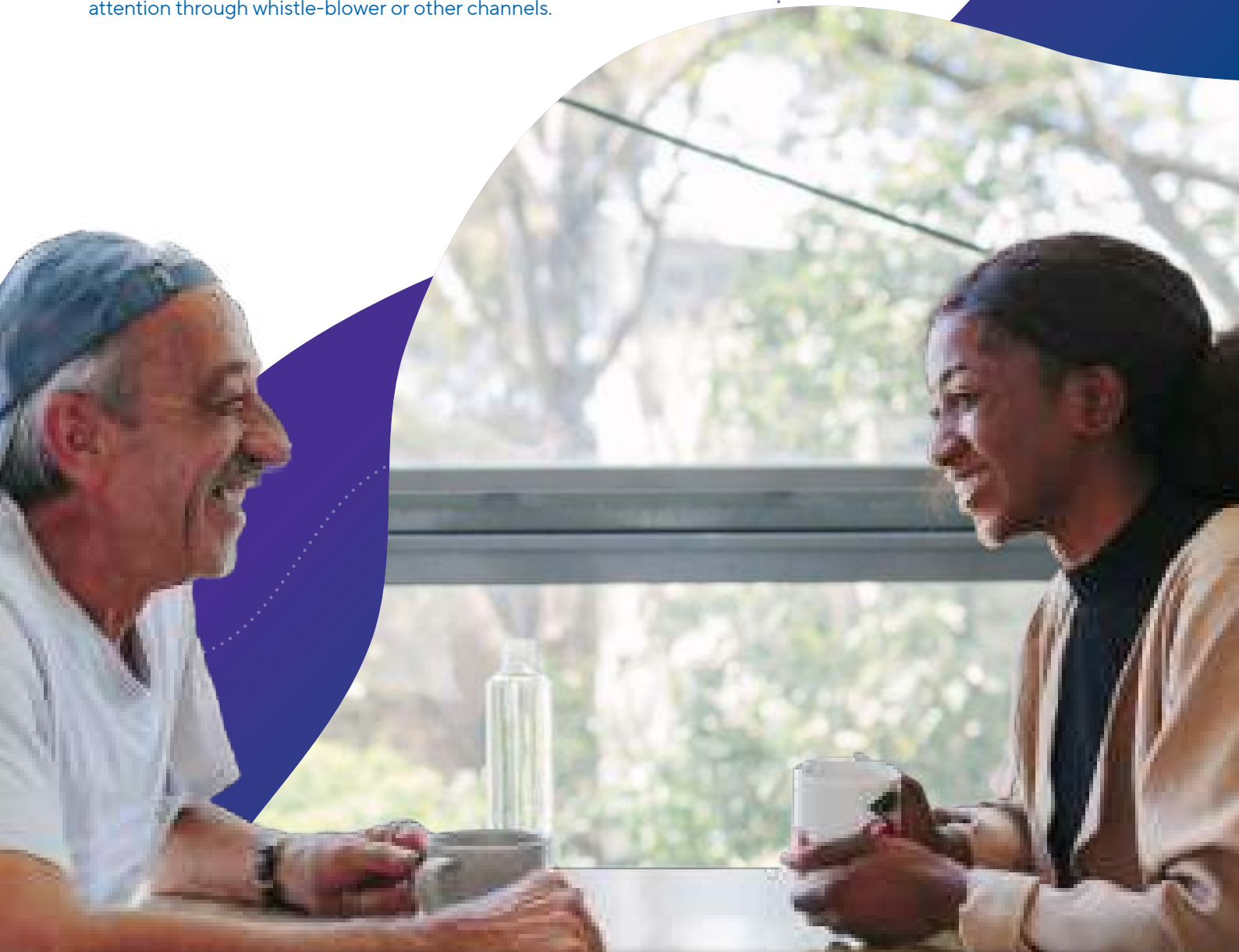




## Patients-survivors screening

In the past year, 13 individuals who had endured modern slavery were identified in public hospitals across Melbourne and Sydney.

These cases involved various forms of exploitation, with nearly every survivor experiencing multiple types of exploitation. Approximately 70% of these individuals were victims of human trafficking, and nearly half of them showed signs of sex trafficking, domestic servitude, or forced marriage. Additionally, more than one-third of the survivors exhibited indicators of family and domestic violence, disability, and mental health issues. Regarding post-discharge support, more than half of the survivors were assisted by the Red Cross's Support for Trafficked People program and over two-thirds received help from other community support service organisations. a remediation process in instances where suspicions of modern slavery may come to our attention through whistle-blower or other channels.



# Dashboard patients screening 2024

# of Modern Slavery Survivors Identified

13

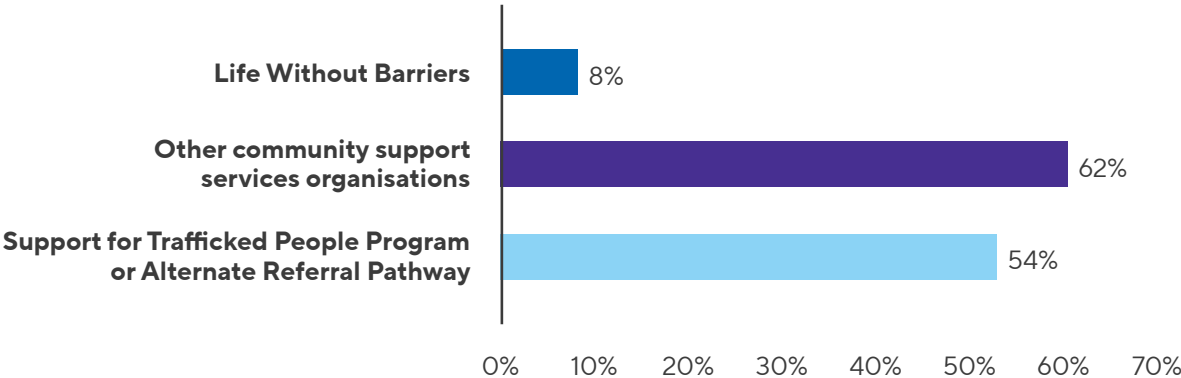
## Exploitation Types

Human Trafficking	69%
Sex Exploitation/Servitude	46%
Child Exploitation	31%
Domestic Servitude	46%
Forced Marriage	46%
Forced Labour	23%
Deceptive Recruitment	08%
Debt Bondage	15%

## Overlaps

Family and Domestic Violence	38%
First Nations	08%
Disability	38%
Mental Health	31%
Other attributes	
Not identified despite multiple presentations to other health care in the past	38%
Mis-identified as Family and Domestic Violence	31%
Not consented to be referred to Federal Police	31%

## Anti-Slavery Referral Statistics



# Outcome of effectiveness assessment

During the previous reporting period, we implemented four pillars as a standardised framework to assess the success of our initiatives.

## Pillar 1 – Governance and Compliance

- Defines the core structure and policies that steer our initiatives, stressing the significance of accountability and well-defined duties.
- Reviews the comprehensive strategies and efforts to address and mitigate the overall risks of 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

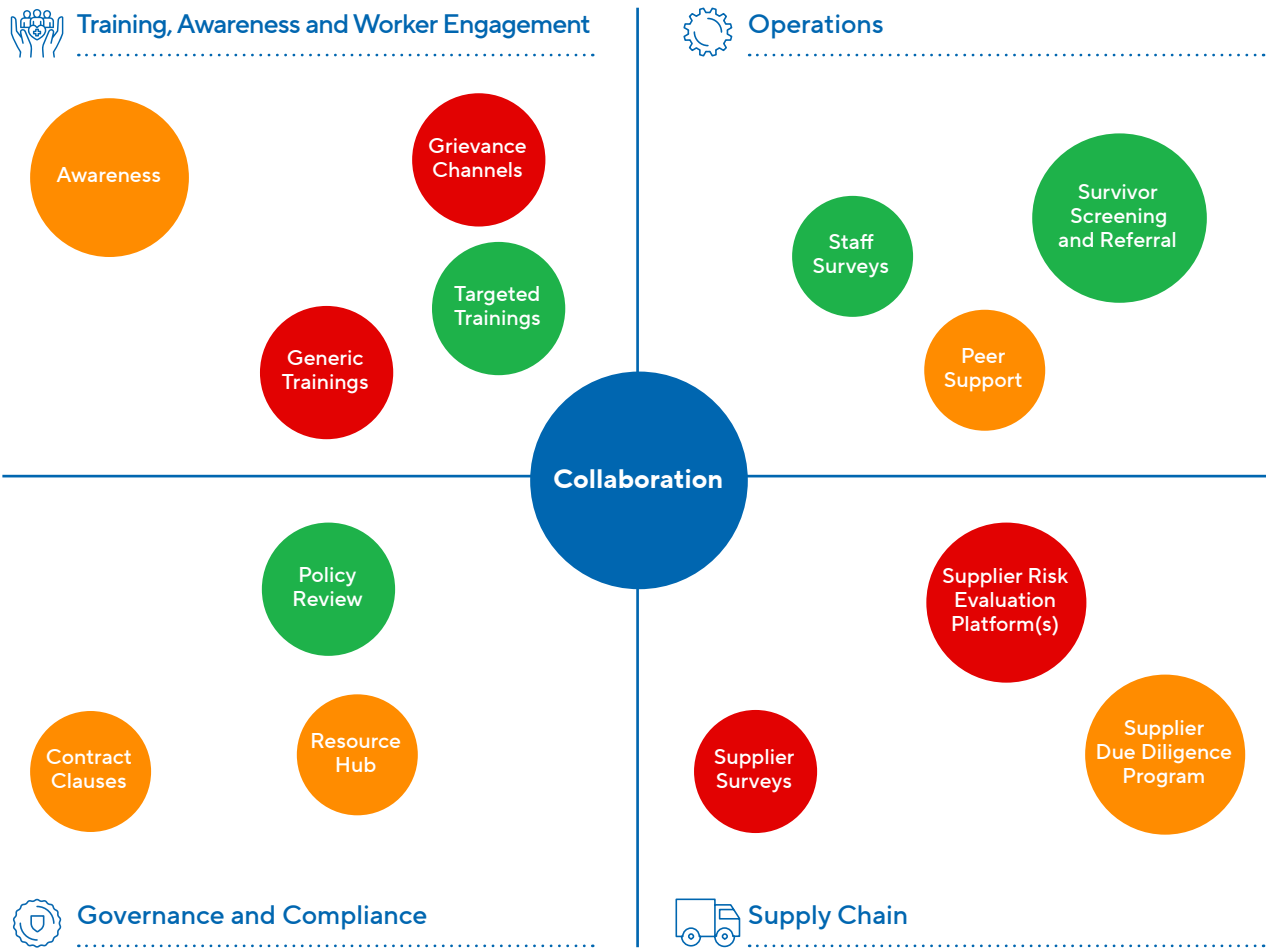
- Examines our external partnerships, including supplier engagement and the mechanisms in place to assess and mitigate risks within supply chain.

## Pillar 4 – Training, Awareness and Worker Engagement

- Addresses how we manage worker engagement and the standards upheld to prevent exploitation.



## Overall progress evaluation



We employ a traffic light system to manage various activities across these 4 pillars, offering a clear visual representation of their status and enabling swift identification of areas needing attention.

**Green** activities are celebrated as successes, indicating they are on track and functioning well.

**Amber** activities highlight areas where additional effort or resources may be necessary, often requiring prompt, proactive measures to address potential issues before they escalate.

**Red** activities demand immediate action, typically involving a re-assessment of strategies and implementation of alternative approaches to correct the situation.

Reflecting on our position from three years ago, we have significantly enhanced our understanding of the risks inherent in our supply chain and operations. Nonetheless, we continue to encounter obstacles in effectively mitigating these risks.

We currently evaluate our overall effectiveness as **Amber**

## Process of consultation with entities owned or controlled

Consultation as between the parent company of 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.





## Criterion 7

# Any other relevant information

We have consistently worked to raise awareness about collaborative opportunities within the healthcare sector to combat modern slavery. Our efforts include:

- Participating in the Commonwealth-funded grant project under the National Action Plan to Combat Modern Slavery (Round 2, 2023-2025), which focuses on screening survivors who present at healthcare facilities and addressing risks in the recruitment process for migrant workers in healthcare.
- Member of the Community of Purpose initiative, “It’s Healthy to Fight Modern Slavery”, led by the Office of the Anti-Slavery Commissioner, NSW, which emphasises the crucial role frontline healthcare workers play in identifying and assisting individuals at risk of or experiencing modern slavery.
- Meeting with the United Nations Special Rapporteur on Contemporary Forms of Slavery, Dr. Tomoyo Obokata, to present insights and suggestions for enhancing the health sector’s involvement in combating slavery.





Better and  
fairer care.  
**Always.**



**ST VINCENT'S**  
Better and fairer care. Always.

UNDER THE STEWARDSHIP OF MARY AIKENHEAD MINISTRIES

[svha.org.au](http://svha.org.au)



# **Australian Catholic University**

## **2024 Modern Slavery Statement**

1 January – 31 December 2024

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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.

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# Statement from Vice-Chancellor and President Professor Zlatko Skrbis

ACU is pleased to submit its fifth annual Modern Slavery Statement to the Australian Government as part of the 2024 Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements. This statement highlights ACU's anti-slavery efforts across the organisation. We have strengthened our risk management processes, due diligence on suppliers and business partners, and considered modern slavery risks in our investment portfolio.

I commend the efforts of ACU's modern slavery working group on their actions to address and continuously improve ACU's response. I am also pleased to have continued to serve on the Advisory Committee of the Domus 8.7 Modern Slavery Remediation Service during the reporting period.

# Statement, approval and signature from Chancellor The Honourable Martin Daubney AM KC

As a Catholic university, we remain committed to upholding the dignity of every individual and community with any connection to ACU's supply chain and operations. Our commitment to transparent, accountable and responsible business practices is a powerful example to our students – the leaders and change-makers of tomorrow. Through our actions, we aim to instil in them the importance of ethical conduct, social responsibility, and the profound impact that they can have on the world.

On behalf of the ACU Senate and Advisory Committee, I approve this Modern Slavery Statement 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 19 June 2025. 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: 19 June 2025



Professor Zlatko Skrbis  
Vice Chancellor and President  
Signed: 19 June 2025

# Criterion 1: About Australian Catholic University (ACU)

An ACU education is grounded in the Catholic understanding of faith and reason working together in the pursuit of knowledge, promotion of human dignity, and advancement of the common good.

We aim to transform lives and communities. Students are challenged to look beyond the classroom, solve real-world problems, develop their own search for meaning and cultivate strong professional ethics. They are invited to stand up for people in need and causes that matter.

Opportunities for personal and professional growth are critical to ACU. This is a university of service – so much so that it is built into the curricula. All ACU courses offer work placements, internships or volunteering opportunities.

High-impact research – with social, cultural and economic benefits – is core to our institution. Our research and enterprise activities develop innovative solutions to issues impacting human dignity and the common good. Through ethically informed research we deliver positive change across ACU, industry, community and government.

We foster academic collaboration and engage with local and international partners to enable the exchange of knowledge and skills and develop dynamic educational and research initiatives. We build healthy social partnerships, assisting communities in actively shaping initiatives that directly impact them.

ACU is a university for everyone. Like all Catholic institutions, the university is inclusive and supportive of everyone, every day – regardless of their faith, tradition or circumstance.

ACU is a young university making a significant impact. Ranked in the top 10 Catholic universities\*, we're also a leader in employability with 95 per cent of our graduates employed\*\*. The university has seven campuses around Australia, a campus in Rome, Italy, and an online campus – ACU Online.

**ACU's 2024 annual consolidated revenue is \$653,085,000.**

\* Based on International Federation of Catholic Universities members ranked on *Times Higher Education* World University Rankings 2025

\*\* Graduate Outcomes Survey – Longitudinal 2023, overall employment for domestic undergraduate students and domestic postgraduate coursework students



## 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.

## Our values

### Truth

ACU is a place where faith and reason are explored in search of truth.

### Excellence

The pursuit of excellence underpins our efforts in teaching, research and engagement.

### Service

ACU is a university of service. We seek to improve the lives of others through compassion, empathy and respect.

## Our vision

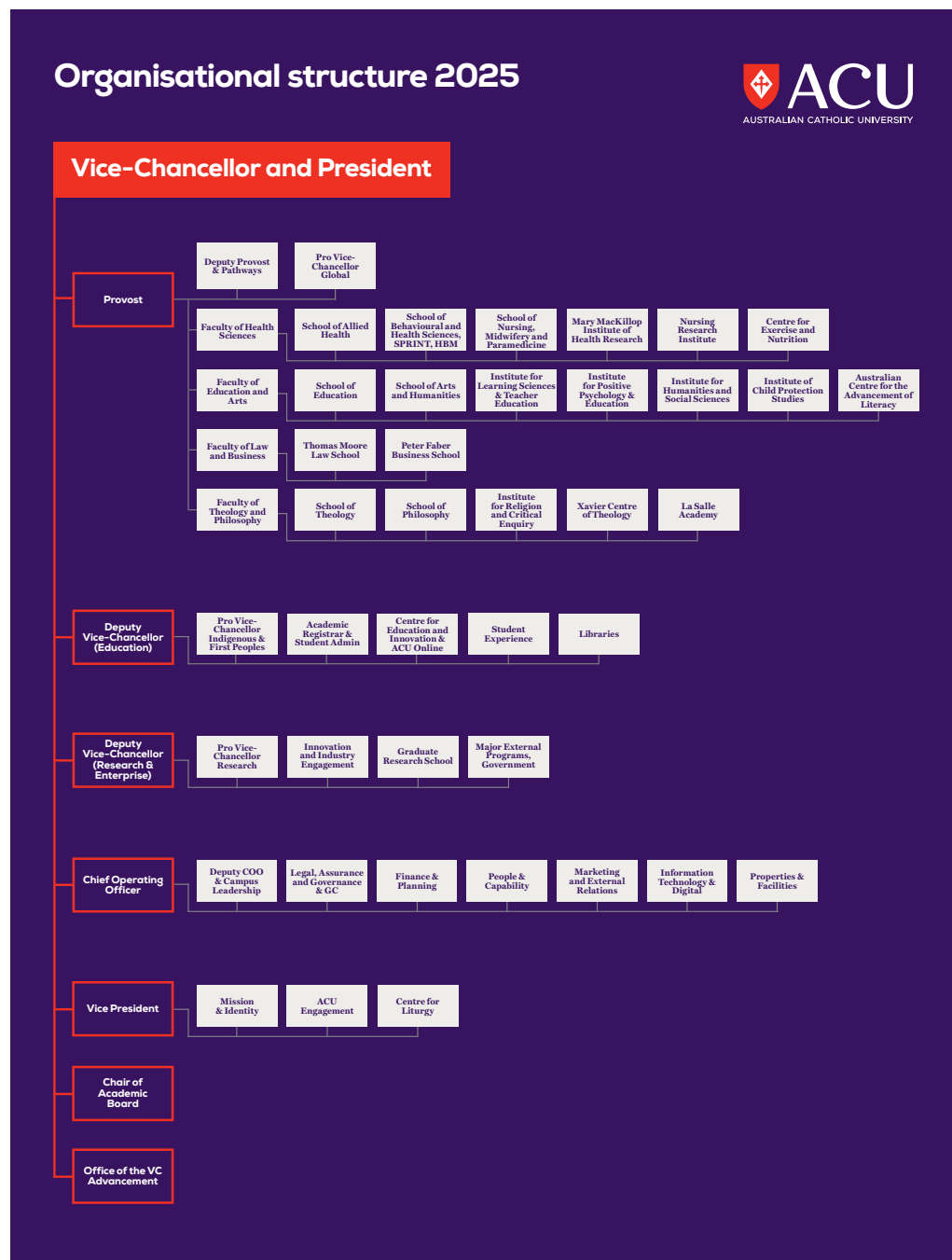
Our vision is to enable flourishing lives, foster thriving communities and build an ethical future.



# Criterion 2: ACU's structure, operations and supply chains

## Our structure

This diagram represents ACU's organisational structure at the end of 2024.



## Our governance framework

ACU's anti-modern slavery initiatives have been incorporated into ACU's governance structure, requiring the approval of the Finance and Resources Committee and ACU's Senate. Our key leaders and governance bodies are as follows:

### CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing authority 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, representing the university both nationally and internationally, and providing strategic leadership and oversight of the operational management of the university.

### 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.

### VICE PRESIDENT

The Vice President is responsible for advancing the Catholic identity and mission of the university in ways that are pastoral and inclusive, thus reflecting the rich diversity of the ACU community. This portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement.

### CHIEF OPERATING OFFICER

The Chief Operating Officer is responsible for the Corporate Services Portfolio. This portfolio covers a broad range of areas including properties and facilities, information technology and finance and planning.

### DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees ACU's research and innovation strategy, external engagement strategy and approaches to securing external research investment, advancing the university's reputation as a leading research institution with close links to industry and government. The role supports academic career development and works to create a culture of excellence and sustainable growth in research and enterprise.

### DEPUTY VICE-CHANCELLOR (EDUCATION)

The Deputy Vice-Chancellor Education leads ACU's Education Portfolio, making a major contribution to the Catholic commitment to education, with responsibilities for the student experience and oversight of key directorates including Libraries, First Nations, Student Experience and the Centre for Education and Innovation.

### 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.

### 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 professional staff, and student bodies.

### STATE CHAPTERS

To connect ACU with local communities, ACU has State Chapters in the Australian Capital Territory, New South Wales, Queensland and Victoria. Chapters act as advisory bodies to Senate but have no direct governance role.

### THE VICE-CHANCELLOR'S ADVISORY COMMITTEE

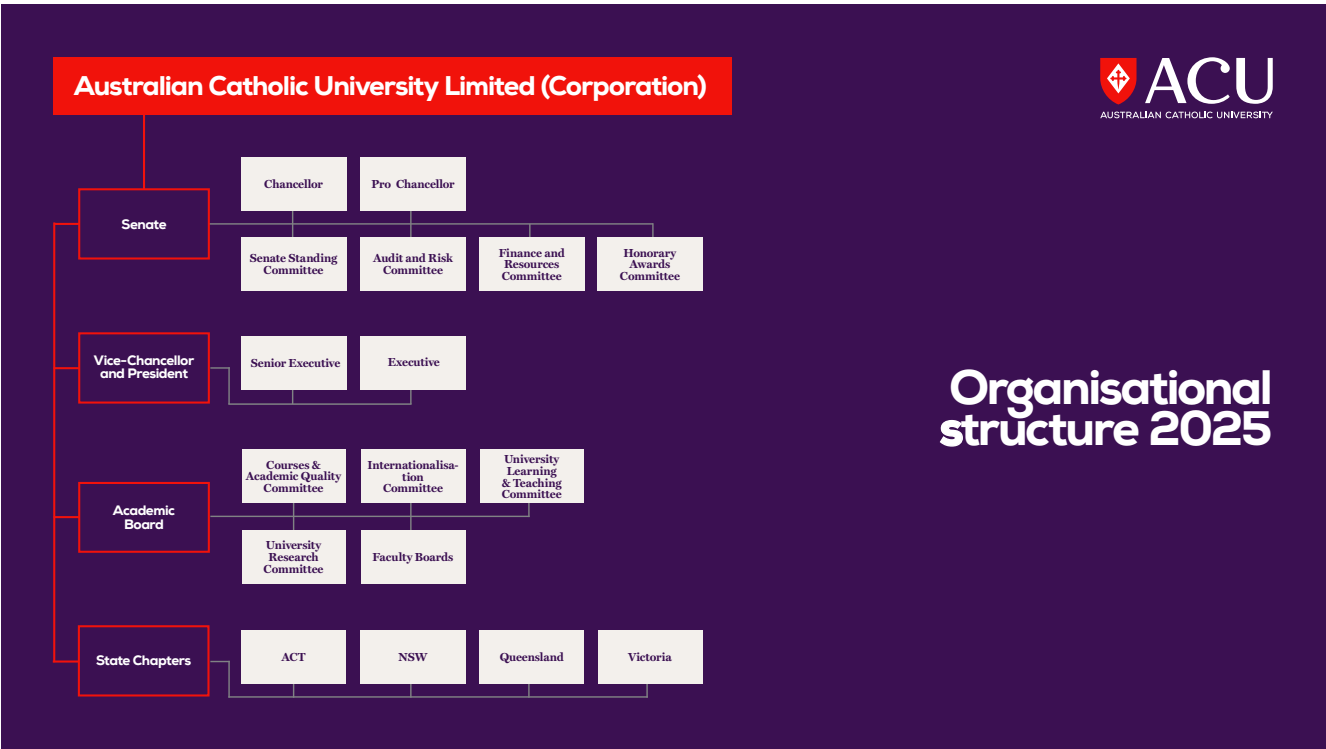
The Vice-Chancellor's Advisory Committee (VCAC) is the university's principal management committee. It is an advisory forum providing advice on matters of strategic importance to the Vice-Chancellor and President.

### 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 ACAN Program Managers. 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.

# ACU's Governance Structure

Below is a visual representation of ACU's Governance Structure as of the end of 2024. ACU's Legal, Assurance and Governance Directorate maintains a suite of policies and procedures which relate to the conduct, decision making, risk management, internal organisation and management of the university.



## Our operations

ACU is a publicly funded university with four primary faculties – education and arts, health sciences, law and business, and theology and philosophy – and a research and enterprise portfolio, an education portfolio, and a corporate services division, made up of directorates, including: Legal, Assurance and Governance; Properties and Facilities; People and Capability; Finance and Planning and Marketing and External Relations.

ACU has seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield – with one international campus in Rome, and a leadership centre in Townsville.

Some key information (2024):

- approximately 2,500 (FTE) staff
- approximately 35,000 students
- more than 140,000 alumni
- approximately 5,800 international students from 96 countries enrolled
- more than 200 international partners (includes PhD students and research arrangements) across six continents
- more than 1,300 ACU students who have studied at our Rome Campus.

NB: Some of this information is in a process of change or being updated. The year the data represents is indicated where applicable.



# Our Strategic Plan – Vision 2033

ACU Vision 2033 sets the strategic direction for the university.

Modern slavery is identified as an important objective in ACU's strategic planning, and is included under a number of focus areas in ACU's Vision 2033.

## Our vision

As a leading Catholic university, we will enable flourishing lives, foster thriving communities and forge an ethical future.



### Flourishing lives

To flourish, individuals require intellectual growth, a sense of wellbeing and moral purpose. This enables them to find fulfilment in their personal and professional lives.



### Thriving communities

Thriving communities are healthy, secure and inclusive. They nurture social connection and provide opportunities for all.



### Ethical future

An ethical future is one that promotes human dignity and the common good above all other considerations.

Vision 2033's focus areas guide us in achieving our ambitions and assist us in setting our operational objectives. The focus areas below are of specific relevance to ACU's commitment to take steps to eradicate modern slavery.

## FOCUS 1 - PROVIDE A LEARNING ENVIRONMENT THAT EMPHASISES GROWTH OF THE WHOLE PERSON

We will equip our learners with the knowledge, skills and confidence to thrive in an interconnected and changing world.

- 1.4 Foster a sense of global responsibility.

## FOCUS 5 - PROMOTE HUMAN DIGNITY AND ADVANCE THE COMMON GOOD

We will fulfil our mission commitment to upholding the inherent worth of every individual and advocating for a just and harmonious world.

- 5.1 Strengthen our contribution to the Asia-Pacific region and beyond.
- 5.2 Form international collaborations to address global challenges.
- 5.3 Promote the importance of ethical practice in all aspects of life and work.
- 5.4 Critically evaluate the effects of global progress and change on individuals, communities and environments.

## FOCUS 6 - STRENGTHEN OUR INSTITUTIONAL FOUNDATIONS

To facilitate the sustained success and growth of ACU, we will consistently work to strengthen our institutional foundations.

- 6.3 Demonstrate environmental, social and governance excellence.

Vision 2033 is a commitment to our mission, growth, innovation and sustainable success. Vision 2033 is designed to navigate the challenges of the future strategically whilst being highly responsive to contemporary needs, ensuring that we not only adapt but thrive and provide impactful contributions to the communities we serve.

Learn more about Vision 2033  
[vision2033.acu.edu.au](https://vision2033.acu.edu.au)

# Criterion 3:

## Modern slavery risks in operations and supply chain

ACU regularly submits supplier and spend data to the risk assessment platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australasian Universities 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 attention on high risk activities.

### Operational risks

Many key operational activities are carried out by Tier 1 suppliers (direct suppliers to ACU), with Tier 2 suppliers providing goods or services to those Tier 1 suppliers. This structure creates potential operational risks, particularly around the delivery and quality of services.

To manage these risks, ACU includes supplier risk categorisation and mitigation actions as part of our broader operational risk framework.

Beyond supplier-related risks, ACU also addresses operational risks by regularly reviewing and updating internal processes and practices to ensure they align with relevant compliance and operational requirements. For further details, refer to **ACU's 2024 Modern Slavery Maturity Assessment** (under Criterion 5).

ACU's commitment to eradicating modern slavery is evident in our inclusion of modern slavery considerations in our Operational Risk Registers. We also implement targeted control measures to ensure we meet all Australian federal and state 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.

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.

In January 2024, AUPN's University Anti-Slavery Program transitioned to the ArcBlue modern slavery risk software solution, to better support Australian and New Zealand universities in identifying supply chain risks and conducting supplier due diligence activity through its self-assessment questionnaire (SAQ) tool.

Additionally, 2024 marked the commencement of the implementation of Sievo across numerous Australian universities, including ACU. As a procurement analytics platform, Sievo enhances visibility into university purchasing patterns and standardises supplier data classification. This unified approach will strengthen risk assessments across university supply chains, enabling institutions to leverage their collective purchasing power more effectively. Since late 2024, ACU procurement staff have attended regular University Procurement Analytics Service Champions forums to learn about the platform's functionality and features; and to share ideas with other university members – in the lead up to full Sievo implementation.

The tools are invaluable in assisting 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 2024 was \$653,085,000, with 69 per cent of this revenue derived from government grants.

We have more than 3,000 suppliers of goods and services in our supply chain. However, 232 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier spend of approximately \$161 million in 2024, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2024 SPEND (\$000S)
Building and construction	\$10,422
Information technology – equipment and services	\$24,091
Student placements	\$16,942
Facilities management	\$9,803
Consulting services	\$6,921
Marketing and communication services	\$11,551
Rent	\$3,420
Other office and workplace supplies	\$2,915
Utilities	\$6,927
Cleaning	\$6,199
Student recruitment – international	\$13,501
Plant and equipment	\$3,397
Security services	\$3,609
Insurance premiums	\$2,771
Travel and accommodation	\$8,337
Library books, systems and services	\$8,232

\* ACU Annual Report 2024





# Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services are 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 and Planning directorate, 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.

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, periodicals, 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 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 increasingly 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 \$31.2 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 overseas network. 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 213 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.

## 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 is continually evolving – it forms an excellent basis for developing ongoing planned activities.

# Our people

ACU has a diverse workforce of staff from different cultural backgrounds, ethnicities, and genders. Our Code of Conduct and comprehensive suite of policies and procedures reflect 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 inclusion.

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 fair, transparent and equitable.

One of the initiatives identified in ACU's EBA has been to create a program to convert work performed by casual academics into more permanent forms of employment to reduce ACU's reliance on casual and sessional academic staff. In the first tranche, more than 45 full-time and part-time continuing positions were established, advertised and appointed. These roles were filled exclusively by current and former ACU casual and sessional academics.

ACU has robust mechanisms to receive complaints relating to staff conduct and behaviour, bullying, harassment and discrimination. Formal complaints are usually submitted via a web portal, all of which are then managed by Employment Relations within the People and Capability Directorate. Anonymous complaints can also be submitted.

## IN DEVELOPMENT

When recruiting staff through third party recruitment agencies, ACU prefers to utilise the services of a preferred supplier panel, selected via a formal open tender process, and to ensure the panel in place will continue to comply with our rigorous procurement standards and values. Accordingly, a small panel of general recruitment providers has now been established, to commence in early 2025.

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 to enable effective decision making.

In 2023, ACU identified inaccuracies in how entitlements were calculated, which had resulted in some casual and sessional academic staff not receiving higher rates of pay where they held PhD qualifications or undertook subject/unit coordination or lecturer-in-charge duties. During 2024, ACU has worked to remediate this issue as quickly as possible; in some situations requiring a correction payment to be made to current and former staff.

A further program of work to review employee entitlements at ACU more broadly is ongoing. We are also working to implement enhanced governance and controls to ensure these errors do not happen again.

Further information may be found in the latest ACU annual report:

ACU Annual Report 2024





# 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 five modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
- Collation and submission of annual 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.
- Planned implementation 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.
- 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.

Specifically, the following actions are in progress or planned:

- 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.
- 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.
- To continue to deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- To continue to use the detailed ACAN maturity assessment to monitor continuous improvement across any impacted areas of ACU.
- 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.

- To continue the engagement with key suppliers in areas of high risk.
- To deploy a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.
- 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.
- Commencement of implementation of Sievo procurement analytics platform which will facilitate easy visibility into purchasing patterns, to standardise supplier data classification across participating universities, and to strengthen risk assessments across our supply chain. Ongoing ACU Procurement staff attendance at regular University Procurement Analytics Service Champions forums to gain and share knowledge before implementation is completed.
- In late 2024, ACU secured the support of a part-time modern slavery specialist to be embedded in the Finance and Planning team for a fixed term. The role was created to further ACU's examination and analysis of its supply chain, identify areas for continuous improvement, and to make recommendations on activities to strengthen ACU's anti-modern slavery work. It is anticipated that in 2025 the specialist will focus on modern slavery risk assessments of high-risk suppliers, examine Tier 2 of the supply chain for those suppliers, and identify opportunities for collaboration with other teams across ACU to manage modern slavery risks.

# 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 provide 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 verify the information by audit or other validation processes.

## ROBUST NEW NATIONAL CLEANING AND SECURITY AGREEMENTS

In 2024, ACU's Properties Directorate finalised two important tender projects. These were each the result of a formal and stringent tender process commenced in 2023 through the University Procurement Hub (via Accenture), to select a security services company and a cleaning company to service ACU's seven Australian campuses. The suppliers' existing Modern Slavery documentation, activities and commitments were a key part of the tender evaluation criteria and a key part of ACU's contracts with the selected companies.

The executed agreements between ACU and the cleaning and security companies require that each of those must:

- take reasonable steps to ensure there is no modern slavery in the supply chains for the contractor agents and or contractors, or in any part of their respective businesses or dealings.
- conduct their businesses in a manner consistent with the principles of the Modern Slavery Act, and that neither the contractor nor its agents, contractors or employees has been convicted of any offences under the Modern Slavery Act nor been the subject of any investigation or enforcement under the Modern Slavery Act.
- implement due diligence procedures for its own contractor agents, contractors and other participants to ensure that there is no modern slavery in its supply chains. These procedures are documented in the annual modern slavery statements prepared by the respective organisations (as below.)
- in the first quarter of each year, deliver to ACU an annual modern slavery statement detailing what steps the company has taken to ensure modern slavery is not present in its supply chain or any part of its business. The Agreement stipulates that *"The Contractor must deliver to ACU... no later than 3 calendar months from December 31 each year, an annual statement prepared in accordance with section 16(1) of the Modern Slavery Act, including, but not limited to, the steps it has taken to ensure that Modern Slavery is not taking place in any of its supply chains or in any part of its business."* The suppliers' annual statements are reviewed by ACU – and, where indicated, appropriate recommendations made to the supplier for future improvements, adjustments or corrective action. The first annual statement has been received from each of the organisations.
- notify ACU immediately should it become aware of modern slavery – or even suspect it, in any part of its supply chain.

Furthermore specific clauses in each of these agreements stipulate that the contractors may be subject to annual integrity payroll audits by a third party auditor nominated by ACU, and that *"The Contractor must deliver to ACU... such other information or reports as may reasonably be required from time to time by ACU to comply with the requirements, or avoid any contravention, of the Modern Slavery Act."*

# 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 2024, 55 ACU suppliers are on Sedex, with 276 suppliers having completed ACAN's Supplier Survey.

The Sedex tool has a number of useful capabilities and we will continue to explore and implement these further. In January of each year, ACU provides the previous year's 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, and to facilitate ACAN's assistance in 2025 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 support ACU Procurement staff, providing training on Sedex functions and updates, and offering assistance and guidance to use the tool effectively.

Across 2024 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.

In 2024, ACU Procurement staff participated in Sedex member in-person roundtable discussions. These events brought together national and international organisations from a range of different industries, to workshop collaborative strategies to identify, manage and remediate modern slavery risks. Participants workshopped programme approaches, learnings and common challenges.

The use of Sedex complements the similar process also being undertaken through the AUPN modern slavery dashboard (which is specific to suppliers across the university sector).







## Focus on clothing

Encompassing quality regalia, ACU-branded clothing and uniforms, and other items – apparel is an important category for ACU. It represents and highlights the ACU brand and reputation, and holds a vital place in students' memories across their ACU journey – from uniforms signifying professional development and sports victories, to graduation gowns marking the culmination of years of hard work.

ACU purchases clothing from a range of suppliers, for multiple purposes.

However, the clothing industry is very high risk for modern slavery practices. This risk exists across all phases of production and manufacture. Clothing suppliers typically employ several overseas factories, and so scrutiny and visibility can be more challenging. This can make it harder to 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 can result in disparities as to how modern slavery risks are handled and addressed.

During 2024, ACU continued to examine its clothing supply chain, working closely with Tier 1 suppliers to ensure that mechanisms were in place to mitigate modern slavery risks. Three of ACU's apparel suppliers are featured below.

### ANDREWS CORPORATE CLOTHING

Andrews Corporate Clothing (ACC), ACU's preferred uniform supplier, has a multi-layered approach to providing safeguards in their supply chain in Australia and offshore. ACC has been accredited by Ethical Clothing Australia and has had its Australian supply chain fully audited to ensure the fair and proper treatment of all workers. Ethical Clothing Australia works with local textile, clothing and footwear (TCF) businesses to protect and uphold the rights of Australian garment workers.

ACC's commitment to an ethical supply chain doesn't stop at Australia's borders. ACC utilises 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 key areas of social accountability in the workforce - including forced labour, working hours, remuneration, and health and safety.

ACC undertakes third party audits (including Business Social Compliance Initiative (BSCI) and Sedex) of all its offshore manufacturing partners to ensure ethical supply chain standards are met. In addition to this, ACC directors and management make numerous inspections of all local and offshore manufacturing facilities in order to ensure standards are being maintained by partners. ACC's partners must execute a Supply Agreement detailing and committing to various Ethical Supply standards.

### BLUEGUM CLOTHING COMPANY

ACU's Student Life's aim is to bring students the excitement and experience of all things university outside of the classroom. In 2024, it sourced casual clothing for volunteers from Bluegum Clothing Company. Bluegum responsibly sources its products and is accredited by Ethical Clothing Australia. It is also member of the Fair Labour Association and Worldwide Responsible Accredited Production. The Government of Victoria has included Bluegum on the Ethical Supplier Register for uniforms and PPE. Bluegum is committed to ethical and social procurement compliance in its offshore supply chain.

### GFP EVENTS

GFP Events is a long-standing and valued provider of graduation regalia to ACU, and as such monitor their supply chain closely. Academic regalia made from recycled fabric is manufactured in China and India, where GFP conduct regular site visits to factories and small businesses. These visits provide an opportunity for GFP to reinforce their stance on modern slavery. Fair payment for goods is central to GFP's ethical business practices, as are good working environments and conditions for workers in China and India.

GFP works with Trace, an organisation assisting them in measuring their carbon footprint, setting clear goals to reduce emissions, and making sustainability part of everyday decisions while they track progress along the way. GFP also works with Loop Upcycling, a West Australian social enterprise company that provides businesses with solutions to utilise redundant textiles and create work opportunities for people experiencing vulnerability in the community. Currently, Loop are turning obsolete and old hoods into teddy hoods and other accessories for GFP's merchandise range.

## ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which underwent substantial revision in 2022 and 2024. The 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.

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*"
- 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."

ACU's Procurement Policy underwent further change in 2024, which included adding a section on Supplier Agreements, which stipulates that where an ACU contract template document (containing an existing pre-approved and robust Modern Slavery Clause) is not used, in favour of the supplier's template, the staff member must ask ACU's Office of General Counsel to insert a suitable Modern Slavery Clause during a mandatory legal review of the Agreement, prior to its execution.

## 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. Tender documentation and contracts are maintained in SharePoint databases, and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

## MARKETPLACE 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 uses 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:

- Group 1. Management levels 5 and 6 including National and State Managers.
- 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.
- Group 3. Designated purchasing staff within a faculty or directorate as nominated by management level 6 or higher.

At the end of 2024, approximately 429 staff (including directors and managers) had completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'.

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 (with ACU staff attendance at regular meetings)

**ACAN Anti-Modern Slavery Working Group:** In 2024, 10 monthly ACAN webinars and five supplementary webinars were held. In addition, an ACAN audit forum was held in both Sydney and Melbourne, and ACU's ACAN Program manager hosted a valuable half day planning session for ACU's Eradicating Modern Slavery Group members.

**AUPN Modern Slavery Working Group Anti-slavery Forum meetings:** Nine meetings were held in 2024. Meetings featured a range of informative presentations, including by Ethical Clothing Australia, Property Council of Australia and Australian Red Cross, with participating universities generously sharing their approach to managing modern slavery risk.

**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. Two meetings and a half-day planning day were held in 2024. 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.

Since inception, 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
- 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.

In August 2024, the Chair coordinated and held a half-day EMS Group Planning Session (in Sydney and online), to:

- discuss action planning and working roles and responsibilities within the group
- brainstorm potential activities, initiatives and commitments moving forward
- consider potential future ACU staff additions to the group's membership, where there may be a knowledge or reach gap
- review the 2023 Modern Slavery Statement.

The ACAN Program Manager attended and provided a comprehensive presentation on both updates and reminders to the group on the ACAN framework and the Modern Slavery Act requirements. *Domus 8.7* integration into ACU channels, and ACU's spend and risk profile were also discussed.

In late 2024, the Chair of the Eradicating Modern Slavery Working Group and other group members were invited to present on ACU's Human Research Ethics Committee's Training Day. The committee, together with Ethics Panels, ensures all research conducted by ACU staff or students involving humans is conducted in an ethical manner, and that the rights and interests of research participants are protected.

In the presentation, titled 'Ending Modern Slavery at ACU' the EMS group members covered off with colleagues the legislative requirements the university needed to align with, as well as the legislation's alignment with the university mission. Information was provided on actions undertaken across the university to address modern slavery in its supply chains as well as modern slavery inclusion in the academic/teaching curricular of the university. Discussion on how research staff could contribute to identification and elimination of modern slavery was also undertaken.

ACU's EMS group was pleased to support and participate in ground-breaking experimental research by RMIT University, testing practical solutions to improve remediation of modern **slavery in supply chains**. Supporting this kind of research is vital to continuous improvement and is an expression of ACU's commitment to going beyond compliance to actively participating in impactful change.

Moving forward into 2025, the Working Group's focus 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 its supply chains.

## ACU's five anti-modern slavery (AMS) foundation focus areas of support

From the commencement of its anti-slavery journey, ACU has identified, created initiatives around and will continue to consolidate into its actions five fundamental focus areas of support to address slavery risks in its supply chains.

For several years, ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the AUPN, and attended regular meetings and additional information

and planning sessions. A number of the actions required to give effect to the following five focus areas 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) focus areas of support.

### FOCUS AREA 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 to continue to move towards not having 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.

**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.

### FOCUS AREA 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 were available to ACU staff in 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 recently conducted to cover 2024, with those results presented 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 are taking to address this.
- Key suppliers to ACU have been contacted directly or asked to participate in online education forums about modern slavery, the risks in their industry, and what they need to do to address them. This includes ACU's key apparel provider for health sciences uniforms and key construction and facilities maintenance suppliers.

### FOCUS AREA 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 spend and other data 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 monitor and manage potential modern slavery activity.

### FOCUS AREA 4: REMEDIAL ACTION

Remedies to identify modern slavery practices will take a variety of forms, as summarised below:

- Managing supplier relationships in accordance with Focus Area 1: A Purchasing Commitment.
- Using specialist organisations such as Sedex, 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 is either in the process of or committed to implementing the above points.

### FOCUS AREA 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 its consolidated annual statement.

**ACTION:**

- ACU will continue to collaborate with ACAN to submit a comprehensive and consolidated annual statement.
- Key ACU personnel responsible for generating the statement have attended ACAN report writing workshops, and regularly attend educational seminars, workshops and meetings run by ACAN, the AUPN and Sedex – in the process learning from and sharing knowledge with the other participants.
- ACU uses guidance and feedback provided by ACAN throughout the process of creating its annual statement.



# 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 to 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.	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 and 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 forums. 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.	Two 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.	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.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	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.	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.
	AMS initiatives are made known during recruitment and to relevant agencies. Needs review to ensure existing practices are adequate.	The above tools will enable supplier MS risks to be monitored, and corrective actions taken to address concerns where they arise.		
		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 aim to ensure that modern slavery does not occur in the companies in which we invest, and in their supply chains. This includes funds managed by external managers and our self-managed portfolios, which are mainly bank term deposits. The university supports investments in the Catholic Church's charitable, religious, and educational works. We also support ethical and socially responsible investments. We invest only with organisations that demonstrate strong environmental stewardship, consumer protection, human rights, and employee diversity practices.

# 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 and 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 to each intake for commencing international students, based on a collaboration with ACU's Careers and Employability Service. 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 Fair Work 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 met in early 2024 to strengthen the existing survey questions. The new survey went live in late April 2024 and the results will be included in next years statement.

### 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.

ACAN program managers recently trained 12 ACU counsellors on how to identify and respond safely to disclosures of modern slavery, also making a recording of the session which now forms 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 have conducted outreach to the law firm to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery, moving forward.

In 2024, ACU's Careers and Employability team undertook fair work training from the Ombudsman, to ensure they are well-prepared to offer fair work support and advice through appointments to assist students to access correct and current information. It is expected this training will continue annually.

ACU's Access and Disability Service team assess all organisational partnerships and suppliers for modern slavery compliance, with priority given to those demonstrating robust policies, certification and practice against modern slavery. Where suppliers do not provide formal documentation, the team engages to ensure they have conducted due diligence in relation to their work practices and supply chains.

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.



# 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 generates a maturity assessment from an annual Entity Profile survey completed by ACU Procurement, with information sourced from across ACU.

The ACAN maturity assessment provides a score card of ACU's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is 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:

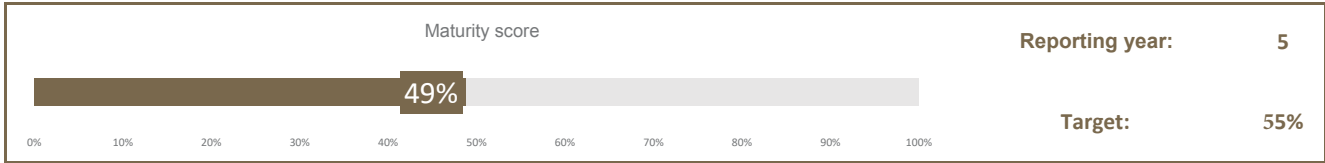
**Holistic overview:** Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards 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.



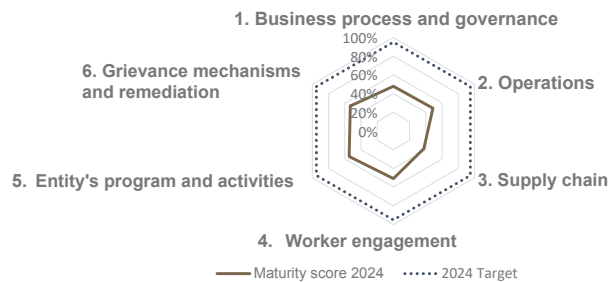
The 2024 year result for ACU is as follows:



Australian Catholic University (ACU) – 2024 analysis by pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business process and governance	54%	58%	41%	39%	48%	↑ 4%
2. Operations	48%	68%	42%	38%	49%	↑ 6%
3. Supply chain	13%	80%	31%	27%	38%	↑ 2%
4. Worker engagement	45%	64%	45%	49%	51%	↑ 11%
5. Entity's program and activities	100%	30%	50%	38%	55%	↑ 6%
6. Grievance mechanisms and remediation	63%	60%	51%	39%	53%	↑ 1%
Average	54%	60%	43%	38%	49%	
	↑ 5%	↑ 4%	↑ 5%	↑ 5%	↑ 5%	

Maturity score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score



Maturity score  
2023 – 44%  
2024 – 49%

ACU’s score falls in the 31% – 50% = **Emerging Practice** (Years 3 – 5) level. ACU’s 2023 maturity assessment score was **44 per cent**, with our 2024 score increasing to **49 per cent** based on initiatives and practices undertaken or introduced across the university over the reporting period. 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** – In 2023, ACAN introduced the ACU baseline data table (see 2024 table at right), which can be used to show continuous improvement over time, by comparing to previous years.

ACTIVITY	ACU
INTERNAL / STAFF	
Hours spent on modern slavery activities	720
Individual staff completed e-learning	468 c
E-learning modules completed	897 c
EXTERNAL / SUPPLIER ENGAGEMENT	
Total number of ACU suppliers	3007
Number of suppliers with visible contact information	2689
Number of suppliers across high-risk categories	982
Number of ACAN Supplier Surveys completed	276 c
Invited to join Sedex	85 c
Joined Sedex	37 c
Sedex SAQ completed	8 c
DOMUS 8.7 EXTERNAL REFERRALS AND INTERNAL GRIEVANCE MECHANISMS	
Contacts made via worker voice / grievance mechanism and other avenues as stated*	
Faircall external whistleblowing service	24
Staff complaints (via web portal – anonymous option available)	25
Student grievances (via AskACU webform)	242
Individuals identified or referred for modern slavery assessment	0
Individuals with modern slavery cases remediated	0

\* Numbers shown are as instances recorded, prior to any investigation, or explanatory information being sought  
c = cumulative total

## Measures to assess effectiveness of anti-modern slavery actions – in use or in development

The following measures are aimed at assessing 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'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, Associate Professor Kunle Ola. The students continue to complete their pro bono placements with Domus 8.7 modern slavery remediation service.

To date, the collaboration has contributed more than 9,000 hours of review, analysis and ranking of statements submitted to the Australian Government's online Modern Slavery Statements Register.

In 2024, five ACU law students contributed to the Domus 8.7 Index. To date, ACU students have analysed more than 2,300 modern slavery statements (at an average of 11 pages per statement without graphics/other visuals included in page count).

During the 2024 intake, Domus 8.7 committee member and prominent modern slavery survivor advocate Moe Turaga, joined students undertaking their pro bono placements, sharing insights from his lived experience to encourage them in their learning.

### SAINT JOSEPHINE BAKHITA, PATRON SAINT OF ACU BLACKTOWN CAMPUS – INAUGURAL LECTURE

*"Alone, we may feel powerless about preventing modern slavery, but together, we can make a difference,"* Bishop Vincent Long OFM Conv, Bishop of Parramatta.

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, who was herself kidnapped and sold into slavery as a child.

On 8 February 2024, ACU's Blacktown Campus hosted the inaugural St Josephine Bakhita Lecture.

Bishop Vincent Long OFM Conv, Bishop of Parramatta, delivered the lecture, focussed on "... how we serve the most vulnerable, and break down divisions that undermine human dignity and solidarity of our communities".

ACU Blacktown Campus Dean Dr Valentine Mukuria said the inspiration for setting up the lecture series was to provide an opportunity to reflect on the values of St Josephine Bakhita.

Dean Mukuria stressed the importance of ACU, in partnership with other organisations, having a "mandate to look at people with all the dignity that comes from being children of God."

St Bakhita's life served as an example to ACU students in overcoming adversity and following the path of what we are called to do.

### FACULTY OF EDUCATION AND ARTS ANTI-SLAVERY INITIATIVES

The below represents anti-slavery activities instigated by the Faculty of Education and Arts regarding integration into curriculum, teacher education and research.

ACTIVITY	DESCRIPTION
<b>Integration into curriculum</b> Initial Teacher Education	Anti-slavery awareness is engaged with in the unit TECH209 Textile Industries ( <b>TECH209 - Textile Industries (acu.edu.au)</b> ) in relation to allegations of the fashion and textile industry and regulatory measures.  Representative resources are: <b>Get The latest ethical fashion guide - Baptist World.</b> And concepts like <b>'True Cost of Fashion'</b>
<b>Integration into curriculum</b> Bachelor of International Development Studies; international development studies minor sequence	Anti-slavery awareness is engaged with in several units in international development. In particular the unit <b>DVST200 Refugees and Forced Migration</b> looks at the intersection between asylum/human trafficking.
<b>Research</b>	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 for a better understanding of the dynamics of modern slavery, with education being at the core of changing behaviour.
<b>Supply chain research</b>	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 and Planning to update our processes to ensure that we meet requirements for eradicating modern slavery in our procurement supply chain.

**Australian Catholic  
University (ACU)**  
**Modern Slavery  
Statement 2024**



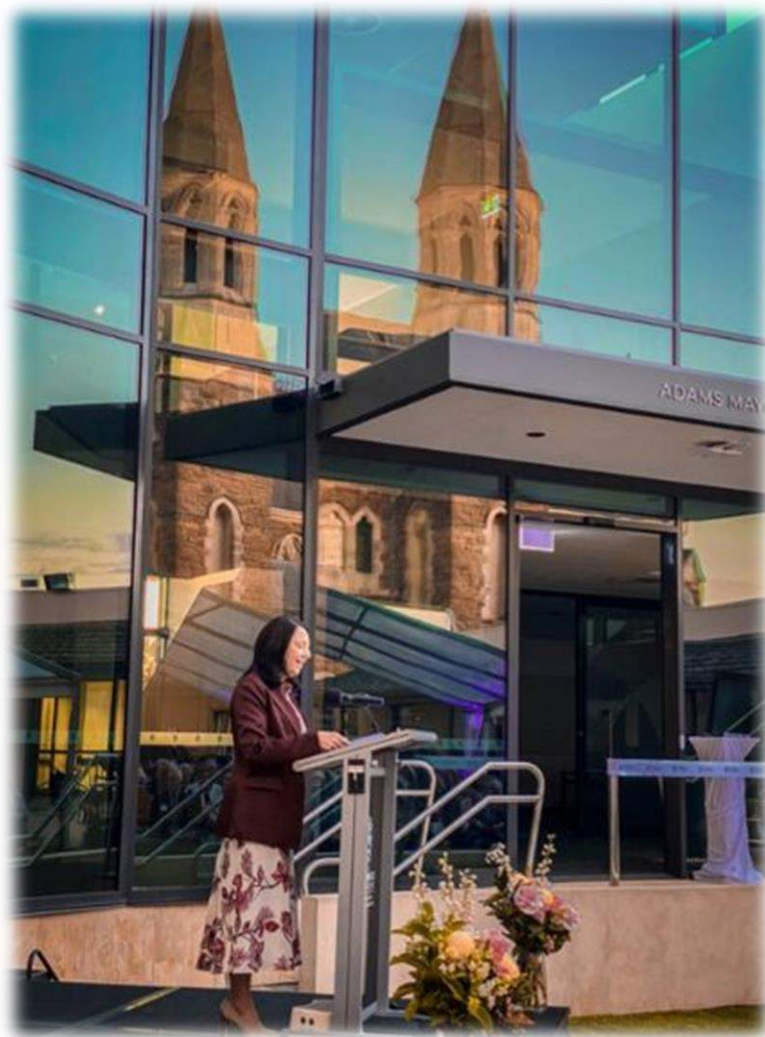






# 2024 Modern Slavery Statement

1 January – 31 December 2024





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### 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.

<b>Educational Ministry</b>	<b>ABN</b>
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.dominican.edu.au](http://www.dominican.edu.au)

Contact for modern slavery:

Robert Napoli  
Chief Executive Officer  
[rnapoli@dominican.edu.au](mailto:rnapoli@dominican.edu.au)

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## Introduction

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

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

This is our second Modern Slavery Statement.

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

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

DEA is committed to ensuring that effective policies and procedures are in place to minimise the risk of

modern slavery occurring within our Ministries' business operations and supply chain. We respect the human rights of our students and their families, our staff, our suppliers and the communities in which our Ministries operate. Our collective intention is to identify and manage risks related to human rights across our network and through our supply chain management.

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

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

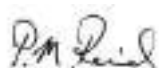
This statement is published by DEA and is consistent with the reporting obligations under the Modern Slavery Act 2018 (the Act). The statement is prepared by DEA on behalf of itself and its entities.

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

Tony O'Byrne – Chairperson



Paul Reid – Treasurer






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

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

## Reporting Criterion 1: About Dominican Education Australia

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

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

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### 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.

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### 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.

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### 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.

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

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

### Priorities

This is our second Modern Slavery Statement. DEA has progressed from 2023 where there was implementation of a modern slavery risk management program at one of our Ministries, Siena College Limited. Based on the lessons learned and experience from working with Siena College in 2023, DEA has extended the program in 2024 to four of its Ministries, with a view to full implementation with all six Ministries in 2025.

2024 saw a more tailored approach in its development of a modern slavery risk management program, that aims to maximise opportunities for mitigating and minimising risks of modern slavery in DEA Ministries.



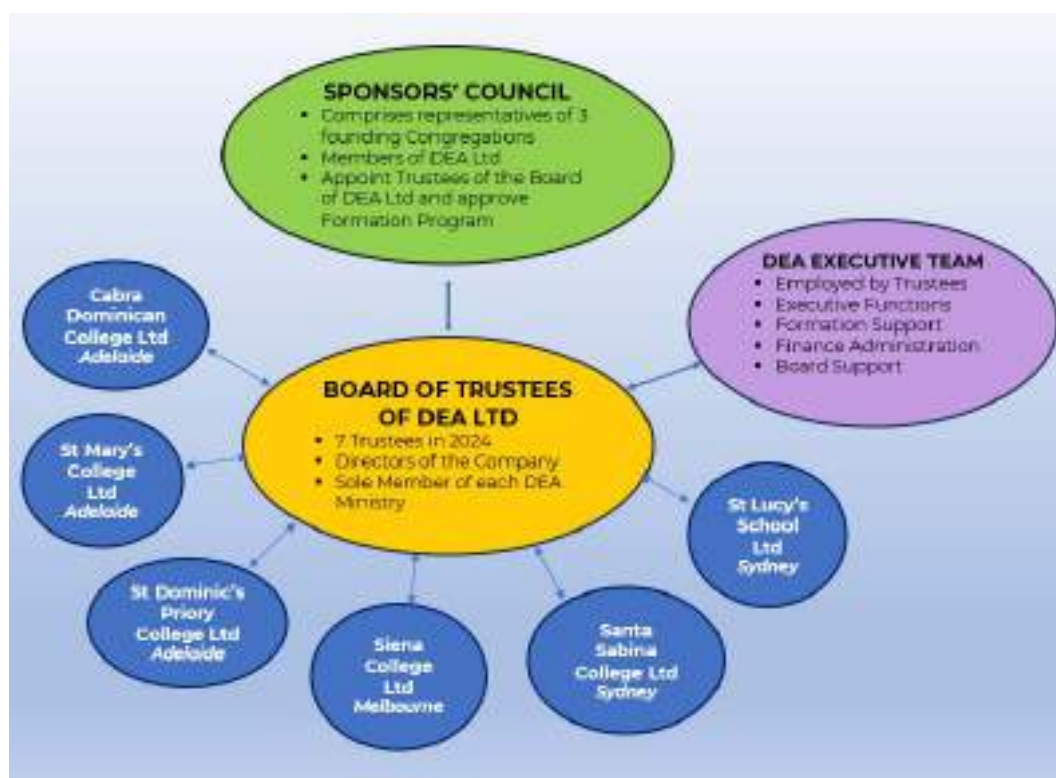


## Reporting Criterion 2: Operations and Supply Chain

### Our Organisational Structure

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

#### DIAGRAM SHOWING ORGANISATIONAL STRUCTURE OF DEA



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

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

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

- Finance & Risk
- Safeguarding
- Mission and Formation

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

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

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

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

## Operations

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

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

## Workforce Profile

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

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

## DEA Modern Slavery Working Group (MSWG) in 2024

The DEA MSWG was comprised of:

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

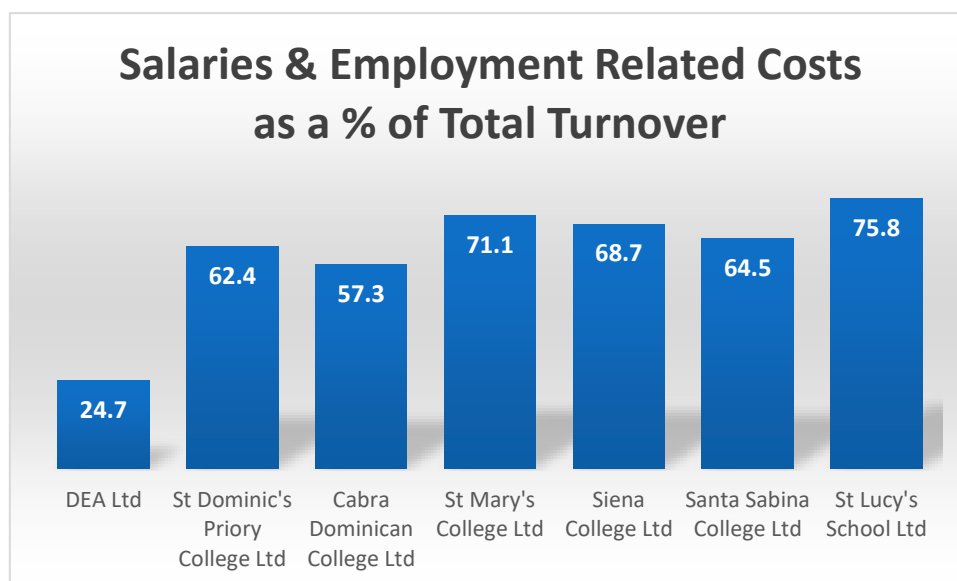
The MSWG is accountable to the Finance and Risk Subcommittee through the CEO, who chairs the MSWG and provides a progress report to the Trustees every 2 months.

10 meetings took place in 2024.



## Supply Chains, Goods and Services

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



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

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

### The following categories support our Ministries' operational requirements:

Banking  
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"><li>• Building and construction</li><li>• Cleaning and Security</li><li>• Events and event management</li><li>• Facility management and property maintenance</li><li>• Finance and Investment</li><li>• Food and catering services</li><li>• Furniture and office supplies</li><li>• ICT Hardware</li><li>• Labour Hire</li><li>• Linen, laundry and textile products</li><li>• Medical devices and supplies</li><li>• Uniforms and PPE</li><li>• Waste management services</li></ul>	<ul style="list-style-type: none"><li>• Advertising &amp; Marketing</li><li>• ICT Software and network services</li><li>• Utilities</li><li>• Fleet management, consumables and maintenance</li><li>• Travel and accommodation</li><li>• Print / Mail Provider</li></ul>	<ul style="list-style-type: none"><li>• Professional services</li><li>• Financial expenses</li><li>• Government and agency fees</li><li>• License / membership fees</li></ul>

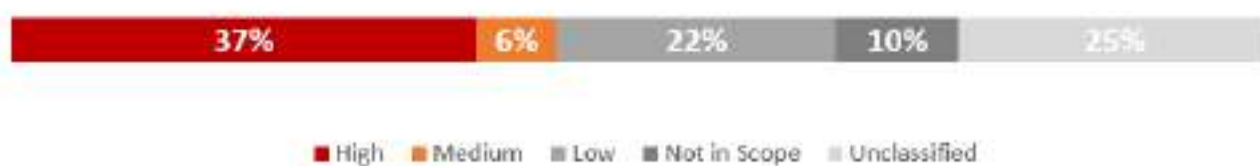
Note: The following categories are Not in Scope of the ACAN Category Risk Taxonomy

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

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

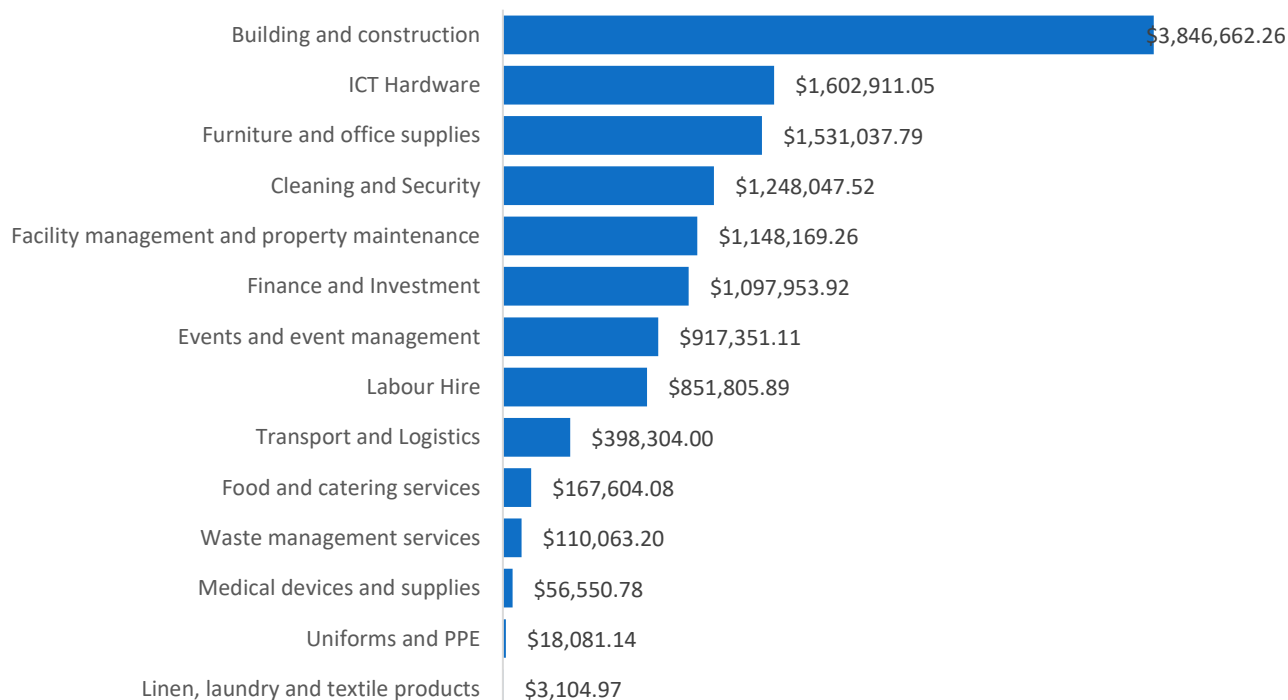
Based on ACAN's analysis of \$35,182,000 of spend data provided by four of our Ministries, the following percentage of spend and risk bar illustrates DEA's main areas of priority for action. The highest spend percentage for DEA Ministries is with suppliers considered more likely to be high risk according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

### Percentage of Spend per ACAN Taxonomy Risk



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

### \$ Spend in High Risk Procurement Categories



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



## Reporting Criterion 4: Steps taken to address Modern Slavery Risk

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

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

### Grievance Mechanism and Remediation Pathways

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

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

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

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

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

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



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

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

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

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

DEA and its Ministries will prioritise the following tasks:

FOCUS	Priorities
<i>Strategy &amp; 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 2025.</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 their risk appetite.</p>
<i>Supplier Due Diligence</i>	<p>Modern slavery pre-qualification requirements included into all 2025 contracts and requests for tender, including future building tenders.</p> <ul style="list-style-type: none"> <li>- Supplier Survey [entry point engagement = 20 questions, 5 mins to complete]</li> <li>- Webinar attendance/training completion</li> <li>- Sedex membership and Self-Assessment Questionnaire (SAQ), as requested</li> </ul> <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 &amp; 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"> <li>- 8 February Feast Day of St Josephine Bakhita</li> <li>- 8 March International Women's Day</li> <li>- 1 May Feast Day of St Joseph the Worker and International Workers Day</li> <li>- 30 July UN World Day Against Trafficking in Persons</li> <li>- 11 October International Day of the Girl Child</li> <li>- 2 December UN World Day for the Abolition of Slavery</li> <li>- School events – ACAN team member in each Ministry's geographic location</li> </ul> <p>Communicate our anti-slavery commitment to stakeholders</p> <ul style="list-style-type: none"> <li>- Website / Social media / Newsletters</li> </ul>

## Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

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

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

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

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

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

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

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

The scoring scale ranges from: 0 to 100

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

### Dominican Education Australia - Overview



### Dominican Education Australia - 2024 Analysis by Pillar

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

## Reporting Criterion 6: Internal Consultation

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### Priorities

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

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

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

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

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





## Reporting Criterion 7: Other Information

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No other relevant information







**MacKillop  
Family  
Services**



## **Modern Slavery Statement 2024**

1 January 2024 – 31 December 2024

**[mackillop.org.au](https://mackillop.org.au)**

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# Introduction, Approval and Signature

This is the fifth 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. Given the vulnerable groups we work with, we are also often on the front lines with children, young people and families who are most at risk of being victims of Modern Slavery. The factors that contribute to good outcomes for the communities are varied and operate at multiple layers of an organisation, community and society. We remain committed to identify and address our impact through our work as outlined in this Statement and in our Sustainability Strategy. The Act and its objectives are consistent with our organisational Purpose, Vision and Values.

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 2024 Compendium of Modern Slavery Statements.

This Statement relates to the period 1 January 2024 to 31 December 2024 (“Reporting Period”).

This Statement was approved by the principal governing body of MacKillop on 30 May 2025 and is signed by a responsible member of MacKillop as defined by the Act.

A handwritten signature in black ink, appearing to read 'Charles Reis'.

**Charles Reis**  
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 the children and families we support.

MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families. 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 have recently established our first specialist school in New South Wales.

For more information on MacKillop and our services, visit [www.mackillop.org.au](http://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 Sustainability Strategy 2023-2027 ("Sustainability Strategy"), outlines our commitment to making a positive impact.

Our Sustainability Strategy provides the blueprint for implementing actions in the below four focus areas. A copy of our Sustainability Strategy can be found at [www.mackillop.org.au/sustainability](http://www.mackillop.org.au/sustainability).

The end of financial year 2024 marked one year of MacKillop's Sustainability Strategy. Below we highlight one initiative in each Focus Area achieved in the financial year 2024.

### Focus Area: Deepening our commitment to Aboriginal self-determination, reconciliation, and cultural safety



#### MacKillops Innovative Reconciliation Action Plan

Our RAP drives initiatives to strengthen our relationships with and opportunities for Aboriginal and Torres Strait organisations and communities and people. This includes a workforce strategy, supplier diversity strategy, embedding cultural protocols and enhancing cultural learning.

As at the end of 2024 we had completed 97 of our 109 deliverables aligned to the focus areas of Relationships, Respect, Opportunities and Governance.

### Focus Area: Nurturing a diverse, inclusive, and culturally safe organisation



#### Cultural Mentoring Program

The implementation of our Cultural Mentoring Program is helping to create a best practice model when working with multicultural communities.

As at the end 2024 we had recruited 21 Cultural Mentors from 14 cultural backgrounds. We are currently averaging 2-3 cultural consults per week who continue to support cultural connection and relationship-based care.

### Focus Area: Acting on climate change and reducing our footprint



#### Waste Management Plan

Implementing a Waste Management Plan to promote the concept of the waste hierarchy in our aim to generating the minimum amount of waste from our operations.

In 2024 we implemented a Waste Management Procedure and Plan to support our goal for reducing our environmental footprint. This included regular reporting to identify and track our waste streams.

### Focus Area: Building sustainability into our procurement and financial management



#### Social and Environmental Procurement Strategy

MacKillop has developed and implemented the first stages of its Social Procurement Strategy. The focus of the first stage has been in Supplier Diversity and providing opportunities for Aboriginal and Torres Strait Islander owned businesses.

With the support from our Supply Nation membership, we have developed a Supplier Diversity Program Action Plan. This plan has identified key areas that are being addressed to support and enable our Supplier Diversity objectives.

# 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 2024, MacKillop had an annual revenue of over \$296 million.

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. Our status as a separate legal entity was not impacted by this change. Our Board of Directors is comprised of thirteen Directors, who dedicate their time and experience.

## Mercy Community Services Group

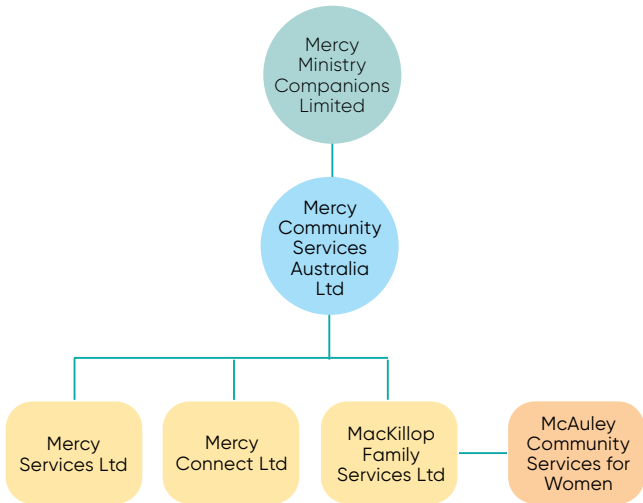


Figure One: MacKillop Group Organisational Structure





## Governance Structure and Modern Slavery Framework

MacKillop has established the following governance framework to manage Modern Slavery supply chain risks.

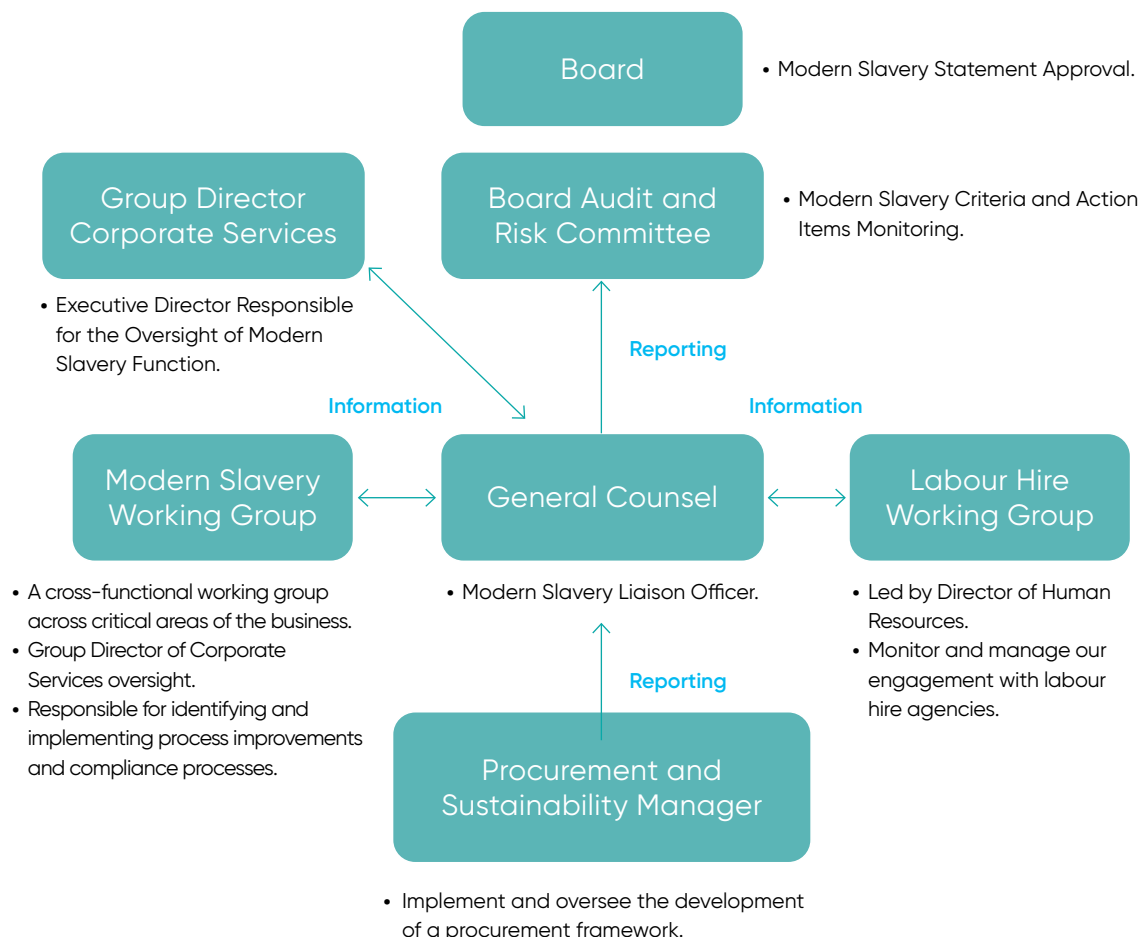


Figure Two: Internal Governance Structure

### Modern Slavery Working Group ("MSWG"):

**Chair:** Procurement and Sustainability Manager.

**Attend:** General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, General Counsel, General Manager of Property and Fleet, Director of Human Resources, Director of Community Engagement, Director of Ethos and Culture, Director Aboriginal Service Development.

**Optional:** Operational Directors for each of our States and Territories.

**Purpose:** A cross-functional working group responsible for identifying and implementing process improvements and compliance processes.

**Frequency:** quarterly.

**Executive Responsible:** Group Director of Corporate Services.

### Labour Hire Working Group:

**Purpose:** his group monitors and manages our relationships with labour hire agencies and recruitment agencies. It manages and monitors our compliance obligations (including labour hire licences) in relation to those agencies, their staff and work health and safety issues. The group is responsible for MacKillop's "approved labour hire agency supplier list" and oversees the approval process for any new labour hire agencies.

**Frequency:** quarterly.

**Executive Responsible and Chair:** Director of Human Resources.

**Attend:** Group Director Operational Performance, HR Manager - Engagement and General Counsel.

**Optional:** Our Procurement and Sustainability Manager and Operational Directors for each of our States and Territories.



## 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 over 200 properties, including 46 administration sites.

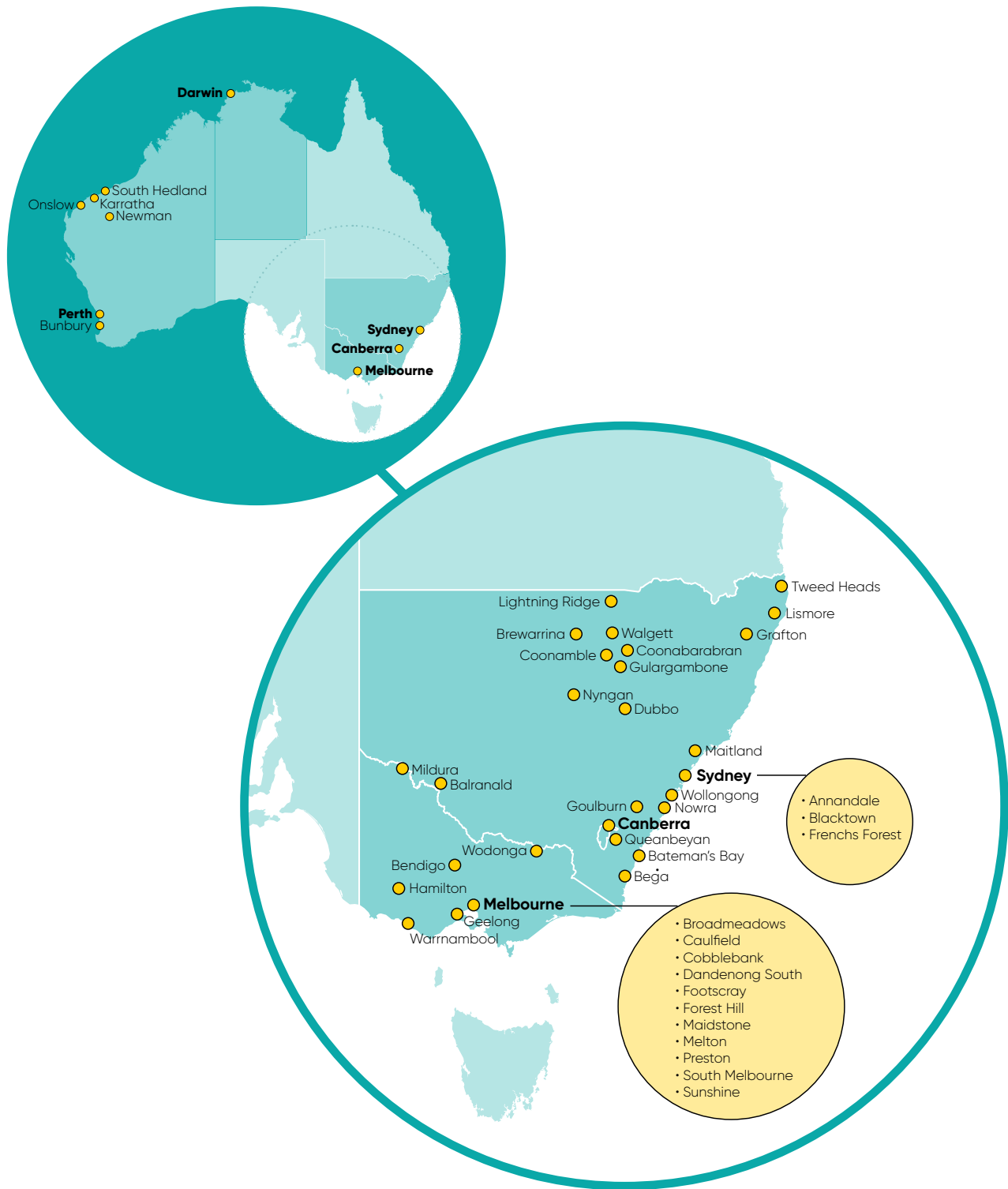


Figure Three: MacKillop Geographical Locations



## Supporting families

**16,000+**

families supported to stay together

**1,377**

care leavers supported to access records relating to their childhood

**831**

women and children experiencing family violence and homelessness were supported by McAuley Community Services for Women



## Safe homes for young people

**358**

young people at risk of homelessness provided accommodation and support

**2,034**

young people supported in foster care

**1,032**

young people supported in residential care

**36**

young people supported to live independently



## Collaborating with schools to enhance outcomes

**40**

schools supported by The MacKillop Institute to implement the ReLATE model, reaching over 13,000 students

**400**

teachers trained in 6 schools to strengthen prevention and responses to child sexual exploitation, harmful sexual behaviours and dating violence through Power to Kids in Schools

**700+**

secondary schools supported with loss and grief education and support by the Seasons for Life initiative



## Access to education

**160**

students enrolled at our schools

**873**

young people connected to education through our engagement programs

**418**

students assisted with therapy dogs through Paw Pals



## Partnering for greater impact

**600+**

residential care workers trained in Power to Kids

**20+**

partnerships with Aboriginal Community Controlled organisations

**4**

new organisations committed to implementing the Sanctuary trauma-informed model

## Supply Chains

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.

The key types of goods and services MacKillop sources remains similar to previous Reporting Periods. However, we have adopted a risk based approach to managing our supply chains, with a focus on our high risk categories. Our Due Diligence process with those suppliers is aimed at developing a better understanding of the Modern Slavery Risks within their supply chain.

Our long term aim is to progressively develop a supply chain map to better demonstrate the geographic location and nature of products and services sourced. We are also working with ACAN to leverage the network and Sedex platform to aid in this exercise.

## 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 and our clients.

Our organisational risk framework incorporates the potential risks of Modern Slavery practices across our operations and supply chains.

As part of our assessment, MacKillop adopts the risk categories outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"), being risks that may *cause, contribute to, and/or be directly linked to* Modern Slavery practices. The Guidance Report also identifies that risks can arise due to the sector/industry, types of products and services, geographic locations, and business models that businesses operate within.

In reviewing the services we deliver, and the goods and services we procure, we remain of the view that while our operations do not cause or contribute to Modern Slavery practices, we may be directly linked to Modern Slavery risks through our supply chains.

Our assessment of Modern Slavery Risks based on the sector/industry and types of products and services we procure in are outlined below and this is where most of our efforts are focused.

### Operational Risks

We employ approximately 2,200 staff, operating from over 200 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 200 migrant workers (workers on a Temporary Visa in Australia). Our Human Resources Team is responsible to ensure 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, some of which are migrant workers. During the Reporting Period, labour hire agency and recruitment costs remained our largest spend category from prior years, with spend of approximately \$32,281,668 and approximately 23 suppliers. 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, referenced above (page 14). During the Reporting Period, there were significant efforts made to reduce MacKillop's risk around Labour Hire. A number of improvements were introduced across the organisation, as outlined in Table Five (page 20).

In addition to our staff, we have almost 850 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 across all categories of our workforce.

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, as outlined in Table Three (page 20).

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. In the Reporting Period, MacKillop conducted a number of Internal Audits to review and improve management of our conflicts of interest, declaration of gifts and fraud and corruption processes.

## Supply Chain Risks

MacKillop is committed to developing systems and processes to improve the management of 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 worked to embed its Category Management Strategy, which focuses MacKillop's efforts on suppliers with a higher Modern Slavery risk in their supply chains (refer to Table Three, page 20),

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 2024, MacKillop had annual revenue of over \$296 million.

During the Reporting Period, MacKillop's total spend was \$117,653,638 with over 3579 suppliers. Table Three provides a breakdown of the number of suppliers and spend amount in each of MacKillop's spend brackets.

Spend Bracket	Number of Suppliers	Total Spend
Under \$1,000	1412	\$658,663
Between \$1,000 and \$4,999	1206	\$2,840,595
Between \$5,000 and \$9,999	328	\$2,308,647
Between \$10,000 and \$49,999	415	\$8,778,033
Between \$50,000 and \$99,999	79	\$5,445,432
\$100,000 plus	139	\$97,622,268

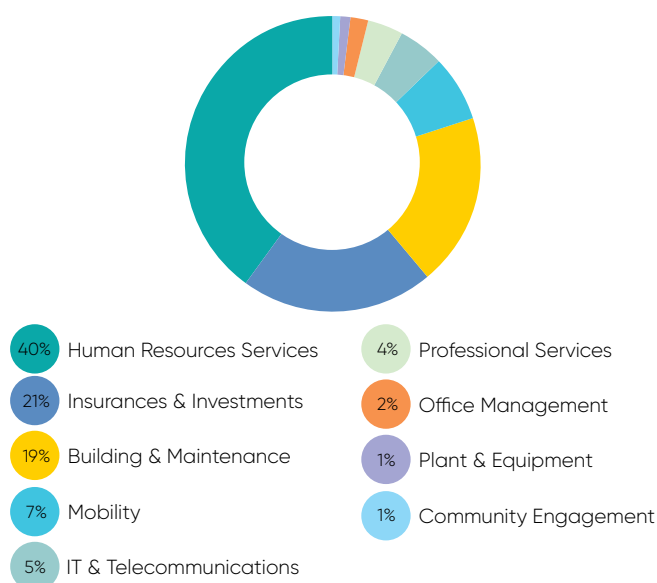
**Table One: Break-down of Suppliers by Spend Bracket**

### Addressable Spend

MacKillop's 'Addressable Spend' captures spend relating to our nine main Procurement Categories and forty-five Sub-Procurement Categories. For the purpose of our category management, a number of expense types are excluded, such as client costs, partnership costs and fixed costs, such as rent.

Addressable Spend makes up nearly 80% of our total spend. During the Reporting Period, the total Addressable Spend analysed via our spend management platform was \$93,470,459 spread over 2,399 suppliers. MacKillop spent \$100,000 ("Materiality Threshold") or more with 114 Suppliers within Addressable Spend Procurement Categories. This analysis enables us to identify more accurately our significant suppliers and conduct effective supplier relationship management processes.

Addressable Spend at MacKillop has been identified in the following Procurement Categories:



**Graph One: Main Procurement Categories (Addressable 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 Addressable Spend.

Category Main	Category Sub	Risk Rating	%
Human Resources Services	Agency Costs	High	34.54%
Insurances and Investments	Investments	High	13.91%
Buildings and Maintenance	Buildings at Cost	High	9.55%
Insurances and Investments	Insurance Workcover	Low	7.01%
Mobility	Vehicles Purchased	Medium	5.14%
Buildings and Maintenance	Buildings Maintenance	High	4.75%
Professional Services	Consultancy Costs	Low	3.27%
Human Resources Services	Contractors	High	2.32%
Buildings and Maintenance	Utilities	Medium	1.60%
Information Technology and Telecommunications	Hardware	High	1.50%
Human Resources Services	Training Courses	Low	1.46%
Information Technology and Telecommunications	Computer Repairs / Maintenance	Medium	1.40%
Buildings and Maintenance	Cleaning Services and Materials	High	1.27%
Information Technology and Telecommunications	IT Consultancy / Contractors	Low	1.06%
Mobility	Motor Vehicle Repairs/Tyres/Fuel	Medium	1.04%

**Table Two:** Procurement Category Sub-Categories as a percentage of Addressable Spend (Top 16)



## 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. Investments
- c. Buildings Maintenance
- d. ICT Hardware
- d. Cleaning Services and Materials

### Agency Costs (Labour Hire)

MacKillop spent over \$32 million with 23 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 Three (page 20).

### 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.



### Investments

Investments are considered a high Modern Slavery risk due to the complexity of global supply chains, which often span multiple sectors/industries and geographical locations. High-risk industries, the lack of transparency and weak enforcement of labour laws in some regions are particularly vulnerable to exploitative practices and can allow Modern Slavery to exist and persist. Investors need to be mindful of those risks to avoid inadvertently supporting Modern Slavery practices by recognising these risks and implementing robust due diligence, monitoring and ethical investment strategies.

MacKillop has an established Investment Procedure, which is annually reviewed by the Board Finance and Investment Committee that sets out our investment guidelines and processes outlining our commitment to the principals of responsible investment. This includes the application of the United Nations Principles of Responsible Investing (UNPRI) to guide decisions on ESG issues and underlying managers.

Information and Communication Technology (ICT) Hardware

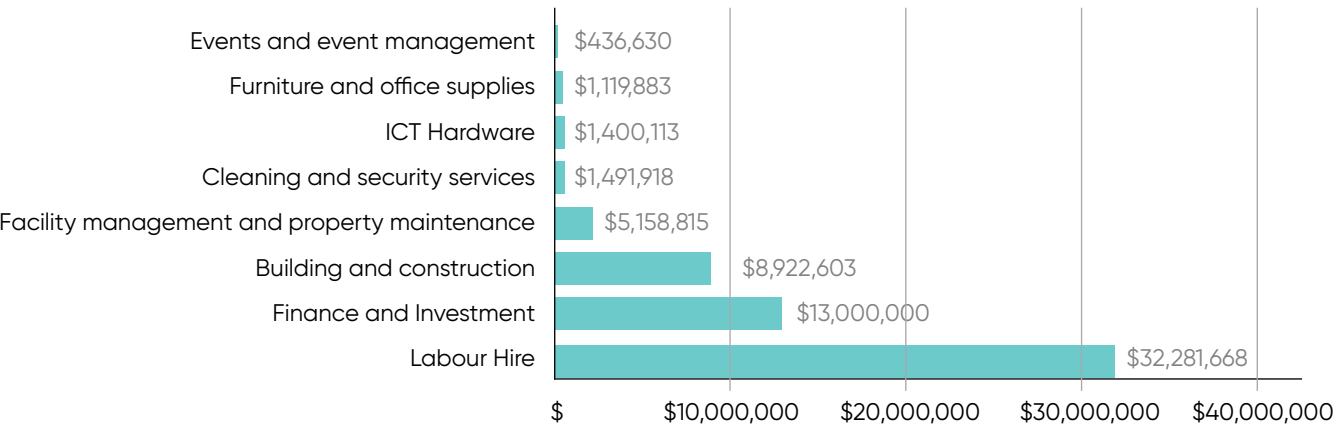
ICT hardware including computers, phones and computer peripherals are purchased through our Corporate Services IT team. During the Reporting Period we purchased over \$4.8 million in ICT related goods and services including \$1.4 million on hardware. According to the 2018 Global Slavery Index, electronics 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

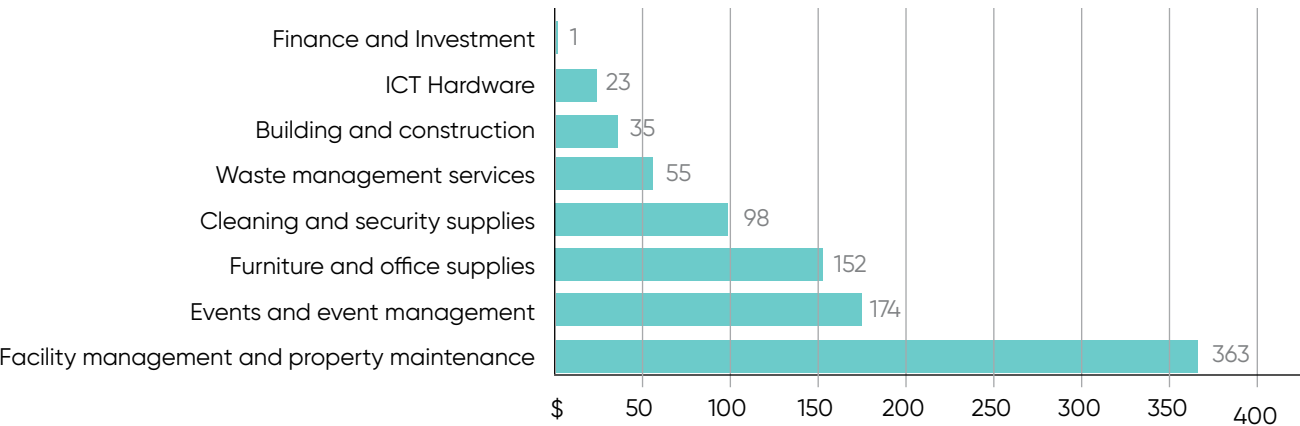
Cleaning services and materials comprises a significant part of our facilities maintenance costs. During the Reporting Period, MacKillop spent a total \$1.2 million for cleaning service providers and cleaning materials. The cleaning sector typically employ low skilled (often migrant) workers who face 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.

Risks within MacKillop’s Main Procurement Categories and Supply Chains According to ACAN’s Risk Category Taxonomy

In addition to MacKillop’s own category management analysis above, we have also reviewed our high-risk categories based on ACAN Risk Category Taxonomy. Below is a breakdown of our spend and supplier numbers aligned to the ACAN Risk Category Taxonomy.



Graph Two: High Risk Categories Spend According to ACAN Risk Category Taxonomy



Graph Three: High Risk Categories Number of Suppliers According to ACAN Risk Category Taxonomy

# 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 2024-2027

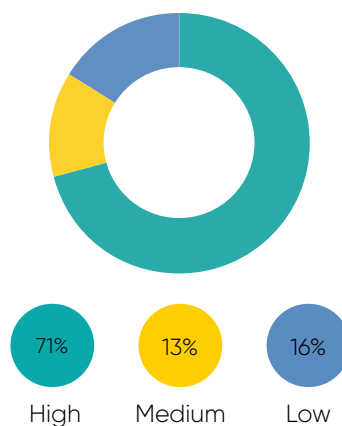
Implementation of our Procurement Strategic Plan 2024-2027 commenced in 2024. A key focus of the plan is Supplier Relationship Management (SRM) and taking a systematic approach for evaluating and managing our suppliers. In the context of Modern Slavery, a key aspect of our SRM is Risk Management. Through better interactions between the supplier and our organisation, we are aiming to identify and mitigate risks associated with the supply chain - including modern slavery risks - more effectively.



## 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.

### Addressable Spend Risk Rating



Graph Four: Spend risk rating as a percentage of total addressable spend

Sourcing Process

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. Modern Slavery considerations have been incorporated in sourcing processes and supplier contractual terms.

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.



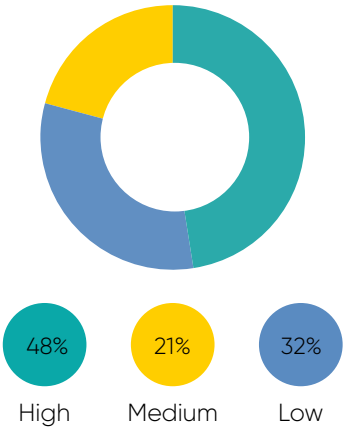
Supplier Relationship Management and MacKillop’s Materiality Threshold

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. 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 107 suppliers in Addressable Spend Procurement Categories.

A high-level risk identification of the 107 suppliers was completed using the ACAN Risk Taxonomy for the basis of the risk rating into High, Medium and Low, the percentage of suppliers in each of these risk rating categories is shown in Graph Four below.

Key Supplier Risk Rating



Graph Five: Risk Rating – Suppliers Over Materiality Threshold (107 Suppliers)

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 Modern Slavery Risk Management Program

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 that support due diligence processes on suppliers.

Supplier risk management and engagement steps are shown below and result in suppliers being placed on a pre-qualified directory. Further due diligence actions includes verification of data and monitoring.

ACAN Supplier Survey Issued	Completed ACAN Supplier Survey	Sedex Invitation (if applicable)
<ul style="list-style-type: none"> <li>MacKillop to advise Suppliers of ACAN involvement</li> <li>MacKillop to provide list of suppliers and emails</li> <li>ACAN to email electronic ACAN Supplier Survey</li> <li>ACAN to monitor and issue reminders</li> </ul>	<ul style="list-style-type: none"> <li>Completed ACAN Supplier Surveys assessed by ACAN</li> <li>Recommendations made to MacKillop for next steps</li> <li>Further follow up required</li> <li>Identified for SEDEX onboarding</li> <li>No further action required</li> </ul>	<ul style="list-style-type: none"> <li>Suppliers invited to join Sedex by ACAN</li> <li>Accepted invitations and completed assessments reviewed by MacKillop</li> <li>Non-compliant suppliers discussed with stakeholders</li> </ul>
2,962 individual ABNs invited	243 supplier responses	41 suppliers joined Sedex

Figure Four: MacKillop and ACAN Supplier Risk Management and Engagement 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, as outlined in Table Three (Page 20).



## 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 continue to undertake reviews of our current policies and procedures relating to safe, fair and ethical work practices to ensure they reflect our efforts, responsibilities and oversight for managing modern slavery risks. This included the review and amendment of our existing Whistleblower policy and procedure.	Number of policies and procedures reviewed.
Deeper analysis of suppliers over the Materiality Threshold in high-risk categories has: <ul style="list-style-type: none"> <li>• improved supplier risk assessment, compliance, due diligence and onboarding processes.</li> <li>• increased stakeholder awareness of Modern Slavery and Procurement Risks with management and the Executive Team.</li> <li>• Greater visibility of supplier spend and performance</li> <li>• Stronger engagement between key personnel involved in purchasing activities and suppliers.</li> </ul>	Number of stakeholder engagement meetings. Number of suppliers being assessed, reviewed and managed. Number of suppliers under contract. Number of suppliers being managed.
Procurement Reporting Dashboards have been created and reviewed at quarterly stakeholder meetings. This has enabled a review of supplier performance and compliance along with any necessary action planning.	Procurement Dashboard Reports issued.
Key personnel involved in purchasing activities and supplier relationships, have been identified and issued with Modern Slavery training.	Number of staff trained.
Procurement continues to engage with stakeholders for better procurement practices including opportunities for tenders incorporating our social responsibility evaluation criteria and due diligence process.	Number of procurement activity involvements.
Implementation of our Procurement Strategic Plan 2024-2027 commenced in 2024 with a key focus on Supplier Relationship Management.	Actions completed according to annual Work Plan.
Raising awareness of Modern Slavery through regular communications aligned to relevant Modern Slavery theme days.	Number of communications published.

Action/ Achievement	Measuring Effectiveness
A Modern Slavery Procedure including documented grievance and remediation processes has been drafted for review, approval and communication.	Procedure implementation.
Participating in monthly ACAN Modern Slavery Working Group webinars and related tasks.	Number of webinar attendances and task completions.
A Modern Slavery Remedy Pathway Flowchart based on the Domus 8.7 process has been drafted review, approval and communication.	Process flow implemented.
MacKillop's Modern Slavery Working Group participated in an experimental research project relating to grievance mechanisms. This experiment was aimed at testing practical solutions in grievance mechanisms and producing actionable insights to support organisations.	Better awareness and tools to address grievance issues.
The Legal and Governance Team commenced an organisation wide Agreement Audit to identify gaps in contracting practices and worked with stakeholders to introduce contracts where necessary.	The number of contracts renewed or executed. Decrease in spend not under contract.
Developed dashboard reports on MacKillop's Agreement Register and commenced reporting to the Executive Team.	Number of reports issued.
Labour Hire Review: Engagement with Labour Hire Agencies was reviewed to address compliance requirements, visa requirements for workers and fees.	Number of Labour Hire Agencies reviewed.
Organisation wide Recruitment Initiative: MacKillop undertook an extensive recruitment initiative to hire permanent staff into 'vacant lines' for shift workers and therefore reduce reliance on Labour Hire.	Number of 'vacant line' shifts filled.

**Table Three:** Achievements in Reporting Period 2024

## 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 Criteria 5):

Pillar	Action for 2025
<b>Business Process and Governance</b>	<ul style="list-style-type: none"> <li>Accountabilities and responsibilities for modern slavery are integrated into position descriptions and employee code of conduct.</li> <li>Review the Modern Slavery Working Groups Terms of Reference along with the cross-functional team members participating in the working group.</li> <li>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.</li> <li>Extend the quarterly Board Audit and Risk Modern Slavery Report to the Executive Leadership Team.</li> <li>Extend the Agreement Register Report to the Audit and Risk Committee and Board.</li> </ul>
<b>Operations</b>	<ul style="list-style-type: none"> <li>Strengthen due diligence processes for selecting recruitment agencies with an emphasis on understanding specific risks and ensure they comply with a zero-tolerance policy for modern slavery.</li> <li>Review and assess our processes for Workforce Management and Monitoring of indirect workers.</li> </ul>
<b>Supply Chain</b>	<ul style="list-style-type: none"> <li>Continue to review and refine our supplier risk management processes and introduce systematic approach to our supplier engagement, including in relation to modern slavery.</li> <li>Incorporate a Supplier Risk Register in our Procurement Risk Register for high-risk suppliers and details documenting the risk management approach taken.</li> </ul>
<b>Worker Engagement</b>	<ul style="list-style-type: none"> <li>Further enhancing our Labour Hire Due Diligence processes by establishing criteria for assessing labour service providers against required labour standards before engagement. This includes evaluating their recruitment practices, working hour policies, wages to workers and accommodation provisions.</li> </ul>
<b>Entity's Program and Activities</b>	<ul style="list-style-type: none"> <li>Incorporate ACAN Program Manager services for comprehensive support, including annual action planning, MSWG participation, and expert advice on modern slavery issues, decisions, and crisis management.</li> </ul>
<b>Grievance Mechanisms and Remediation</b>	<ul style="list-style-type: none"> <li>Develop and communicate a defined procedure and process flow for responding to any identified Modern Slavery risks.</li> </ul>

Table Four: Future Goals for 2025

## 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 strong framework for staff to participate and influence decisions that affect them.

One of the Tools used as part of MacKillop's trauma-informed care model Sanctuary is the S.E.L.F Model, where staff are engaged to share and contribute to decision making. S.E.L.F, representing Safety, Emotions, Loss and Future, is one of the Four Pillars of the Sanctuary Model and can be used in a variety of settings such as Supervision, Team Meetings, Debriefs, Red Flag meetings, Care and cultural support planning. The S.E.L.F model is designed to help an organisation understand and process many of the complex changes that happen in its environment.



Figure Five: Sanctuary S.E.L.F. Model

## 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.

We were pleased to support ground-breaking experimental research by RMIT University testing practical solutions to improve remediation of Modern Slavery in supply chains. Supporting this kind of research is vital to continuous improvement and is an expression of our commitment to going beyond compliance to actively participate in impactful change.

# 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 and the key initiatives and actions outlined in Achievements (page 20), Table Five, outline the actions and achievements undertaken during the Reporting Period and how we monitored, reported and evaluated the effectiveness of those actions.

## 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 drafted a Modern Slavery Procedure and Process Flow document 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. To date, our Board, the Executive Team and Managers have been trained. All MacKillop staff have also been invited to participate in the training. During the Reporting Period, we undertook a targeted approach in our training schedule by issuing training to MacKillop staff who were identified as participating in the purchasing process in high-risk categories of goods and services.

Our Learning and Development team have created an automated weekly report showing employee training completion status, thereby enabling the organisation to track and monitor the 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

MacKillop continues to utilise ACAN's Maturity Assessment tool in supporting our Modern Slavery Risk Management approach. The Maturity Assessment is used to identify key areas of our operation and potential actions to consider when looking for continual improvement.

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.

A scoring analysis by pillar comparison of our 2023 and 2024 periods, has shown an improvement in our overall maturity score. This is further demonstration of the effectiveness of our Risk Management Program and improvements being made.



## ACAN Baseline Data

Part of our annual maturity assessment processes is completing an annual questionnaire and inputting key modern slavery metrics. This data is then extracted in the below report where it is used to track and assess the performance of key components in our modern slavery risk management processes.

	Activity	2023	2024
<b>Internal / Staff</b>	Hours spent on modern slavery activities	320	330
	Individual staff completing e-learning	30	50
	E-learning modules completed	90	116
<b>External / Supplier Engagement</b>	Number of suppliers with visible contact information and ABN	4181	2962
	Number of suppliers across high-risk categories	746	409
	Number of ACAN Supplier Surveys completed	199	243
	Invited to join Sedex	74	52
	Sedex SAQ completed	3	15
	Social audits	1	0
	Corrective actions	0	0
<b>Domus 8.7 External Referrals</b>	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 remedied	0	0

**Table Seven: MacKillop's Baseline Data for 2023-2024**

## 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 2024 - Reflection for the Feast Day of St Josephine Bakhita and International Day of Prayer and Awareness against Human Trafficking:**  
Reflection for the Feast Day of St Josephine Bakhita and International Day of Prayer and Awareness against Human Trafficking. This communication included material regard to our modern slavery strategy and sustainability strategy.
- b. 20 February 2024 - World Day of Social Justice:**  
Staff were invited to connect with our MacKillop Purpose Statement and our MacKillop Values.
- c. 12 June 2024 - Reflection sent for World Against Child Labour and a commitment to End Child Labour:**  
Reflection sent for World Against Child Labour and a commitment to End Child Labour. The alignment between our Modern Slavery actions, Sustainability Strategy and core services were communicated.
- d. 18 - 24 June 2024 - Refugee Week:**  
The theme for Refugee Week in 2024 was Finding Freedom - Family. To unconditional love. To strength in times of adversity. To unwavering bonds.
- e. 7 - 13 August 2024 - 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. 9 September 2024 - Modern Slavery Statement:**  
Communications issued detailing the publication of our latest statement. The communication also included a call out to all staff to complete the Modern Slavery training modules to gain a better understanding of Modern Slavery in today's world.
- g. 29 September 2024 - 110th - World Day of Migrants and Refugees:**  
We asked for a commitment to walking alongside migrants and refugees.
- h. 11 October 2024 - 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 was "Girls' Vision for the Future". Staff were sent information and resources on the awareness day.
- i. 25 November 2024 - International Day for the Elimination of Violence Against Women:**  
We joined the global community for the United Nations 16 days of activism which began on 25th November. Over this campaign we were asked to reflect on women of our own communities; the places where we live and work; the women whose lives are connected to ours.
- j. 2 December 2024 - Communications issued for the UNs International Day for the Abolition of Slavery:**  
This communication highlighted an AFP report highlighting the types of modern slavery and the instances reported in the 2023-24 period.
- k. 10 December 2024 - Human Rights Day 2024:**  
The theme Our Rights, Our Future, Right Now.

## 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

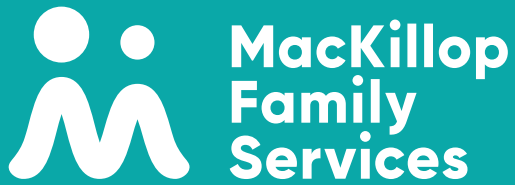
### Attendance at External Forums

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 Forums, 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](mailto: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 (LGBTIQA+) have the right to be safe.

[mackillop.org.au](http://mackillop.org.au)







## ***2024 Modern Slavery Statement***



**1 January – 31 December 2024**

**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 (ABN 76654014794). It covers the following 12 colleges:

Assumption Catholic College, Kilmore VIC, ABN 85 917 803 177  
Lavalla Catholic College, Traralgon VIC, ABN 74 453 482 885  
Marcellin Catholic College, Bulleen VIC, ABN 77 413 001 496  
Marist College Ashgrove, Ashgrove QLD, ABN 13 937 359 780  
Marist College Bendigo, Bendigo VIC, ABN 48 218 856 996  
Marist College Canberra, Pearce ACT, ABN 62 466 078 521  
Newman College, Churchlands WA, ABN 34 822 196 385  
Red Bend Catholic College, Forbes NSW, ABN 70 721 984 562  
Sacred Heart College, Adelaide SA, ABN 52 010 674 805  
St Gregory's College, Campbelltown NSW, ABN 42 940 977 322  
St Joseph's College, Hunters Hill NSW, ABN 75 236 399 077  
The John Berne School, Lewisham NSW, ABN 68 159 428 251

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Mascot NSW 2020

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**Marist Schools Australia  
2024 Modern Slavery Statement**



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## Foreword, Approval and Signature

Marist Schools Australia Limited (MSA Ltd) recognises its fundamental responsibility to respect the dignity of all people through identification of practices in modern slavery within operations and supply chains in which it engages. This commitment is consistent with MSA's worldview which is informed by 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, and presents the face of Jesus Christ to those whom we seek to serve. 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.

MSA's stance on modern slavery acknowledges the potential impact of commercial activities on vulnerable populations. We are dedicated to taking practical measures to mitigate risks within our operations and supply chains. We 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 a vital part of 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 circular portrait of Professor Brother David Hall, a man with glasses and a mustache, smiling. Below the portrait is his handwritten signature in black ink.

Professor Brother David Hall fms  
Board Chair

A circular portrait of Dr Frank Malloy, a man with a balding head, smiling. Below the portrait is his handwritten signature in black ink.

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 25 June 2025.

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 2024.



St Marcellin Champagnat with school children and parents.

### **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 twelve schools across Australia.

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 six 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 include education through both a single sex and co-educational setting from Kindergarten/Foundation to Year 12.

Since January 2022, MSA Ltd has been responsible for:

- ensuring, as a priority, that the twelve Colleges, which they govern, manage and operate, follow modern, best-practice governance. This ensures compliance with Australian laws (including education regulations) and provide



a safe and supportive learning environment that reflects Catholic education and Marist values.

- offering formation, professional development programs, staff training, and youth ministry resources to fifty-six schools in total, acknowledging that many of them are governed by separate diocesan or other authorities.

The Marist School's Australia Limited's annual turnover for 2024 was \$464,438,555.



The oldest Photo of a Marist Brothers Community in Australia

## **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 is 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 fifty-six schools across Australia that operate in the Marist tradition and who are part of the Marist Schools Australia Network. MSA Ltd directly governs twelve schools Australia-wide including in New South Wales, Queensland, Victoria, South Australia, Australian Capital Territory and Western Australia.

In 2024, the Board of MSA Ltd comprised ten directors.



The MSA Ltd Board of Directors;

- set the strategic direction of MSA Ltd
- provide governance of the education ministry's operations
- oversee the operational framework and management of MSA Ltd and associated schools
- appoint, support and guide the National Director/Executive Officer 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 the National Director to manage the education ministry's operations.

The role of National Director includes;

- putting into action the strategies and policies determined 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 twelve 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 College. The College Principal has the delegated authority and responsibility of the day-to-day management of the College from the National Director.

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

### **Governance of Modern Slavery Risks and Compliance**

MSA Ltd has an executive level advisory group, the Modern Slavery Working Group (MSWG), whose role is to ensure modern slavery risks within the education ministry are identified and controlled. The MSWG is composed of the National Director, Head of Business and Head of Governance, Risk and Legal. Meetings are held quarterly.

The MSWG liaises with Principals, College business managers and human resources managers, who have responsibility for managing modern slavery risks at the school level. College business managers and HR managers provide supplier and people information to the MSWP for risk analysis.

The MSWG provides advice for the development of modern slavery risk policy, which is submitted to the MSA Ltd board for approval. The MSWG provides advice relating to risk identification and control recommendations for the MSA Ltd risk register.



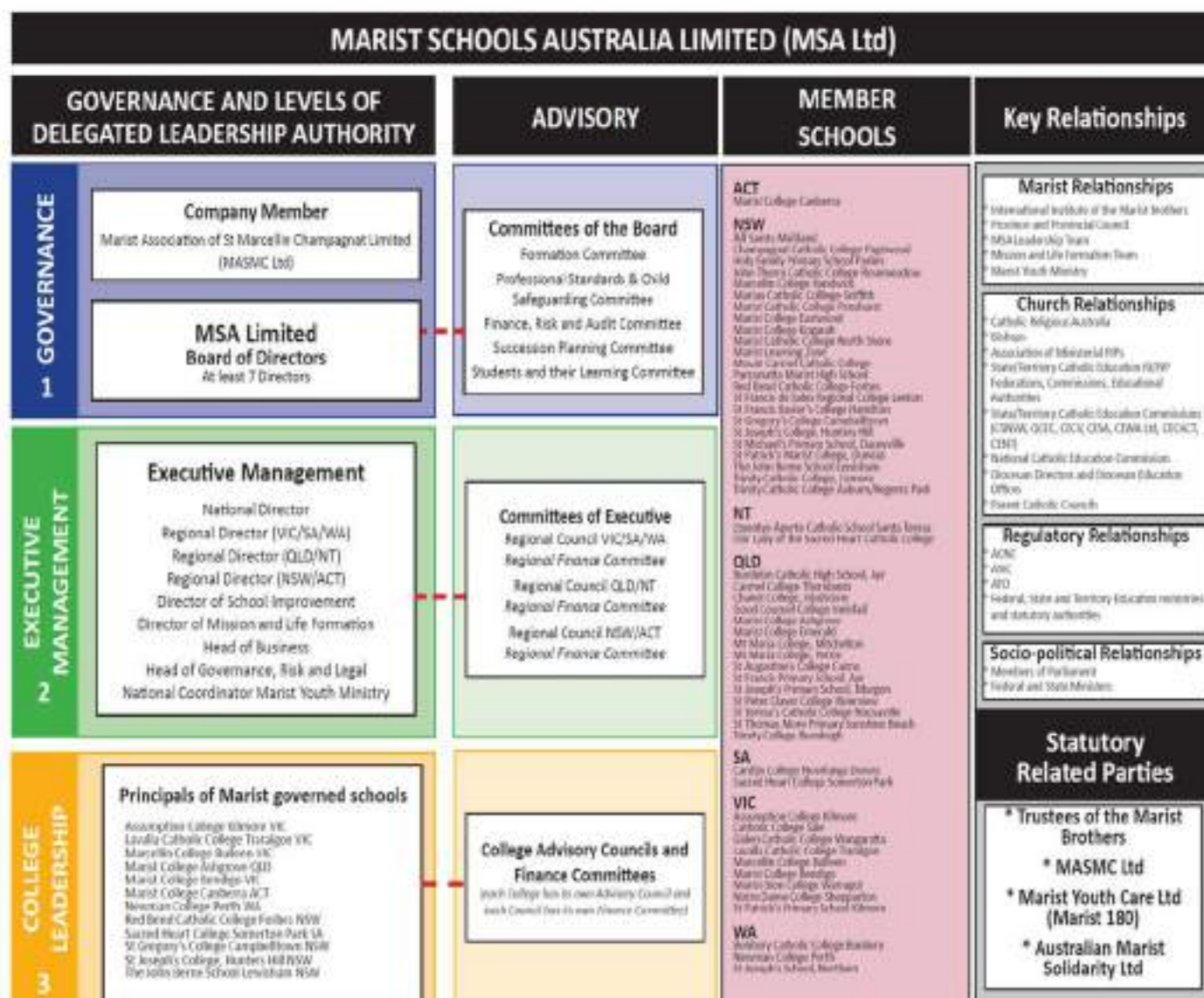


St Joseph's College, Hunters Hills



Red Bend Catholic College, Forbes

## Organisational Structure



MSA Ltd provides education for 16,007 students, supported by 2,101 staff consisting of 1,257 teaching staff and 844 other staff.

MSA Ltd's annual turnover for 2024 was \$464m. Income from the Colleges includes 47% 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 49% 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 Ltd's primary focus is on Catholic teaching and learning. Its strategic priorities are:

- Catholic identity and Marist spirituality
- Learning and teaching in the Marist way
- Governance and strategic leadership
- Student and staff wellbeing

To support these strategic priorities, MSA Ltd's operations include:

- improvements in facilities and resources with over \$75m in capital projects being undertaken in 2024, including major upgrades of boarding facilities in two Colleges to provide further boarding opportunities. 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
- use of a diverse network of goods and services engaging contractors and subcontractors for catering, cleaning, gardening, waste management, building, and facilities maintenance tasks
- investment of funds set aside for Long Service Leave and other longer term purposes which are subject to investment policy requirements, including ethical considerations
- development and execution of formation programs for staff and students, including targeted programs and professional development for Principals, Deputy and Middle Leaders
- compliance and risk management, and assistance with handling of College level incidents

## **MSA Ltd Workforce Profile**

MSA Ltd employs College leaders, teaching staff, administrative staff and executive management. Through its Colleges, it also engages contractors to support services including property maintenance, hospitality, security, waste management and uniform supply. It seeks to uphold standards of Catholic Social Teaching through its workforce and to provide to all people a safe environment. Management of the MSA Ltd workforce is in accordance with various Enterprise Agreements and through fair, equitable and transparent contract arrangements.



## MSA Ltd Supply Chain

Purchases and engagement of contractors and suppliers are made at a local level due to geographical diversity, to ensure alignment with local market value and optimisation of cost. MSA Ltd exercises control through policy requirements including financial spending limitations for Principals and MSA Ltd approved budgets.

MSA Ltd contracts include terms and conditions relating to modern slavery and standard contracts for major works contain explicit anti-slavery clauses.

### **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.
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.

3. These workers may face language barriers, lack of awareness of their rights, and limited access to legal recourse.
4. **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.
5. **Subcontracting Practices:** Subcontracting is common in the construction industry, leading to fragmented supply chains and reduced transparency. A lack of oversight, monitoring and verification of worker conditions contributes to an environment where people are at-risk of modern slavery.
6. **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.



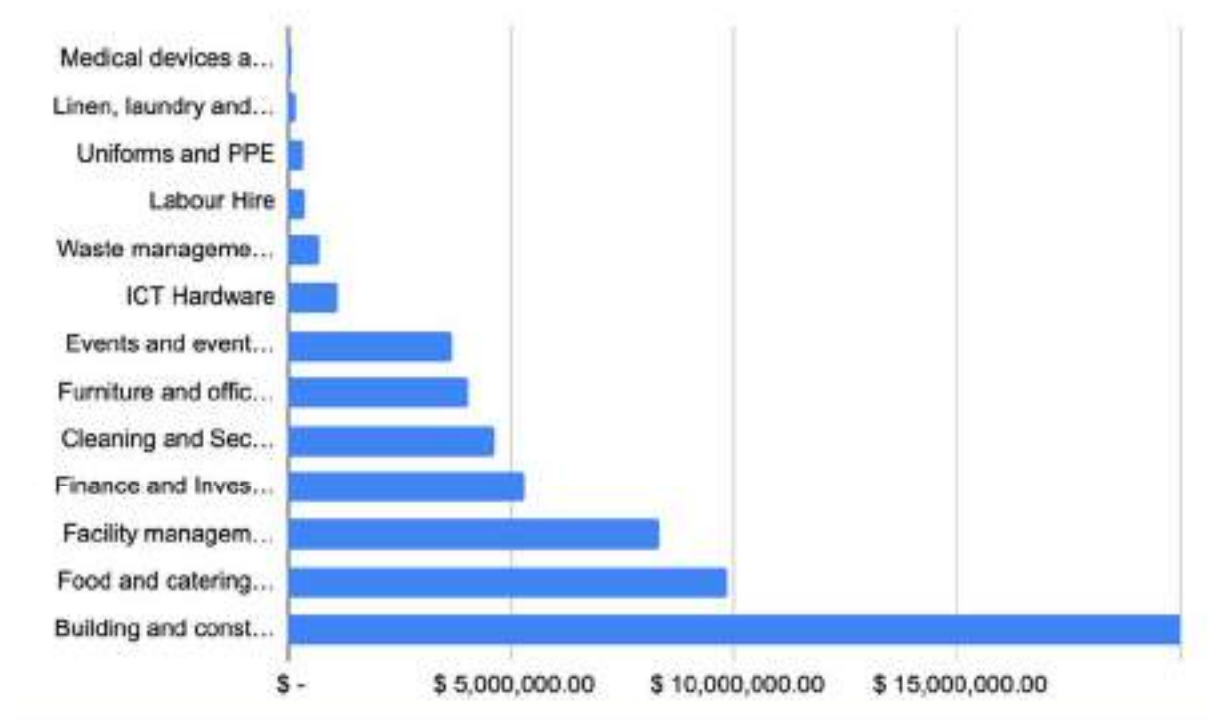
Marcellin College Bulleen

### Analysis of Recurrent and Capital Procurement in 2024 Across Our Schools

<b>Risk Category</b>	<b>Supplier Taxonomy</b>	<b>% of Total</b>	<b>No of Suppliers</b>
High	Building and construction	40%	191
High	Cleaning and Security	3%	58
High	Events and event management	2.5%	308
High	Facility management and property maintenance	6%	537
High	Finance and Investment	4%	40
High	Food and catering services	7%	300
High	Furniture and office supplies	3%	650
High	ICT Hardware	1%	23
High	Labour Hire	0.3%	21
High	Linen, laundry and textile products	0.1%	27
High	Medical devices and supplies	0.6%	31
High	Uniforms and PPE	0.25%	63
High	Waste management services	0.5%	25
High	Education & Training	3%	165
Medium	Advertising & Marketing	0.4%	67
Medium	ICT Software and network services	4.7%	244
Medium	Utilities	1.6%	35
Medium	Fleet management, consumables and maintenance	1.3%	93
Medium	Travel and accommodation	5%	201
Medium	Print / Mail Provider	0.7%	49
Low	Professional services	8%	697
Low	Financial expenses	1%	14
Low	Government and agency fees	5%	46
Low	Licence/Membership fees	1.3%	256

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 (2024)



#### **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 2024, MSA was a participating member of the Australian Catholic Anti-Slavery Network (ACAN) and extensively utilised ACAN resources in progressing its anti-slavery program and developing its Modern Slavery Policy and Statement. MSA Ltd's membership to 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.

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.

During 2024, MSA undertook the following important anti-slavery actions:

2024 Actions
<ul style="list-style-type: none"><li>• <b>Modern Slavery Policy</b> and anti-slavery program was extended to school level</li><li>• <b>Modern Slavery Working Group</b> continued to meet and included the MSA National Director, Head of Business and Head of Governance, Risk and Compliance</li><li>• Development of <b>responsible investment policies</b> by explicitly covering modern slavery</li><li>• Development of a <b>Risk Appetite Statement</b> to work towards eliminating modern slavery practices in the supply chain and operations of the schools and inclusion of modern slavery risk as one of the MSA <b>macro operational risk</b> areas</li><li>• Standard form building and supplier <b>contracts</b> amended to include anti-slavery clauses</li><li>• Discussions about <b>supplier risk</b> have continued between the MSA Head of Business and MSA School Business Managers during 2024. 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</li><li>• Each of the twelve MSA governed schools provided <b>supplier data</b> for risk analysis</li></ul>



For 2025, MSA has maintained its membership with ACAN and supported by this engagement MSA is undertaking the following actions to evolve its anti-slavery program.

2025 Actions
<ul style="list-style-type: none"> <li>• <b>Modern Slavery Policy</b> and anti-slavery program will continue to be embedded at school level</li> <li>• <b>Modern Slavery Working Group</b> to be expanded to include representation of school Business Managers</li> <li>• <b>Training</b> at Board and Executive level to be undertaken by MSA directors and MSA executives</li> <li>• Continue to <b>assess and monitor emerging modern slavery risks</b> as part of the MSA macro-operational risk assessment</li> <li>• College supplier, spend and workforce <b>data to be collected by MSA for risk analysis</b> in Q4 and Q1 <b>annually</b></li> <li>• Invite high risk suppliers to participate on <b>Sedex</b></li> <li>• Review <b>non-standard supplier contracts</b> with a view to including anti-slavery clauses</li> <li>• Include <b>remediation obligations and expectations in contracts</b> with high-risk suppliers that they must notify and consult with MSA Ltd to ensure victim centred remediation processes are implemented to the satisfaction of MSA Ltd.</li> <li>• Expand school <b>communications</b> and engagement activities to include awareness raising about modern slavery and the preventative actions being undertaken by MSA</li> <li>• Continue to <b>participate</b> in the <b>ACAN</b> Modern Slavery Risk Management Program</li> </ul>

Further, through ACAN, MSA Ltd's **membership to Sedex - the Supplier Ethical Data Exchange**, has supported engagement with suppliers. 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 2025 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

### **Grievance Mechanism and Remediation Pathways**

MSA Ltd's Complaints, Conflict of Interest and Whistleblower Policies are all available on the MSA Ltd website.

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

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

If and where MSA Ltd is directly linked to modern slavery by a business relationship we are committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

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

During 2024, MSA did not receive any complaints, disclosures or concerns relating to modern slavery.



## **Criterion 5: Assessment of the effectiveness of our actions**

MSA is working to embed the principles in the areas of our business that present risk and will continue to review these actions. MSA is working on measures to assess the effectiveness of our actions. As we mature in this space these measures will also mature.

### **Maturity Assessment**

The ACAN Modern Slavery Maturity Assessment provides a score card of MSA Ltd'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 and establish a multi-year action plan.

The maturity score is designed to provide a comprehensive view of MSA Ltd's efforts across 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.

The maturity score for 2023 was 31%. Whilst actions have been undertaken in 2024 to protect against modern slavery, MSA and its Colleges have remained operationally consistent, and as such there have been no material changes that impact the maturity score. Given actions underway in 2025, however, MSA is committed to improving its maturity score and for 2025 will undertake a full reassessment of its maturity level, with the assistance of ACAN.



## 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 holds a quarterly meeting involving the MSA Regional Director, Head of Business, College Principal and business manager at each College to drive operational and finance actions and compliance requirements. This is a structured meeting with a standing agenda, including modern slavery risks, and supplier and workforce data analysis.

### Criterion 7: Other relevant information

No other relevant information











# 2024 Modern Slavery Statement

1 January 2024–31 December 2024



# Acknowledgement of Country

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 Ltd**

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**Website** [www.mercy.edu.au](http://www.mercy.edu.au)

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**ABN** 69 154 531 870

**ACN** 154 531 870

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# Approval statement

Georgina Smith, Board Chair

At Mercy Education, we are committed to upholding the dignity and freedom of every individual, guided by our Catholic and Mercy values of Compassion, Justice, Hospitality, Service, Respect and Courage.

Our commitment to addressing modern slavery is reflected in our policies, our operations, our schools and our engagement with the broader Mercy community. We are dedicated to ensuring that modern slavery is not tolerated in any part of our organisation or its supply chains.



This statement represents Mercy Education's continued pledge to combat modern slavery, as we continue to monitor and refine our approach, ensuring we bring about meaningful change.

With this in mind, I present the Mercy Education Modern Slavery Statement for 2024, in the hope that we can all move forward with greater awareness, accountability, and commitment to justice.

This Modern Slavery Statement was approved by the Mercy Education Board, which is the principal governing body of Mercy Education Ltd as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 20 June 2025.

This modern slavery statement is signed by the Chair as the responsible member of Mercy Education Ltd as defined by the Act.

A handwritten signature in black ink that reads "Georgina Smith". The signature is fluid and cursive.

Georgina Smith  
Board Chair  
Mercy Education Ltd

# About Mercy Education Ltd

Mercy Education is a third sector Catholic organisation responsible for the governance and operation of thirteen Mercy colleges across Victoria, South Australia, and Western Australia. Led by the teachings of Jesus Christ and the vision of Catherine McAuley, foundress of the Sisters of Mercy, we provide services to Catholic schools and have a strong network of affiliated colleges united by the Mercy charism. We are an incorporated Ministry of Mercy Ministry Companions Ltd (MMCL).

Mercy Education is a stand-alone legal entity and is the sole member of Emmanuel College Foundation Limited.

This Modern Slavery Statement covers our 13 Catholic schools spanning across three states. This Statement does not cover schools affiliated with Mercy Education who receive support and professional development whilst 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. Mercy Education Governed Schools are as follows:

## 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

## Western Australia

Mercedes College, Perth  
Santa Maria College, Attadale  
St Brigid's College, Lesmurdie

## South Australia

St Aloysius College, Adelaide

## Our Vision

To enrich a dynamic community of Catholic schools committed to the spirit of Mercy.

## Our Values

Compassion, Justice, Hospitality, Service, Respect and Courage.

# Operations and Supply Chain

The Mercy Education National Office is based in East Melbourne, Victoria. The National Office provides executive level support to both the Board and 13 Catholic schools. This support is focused on strategic and structural matters relating to mission, quality, finance, governance and operations, 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 Governance, Finance and Audit, Risk and Compliance, Education Standards and Effectiveness and Mercy Identity and Mission.

Operational decision-making at each of the 13 schools is the responsibility of the College Principal, who reports directly to the Chief Executive Officer of Mercy Education.



## Our Operations

A snapshot of Mercy Education operations in 2024:

- Mercy Education 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 2024's census, 14,135 students were educated in Mercy Education schools
- In 2024, our youngest school was 87 years old, and our oldest school was 178 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 2024 operations:

- Approximately 1,838 staff worked in full-time or part-time employment across Mercy Education schools
- A further 10 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 7,865 organisations.

## Our Supply Chain, Goods and Services

In 2024, Mercy Education had a total operational turnover of \$346m. As an educational institution, the major element of our expenditure is teaching and support staff whose salaries and employment related cost represented 67% of our turnover.

In terms of non-staffing expenditure, in 2024, Mercy Education spent \$107m on recurrent expenditure and an additional \$52m on capital expenditure.

In 2024 a supplier analysis was undertaken identifying that Mercy Education works with over 7,865 individual suppliers annually. A breakdown of total expenditure by our schools in each supplier category is included below.

## Governance & Risk 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 ethical obligations as people of Mercy).

For these reasons, the Mercy Education Board will always maintain an active role in the supervision of our progress in respect to anti-modern slavery.

The RISKCOM Committee has established the Modern Slavery Working Party: a strategic initiative that convenes quarterly with one representative from each school. This platform fosters discussions on educational opportunities, resources, and curriculum initiatives while reinforcing accountability across supply chains. In 2024, a role description was drafted for Modern Slavery representatives, and this has since been formalised in 2025.

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 supply chains. Our commitment remains steadfast in actively managing these identified risks, enhancing procurement protocols, and establishing robust reporting mechanisms moving forward.

The corporate risk to Mercy Education was reviewed and existing controls were documented:

- Anti-Modern Slavery Working Party (stakeholder consultation) with Anti-Modern Slavery Liaison Officers re-appointed in each school
- Anti-modern slavery training was 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's Supplier Code of Conduct was formally adopted by our major suppliers
- A role description for School Modern Slavery Representatives was drafted (and has since been formalised in 2025).



# Modern Slavery Risks

Mercy Education engages with a total of 7,865 suppliers across various sectors. In 2024, Mercy Education procured \$155 million in goods and services. Of this, 72% (\$111 million) was spent in potentially high-risk procurement categories across 11 categories of suppliers. Our major spend categories are detailed on the following page, along with a breakdown of supplier spend per category. Additionally, Mercy Education has drawn on the Australian Catholic Anti-Slavery Network (ACAN)'s references to categorise the modern slavery risks associated with each procurement category.

## Supplier Spend Breakdown by Risk Category

The table below summarises our procurement activities, categorising supplier spend based on modern slavery risk:

Risk Category	Supplier Taxonomy	Annual Spend	% of Total Suppliers	No of Suppliers
High	Building & Construction	38,778,891	3%	199
High	Financial Expenses	20,105,476	1%	64
High	Facility & Property Maintenance	12,681,282	8%	596
High	Educational Resources	11,935,228	27%	2095
High	ICT Hardware	7,066,355	1%	115
High	Cleaning & Security Services	6,663,213	1%	77
High	Food & Catering Services	3,749,120	2%	178
High	Utilities	3,640,297	1%	68
High	Furniture & Office Supplies	3,064,499	2%	179
High	Uniforms & PPE	2,178,050	1%	50
High	Labour Hire	1,259,234	2%	123
Medium	Travel & Accommodation	8,385,279	2%	178
Medium	ICT Software & Network Services	5,744,141	3%	243
Medium	Unknown	4,573,448	35%	2730
Medium	Advertising & Marketing	1,546,489	2%	142
Medium	Print / Mail Provider	920,936	1%	43
Medium	Plant & Machinery	900,833	0%	32
Medium	Fleet Vehicles Management	708,933	1%	83

Risk Category	Supplier Taxonomy	Annual Spend	% of Total Suppliers	No of Suppliers
Low	Government & Agency Fees	9,691,967	0%	29
Low	Licence & Membership Fees	9,223,567	5%	405
Low	Professional Services	1,875,996	3%	216
Low	Waste Management	356,630	0%	19
Low	Finance & Investment	14,223	0%	1

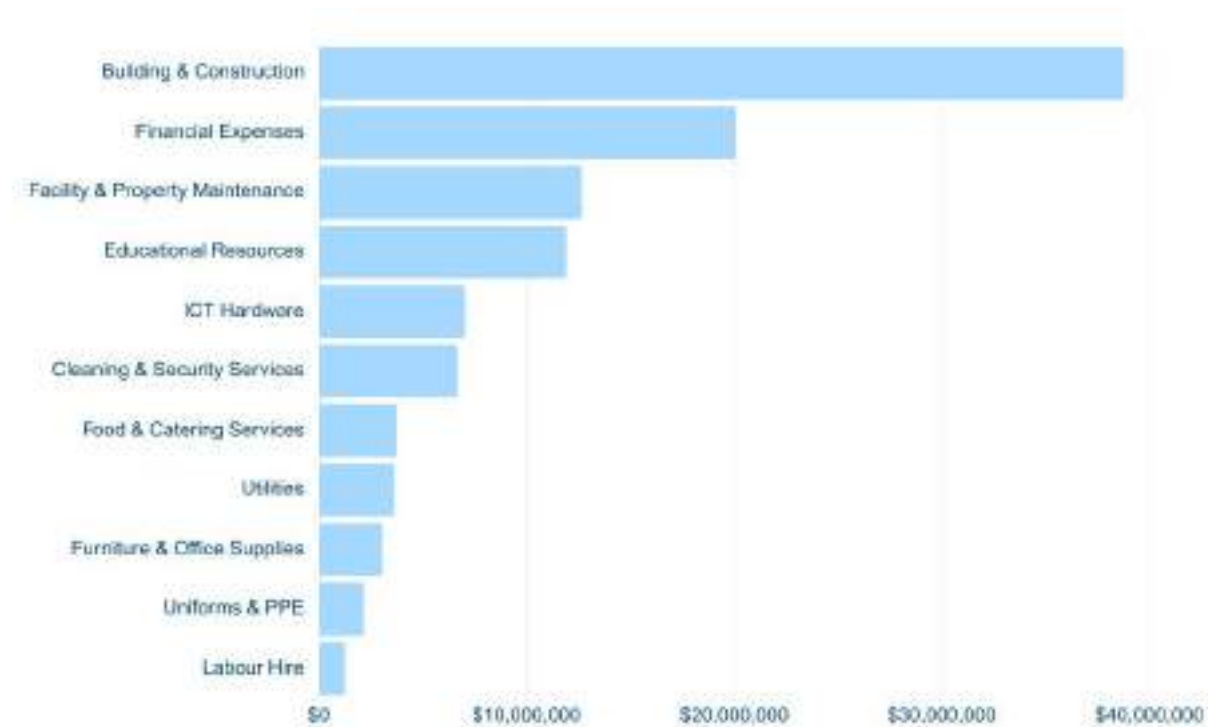
## Supply Chain Risk Assessment

Mercy Education continues to assess supply chain risks using the ACAN procurement category risk taxonomy, which helps identify high-risk industry sectors. This analysis also incorporates:

- commodity and product risks identified in internationally recognised reports on forced labour and modern slavery
- insights from the 2023 Global Slavery Index (GSI) and other relevant Australian and global sources.

By refining our supplier profiling, we have improved our ability to identify modern slavery risks, including risks linked to geographical production locations.

### Top 10 Procurement Areas by Spend (\$M) - 2024



## Key Supply Chain Risks

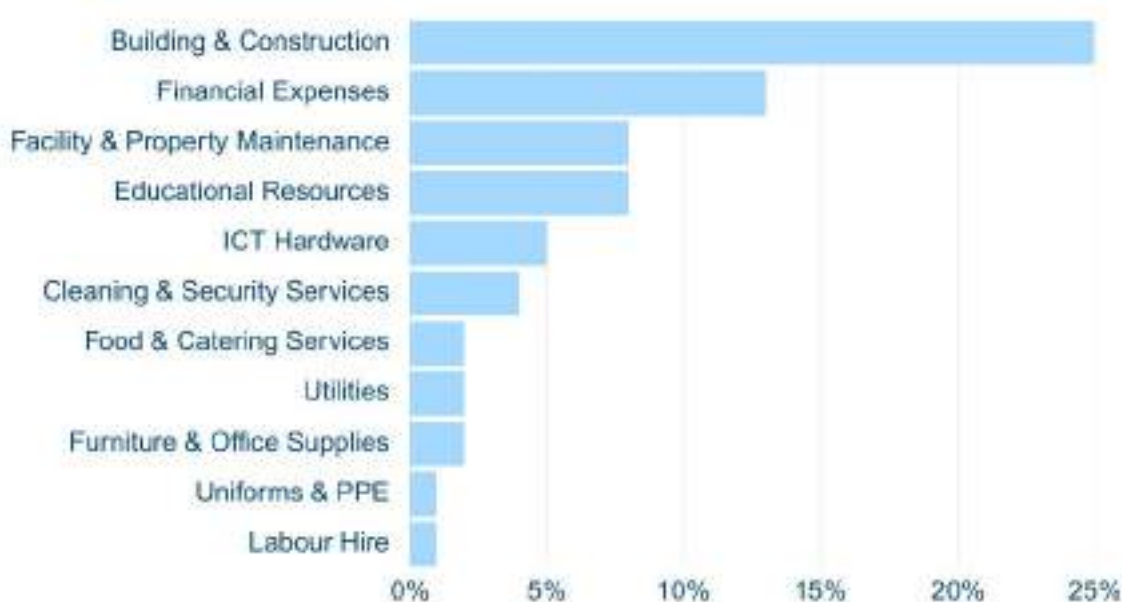
Mercy Education's risk assessment has identified four key procurement areas with an elevated risk of modern slavery:

- Building and construction
- ICT hardware
- Clothing and textiles
- Cleaning and security.

These sectors have been flagged due to their high-risk supply chains, which often involve complex international sourcing and exposure to potential exploitation.

## 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.



## Challenges in Risk Assessment

One of the key challenges in conducting a robust supply chain analysis is the decentralised accounting system across Mercy Education. Each of our 13 schools and the National Office uses different financial software platforms, leading to:

- fragmented data, making risk tracking difficult
- limited visibility over procurement practices
- inconsistent supplier information, impacting our ability to assess modern slavery risks effectively.

To address this challenge, Mercy Education is working towards improving data consistency across all entities, which will enable:

- better risk tracking
- more comprehensive supplier engagement
- enhanced compliance with modern slavery risk management requirements.

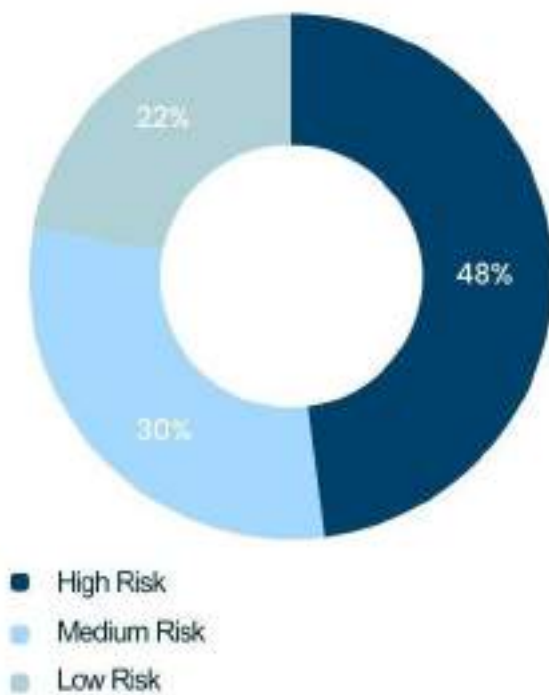
## Modern Slavery Risk Metrics

To quantify and prioritise our risk management efforts, Mercy Education has assessed supplier spend using risk indicators. The following metrics provide insight into our high-risk exposure:

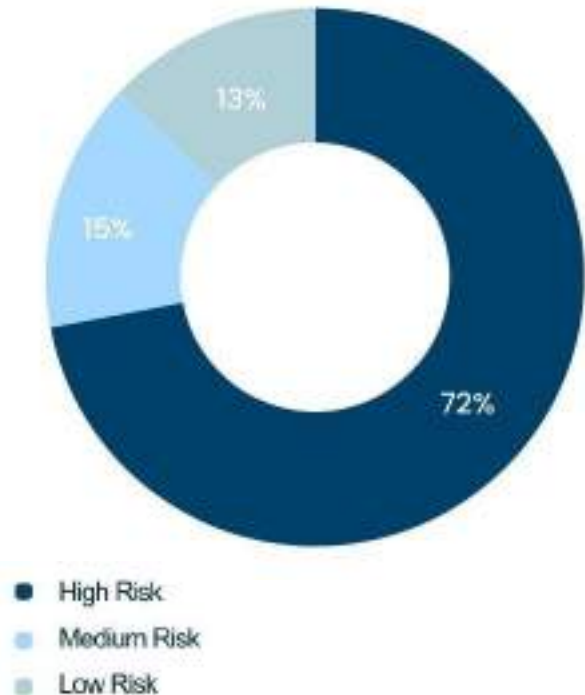
- 48% of total suppliers operate in high-risk categories
- 72% of total procurement spend is attributed to high-risk categories
- high-risk category spend totals \$111 million.

## Supplier and Spend Percentage Breakdown

Risk as a percentage of suppliers



Risk as a percentage of total spend



# Actions Taken to Address Modern Slavery Risks

## Embedding Modern Slavery Controls in Procurement

Mercy Education integrates modern slavery considerations into procurement through:

- tender and contract processes: New contracts include modern slavery clauses
- supplier due diligence: Key suppliers in high-risk categories (e.g., uniforms, ICT, cleaning) are reviewed annually
- supplier engagement: Regular communication with suppliers regarding modern slavery expectations
- sector collaboration: Continued participation in ACAN working groups and initiatives.

## Staff Training and Capacity Building

- 9 Mercy Education staff completed ACAN modern slavery e-learning modules in 2024, with a total of 4 courses completed
- Three Working Group meetings were conducted on modern slavery, with 16 staff participating
- Modern slavery responsibilities have been embedded into relevant position descriptions and role expectations.

## Risk Monitoring and Reporting

- Ongoing risk assessments in high-risk procurement categories such as cleaning, construction, ICT, and uniforms
- Development of a risk control monitoring process to track implementation across all schools
- Annual Board reporting on modern slavery compliance and mitigation efforts.

## Grievance Mechanism and Remediation

- Staff and suppliers can currently report concerns via Mercy Education's Whistleblower Policy.
- Mercy Education is integrated with Domus 8.7's remediation service, ensuring appropriate responses to modern slavery risks.

# Assessing Effectiveness

Mercy Education has adopted ACAN Baseline Data metrics in 2024 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.

2024	Activity	2024	2023
<b>Internal / Staff</b>	Hours spent on modern slavery activities	77	30
	Individual staff completed e-learning	15	20
	E-learning modules completed	70	100
<b>External / Supplier Engagement</b>	Total number of suppliers	7,865	6,033
	Number of suppliers with visible contact information and ABN	193	213
	Number of suppliers across high-risk categories	176	1,337
	Number of ACAN Supplier Surveys completed	79	76
	Supplier staff attending capacity building webinars	0	42
	Invited to join Sedex	29	12
	Joined Sedex	23	3
	Sedex SAQ completed	11	1
	Social audits	0	1
	Corrective actions	0	0
<b>Domus 8.7 External Referrals</b>	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

The ACAN Modern Slavery Maturity Assessment provides a score card of 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 2024 result for Mercy Education is 36%

The 2024 score is a 2% increase from 2023 and 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 2024
Business Process and Governance	43%	50%	26%	31%	38%
Operations	43%	38%	23%	35%	35%
Supply Chain	0%	80%	25%	12%	29%
Worker Engagement	16%	41%	22%	16%	24%
Entity's Program and Activities	100%	15%	30%	31%	44%
Grievance Mechanisms and Remediation	63%	60%	29%	25%	44%
Average	44%	47%	26%	25%	36%

# 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 Modern Slavery Representatives in each school.

# Other Information

Case Study:

## Raising Awareness of Forced Marriage

School	Santa Maria College, Attadale, Western Australia
Activity	Year 11 ATAR – Unit 2: Societal and Religious Views on Forced Marriage
Date	Term 2, 2024
Type of Awareness	Forced Marriage
Participants	85 Year 11 ATAR students and 4 teachers

Overview

As part of the Year 11 ATAR Religion and Life curriculum, Santa Maria College students explored the issue of forced marriage, examining its impact within Australian society and through the lens of Catholic teachings. The unit aimed to deepen students’ understanding of forced marriage as a form of modern slavery, fostering critical thinking about ethical, social, and religious responses to this global issue.

Incorporating Modern Slavery Awareness

The learning activity involved:

- Analysing the key features and motivators behind forced marriage
- Comparing societal and religious perspectives on the issue, particularly in the Australian context
- Exploring the Catholic Church’s stance and response, emphasising human dignity, justice, and advocacy against forced marriage.

Key Takeaways and Impact

Students gained a comprehensive understanding of forced marriage as a violation of human rights through the unit. They were encouraged to reflect on how societal and religious perspectives influence policy and advocacy efforts. By critically engaging with real-world examples and Catholic teachings, students developed an awareness of their role in promoting justice and dignity for vulnerable individuals.

This initiative highlights the importance of education in addressing modern slavery, equipping young people with the knowledge and ethical foundation to challenge injustices in society.

## Case Study:

# Responding to the Need of Our Time: Raising Awareness of Exploitation in Supply Chains

<b>School</b>	Catherine McAuley College, Bendigo, Victoria
<b>Activity</b>	Responding to the Need of Our Time (Session at the 2024 Australasian Mercy Secondary Schools Association Student Conference)
<b>Date</b>	26 June 2024
<b>Type of Awareness</b>	Exploitation in Supply Chains
<b>Participants</b>	145 students and educators

## Overview

As part of the 2024 Australasian Mercy Secondary Schools Association Student Conference, Catherine McAuley College students took part in a session titled *Responding to the Need of Our Time*, which focused on modern slavery and exploitation in global supply chains. Delivered in collaboration with Young Mercy Links and Mercy Hub Melbourne, the session aimed to empower students with knowledge about ethical consumption and their role in advocating for change.

## Incorporating Modern Slavery Awareness

During the session, delegates were introduced to the work of Young Mercy Links, with presenters sharing their personal experiences of working with vulnerable and marginalised communities in Australia and overseas. Discussions on global conflicts highlighted the links between displacement, vulnerability, and exploitation.

To deepen their understanding, students were asked to bring an item of clothing to swap with others. This interactive activity sparked conversations about sustainable fashion, ethical consumer choices, and the importance of addressing exploitation within supply chains.

## Key Takeaways and Impact

Students left the session with a greater awareness of the hidden injustices in global supply chains and the power they have to make a difference. They were encouraged to challenge exploitative practices by adjusting their purchasing habits, raising awareness in their communities, and using their voices to advocate for ethical fashion. The session reinforced the message that even small, individual actions can contribute to meaningful change.

This initiative highlighted the importance of education in tackling modern slavery, equipping students with the knowledge and motivation to be part of a more just and sustainable future.

## Collaboration and Partnerships

This session was made possible through collaboration with:

- Young Mercy Links South Australia
- Young Mercy Links Victoria
- Mercy Hub Melbourne.

Suite 2.02, Level 2, 289 Wellington Parade South  
East Melbourne, VIC 3002

Tel: (03) 9977 3870

Email: [contact@mercy.edu.au](mailto:contact@mercy.edu.au)

[www.mercy.edu.au](http://www.mercy.edu.au)

ABN: 69 154 531 870









Mercy Health

*Care first*

# Mercy Health:

Modern Slavery  
Statement 2024



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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



Virginia Bourke  
Chair, Mercy Health

This is the fifth modern slavery statement provided by Mercy Health under the Modern Slavery Act 2018 (Cth).

I welcome the opportunity to provide a report on the steps Mercy Health has taken to assess and address modern slavery risks within its operations and supply chains.

During the last 5 years, there has been a growing awareness of the reality of modern slavery, no doubt amplified by the requirement for large organisations to make annual modern slavery statements.

Given that growing awareness, it was disappointing that the 2023 Global Slavery Index found that there were still 41,000 individuals in modern slavery in Australia.

That stark reality is a reminder of just how important it is that we identify and eliminate risks of modern slavery in Australia and elsewhere. It is an obligation that goes to the heart of our mission as we strive for justice for the many people who experience powerlessness and live in vulnerable conditions.

This statement is made together with a range of Australian Catholic organisations in the Australian Catholic Anti-Slavery Network (ACAN). Mercy Health is pleased that this modern slavery statement will form part of ACAN's compendium of modern slavery statements.

As Chair of Mercy Health, I would like to thank everyone who has worked to eliminate modern slavery in the supply chains of Mercy Health. I look forward to continuing to lead and support our efforts to eliminate modern slavery.

# 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 \$637,736,256 in 2024).
- » Mercy Aged and Community Care Ltd (revenue \$440,527,298 in 2024).
- » 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 \$1.1 billion in 2024).

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](http://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 2024.

## 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

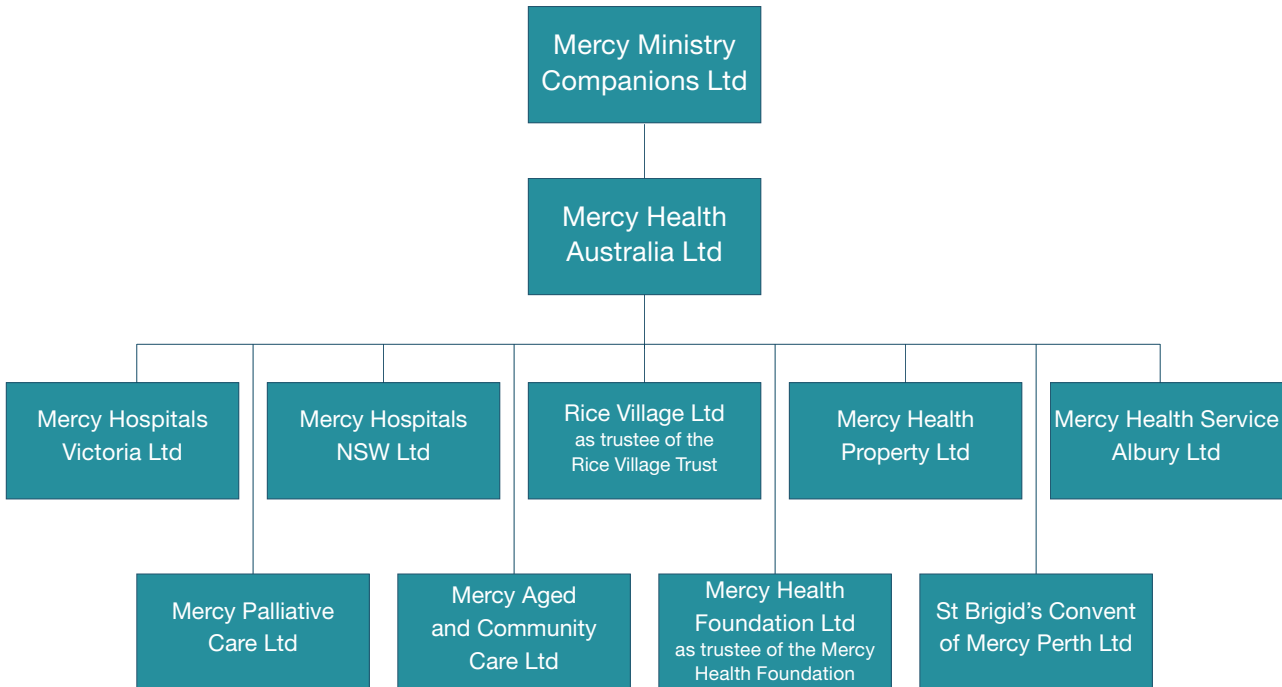
\* A trust established in accordance with the wills of Hannah Kathleen Moylan and Margaret May Rice administered cy-pres in accordance with Orders made by the Supreme Court of Victoria on 19 November 1993 and leave pursuant to section 63 of the Religious Successory and Charitable Trusts Act 1958 (Vic) 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.



# Corporate Structure

Mercy Health’s corporate structure is illustrated in the following chart:



# Our governance framework

Mercy Health Australia Ltd and its subsidiaries, along with Rice Village Trust and Mercy Health Foundation Trust, constitute Mercy Health.

The membership of the boards 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 116,000 people in our Victorian hospitals in 2024. In that year, just over 8,770 babies were born in those Victorian hospitals, 1,818 families were supported by our early parenting centres and more than 3,000 people received mental health services.

At the end of 2024, Mercy Health was operating 30 residential aged care homes across four states, providing care to about 2,300 people.

Mercy Health also supports people to live independently at home. In 2024, we provided care for more than 4,173 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.

## Modern slavery risks in our operations and supply chain

### Operational risk

About 11,227 people — 78 per cent of whom are women — worked for Mercy Health in 2024. Of the total number of staff, 5,637 worked in health services, 4,514 worked in residential aged care, 687 worked in home care and 389 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 375 staff from 29 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 2024, Mercy Health purchased goods and services to the value of more than \$330 million from approximately 3,500 suppliers for the purpose of carrying out its activities.

The goods and services purchased by Mercy Health to support its operations are outlined above. Those goods and services include a number of categories identified as high risk in the ACAN Category Risk Taxonomy:

High Risk Categories	
» 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

The actions taken to address those supply chain risks within Mercy Health are identified below. As this is our fifth Statement, we are reflecting on all of our achievements in the first five years of our modern slavery program.

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; Chief People Officer; and the Chief Information Officer. 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.

Supplier Engagement

Across the five years Mercy Health has run its modern slavery program, we have engaged with significant suppliers to understand and influence their systems for assessing and addressing the risk of modern slavery in their operations and supply chains.

Our supplier engagement has included:

- » Implementing a detailed modern slavery questionnaire, designed to identify direct supplier risk as well as risk in at least second-tier supply chains.
- » Developing standard letters to suppliers providing the Mercy Health Supplier Code of Conduct and Modern Slavery Policies and requesting a commitment to the Code and Policies.
- » Including the Code and Policies in tender documentation and the requirement for tenderer acknowledgement.
- » Inclusion of modern slavery clauses in significant Mercy Health supply contracts and tender documentation.

## Partnerships

Mercy Health operates in partnership to address risks of modern slavery.

### Australian Catholic Anti-Slavery Network (ACAN)

Since 2019, Mercy Health has been 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 has worked with ACAN to develop our organisational commitment, internal education and training, procedural tools and resources 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.

### 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.

In 2019, we developed a Modern Slavery Risk Management Approach Procedure, which aligns to the overall framework.

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)	<p>Assess the level of strategic and value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)</p> <p>Develop an engagement strategy based on the strategic/value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)</p>	Where instances of modern slavery are identified, a prioritised risk management approach is taken: <ul style="list-style-type: none"> <li>i. Modern slavery risk caused by our Entity</li> <li>ii. Contributed to by our Entity</li> <li>iii. Directly linked to our Entity</li> </ul>
Scope	Mercy Health 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		

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.

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.

# Education and awareness

Mercy Health has continued to promote internal education and awareness of modern slavery.

## Internal

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	10	138
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.

In 2022, we commenced posting 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. In 2024, we published two posts in 2024, and Communications from our Group Chief Executive Officer included material on Modern Slavery.

## Supplier

We also encouraged our suppliers to educate themselves about modern slavery.

Since 2022, Mercy Health has invited suppliers to attend webinars for suppliers to Catholic entities presented by ACAN which cover 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 12 suppliers attended those webinars in 2024.

## Community

To promote awareness of modern slavery and Mercy Health's efforts to overcome it, we placed the Mercy Health Modern Slavery Statements for 2020 to 2023 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.



## 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 continued providing the minutes of its meetings to the Mercy Health executive to allow ongoing governance by the executive of the Working Group's effectiveness. This has continued through 2023 and 2024.

## 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 approved the giving of this statement.
- » Members of the management team involved in the Working Group work across all entities that constitute Mercy Health.
- » A draft of this Modern Slavery Statement was provided to the Board of the Mercy Health Foundation.
- » Neither Mercy Hospitals Victoria Ltd nor Mercy Aged and Community Care Ltd own or control any other entities.

## 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 10 June 2025.



Virginia Bourke

Chair, Mercy Health Australia Ltd



**Mercy Health**

*Care first*

#### For more information

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##### **General Counsel**

Mercy Health Support Services  
2/12 Shelley St  
Richmond Vic 3121  
[mercyhealth.com.au](http://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, present and emerging. This statement was produced on Wurundjeri Country.

Artwork: from wabung-ngetel ('Call of Country') by Gunnai and Yorta Yorta artist Dixon Patten.





# MODERN SLAVERY STATEMENT

ANNUAL REPORT

20  
24





# KAYA NGAJI GURRIJIN HELLO

MercyCare acknowledges Aboriginal and Torres Strait Islander Peoples as Traditional Custodians of Country throughout Australia. We pay our respects 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, or the purposes of this statement “MercyCare”.

MercyCare’s Corporate Office is located at 38 Ord Street, West Perth, WA 6005

W [mercycare.com.au](https://www.mercycare.com.au)  
E [Procurement@mercycare.com.au](mailto:Procurement@mercycare.com.au)  
T 08 9442 3444  
F 08 9442 3445

## Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of MercyCare Limited on 5 June 2025 as defined by the Modern Slavery Act 2018 (Cth) (“the Act”).

This Modern Slavery Statement is signed by a responsible member of MercyCare Limited as defined by the Act.

*PF Walsh*

**Patrick Walsh**  
BOARD CHAIR

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Acknowledgement, Disclosure, Approval and Signature

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# 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**  
(ABN 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 services and aged care services.

The foundations of MercyCare are deeply rooted in the vision of Catherine McAuley, who began her work in Ireland during the early 1800s to fight injustices and bring compassion and care to the vulnerable. This mission was carried forward by the Sisters of Mercy, led by Sister Ursula Frayne, who arrived in Fremantle in 1846. For the next century and a half, the Sisters of Mercy delivered education, welfare, and health services in Perth and beyond.

Today, MercyCare continues this legacy by delivering essential services that support individuals across all stages of life, with a focus on assisting those who are most vulnerable. Our commitment to justice and dignity extends beyond direct service delivery to ensuring ethical and responsible practices in our operations and supply chains.

MercyCare is guided by six values—Courage, Integrity, Respect, Justice, Compassion, and Excellence. Modern slavery stands in direct opposition to these values, as it exploits individuals and undermines human dignity for financial gain.

MercyCare’s Modern Slavery Working Group oversees efforts to identify, assess, and mitigate modern slavery risks. Comprising representatives from across the organisation, it reports to the Executive Leadership Team, embedding modern slavery considerations into organisational governance.



Mission Ethos points to our purpose and reason for existence. It gives expression to MercyCare’s unique spirit and character. It is how MercyCare thinks, feels and acts in response to our mission by engaging our head, heart and hands.



Our Entities (CONTINUED)

Our impact extends across the Perth metropolitan area and regional Western Australia, with approximately 25 services spanning 30 locations. Working across early learning, multicultural services, youth, homelessness, disability and aged care we are committed to protecting vulnerable individuals and embedding ethical practices across our organisation.

25  
services across

30  
locations

- Offices
- Early Learning Services
- Aged Care Services
- Family and Community Service

PERTH



CRITERION 2

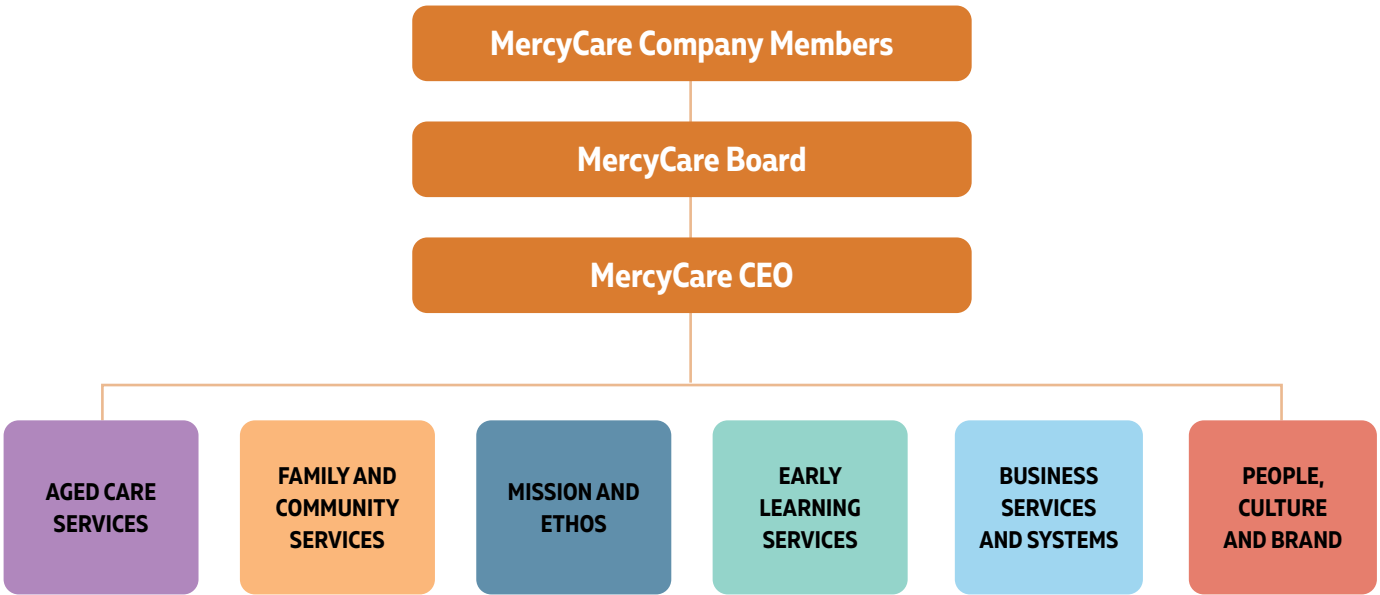
OUR STRUCTURE, OPERATIONS, PEOPLE AND SUPPLY CHAINS

Organisational Structure

MercyCare is a **Public Juridical Person (PJP)**, with **MercyCare Limited** serving as its civil entity. The organisation operates through two subsidiaries:

- **Mercy Community Services Ltd**
- **Mercy Human Services Ltd**

MercyCare’s civil entities are companies limited by guarantee, governed by a Board of Directors, and mandated to operate as non-profit organisations in accordance with their constitutions. Additionally, MercyCare Ltd is registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC) and holds Public Benevolent Institution (PBI) status.



# Operations and Services

MercyCare delivers essential community services across Western Australia, primarily within the Perth metropolitan area. The organisation also manages Aboriginal Short-Stay Accommodation in the Kimberley region.

## Our core services include:

- Early Learning Services
- Family and Community Services
- Community Aged Care
- Residential Aged Care

Modern slavery risk management is an evolving priority for MercyCare. Recognising the need for continuous improvement and ongoing investment in capacity building to maintain vigilance against modern slavery threats.

To empower our workforce and enhance our approach to modern slavery, MercyCare is focusing on the following key areas:

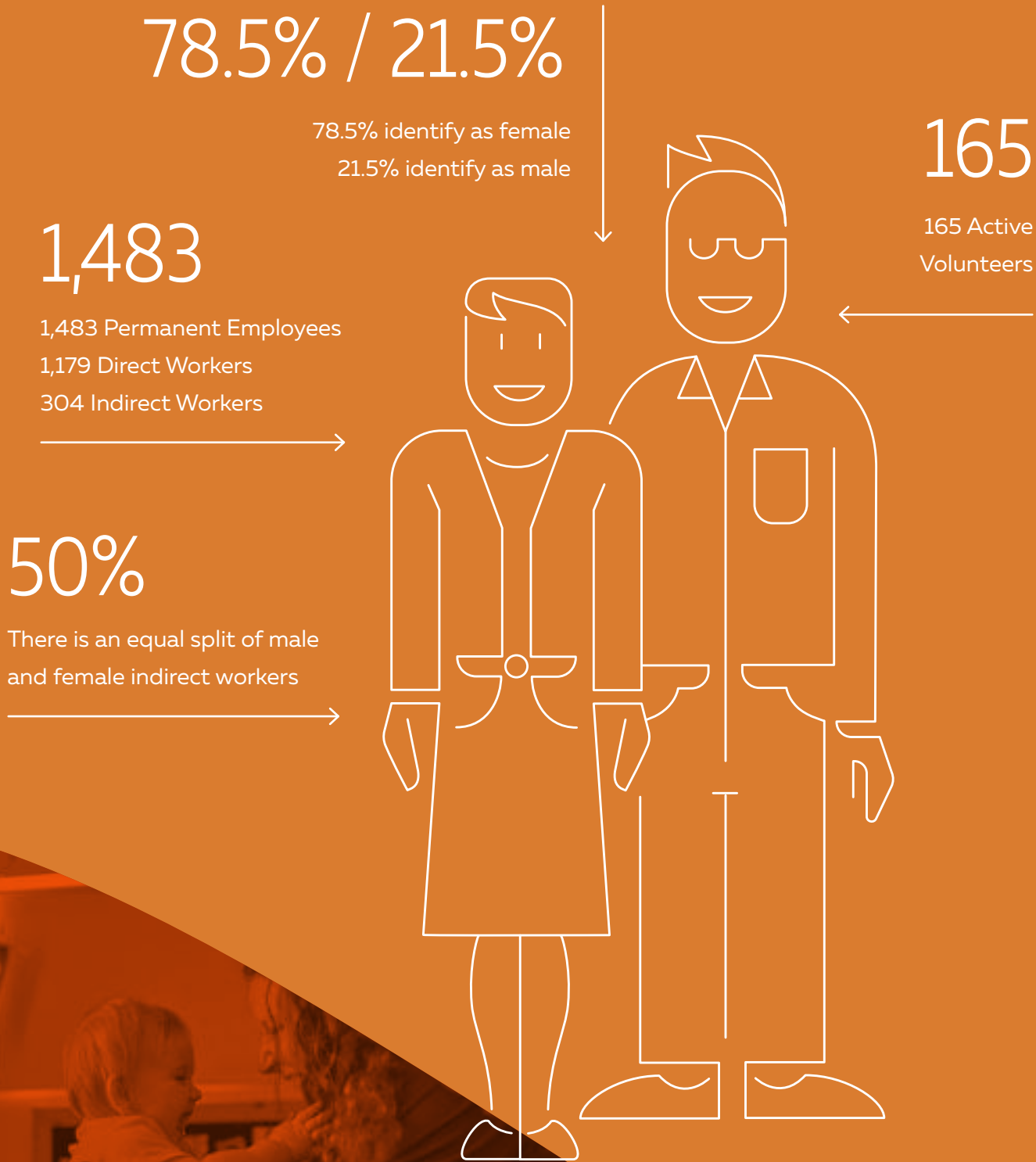
1. **Stakeholder Engagement**  
Actively engaging employees, clients, and community members to increase awareness of modern slavery.
2. **Enhancing Workplace Practices**  
Strengthening policies and processes to promote ethical workplace standards, ensuring a safe and inclusive environment for all employees.
3. **Community Partnerships**  
Establishing strong collaborations with community organisations to provide support for vulnerable populations.
4. **Training and Development**  
Providing ongoing education and training for employees to enhance their skills, knowledge, and ethical awareness in service delivery.
5. **Continuous Improvement**  
Enhancing our approach to modern slavery risk mitigation through regular review and refinement of practices, processes, and awareness initiatives.

By prioritising these areas, we reaffirm our commitment to delivering high-quality, ethical services while upholding our responsibilities to our clients and broader communities.



# Our People

MercyCare’s workforce is dedicated to advancing our mission and ensuring high-quality service delivery. The organisation comprises direct and indirect workers, supported by volunteers who contribute to our operations.





Our Supply Chain

MercyCare operates in the service industry, engaging a diverse supplier base ranging from local sole traders in Western Australia to multinational corporations with global supply chains. In 2024, MercyCare partnered with 1,421 suppliers, with total procurement spend reaching \$51.5 million.

Supplier Overview

MercyCare’s supply chain consists of:

- **Direct Suppliers**  
Businesses that supply goods and services directly to MercyCare.
- **Distributors and Wholesalers**  
Third-party providers that procure and distribute goods on our behalf.
- **Subcontractors**  
Entities engaged through third-party arrangements for service delivery.

While all MercyCare suppliers are Australian-registered entities, we acknowledge that many products and materials originate from international supply chains, where modern slavery risks are more prevalent.

Commitment to Ethical Sourcing

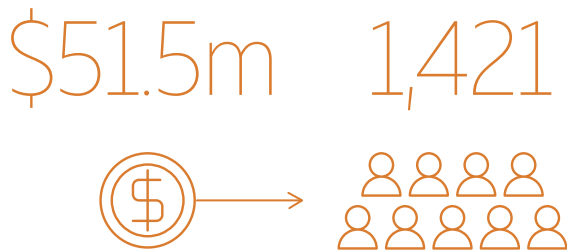
MercyCare is committed to fair labour practices and ethical procurement. To reinforce this, we have:

- Embedded modern slavery clauses within our general terms and conditions.
- Required suppliers to align with our expectations regarding human rights and labour protections, particularly during strategic sourcing activities.
- Actively worked on enhancing supplier engagement and risk mitigation strategies to improve transparency and accountability.

As our understanding of modern slavery risks deepens—particularly regarding the origins of goods and raw materials—we continue to refine our procurement policies and supplier engagement frameworks to strengthen due diligence and ethical sourcing.

General Procurement Overview

We spent \$51.5m with 1,421 suppliers and processed 42,265 invoices.



MercyCare remains committed to enhancing procurement practices and strengthening supply chain due diligence as part of our broader efforts to combat modern slavery risks.

CRITERION 3

MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

MercyCare recognises the presence of modern slavery risks within both its operations and supply chain. A structured approach to risk assessment, supplier engagement, and ethical procurement practices is implemented to identify, mitigate, and address these risks.

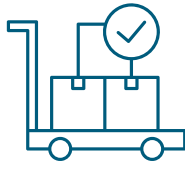
Our workforce plays a key role in upholding ethical standards across all areas of service delivery. MercyCare’s core operational and enabling functions include:



**WORKFORCE MANAGEMENT**  
Supporting staff, facilitating professional development, and overseeing payroll.



**FACILITIES AND ASSET MANAGEMENT**  
Maintaining and managing buildings and infrastructure.



**PROCUREMENT**  
Sourcing goods and services responsibly while upholding ethical supply chain practices.



**GOVERNANCE AND COMPLIANCE**  
Overseeing financial operations, risk management, safety, and regulatory compliance.



**TECHNOLOGY AND COMMUNICATIONS**  
Delivering IT, marketing, and communication services.

To strengthen our modern slavery risk management approach, MercyCare partners with the Australian Catholic Anti-Slavery Network (ACAN) and follows a structured risk management program, which includes:



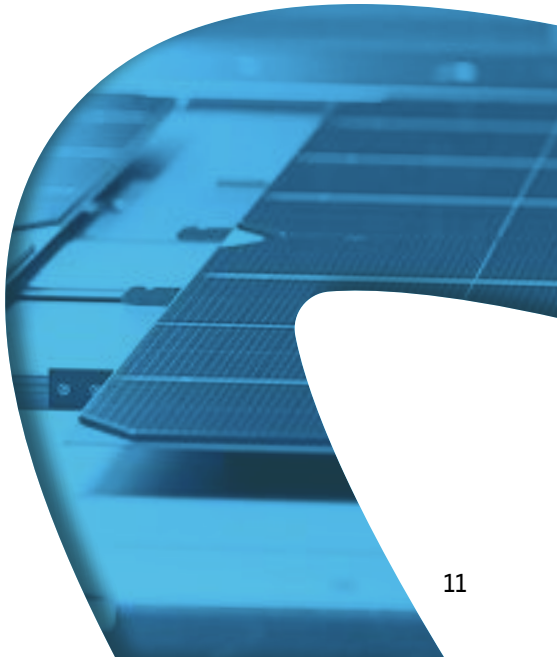
**MODERN SLAVERY RISK PROFILING**  
Assessing the risk exposure of our suppliers and major spend categories.



**CATEGORY RISK**  
Utilising ACAN’s proprietary methodology, to assess high-risk industry sectors and commodities.

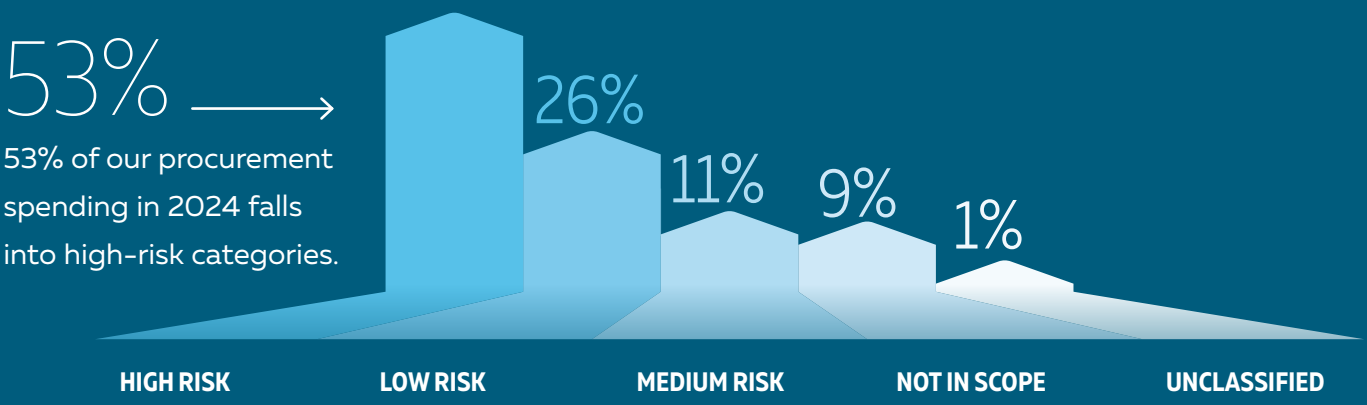


**SUPPLIER TRANSPARENCY INITIATIVES**  
Encouraging supplier onboarding to SEDEX, a global ethical trade platform, to enhance supply chain visibility and accountability.

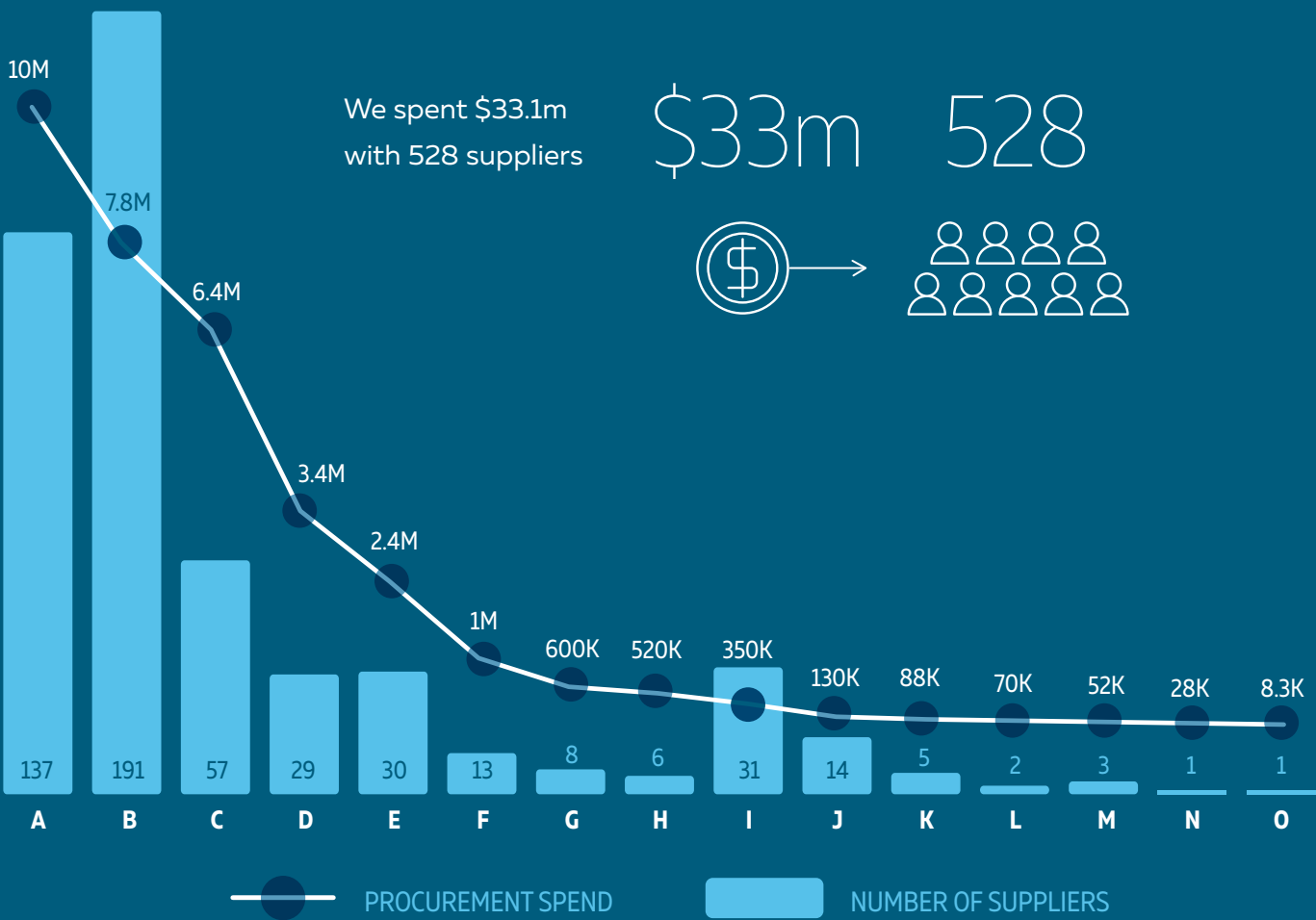


Current Risk Exposure

MercyCare’s Percentage of spend per Procurement Taxonomy Risk



Supplier Data in High Risk Categories



- |   |                                    |  |
|---|------------------------------------|--|
| <b>A</b> LABOUR HIRE                                  | <b>F</b> ICT HARDWARE              | <b>L</b> TRANSPORT AND LOGISTICS             |
| <b>B</b> FACILITY MANAGEMENT AND PROPERTY MAINTENANCE | <b>G</b> CLEANING AND SECURITY     | <b>M</b> LINEN, LAUNDRY AND TEXTILE PRODUCTS |
| <b>C</b> MEDICAL DEVICES AND SUPPLIES                 | <b>H</b> BUILDING AND CONSTRUCTION | <b>N</b> FINANCE AND INVESTMENT              |
| <b>D</b> FOOD AND CATERING SERVICES                   | <b>I</b> UNCLASSIFIED              | <b>O</b> WASTE MANAGEMENT SERVICES           |
| <b>E</b> FURNITURE AND OFFICE SUPPLIES                | <b>J</b> EVENTS AND MANAGEMENT     |  |
|   | <b>K</b> UNIFORMS AND PPE          |  |

Key Risk Areas in Procurement

MercyCare prioritises addressing modern slavery risks in high-risk procurement categories, key areas of focus include:



1. Facilities and Cleaning Services

- Cleaning services have been identified as a high-risk category due to the vulnerability of workers in the sector. In response, MercyCare’s multicultural services team launched a direct employment initiative for asylum seekers who had previously accessed our support services.
- This initiative began with a pilot site and has since expanded across multiple locations, reducing reliance on third-party contractors. By directly employing workers, MercyCare provides fair wages, ethical employment conditions, and improved oversight.



2. Food Supply Chain

- Procurement of fresh produce, wholesale dry goods, bakery items, and dairy is managed through four major food providers under Western Australian Government Common User Agreements (CUAs).
- Each supplier operates under their own modern slavery statement, ensuring baseline transparency and ethical sourcing practices.



3. Facilities Maintenance and Construction

- This category carries inherent modern slavery risks due to its reliance on subcontracted labour and complex supply chains. MercyCare is currently undertaking a sourcing project to review all contractors across the various subcategories under Facilities Maintenance. As part of this process, both incumbent and new providers tendering for these services must demonstrate a strong commitment to addressing modern slavery. With this commitment serving as a core criterion in sourcing activities, the focus on ethical procurement is further strengthened.
- As part of this initiative, MercyCare contracted a Heating, Ventilation, and Air Conditioning provider in February 2025, prioritising compliance with MercyCare’s modern slavery standards. The agreement reinforces our commitment to ethical procurement by establishing clear expectations for subcontractor management and supply chain transparency, further strengthening risk mitigation in this high-risk sector.

While still refining formal risk identification processes, MercyCare leverages internationally recognised data sources to strengthen understanding of modern slavery risks. These include:

- The List of Goods Produced by Child Labour or Forced Labour (U.S. Bureau of International Labour Affairs).
- The Global Slavery Index (2018, Minderoo Foundation’s Walk Free Initiative).

As we continue to develop our risk management framework, we remain committed to expanding supplier engagement, refining risk assessments, and integrating responsible procurement practices to mitigate modern slavery risks across our operations.

CRITERION 4

# ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Addressing modern slavery risks is an ongoing process that requires continuous engagement, education, and improvement. Over the past year, MercyCare has taken significant steps to assess and enhance our approach by embedding modern slavery awareness into our operations, improving procurement governance, and increasing supplier visibility.

## Building Internal Awareness and Capability

To strengthen our organisational understanding of modern slavery, MercyCare has also implemented several employee engagement initiatives:



### 1. Employee Engagement Surveys

In collaboration with the Australian Catholic Anti-Slavery Network (ACAN), an employee survey was conducted to gauge awareness of modern slavery risks and identify areas for further education.



### 2. Leadership Awareness and Influence

MercyCare's procurement team presented on social procurement at a leadership event, highlighting ethical considerations in sourcing. This sparked ongoing discussions with leaders across the organisation, many of whom had limited prior exposure to procurement's ethical dimensions. These conversations have driven a broader awareness of responsible sourcing and encouraged leaders to consider social and ethical impacts in their procurement decisions.



### 3. Cross-Functional Learning

To mark Anti-Slavery Day, MercyCare hosted an employee Lunch and Learn session. This initiative promoted informed discussions and increased awareness of ethical procurement.

These efforts form a strong foundation for embedding modern slavery awareness into MercyCare's organisational culture.

## Strengthening Procurement Processes and Governance

MercyCare has taken foundational steps to improve visibility and oversight of our supplier base:

### Implementation of Category Taxonomy in Procure-to-Pay (P2P)

This initiative enables the organisation to:

- Classify and segment suppliers based on industry, geography, and procurement category.
- Improve reporting and data analytics for enhanced procurement oversight.
- Support structured supplier management, ensuring responsible sourcing practices.

### Quarterly Supplier Reviews Using ManageEngine™

- Quarterly reviews to assess active and inactive vendors are undertaken, maintaining an efficient supplier database and establishing a foundation for future risk-based reviews.

## Embedding Modern Slavery Controls into Policy and Supplier Engagement

### Contract Clauses and Compliance Monitoring

MercyCare has embedded modern slavery clauses into contract templates, ensuring that new supplier agreements align with our ethical procurement standards. Moving forward, MercyCare aims to strengthen contract management by introducing compliance monitoring mechanisms, including supplier reporting on social compliance and ethical sourcing.

### Policy Development and Risk Management

In 2025, the Procurement Policy will be updated to incorporate specific P2P requirements and introduce a Social Procurement Policy. This new policy will address modern slavery risks, Aboriginal business engagement, social enterprise partnerships, and sustainability opportunities.

### Supplier Engagement and Risk Management Plan

As a next step, a structured risk management plan will be developed to review suppliers within high-risk categories systematically. This will strengthen the ability to proactively assess and address modern slavery risks within the supply chain.





# ETHICAL EMPLOYMENT AND SUPPLY CHAIN TRANSPARENCY THROUGH THE MERCYCARE CLEANING SERVICES INITIATIVE

## Context

MercyCare is committed to fostering ethical procurement and employment practices that align with its mission and values. Recognising the heightened risk of labour exploitation in the commercial cleaning sector, particularly among asylum seekers, refugees, and migrant workers, MercyCare developed a targeted social enterprise initiative.

The **MercyCare Cleaning Services Initiative** was established as a pilot program aimed at providing meaningful, safe, and fair employment opportunities for vulnerable individuals while simultaneously mitigating modern slavery risks within the supply chain. This initiative demonstrates MercyCare’s proactive approach to social responsibility by embedding ethical employment standards directly into its operations.

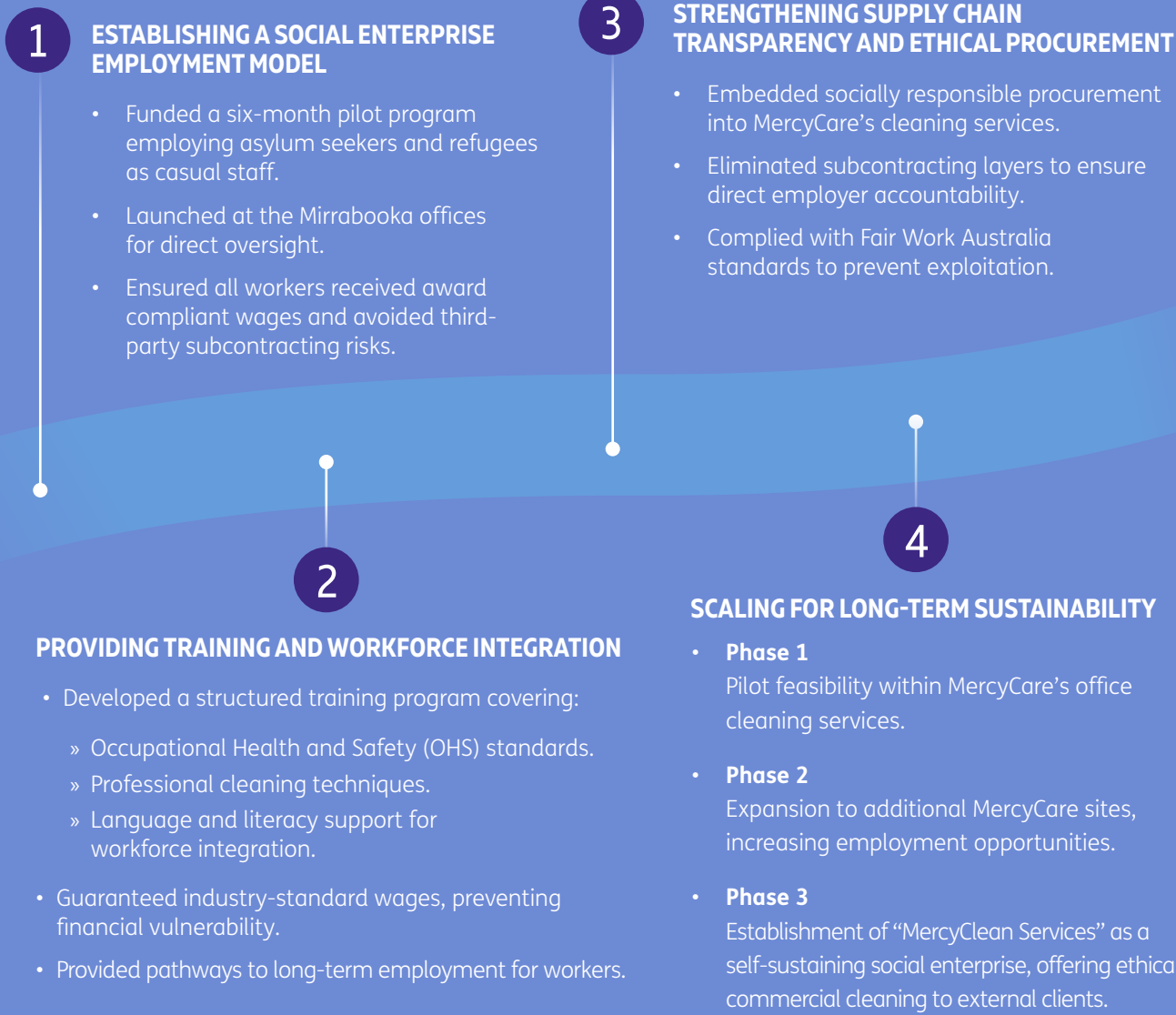
## Industry Risks and Challenges

The commercial cleaning industry is classified as high-risk for modern slavery due to:

- **Prevalence of subcontracting**  
Complex subcontracting chains obscure accountability for fair labour practices.
- **Employment of vulnerable workers**  
Many workers face language barriers, uncertain visa statuses, or limited awareness of their rights.
- **Low wages and poor conditions**  
Informal employment arrangements can lead to underpayment, excessive hours, and unsafe working conditions.

**MercyCare recognised the need for a transparent, ethical alternative that ensures fair wages, safe conditions, and direct employer accountability, eliminating exploitative labour practices.**

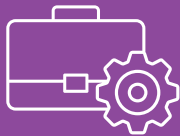
## Action Areas and Key Initiatives



## Impact and Outcomes



**EMPLOYMENT CREATION**  
Provided stable, fair-wage employment to 9 individuals, supporting social and economic integration.



**SKILL DEVELOPMENT AND WORKFORCE READINESS**  
Participants gained valuable technical skills and experience, improving their employability in the broader labour market.



**STRENGTHENED SUPPLY CHAIN INTEGRITY**  
Eliminated subcontracting vulnerabilities, reinforcing MercyCare’s commitment to modern slavery risk mitigation.



**SECTOR LEADERSHIP AND ADVOCACY**  
Positioned MercyCare as a leader in ethical procurement, demonstrating the viability of social enterprises in commercial services.

Through the MercyCare Cleaning Services Initiative, MercyCare is actively reshaping procurement practices to prioritise human rights, fair labour conditions, and supply chain transparency. By embedding ethical employment standards into service delivery, MercyCare is leading by example in social enterprise-driven solutions to modern slavery risk management.

# ETHICAL SOLAR PROCUREMENT – ADDRESSING MODERN SLAVERY RISKS IN RENEWABLE ENERGY

## Context

As part of MercyCare’s commitment to sustainability and responsible procurement, a project has been initiated to install on-site solar Photovoltaic (PV) systems at multiple locations. This initiative aligns with MercyCare’s net zero goals, reduces energy consumption and carbon emissions, and ensures that our supply chain adheres to ethical sourcing practices.

Recognising that the solar industry is classified as high-risk for modern slavery, particularly in raw material extraction and manufacturing, MercyCare has taken proactive steps to mitigate these risks while supporting social enterprises and responsible suppliers.

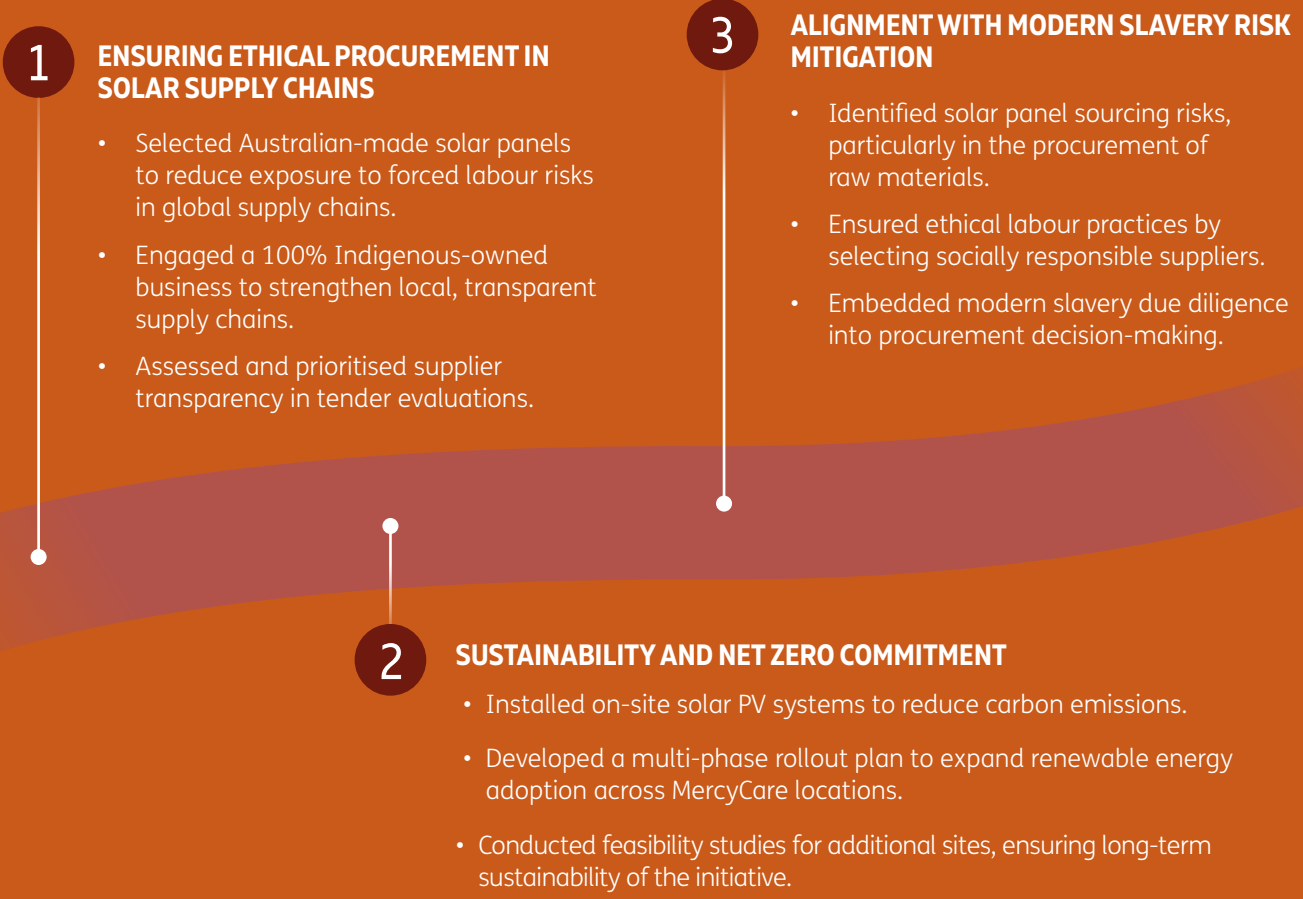
## Project Overview

Following a competitive tender process, MercyCare awarded a contract to Infinity Solar, a 100% Indigenous-owned and operated business and a registered member of Supply Nation. The initial installations are planned for:

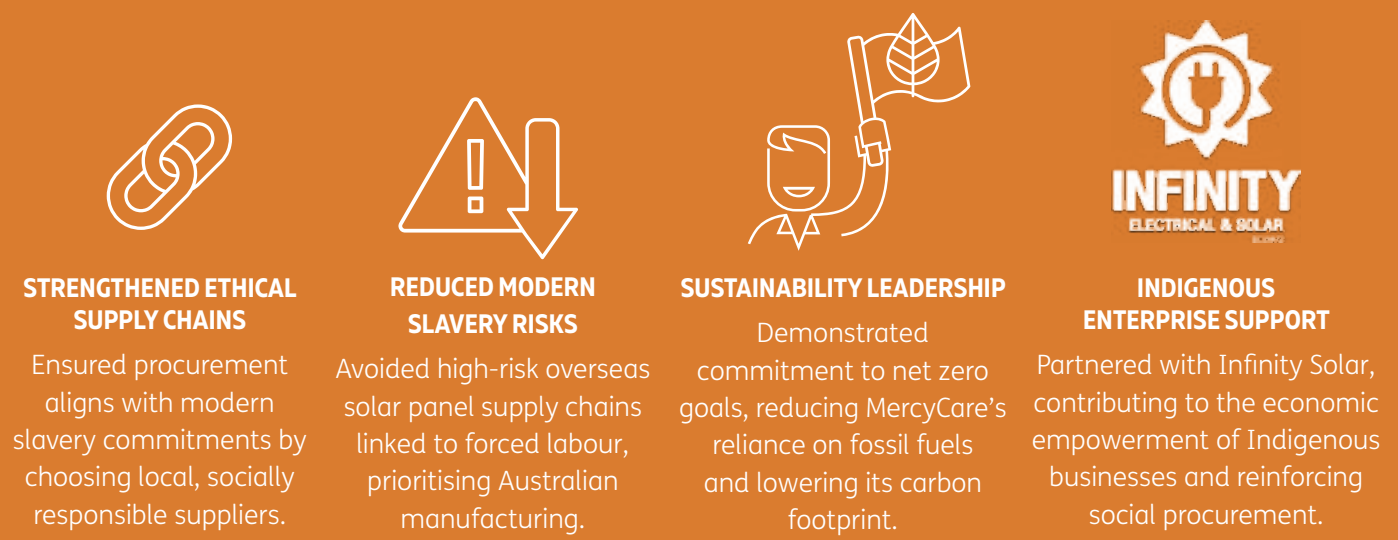
- Early Learning Centre - Ellenbrook
- Early Learning Centre - Piara Waters
- Leghorn Street Office - Rockingham
- Residential Aged Care - Kelmscott

**Additional sites, including Early Learning Centre’s in Ballajura and Bedford, and Residential Aged Care in Rockingham, are under consideration pending further feasibility assessments.**

## Action Areas and Key Initiatives



## Impact and Outcomes



Through this initiative, MercyCare is reducing its environmental impact while ensuring that sustainability efforts do not come at the cost of human rights violations. By embedding ethical procurement into our renewable energy strategy, the organisation reinforces its commitment to modern slavery risk mitigation and responsible business practices.

# ASSESSING EFFECTIVENESS

A multi-year action plan has been established as a strategic framework to measure progress and evaluate ongoing efforts.

COMPLETE IN PROGRESS TO BE COMPLETED



## Enhancing Supplier Awareness

- 278 suppliers included in the September 2024 outreach, requesting survey completion and webinar registration.
- 38 suppliers attended webinars.
- 78 suppliers completed the supplier survey.
- 6 suppliers received SEDEX onboarding recommendations (currently 14 suppliers linked).
- Bi-annual communications to increase awareness across the supply network.



## Modern Slavery Policy Update

- Policy document under review by Modern Slavery Working Group with input from ACAN.
- Update the Modern Slavery Policy.
- Aim: To enforce as a mandatory onboarding document for new staff.
- Establish an ongoing policy review and management process.



## Training and Staff Education

- 'Social Procurement' presentation delivered by Procurement Team at Leadership Event (100+ leaders attended).
- 'Modern Slavery' Lunch and Learn session delivered by Procurement Team on Anti-Slavery Day.
- Develop training programs to educate the broader organisation about modern slavery risks and mitigation strategies.



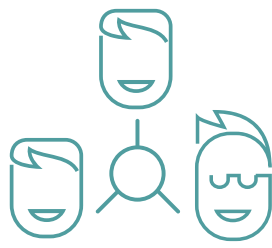
## Supplier Risk and Management

- Implement ongoing monitoring and management of approved suppliers, including audits and reviews.
- Planned Pre-Qualified Vendor (PQV) process for supplier onboarding, including a Modern Slavery risk assessment.



## Staff Engagement and Feedback

- Conduct an initial staff survey to assess modern slavery awareness.
- Development of Modern Slavery e-Learning module.
- Hold follow-up sessions to address feedback and promote understanding.
- Conduct a second survey to measure improvements in awareness.



## Labour Hire Risk Management

- Standalone labour hire contract template designed to support sourcing panel-certified labour hire providers (aged care services, allied health, nurses, carers, cleaners, administrators, kitchen hands).
- The panel sourcing project will enhance contract visibility, compliance, and regular review processes.
- Strengthen labour hire agreements to improve compliance and reduce risk.
- Build strong relationships with key labour-hire providers.

# Measuring Our Progress

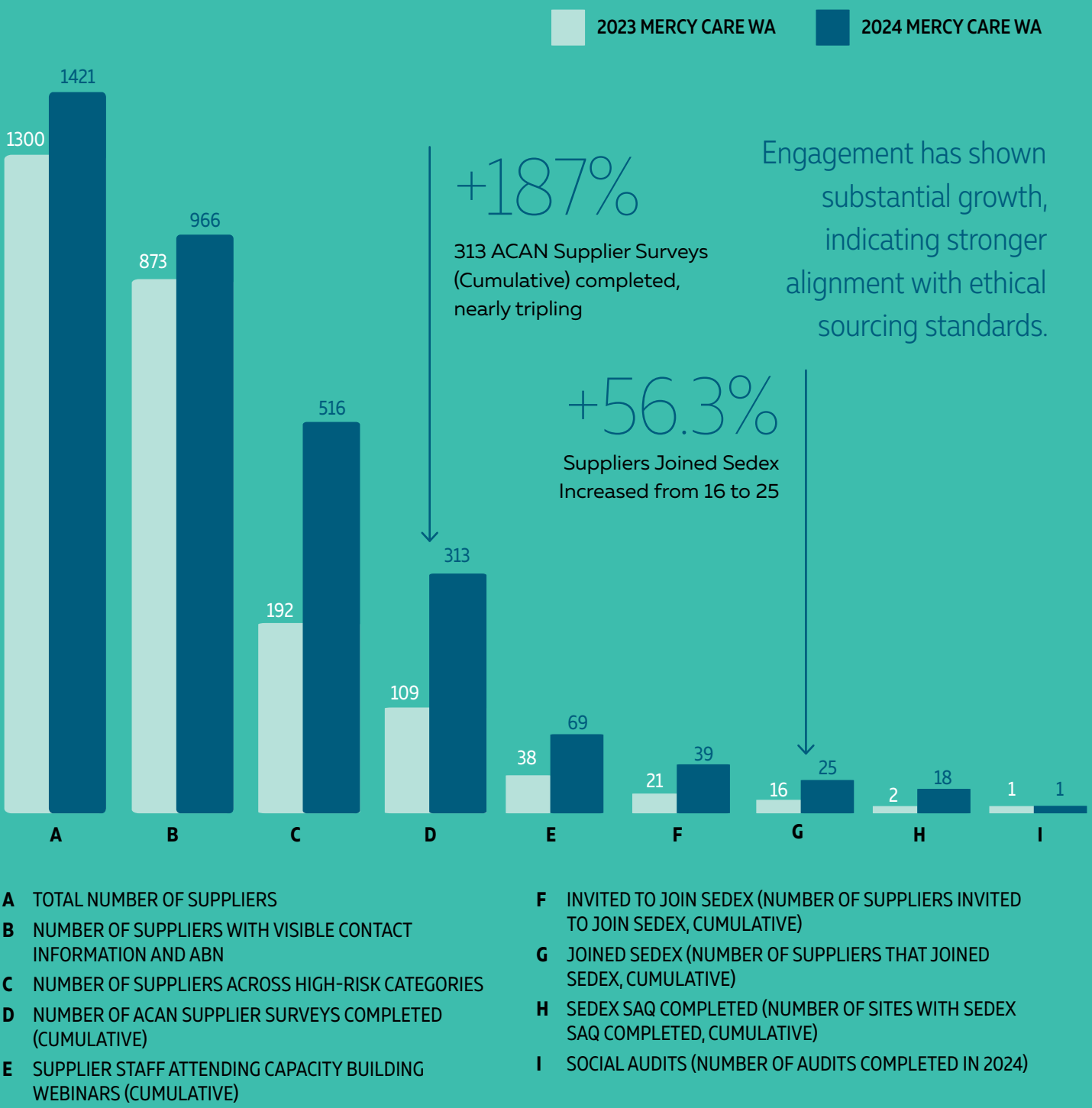
MercyCare's commitment to ethical procurement and modern slavery risk management continues to evolve. In the coming year, MercyCare will continue refining processes, strengthen supplier accountability, and embed modern slavery controls across the procurement framework.

The following key metrics will be utilised to monitor the progress of planned initiatives moving forward.

## Internal / Staff

In addition to measuring external/supplier engagement, we are going to identify key metrics to monitor internal progress.

## External / Supplier Engagement

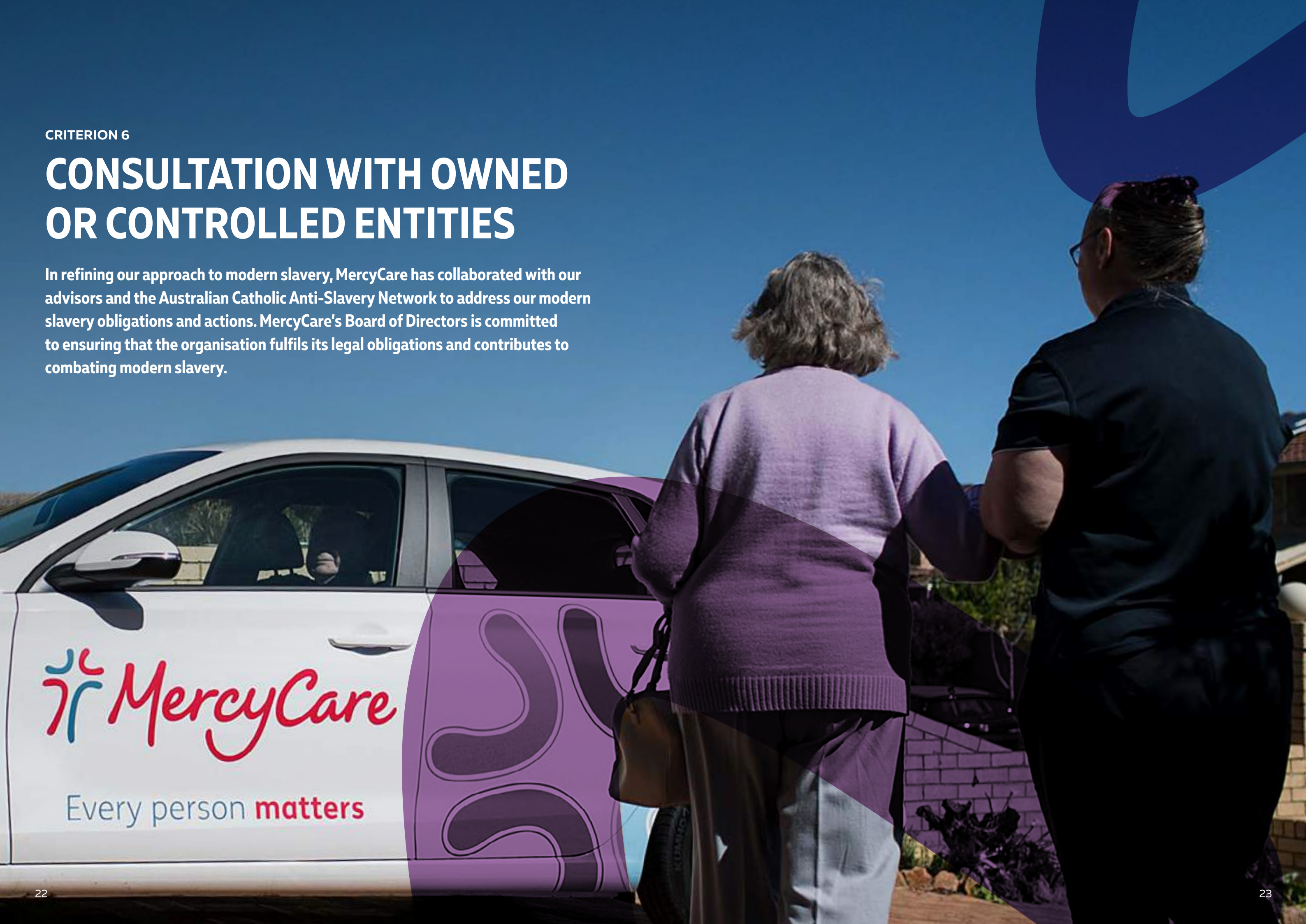




## CRITERION 6

# CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

In refining our approach to modern slavery, MercyCare has collaborated with our advisors and the Australian Catholic Anti-Slavery Network to address our modern slavery obligations and actions. MercyCare's Board of Directors is committed to ensuring that the organisation fulfils its legal obligations and contributes to combating modern slavery.





**MercyCare's Corporate Office is located at 38 Ord Street,  
West Perth, WA 6005**

**W** [mercycare.com.au](http://mercycare.com.au)

**E** [Procurement@mercycare.com.au](mailto:Procurement@mercycare.com.au)

**T** 08 9442 3444

**F** 08 9442 3445





# ***Modern Slavery Statement***

***1 January to 31 December 2024***



***A Special Work of St Vincent de Paul Society Queensland***



Ozanam Villa Clontarf resident  
Elizabeth and Mozart Program  
participant Angie



Call us  
1800 Ozcare  
(1800 692 273)  
or visit  
[ozcare.org.au](http://ozcare.org.au)

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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 19 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.

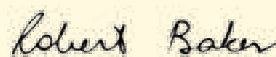
**Compassion** - Welcoming and serving all with care and understanding, and without judgement.

## Endorsement

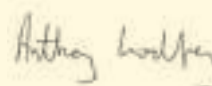
The Board of Ozcare believe that the steps being taken now to reduce the risk of modern slavery and those planned for the future are aligned with our guiding principles and values.

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 22 May 2025.

This Modern Slavery Statement is signed by a responsible member of Ozcare as defined by the Act.



**Robert Baker**  
Chairman



**Tony Godfrey**  
Chief Executive Officer

*Includes clients discharged from  
our services during 2023-24*

# How We Make a Difference



**3,516**  
Home Care  
Packages  
Serviced

**967**  
NDIS  
Participants  
Supported



**494**  
Retirement  
Living Units

**8**

Retirement  
Villages



**94**

Hospital  
Beds



**56,678**  
Calls handled by  
1800 Ozcare

# Brand Map



Oxley Hospital

18 Aged Care Facilities  
15 Community Care Branches  
8 Day Respite Centres  
8 Retirement Villages  
1 Hospital

# Ozcare

Retirement Villages



Sunshine Coast



Kedron



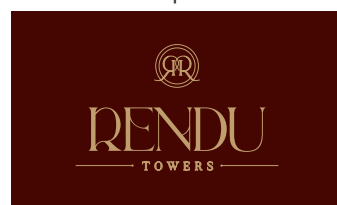
Gold Coast



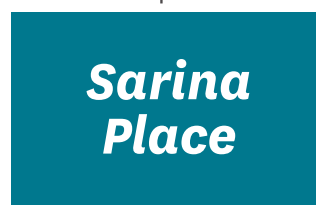
Hervey Bay



Oxley



Newstead



Sarina



Innisfail





# ***Commitment to Eliminating 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 minimize the risk of modern slavery like practices in our supply chain. That commitment extends to maintaining membership of the Australian Catholic Anti Slavery Network (ACAN).

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 organization 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.

Our **ESG Framework** - Environmental Social and Governance (ESG) Framework outlines how as an organisation we act responsibly by setting our standards high, engaging our suppliers and complying with key regulations. A key goal within our ESG framework is to target higher risk suppliers and have them complete Sedex onboarding by end of financial year 2026. Our ESG framework also outlines how we want to be responsible in our procurement activities.

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 2024 were:

1. Building and construction
2. Labour hire / agency staff
3. Food and catering
4. Facility and property maintenance
5. Cleaning and security services

Labour hire contractors are engaged, mostly 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.

# Organisation Structure

## CHIEF EXECUTIVE OFFICER Tony Godfrey

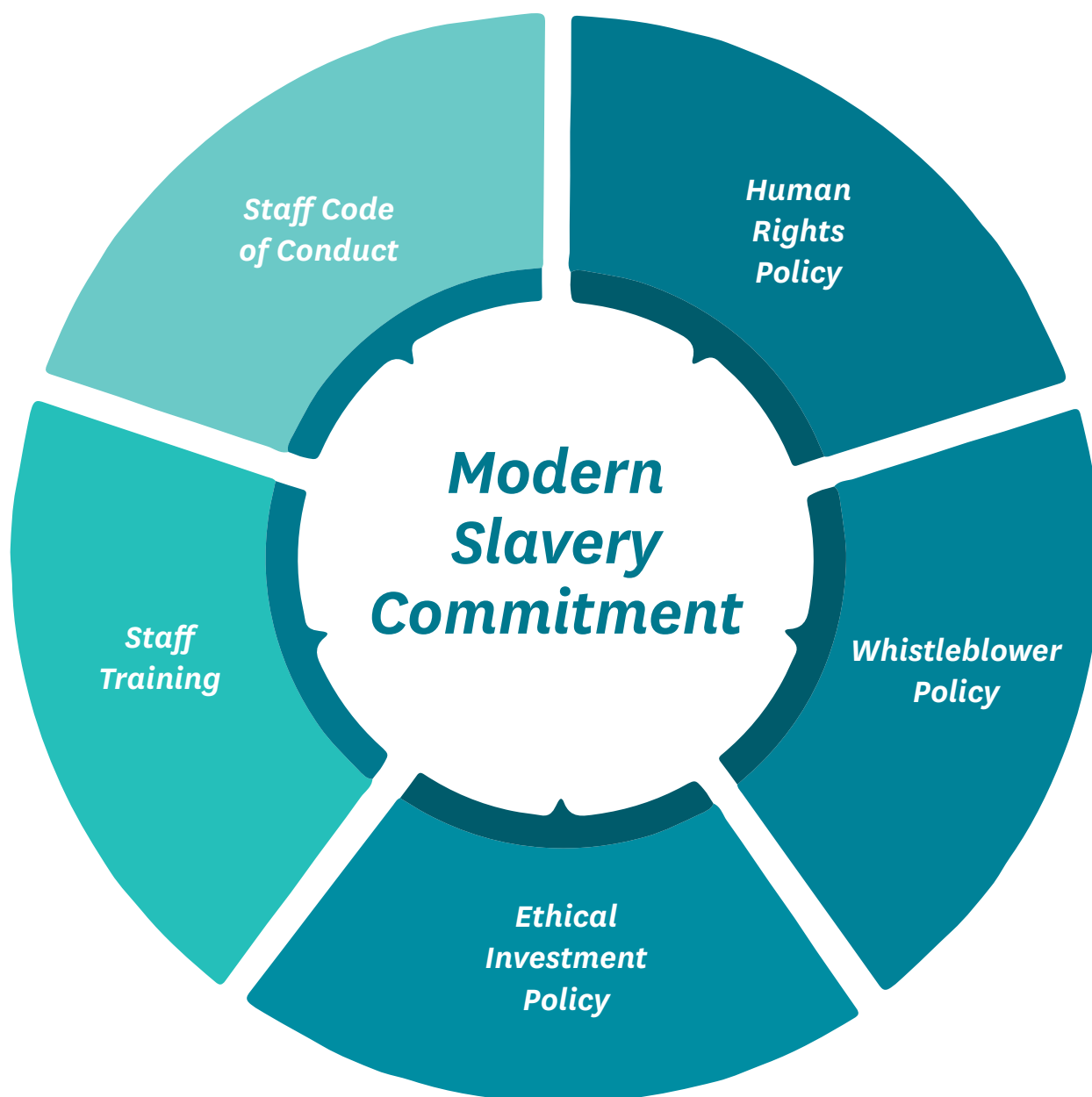
HEAD OF AGED CARE Lanna Ramsay	HEAD OF COMMUNITY CARE Russell Brighouse	DIRECTOR OF HOSPITAL SERVICES Joel Reading	HEAD OF RETIREMENT LIVING Anna Gorgijeski	CHIEF FINANCIAL OFFICER Dinuke Christie-David	CHIEF TRANSFORMATION OFFICER Keith Lavelle	CHIEF INFORMATION OFFICER John Scurr	GROUP MANAGER BRAND & COMMUNICATIONS Roslyn Hunter	GROUP MANAGER CONSTRUCTION & PROPERTY John De Angelis	GROUP MANAGER PEOPLE Brett Warhurst	GROUP MANAGER RISK & COMPLIANCE Joel Reading
RESIDENTIAL AGED CARE	HOME CARE & SUPPORT	PRIVATE HOSPITAL	RETIREMENT VILLAGES	ACCOUNTING & FINANCE	ACQUISITIONS & INTEGRATIONS	INFRASTRUCTURE SERVICES	PUBLIC RELATIONS	CONSTRUCTION & PROPERTY	HUMAN RESOURCES	AUDIT & ACCREDITATION
	DEMENTIA ADVISORY SERVICE	DAY SURGERY		PAYROLL	PROJECT MANAGEMENT OFFICE	IT SERVICE DESK	MARKETING	FLEET	HEALTH & SAFETY	BUSINESS RULES
	NDIS	SPECIALIST OUTPATIENTS CENTRE		INSURANCE	BUSINESS SYSTEMS	CYBER SECURITY		PROCUREMENT	LEARNING & DEVELOPMENT	COMPLIANCE & GOVERNANCE
DAY RESPIRE CENTRES					TECHNOLOGY ASSET MANAGEMENT					PRIVACY
					OPERATIONAL SUPPORT SQUAD					



## 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 2,024 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 2024 is as follows:

Procurement Category	Expenditure	Number of Suppliers
Building and construction	\$34,699,548	233
Labour hire and agency staff	\$23,426,260	34
Food and catering	\$16,307,092	123
Facility and property maintenance	\$8,502,065	605
Cleaning and security	\$5,615,167	231
Medical devices and supplies	\$4,141,632	119
Furniture and office supplies	\$3,740,261	130
Linen and laundry	\$2,643,798	27
Waste management	\$1,409,433	36

## ***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.



*Sally, diversional therapist,  
and Lex, client at Ozcare  
Toowoomba*

## ***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.

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### **Building and facility management**

- Furniture, fixtures and equipment
- Cleaning supplies
- Pest control
- Air-conditioning 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

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### **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

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### **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**

- Air-conditioning 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

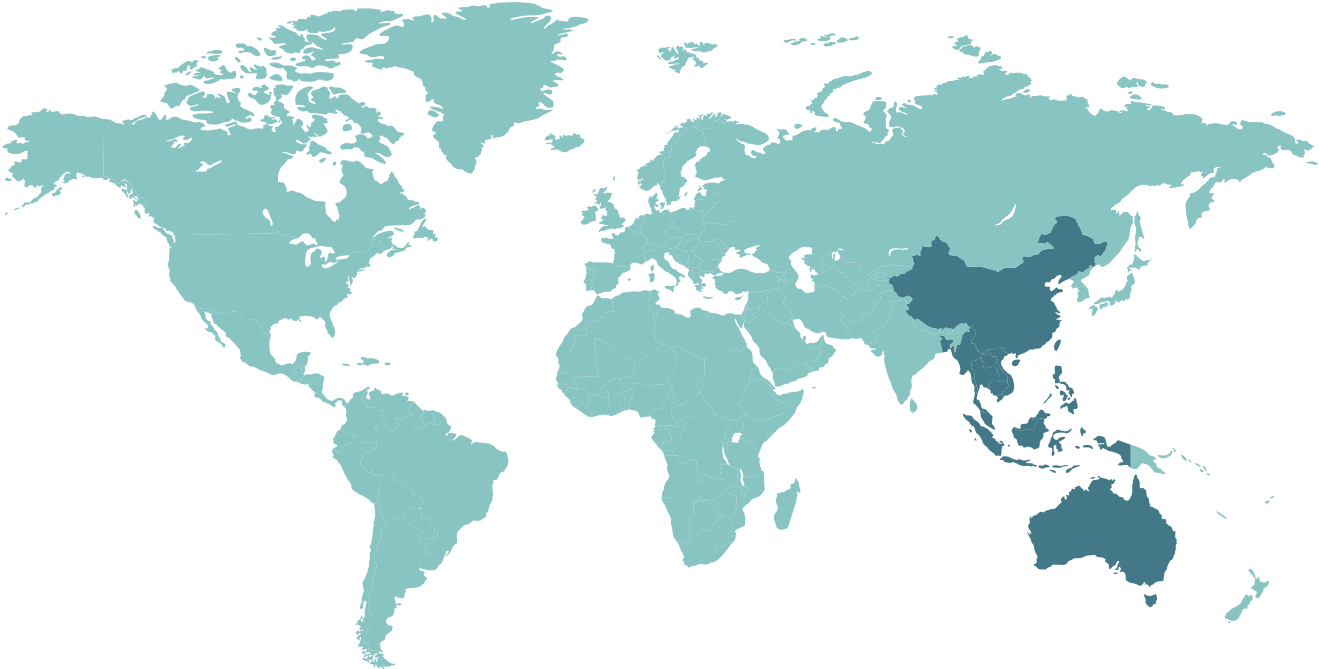
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### **Staffing, volunteers and human resource related**

- 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 and Indonesia
Security services	Australia
Waste management	Australia
Labour hire / agency staff	Australia
Stationery and office supplies	China
Furniture	Australia and South-East Asia
Medical Consumables	Australia, South-East Asia and 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 was introduced into our staff training package suite for relevant staff.

## ***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 Case Study on page 20 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. In 2024, we were able to further address those suppliers participation in Sedex. 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).

Ozcare is a member of the Australian Catholic Anti Slavery Network, a body that has considerable expertise in modern slavery risk management and advice. ACAN can provide advice and support to their members in developing and improving a modern slavery management framework - this statement, including our actions taken has been reviewed by ACAN.

## ***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.

In 2024, we reviewed and improved our standardised service agreements documentation, to strengthen the modern slavery clauses and to add a process to require suppliers, if nominated, to complete the Sedex screening processes.

In 2024, we also formalized our Modern Slavery Working group within Ozcare. The group meets periodically as required, and is chaired by a member of the Ozcare Executive staff which indicates organisational commitment. The group includes purchasing / contract management and internal audit staff.

## ***Complaints, Grievance and Remediation***

Ozcare has not yet had any cases of modern slavery like practice identified in our supply chain, other than the allegation contained in the case study below. We do have practices in place to act as a pathway for the notification of modern slavery like practice, and the reporting of a grievance.

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 or entity implementing actions and processes to investigate and redress negative impacts on people involved in its operations and supply chains. It also seeks to ensure future incidents are prevented by understanding and addressing root causes and any decisions, policies or practices that led to or contributed to the harms.

Ozcare recognises 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.

Ozcare is committed to actively remediate 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, ensuring that they prevent harm and contribute to meaningful and effective remedies.

Ozcare will maintain transparency in any efforts to provide for or cooperate in remediation of modern slavery by including any specific remediation actions and outcomes in our annual Modern Slavery Statement.

As an ACAN participant, Ozcare and its suppliers may access independent modern slavery support and advice through Domus 8.7, a dedicated provider of modern slavery advice, remediation, and prevention services.

Domus 8.7 can provide independent support and advice. In the event of the identification of modern slavery like practice in our supply chain, Domus 8.7 could provide assistance such as :

- Modern slavery assessment and practical guidance
- A coordinated response to victim survivors
- Supports to provide or cooperate in remedial actions
- Offer solutions that are insight-driven and aimed at reducing future risks

## ***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 labour 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 labour 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.

- Increase the number of our suppliers that utilise 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:

- Continue 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 the use of our new supply agreement and the Modern Slavery requirements and clauses in regards to our expectations, accompanied by a Supplier Code of Conduct
- Maintaining our membership and participation in the Australian Catholic Anti Slavery Network.



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)











# Modern Slavery Statement 2024

Reporting period 1 January 2024 - 31 December 2024  
Southern Cross Care (NSW & ACT) | ABN: 76 131 082 374



# Acknowledgement of Country

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Southern Cross Care (NSW & ACT) acknowledges the Traditional Owners of the land and the waters upon which we work and live.

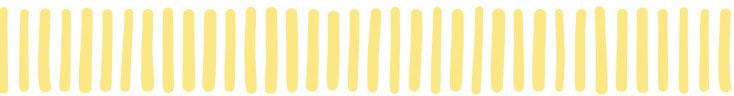
We pay our respects to the Elders past, present and future, for they hold the memories, the traditions, the culture and hopes of Aboriginal and Torres Strait Islander peoples across Australia.

A better understanding and respect for Aboriginal and Torres Strait Islander cultures develops an enriched appreciation of Australia's cultural heritage and can lead to reconciliation. This is essential to the maturity of Australia as a nation and fundamental to the development of an Australian identity.



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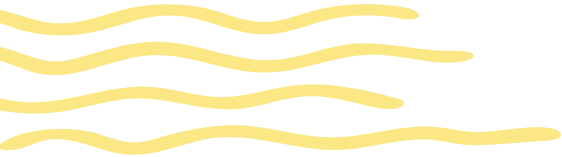


# About us

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At Southern Cross Care (NSW & ACT), our purpose is clear: enabling older people to live life to the full. Our actions are guided by our values: Honesty, Empathy, Acceptance, Respect and Teamwork. We are committed to providing exceptional care that meets the physical, emotional, and spiritual needs of each person we serve. We believe in creating environments where every resident and client feels valued, connected, and supported.

We deliver personalised, quality care and support services across our network of Retirement Villages, Home Care services and Residential Care homes in over 40 locations, including regional communities. Every day Southern Cross Care supports thousands of people to live with purpose and dignity.



# Message from the Chair

Southern Cross Care (NSW & ACT) upholds a 50-year legacy of compassionate aged care in Australia, founded on deep respect and unwavering support for our elders. We are committed to nurturing the physical, emotional, intellectual, social, and spiritual wellbeing of older Australians throughout our communities.

Our dedication to human dignity extends beyond residents and staff to everyone we engage with, driving our persistent efforts to combat modern slavery and uphold ethical practices across our supply chains and the broader aged care sector.

In recognition of this critical challenge, Southern Cross Care (NSW & ACT) joined the Australian Catholic Anti-Slavery Network (ACAN) in 2020. Through this strategic partnership, guided by our Modern Slavery Working Group, we have continuously strengthened our anti-slavery initiatives.

Our fifth Statement highlights significant progress made in 2024. From issuing a Modern Slavery Self-Attestation Statement to our top 50 suppliers to assure their alignment with our ethical standards, to implementing a comprehensive staff training and education program, these initiatives demonstrate Southern Cross Care (NSW & ACT)'s resolute approach to eliminating exploitation and injustice.

Our board, executive, and staff are equipped with the essential knowledge and tools to identify risks and address unethical practices. Through rigorous due diligence, targeted audits, and collaborative supplier relationships, we work to mitigate risks and uphold the highest ethical standards. By maintaining transparency and engaging with industry and the broader community, we strive to lead by example and inspire others to join us on our mission to stamp out modern slavery.

In 2025, we will strengthen our approach through strategic advancements in both policy development and operational implementation internally. Our comprehensive plan includes systematic reviews of recruitment policies and procedures, enhanced staff training initiatives, and regular awareness sessions that reinforce our team's understanding of Modern Slavery Act obligations.

Extending our impact beyond our organisation, we will enhance supplier accountability by requiring our top 75 suppliers to review and sign our Modern Slavery Attestation Statement, while featuring a dedicated session to modern slavery awareness and prevention at our annual Southern Cross Care (NSW & ACT) Conference.

Recognising the power of strategic alliances, we will continue our active participation in ACAN's monthly educational webinars. Upholding transparency as the foundation for meaningful action, Southern Cross Care (NSW & ACT) will publish regular progress reports and improve our website with educational content that empowers our staff, suppliers, and communities to recognise and address modern slavery risks.

Modern slavery persists as a global crisis, affecting an estimated 41,000 people in Australia and 50 million people worldwide. Southern Cross Care remains steadfast in our commitment to combating this injustice and adhering to the highest standards of human rights protection.

We look forward to working alongside our suppliers, partners and communities to create a world free from exploitation, where every person is treated with dignity and respect.

## Principal Governing Body Approval Date

This Modern Slavery Statement was approved on 27 May 2025 by the principal governing body of Southern Cross Care (NSW & ACT), ABN 76 131082 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.

Caroline Waldron

**Caroline Waldron, Chair**



# 2024 Achievements

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Southern Cross Care (NSW & ACT) is committed to upholding the dignity of every person by actively identifying, managing, and reducing the risk of modern slavery across our operations and supply chains. Rooted in our Catholic values and guided by our mission to support the most vulnerable, we recognise the vital role we play in promoting ethical sourcing, safeguarding human rights, and influencing meaningful change through our partnerships.

In 2024, we strengthened our approach to Modern Slavery risk management through deeper staff education, governance oversight, and supplier engagement.

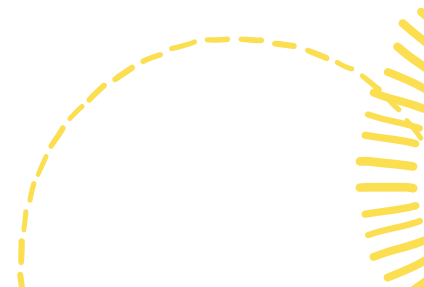
## **Key achievements include:**

- Launching a dedicated Modern Slavery intranet hub for staff, featuring tools, resources, and our formal statements.
- Rolling out training programs across the workforce, supported by a staff-wide awareness webinar.
- Embedding modern slavery as a core consideration in our procurement and vendor review processes.
- Securing 100% attestation from our top 50 suppliers by spend, reinforcing shared expectations around ethical sourcing.
- Forming a strategic partnership with a key supplier to develop a co-designed initiative addressing modern slavery risk.

## **Our focus:**

Our actions are informed by the Australian Modern Slavery Act 2018 (Cth) and our participation in the Australian Catholic Anti-Slavery Network (ACAN), which continues to provide important guidance and benchmarking.

Looking ahead, we will deepen our efforts through stronger data systems, more targeted supplier due diligence, and the launch of a joint initiative with industry partners to support greater supply chain transparency. We remain committed to continuous improvement, collaborative action, and the creation of systems that uphold human dignity across every part of our work.





## Criterion 1

# Our Structure

Southern Cross Care (NSW & ACT) is dedicated to improving the lives of older Australians through a broad range of compassionate services, including Home Care, Retirement Communities, and Residential Aged Care facilities. With a presence in over 40 diverse locations, we are deeply ingrained in regional communities, addressing their unique challenges and distinct needs. Our human-centered approach is powered by our 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 commitment to building inclusive and supportive communities is reflected in all aspects of our work, from thoughtfully designed living spaces to engaging programs that nurture the physical, mental, spiritual, and social well-being of every individual.

Understanding the vital role of ethical integrity, Southern Cross Care (NSW & ACT) is steadfast in upholding ethical practices that respect the rights and dignity of every individual. Our Modern Slavery Statement is more than a declaration; it reflects our commitment to building a more transparent, responsible, and equitable world. Through rigorous oversight of our operations and supply chains, we challenge industry norms and set new standards for operating free from exploitation and injustice.

## Operations

- 27 Residential Aged Care Homes across NSW & ACT
- 26 Retirement Living communities across NSW & ACT
- Home Care packages
- Commonwealth Home Support services
- Respite services
- Allied Health

## Support services

- People & Culture
- Clinical Governance and Engagement
- Enterprise Risk and Process Transformation
- Customer Services
- Digital and Transformation
- Change and Sustainability
- Marketing and Communications
- Strategic Project Delivery and Data Governance
- Information Technology
- Finance and Procurement
- Property
- Legal
- Company Secretary
- CEO's Office

## Criterion 2

# Our operations and supply chain



**2,224**

Dedicated  
Staff



**4,037**

Residents and  
Clients supported



**40**

Towns / Communities  
Served



**26**

Retirement  
Communities



**27**

Residential  
Care Homes



**307**

Home Care  
Suburbs Serviced

## Operations

Our operations are supported by a strong network of 1,895 suppliers, ensuring the smooth delivery and ongoing enhancement of our services. The majority of these suppliers are based in Australia and share our values of integrity and accountability, further strengthening our commitment to supporting the local supply chain.

## Governance

To manage Modern Slavery risks, our Modern Slavery Working Group oversees supplier compliance and due diligence activities. This includes risk classification based on supplier location, spend, and sector exposure.

Governance of these activities is directly connected to our Executive Leadership, with regular reporting to the CEO and Board. This ensures modern slavery remains a strategic priority and that our procurement decisions align with our ethical and legal responsibilities.

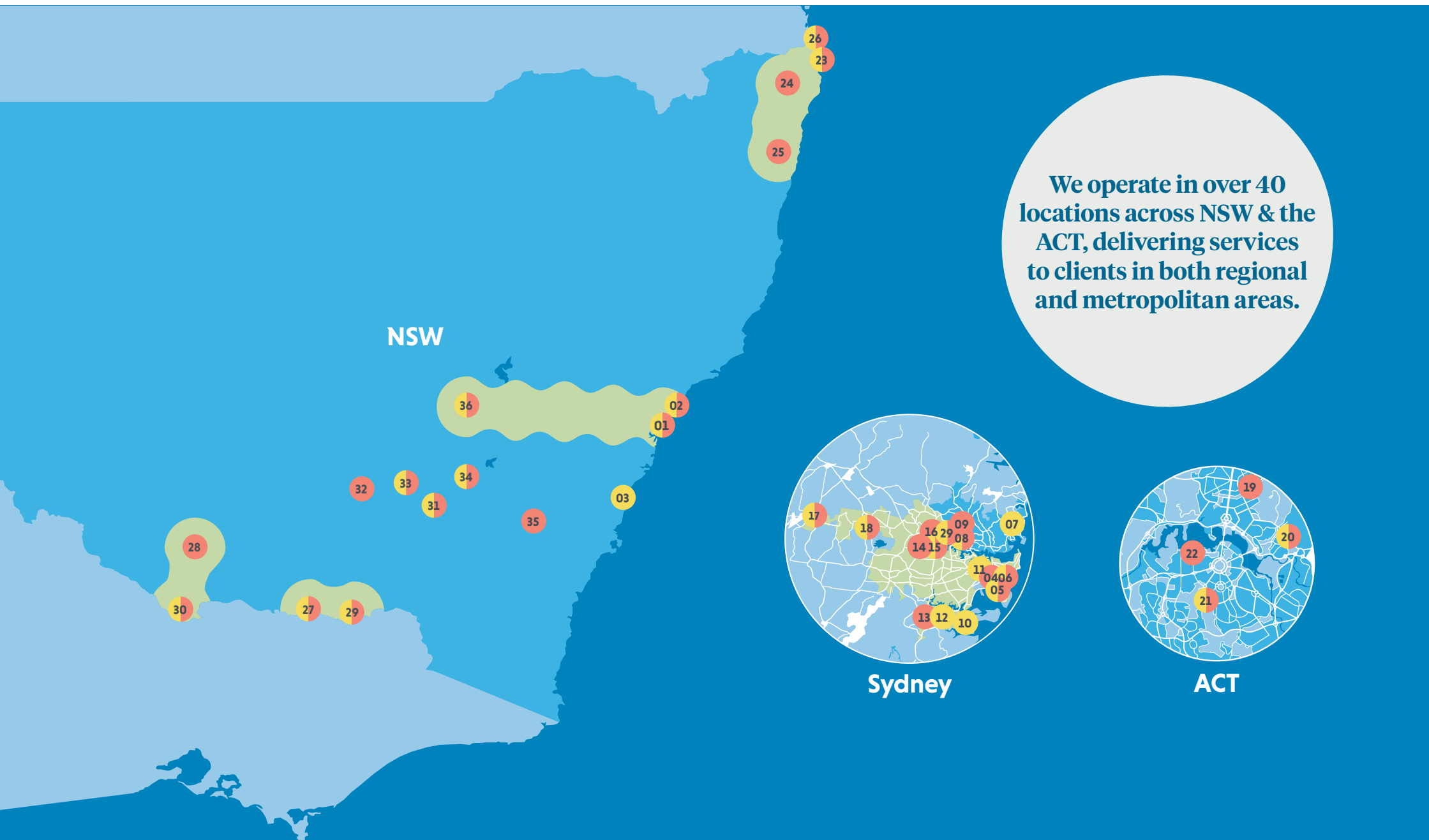
## Supply chains

Southern Cross Care (NSW & ACT) relies on a diverse and complex supply chain to deliver essential services to older Australians across Residential Aged Care, Home Care, and Retirement Living. Our supply partners range from large national providers to small local businesses, with the majority based in Australia. This enables us to maintain strong relationships, support the local economy, and uphold shared values of dignity, integrity, and care.

Goods and services are sourced across a wide range of categories, including:

- **Clinical and care services.** Including, medical equipment and consumables, pharmaceuticals, infection control supplies, and personal protective equipment (PPE).
- **Hospitality and domestic services.** Including, catering, food and beverage supply, linen, laundry, cleaning, and waste management.
- **Facilities and property management.** Including, construction, maintenance, capital works, and refurbishment of aged care homes and retirement villages.
- **Information and communications technology.** Including, software and hardware, digital infrastructure, cybersecurity services, and system support.
- **Corporate and professional services.** Including, legal, financial, human resources, communications, marketing, insurance, and audit services.
- **Utilities and fleet.** Including, energy, water, telecommunications, vehicle leasing, and transport logistics.
- **Labour and workforce.** Including, agency staffing, recruitment providers, consultants, and contractors, including a small cohort of visa holders.

# Where you can find us



## NSW Metropolitan




### Central Coast

- 01 Bateau Bay 
- 02 Caves Beach 

### Illawarra Shoalhaven

- 03 Thirroul 





### Sydney East

- 04 Daceyville 
- 05 Maroubra 
- 06 South Coogee 


### Sydney North

- 07 Manly Vale 
- 08 Marsfield 
- 09 North Turramurra 





### Sydney South

- 10 Caringbah 
- 11 Marrickville 
- 12 Kirrawee 
- 13 Sutherland 

## Sydney West





- 14 Greystanes 
- 15 Merrylands West 
- 16 North Parramatta 
- 17 Penrith 
- 18 Plumpton 

## ACT



- 19 Braddon 
- 20 Campbell 
- 21 Garran 
- 22 Yarralumla 

## NSW Rural & Regional





### Northern NSW

- 23 Banora Point 
- 24 Casino 
- 25 Grafton 
- 26 Tweed Heads South 

## Riverina

- 27 Corowa 
- 28 Deniliquin 
- 29 Lavington 
- 30 Moama 

### South West Slopes

- 31 Cootamundra 
- 32 Leeton 
- 33 Temora 
- 34 Young 




### Southern NSW

- 35 Goulburn 

### Western NSW

- 36 Parkes 

### Legend

-  Retirement Villages
-  Residential Care
-  Home Care

## Criterion 3

# Modern Slavery risks

Southern Cross Care (NSW & ACT) recognises that the risk of modern slavery may exist across both our operations and supply chains. In 2024, we continued to assess these risks with the support of our spend management platform, supplier engagement efforts, and partnership with the Australian Catholic Anti-Slavery Network (ACAN).

### Supply chain risks

Our procurement activities span 12 main categories and 45 sub-categories, involving 1,895 suppliers and \$111 million in spend during the reporting period. The breadth and complexity of our supply chain creates exposure to modern slavery risks, particularly in categories with outsourced labour, international sourcing, and limited supply chain transparency.

Through our collaboration with ACAN and our internal risk classification process, we have identified elevated risk in the following supplier categories:

- Medical equipment and consumables
- Property and maintenance services
- Construction and capital works
- Cleaning and waste management
- Personal protective equipment (PPE) and uniforms
- Linen and laundry
- Labour hire and agency staffing
- Food and catering services
- Information and communications technology (hardware and software)

These categories reflect common high-risk indicators, including multi-tiered supply chains, offshore manufacturing, and contract-based labour. In response, we have implemented supplier due diligence measures including risk tiering, attestation requirements and structured supplier engagement to monitor and manage these risks.

### People risks

Modern slavery risks may also arise within our operations, particularly in relation to the use of contracted or agency labour. While most of our workforce is directly employed under enterprise agreements or individual employment contracts, we engage third-party labour for specialist or surge capacity needs.

The aged care sector, like many others, faces broader systemic pressures such as workforce shortages and increasing demand. These dynamics may elevate vulnerability among some cohorts, particularly migrant workers or those employed under indirect arrangements.

Although no direct instances of modern slavery have been identified within our operations, we remain mindful of the hidden nature of exploitation and the importance of maintaining strong internal awareness and oversight.



Criterion 4

# Actions taken to assess and address risks

In 2024, Southern Cross Care (NSW & ACT) reinforced its commitment to identifying, addressing and eliminating modern slavery across our operations and supply chains. Our approach focused on education, governance, supplier engagement, risk mitigation and transparency.

## Strategic partnerships and governance

We continued our active membership in the ACAN, supporting sector-wide collaboration. Since joining in 2020, this partnership has enabled knowledge sharing, peer benchmarking and joint submissions to the modern slavery public register. ACAN also participated in our Modern Slavery Working Group meetings, enriching our strategy with expert guidance.

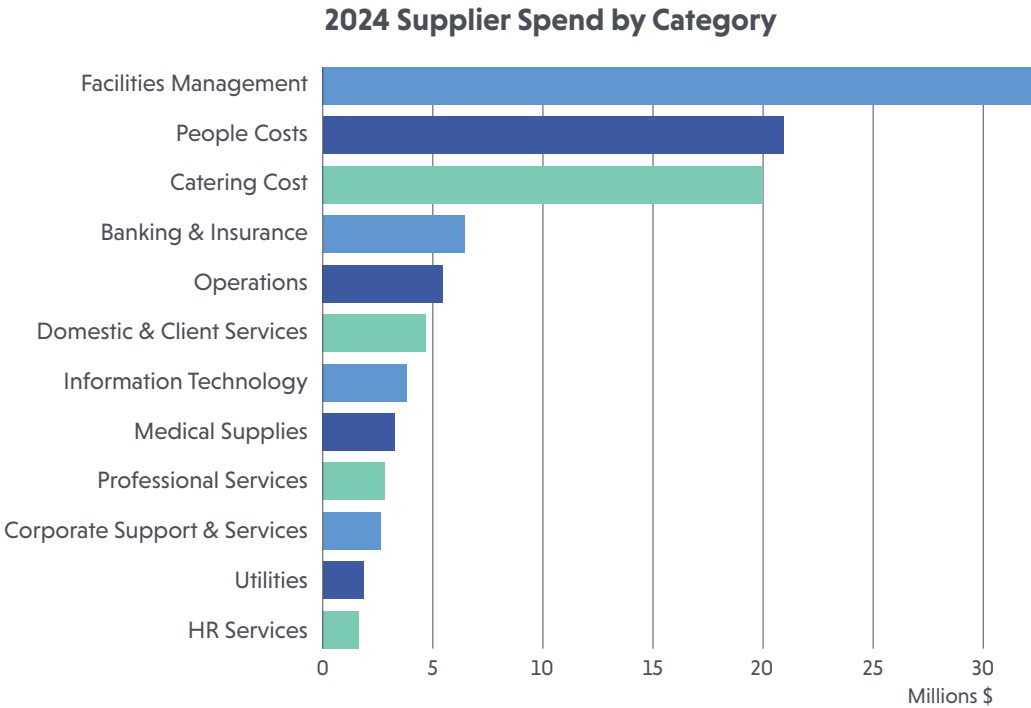
Southern Cross Care (NSW & ACT)'s Modern Slavery Working Group met quarterly in 2024, with participation from seven departments, achieving an 86% attendance rate. This cross-functional team, including representatives from procurement, IT, marketing and communications, people and culture, ensures a coordinated and informed response to modern slavery risks. These meetings will continue in 2025 to further strengthen our strategic response.

Our CEO and Board receive regular updates, ensuring executive oversight of our progress. In June 2024, we shared our Modern Slavery Statement with our supplier base, followed by publication on our company website and internal Heart HQ platform. This marked an important step in promoting transparency and awareness across all stakeholders.

## Supplier engagement and risk management

In 2024, we analysed \$111 million in spend across 1,895 suppliers and 45 procurement sub-categories using our spend management platform. This enabled targeted risk assessments by sector, geography and spend.

Procurement categories:





#### Key actions included:

- Issuing Southern Cross Care (NSW & ACT)'s Modern Slavery Self-Attestation Statement to our top 50 suppliers, with 100 percent completion and endorsement.
- Conducting quarterly supplier meetings that included modern slavery as a standing agenda item, beginning with six key suppliers and with plans to expand to the top 20 in 2025.
- Featuring our modern slavery statement in the internal Take 5 publication, accompanied by an endorsement from the Chair of the Board.
- Meeting with strategic supplier partner Bunzl to co-design a joint initiative addressing modern slavery. Planning will continue in 2025, with shared deliverables and targets to be confirmed.

We maintain a robust approved supplier management system, including audits and reviews to assess compliance with Southern Cross Care (NSW & ACT)'s Modern Slavery Policy, Supplier Code of Conduct and attestation requirements.

## Training and awareness

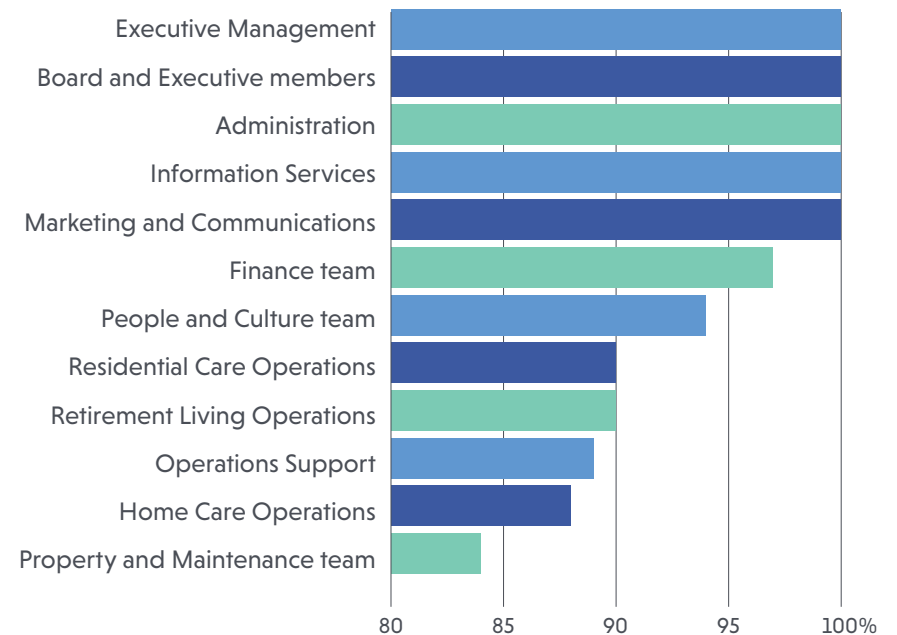
In 2024, Southern Cross Care (NSW & ACT) advanced its modern slavery education and training program across the organisation.

- Our e-learning module was integrated into the staff training platform, and a 30 minute ACAN led awareness webinar was attended by 77 staff.
- Training completion rates across teams reached an organisational average of 90%, with the Executive Team achieving 100% participation.
- A new online training module was developed and reviewed by the procurement team, with rollout planned for 2025.

- Modern slavery was included as a topic at the Southern Cross Care (NSW & ACT) Care Conference and in regular meetings with Residential Aged Care Facility Managers
- A staff awareness survey was conducted in December to help inform future training and engagement efforts.

The Southern Cross Care (NSW & ACT) intranet was also updated with modern slavery statistics from the Global Slavery Index, relevant news articles, and video resources to increase awareness and staff understanding of the issue in both global and local contexts.

#### Modern Slavery Training Completion Rates



## Grievance mechanisms and reporting

Southern Cross Care (NSW & ACT) provides multiple confidential channels for reporting modern slavery risks.

- A whistleblower hotline is available to all employees for reporting misconduct, including concerns related to modern slavery.
- A dedicated supplier grievance channel is managed by our procurement team. While no modern slavery-related complaints were received in 2024, Southern Cross Care (NSW & ACT) remains vigilant and ready to respond.
- In the event of a breach, Southern Cross Care (NSW & ACT) commits to engaging with the relevant supplier within 24 hours and works closely with ACAN to support remediation.

## Communication and ongoing engagement

Southern Cross Care (NSW & ACT) recognises that building awareness and maintaining open dialogue are essential to sustaining a culture that actively identifies and responds to modern slavery risks. In 2024, we implemented a range of communication and engagement initiatives to strengthen understanding across our workforce and broader community.

- In June 2024, Southern Cross Care (NSW & ACT) featured the signed Modern Slavery Statement in our internal Take 5 publication, accompanied by a message from the Chair of the Board reinforcing our commitment to ethical integrity and transparency.
- In August 2024, Southern Cross Care (NSW & ACT) Business Partners began including modern slavery as a regular agenda item in meetings with Residential Aged Care Facility Managers, supported by tailored presentations to enhance staff awareness.

- Modern slavery awareness was incorporated into ongoing conversations with frontline staff across sites, with Business Partners reinforcing key messages during visits.
- On 2 December 2024, Southern Cross Care (NSW & ACT) published a message across our social media platforms to mark the International Day for the Abolition of Slavery, raising public awareness and affirming our commitment to ethical and responsible care

These actions form part of our broader strategy to promote shared accountability, embed ethical practices, and keep modern slavery risk front of mind across all levels of our organisation.

## Criterion 5

# Assessing our effectiveness

In 2024, Southern Cross Care (NSW & ACT) made significant progress in strengthening its approach to identifying and addressing modern slavery risks. Through enhanced governance, supplier engagement, staff training, and awareness initiatives, we have embedded ethical practices more deeply across our operations and supply chains. The actions below demonstrate our commitment to continuous improvement and our obligations under the Modern Slavery Act 2018 (Cth).

Southern Cross Care (NSW & ACT) Goals		Target	Date	Status	Update
1.a	Build on and expand on Modern Slavery information on the Southern Cross Care (NSW & ACT) intranet.	Update and enhance Modern Slavery content on the intranet.	2024	Completed	A dedicated Modern Slavery information page has been launched on the Southern Cross Care (NSW & ACT) intranet. It includes an overview of modern slavery, key policies, external resources, Southern Cross Care (NSW & ACT)'s Modern Slavery Statements, relevant news articles, and staff training opportunities.
1.b	Attend monthly Modern Slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Completed	Southern Cross Care (NSW & ACT)'s Modern Slavery Steering Committee maintains active engagement with national best practice by participating in monthly Australian Catholic Anti-Slavery Network (ACAN) webinars.
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of Modern Slavery.	Deliver ongoing training programs.	2025	Completed	Southern Cross Care (NSW & ACT) implemented modern slavery training across its workforce, achieving organisational average of 90%, with the Executive Team achieving 100% participation. A dedicated all staff webinar was held in December 2024 to reinforce awareness and obligations.
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'s commitment and obligations under the Modern Slavery Act.	Conduct regular awareness sessions.	Bi-annually	Completed	Internal communications have continued to highlight Southern Cross Care (NSW & ACT)'s responsibilities under the Modern Slavery Act, including regular updates through staff newsletters and leadership communications.
1.e	Include a Modern Slavery segment in the annual Southern Cross Care (NSW & ACT) conference.	Include Modern Slavery segment in the conference agenda.	Annual	Completed	The 2024 Southern Cross Care (NSW & ACT) Leadership Conference included a session focused on Modern Slavery risks and our Laudato Si' aligned ethical sourcing priorities. Materials were provided to all attendees.

Southern Cross Care (NSW & ACT) Goals		Target	Date	Status	Update
1.f	Attend quarterly Modern Slavery Steering Committee meetings.	Ensure representation at all quarterly meetings.	Quarterly	Completed	Quarterly Steering Committee meetings are held to oversee Southern Cross Care (NSW & ACT)'s Modern Slavery strategy and monitor progress. Outcomes are formally documented and inform ongoing actions. ACAN has also been invited to attend and present at key meetings.
1.g	Ask our top 75 suppliers by spend to review and sign Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2026	Completed	Southern Cross Care (NSW & ACT) achieved 100% attestation from its top 50 suppliers by spend, confirming their review and agreement to Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement and ethical sourcing principles.
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	Completed	A strategic partnership was established with Bunzl to co-design a joint initiative aimed at reducing modern slavery risk in supply chains. The project scope and shared KPIs are being finalised for implementation in FY2026.
1.i	Include relevant Southern Cross Care (NSW & ACT) stakeholders in vendor reviews and include Modern Slavery as an area of discussion.	Incorporate Modern Slavery topics into vendor reviews.	2025	Completed	A supplier risk classification system has been introduced, incorporating country of origin, spend, and sector risk indicators. Modern Slavery is now a standing agenda item in procurement-led vendor reviews.

## Criterion 6

# Consultation

As a single reporting entity, Southern Cross Care (NSW & ACT) undertakes internal consultation through structured cross-functional engagement. Our Modern Slavery Working Group, comprising representatives from procurement, legal, people and culture, marketing and communications, information technology, and operations, meets quarterly to review progress, assess risk, and guide strategic priorities.

Input from these teams supports the development of our Modern Slavery Statement and ensures our organisation-wide actions are informed, coordinated, and aligned with our values and compliance obligations. Regular updates are provided to our CEO and Executive Team, with oversight maintained by our Board.





## Criterion 7

# Future actions

In alignment with commitment to the dignity of all people and the stewardship of our global community, Southern Cross Care (NSW & ACT) is dedicated to continuing and enhancing our efforts against modern slavery in 2025. Our approach is holistic, emphasising care for people and the planet, and includes the following focused objectives:

	Southern Cross Care (NSW & ACT) Goals	Target	Date	Responsibility
1.a	Ensure our recruitment policy and procedures are well-documented and regularly reviewed to ensure Southern Cross Care (NSW & ACT) remains vigilant against potential risks.	Update and recruitment policies are updated, reviewed and aligned to prevention practices	2025	Procurement
1.b	Attend monthly modern slavery ACAN webinars.	Ensure consistent attendance and participation.	Monthly	Procurement
1.c	Continue to educate and train Southern Cross Care (NSW & ACT) staff to understand and recognise the signs of modern slavery.	Deliver ongoing training programs.	2025	People & Culture, Procurement
1.d	Remind Southern Cross Care (NSW & ACT) staff about Southern Cross Care (NSW & ACT)'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 Southern Cross Care (NSW & ACT) 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 Southern Cross Care (NSW & ACT)'s Modern Slavery Attestation Statement.	Achieve 100% review completion from top 50 suppliers. Achieve 100% supplier agreement from top 50 suppliers.	2025	Procurement
1.h	Publish regular reports to stakeholders of Southern Cross Care (NSW & ACT)'s efforts and achievements	Form a strategic partnership and initiate a joint project.	2025	CEO, Procurement
1.i	Add content to Southern Cross Care (NSW & ACT)'s external website to remind our customers and suppliers about modern slavery risks	Publish content to the Suppliers & Procurement section of the Southern Cross Care (NSW & ACT) internet.	2025	Procurement, Marketing and Communications
1.j	Expand modern slavery training programs for the Procurement team, to recognise and address modern slavery risks	All Procurement team members to complete modern slavery training modules two and three from ACAN.	2025	Procurement



we care  
about  
**people**









TO GROW COMMUNITIES WHERE  
**BEST LIVES ARE LIVED**

**Modern Slavery Statement 2024**

[sccqld.com.au](https://sccqld.com.au)



This Modern Slavery Statement was approved on the 25 June, 2025 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

Southern Cross Care (Qld) Ltd  
2078 Logan Road, Upper Mt Gravatt Qld, 4122  
ABN: 65 104 033 471

For enquiries relating to this document, contact our Modern Slavery Liaison Officer (MSLO):  
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Email: [procurement@sccqld.com.au](mailto:procurement@sccqld.com.au)  
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### 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 recognises 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 engage 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 from, and in consultation with, the Australian Catholic Anti-Slavery Network and SCCQ's partner Southern Cross Care organisations.

## Criterion 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.

With a staff of over 1,300, SCCQ provides compassionate care and support to over 2,600 individuals across 13 residential aged care homes, 5 retirement villages, and over 1,000 home care clients 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.

## Criterion 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 is governed by a Board of 9 members with delegation given to the company CEO and carried out through an Executive Leadership Team. SCCQ has a combined annual revenue of \$145.5M and directly employs a workforce of over 1,300 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 SCCQ's operations.

To effectively address the requirements of SCCQ's residents and clients, SCCQ engages the services of 1033 active suppliers spanning a wide array of sectors encompassing facilities management, medical supplies, PPE,

### Southern Cross Care Locations – Qld



professional services, allied health, information technology, building and construction, maintenance, handyman services, and domestic assistance.

SCCQ remains steadfast in its commitment to utilise its market presence and influence to raise awareness within industries and communities about the perils of contemporary slavery.

### 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 and Governance Risk and Finance Committee via the SCCQ ELT, specifically the CFO or appropriate delegate.

## Criterion 3. Assessing SCCQ's operations and supply chains

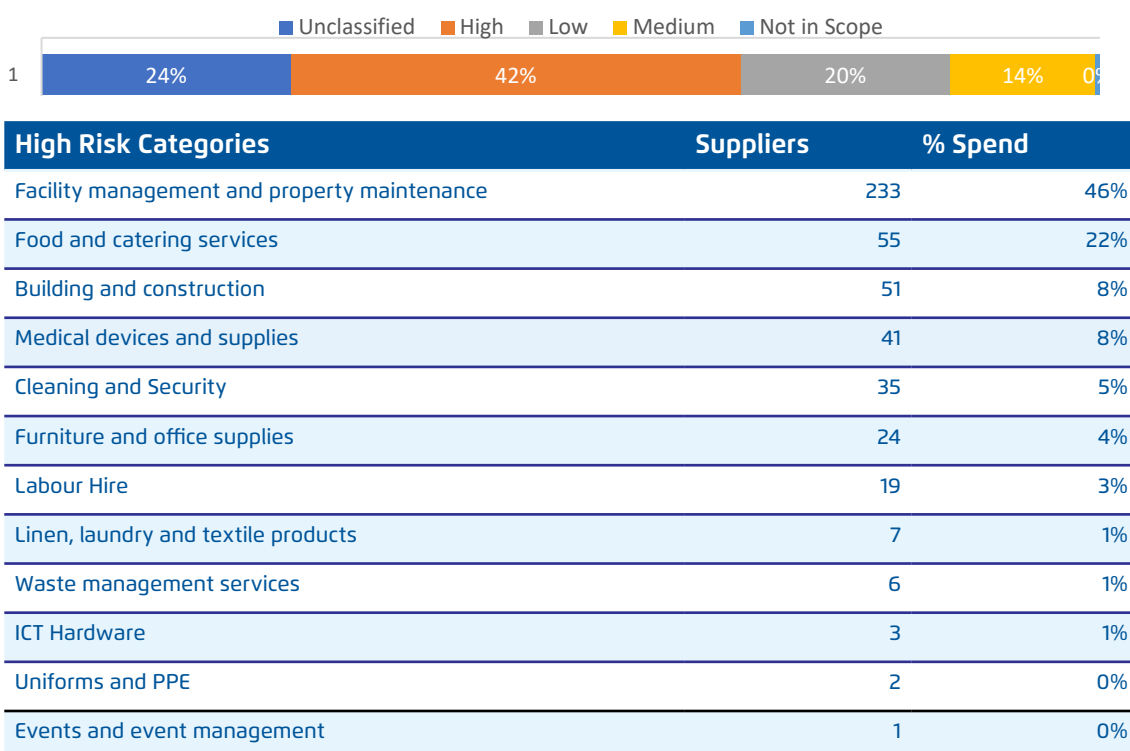
In the lead up to becoming a reporting entity for the purposes of modern slavery, SCCQ undertook a learning journey to better understand SCCQ's obligations and the methods SCCQ could utilise in order to meet those obligations.

Joining the Australian Anti-Slavery Network (ACAN) in July of 2022, SCCQ committed to using SCCQ's influence in their community as a collective with 52 other Catholic entities.

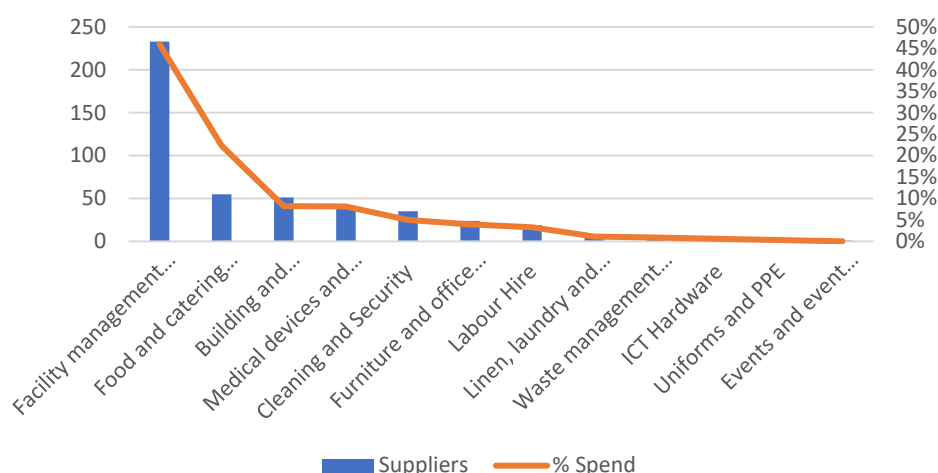
Through peer consultation and expert advice from ACAN and its members, SCCQ is committed to providing a Modern Slavery Statement together with other members in the form of a group compendium, which ACAN will submit to the Modern Slavery Public Registry on behalf of all of its member entities.

The below data tables from SCCQ's baseline data set and based on ACAN's Risk Taxonomy, clearly outline where SCCQ can focus activities around high risk suppliers.

### Data for suppliers in high risk categories



## High risk suppliers by spend %



## Criterion 4. How SCCQ are addressing modern slavery risks

In 2023, SCCQ committed to undertaking several initiatives to assist us in addressing modern slavery risks including the following actions:

### a. Training

SCCQ committed to the roll out of online modern slavery training to staff, utilising SCCQ's Purchase-to-Pay system (Basware). During the 2024 reporting period, SCCQ utilised ACAN's Modern Slavery 101 video training modules and embedded them into its internal Learning Management System.

This training was then rolled out to 168 staff who were identified by job role and split into high, medium or low risk, dependent on their interaction levels with the supply chain. To further embed staff knowledge of modern slavery, this training is being embedded into relevant annual training for staff.

Modern slavery 101 eLearning		
Priority	Completed	Incomplete
High	77%	23%
Mid	63%	38%
Low	48%	52%
<b>Grand Total</b>	<b>62%</b>	<b>38%</b>

### b. Survey of supply chain

SCCQ conducted a review of the top 80% of its supply network (by spend). This review was to understand how many of our existing network utilised Sedex (a modern slavery pre-qualification membership) and how many were active across multiple ACAN members.

Of the 92 suppliers reviewed, it has been found that 7.6% are already SEDEX members with a further 38% having completed SEDEX's Self-Assessment Questionnaire (a tool used to determine a supplier's need to join SEDEX).

### c. Updated procurement page

In line with modern slavery legislation, SCCQ updated its public facing procurement webpage.

This page is available to all persons and potential new suppliers and changes include a link to the Modern Slavery Act 2018 Cth, and a short statement of SCCQ's commitment to the Act.

<https://sccqld.com.au/suppliers-procurement/>

### d. Internal

SCCQ has created an internal modern slavery guide via its Intranet site. This provides staff with access to education about modern slavery, SCCQ's commitment to the Act and details to the Antislavery Australia website.



A dedicated modern slavery email address to report any modern slavery incidents or concerns is also active, with no incidents being noted to date.

#### e. Stakeholder engagement

SCCQ procurement team is proactively engaging with the business at the outset of activities to identify potential modern slavery risks. This early involvement enables procurement staff to hold informed and educational conversations about modern slavery.

As a result, staff, particularly those purchasing directly from international vendors outside our designated supply channels, have shown increased awareness of the issue.

#### f. Laudato Si

A Laudato Si management committee has been established and incorporating modern slavery and a procurement representative.

#### g. New supplier process

SCCQ's new supplier process continues to evolve and become more robust, with supplier questionnaires, surveys and welcome emails, all enabling increased oversight of our supply chains.

With SCCQ's new Supplier Base Management software (ScanMarket), SCCQ are now able to electronically store all relevant supplier information and documentation, including a supplier's Modern Slavery Statement and/or policy if they have one.

Further, SCCQ can utilise self-written questionnaires to assess a supplier, prior to the onboarding, and send out various questionnaires, surveys and other materials to already embedded suppliers.

To date, SCCQ is asking for completion of a new supplier questionnaire, which includes various modern slavery questions and sending a "Welcome" email which contains a statement affirming SCCQ's stance on modern slavery and details of the dedicated modern slavery email address for any potential grievances.

Future plans include additional questions within the onboarding around SEDEX membership and potential willingness to join SEDEX.

#### h. Remediation

SCCQ is committed to providing appropriate remedy to people impacted by modern slavery, including provision for and actions to address harms to people, and to address future risks if found to have caused or contributed to modern slavery.

Whilst no cases of modern slavery have been detected within SCCQ's operations or supply chains, SCCQ understand the complexity and specialist resources required in order to ensure the best outcomes for those impacted and therefore plan to integrate the existing grievance and remediation response with Domus 8.7, which was established in 2022, to provide remedy to people impacted by modern slavery.

#### *About Domus 8.7*

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced. Domus 8.7 provides direct support to victim survivors and provides guidance to Catholic entities participating in the ACAN Program.

Domus 8.7 also provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery. Domus 8.7 is guided by the principles of collaboration, flexibility, and ethical standards, designed to support Catholic entities and victim survivors.

Domus 8.7 was established as an agency of the Catholic Archdiocese of Sydney in 2020. Catholic entities participating in the ACAN Program are the founding members of Domus 8.7.

#### **Remediating modern slavery - An organisational imperative**

The Act mandates proactive efforts to identify, prevent, mitigate and address the impacts of modern slavery.

When an organisation encounters instances of people impacted by modern slavery, the organisation has a responsibility to provide effective remediation.

This involves steps to restore the victim survivors to their pre-exploitation state as much as possible.

Remedial actions vary on a case-by-case basis, and may include:

- Transport, accommodation and crisis support
- Services to address psychological and physical impacts
- Financial or non-financial compensation
- Offering alternative employment opportunities
- Payment of wages and entitlements
- Reimbursement of unfair recruitment and other fees
- Training to support new employment opportunities

### **Criterion 5. Assessing the effectiveness of SCCQ's modern slavery actions**

#### **Baseline data overview**

This dataset provides a foundational assessment of supplier engagement, transparency, and modern slavery risk management. It helps identify key trends, areas requiring further attention, and opportunities for strengthened due diligence.

The data points included reflect both supplier visibility and compliance activities, ensuring a comprehensive approach to ethical sourcing and governance.

- **Total number of suppliers** – represents the full scope of suppliers within the procurement network.
- **Number of suppliers with visible contact information and ABN** – measures supplier transparency and accessibility, a critical factor in verifying legitimacy and accountability.
- **Number of suppliers across high-risk categories** – identifies suppliers operating in industries or regions with heightened modern slavery risks, helping prioritise due diligence efforts.



- **Number of ACAN supplier surveys completed** – demonstrates supplier participation in assessments designed to evaluate their policies and practices related to ethical labour standards.
- **Supplier staff attending capacity building webinars** – tracks engagement in educational initiatives aimed at strengthening supplier awareness and commitment to modern slavery compliance.
- **Invited to join Sedex** – reflects outreach efforts to integrate suppliers into ethical trade platforms that enhance transparency and compliance.
- **Joined Sedex** – indicates supplier willingness to engage with Sedex, a global network focused on ethical business practices.
- **Sedex SAQ completed** – measures supplier participation in self-assessment questionnaires, a key step in evaluating risk exposure and compliance levels.
- **Social audits** – tracks independent assessments of supplier operations to verify ethical labour practices beyond self-reported data.
- **Corrective actions** – highlights identified risks and remediation efforts, ensuring accountability and continuous improvement across the supply chain.

This data serves as a baseline for monitoring supplier compliance and engagement, allowing for evidence-based decision-making in ethical procurement strategies.

	Activity	Southern Cross Care (Qld) 2023	Southern Cross Care (Qld) 2024
<b>Internal/ Staff</b>	Hours spent on modern slavery activities	90	100
	Individual staff completed e-learning	3	87
	E-learning modules completed	12	93
<b>External/ Supplier Engagement</b>	Total number of suppliers	1031	1033
	Number of suppliers with visible contact information and ABN	92	999
	Number of suppliers across high-risk categories	0	476
	Number of ACAN Supplier Surveys completed	0	125
	Supplier staff attending capacity building webinars	4	6
	Invited to join Sedex	0	19
	Joined Sedex	0	37
	Sedex SAQ completed	0	3
	Social audits	0	0
	Corrective actions	0	0

\* 2023 marks the commencement of SCCQ's modern slavery journey with improvements show via 2024 activities.

SCCQ's new supplier process and electronic supplier management system (ScanMarket) is showing a marked increase in supplier visibility with a significant jump in number of suppliers with visible contact information and ABN details.

## Where to from here

As SCCQ's modern slavery practices mature, we are determined to continually improve and evolve our processes and approach to ensuring that modern slavery practices do not take place within our supply chains. To this end, in 2025 SCCQ is looking forward to:

### a. Training

SCCQ are looking to continue the strong start made in training its people. 2025 will see continued focus on completion rates for Modern Slavery 101 amongst all staff groups that make purchases or contact SCCQ's supply chain in any way.

Further to this, SCCQ will be investigating ways in which this same training may be shared with its suppliers and partners to further expand on the education of "What is modern slavery".

### b. Survey of supply chain

SCCQ, in collaboration with ACAN, will continue to review its supply chain and increase its partners awareness of its requirements. SCCQ will continue to work with ACAN in order to synchronise taxonomy and ensure that all agreed high risk suppliers are surveyed and encouraged to undertake ACAN led webinars or information sessions as well as SEDEX's self-assessment questionnaire to assess a supplier's suitability to join Sedex.

### c. Sedex onboarding

SCCQ will encourage its largest, high risk suppliers to enrol with Sedex, a modern slavery pre-qualification membership. With an aim of having 25% of high-risk suppliers either signing up to Sedex or completing Sedex self-assessments.

### d. Supplier case consolidation

SCCQ will look to reduce its supply chain in 2025 by 15% to 20%. This will predominately occur in the Support At Home sector where SCCQ has a large number of suppliers providing the same or similar services within a common area. This consolidation will allow SCCQ to focus on deepening its partnerships with suppliers and reduce its risk exposure, whilst continuing to educate around the effects of modern slavery.

## Criterion 6. Consultation with owned or controlled entities

SCCQ did not own or control any other entities during the 2024 reporting period, so no consultations were undertaken.

## Criterion 7. Any other relevant information

SCCQ has no further information to add under this Criterion.





## CONTACT US

### Connect with us

 [sccqld.com.au](http://sccqld.com.au)

 1800 899 300

 [enquiries@sccqld.com.au](mailto:enquiries@sccqld.com.au)

 Southern Cross Care (Qld) Ltd  
2078 Logan Road  
Upper Mt Gravatt Q, 4122











# 2024 Modern Slavery Statement



Southern  
Cross Care WA

[scrosswa.org.au](https://scrosswa.org.au)



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# Board Chair message

Southern Cross Care WA is committed to our purpose of helping people live extraordinary lives, every day, connected to communities. This extends to both our employees and our suppliers.

It is through this commitment that Southern Cross Care (WA) Inc. (SCCWA) presents our first Modern Slavery Statement under the Modern Slavery Act 2018 (Cth).

This statement is consistent with our purpose and values of I listen, I act, I don't give up and we work as one. It reflects our commitment to taking meaningful action and acting with integrity to support vulnerable members of our community.

This statement is made together with other Australian Catholic organisations. SCCWA is pleased to be a part of the Australian Catholic Anti-Slavery Network (ACAN), and for our Modern Slavery Statement to form part of ACAN's compendium of Modern Slavery Statements.

As Chair of SCCWA, I would like to thank everyone who has helped develop this important work, from discerning the issue and our commitment to action to delivering the final statement.

I look forward to leading and supporting our ongoing efforts to eliminate Modern Slavery.



**Tony Vis,**  
**Board Chair,**  
**Southern Cross Care (WA) Inc.**



# Reporting criteria 1 & 2: About us

In 1966, Southern Cross Care WA, formerly known as Southern Cross Homes, was created by the Order of the Knights of the Southern Cross (the Knights), who were committed to improving the lives of their fellow West Australians.

Now the legacy of the Knights lives on as SCCWA continues to support the complex health, care and accommodation needs of our aging population and those living with mental illness.

Whether living independently in their own home, in one of our retirement villages, or needing a higher level of physical or mental health care, we aim to help our residents and clients live extraordinary lives, every day, connected to communities.

Making a meaningful difference in people’s lives is made possible by our dedicated workforce of over 1000 employees and more than 100 volunteers. From nurses and carers working on the frontline to those behind the scenes in leadership and support roles, our ever-growing teams deliver care and services to over 3,000 West Australians across our Residential, Mental Health, Disability and Community Housing portfolios.

## Our purpose

People live extraordinary lives, every day, connected to communities.

## Our vision

Transforming our sector and the experiences of the people we care about.

## Our values

Our values guide how we live and work, day to day. They define how we behave to each other and the attributes we recognise and celebrate. Our values take the normal to memorable and set a shared standard for how we care for others, now and in the years to come.

All of our people operate from a core belief that I enable the extraordinary because:



I listen



I act



I don't give up



We work as one

This is our promise to our clients, residents and each other.

## Our services and locations



### **Residential Aged Care**

SCCWA has eight residential aged care homes throughout metropolitan Perth and regional WA, providing 24/7 clinical and personal care while prioritising the dignity and personal choices of our residents. Our homes in Rossmoyne and Success also accommodate eight-bed transition units for residents requiring mental health care in High Dependency Units (HDU). In addition to Residential Aged Care, Villa Pelletier in West Leederville supports people over 65 who have health needs and are experiencing homelessness or insecure tenancy, through our Housing the Homeless program.



### **Retirement Living (Independent Living Units)**

Our seven Retirement Villages in the Perth metropolitan area offer a sense of safety, security, and community where residents can enjoy their independence and make the most of their retirement.



### **Mental Health Services and Support**

SCCWA offers a broad range of Mental Health services for our clients and their carers or family members. We support adults aged between 18 and 65 who have a diagnosed mental illness or are experiencing mental health concerns. We offer various support services in three residential settings and in the community, through our Community Mental Health and Family and Carer Support programs.



### **Pastoral Care**

Our pastoral carers are trained to listen and help our residents and their families make sense of the changes that are occurring and provide support during difficult and challenging times. The pastoral care team delivers pastoral care to residential aged care, villages, and home care. They also deliver our Connect the 40% program and assist with our No One Dies Alone program.





## Home Care

Our Home Care services include care via Home Care Packages (HCP), the Commonwealth Home Support Programme (CHSP), Short-Term Restorative Care (STRC) Program and the Community Transition Care Program (CTCP). We provide home care services to 150 postcodes across the Perth metropolitan area, Broome townsite and within a 30km radius of Bunbury and Busselton.



## Disability Support

SCCWA is a registered provider under the National Disability Insurance Scheme (NDIS). Our disability services provide opportunities for people living with a disability to increase participation in all aspects of community life. In FY23/24, we supported 33 clients under the NDIS.



## Respite Care

Our respite services include a range of flexible, day or overnight respite options, either in-home, at one of our dedicated respite centres in Forrestfield or Hilton, or short-term in one of our residential aged care homes.



## East Fremantle Health and Wellness Centre

Our Health and Wellness Centre in East Fremantle offers specialised exercise and rehabilitation services for people aged over 55. The centre, co-located with our residential aged care home SCCWA East Fremantle, provides a range of services including rehabilitation physiotherapy, exercise physiology, gym sessions, hydrotherapy, and group classes, and is available to the public with a GP referral.



## Southern Cross Housing

Southern Cross Housing Ltd (SCH) offers affordable community housing to people over 55 or younger people living with mental illness or disability. SCH provides 358 properties across 39 suburbs in Perth, ranging from the City of Joondalup in the north to the City of Rockingham in the south and out to the City of Swan in the east.



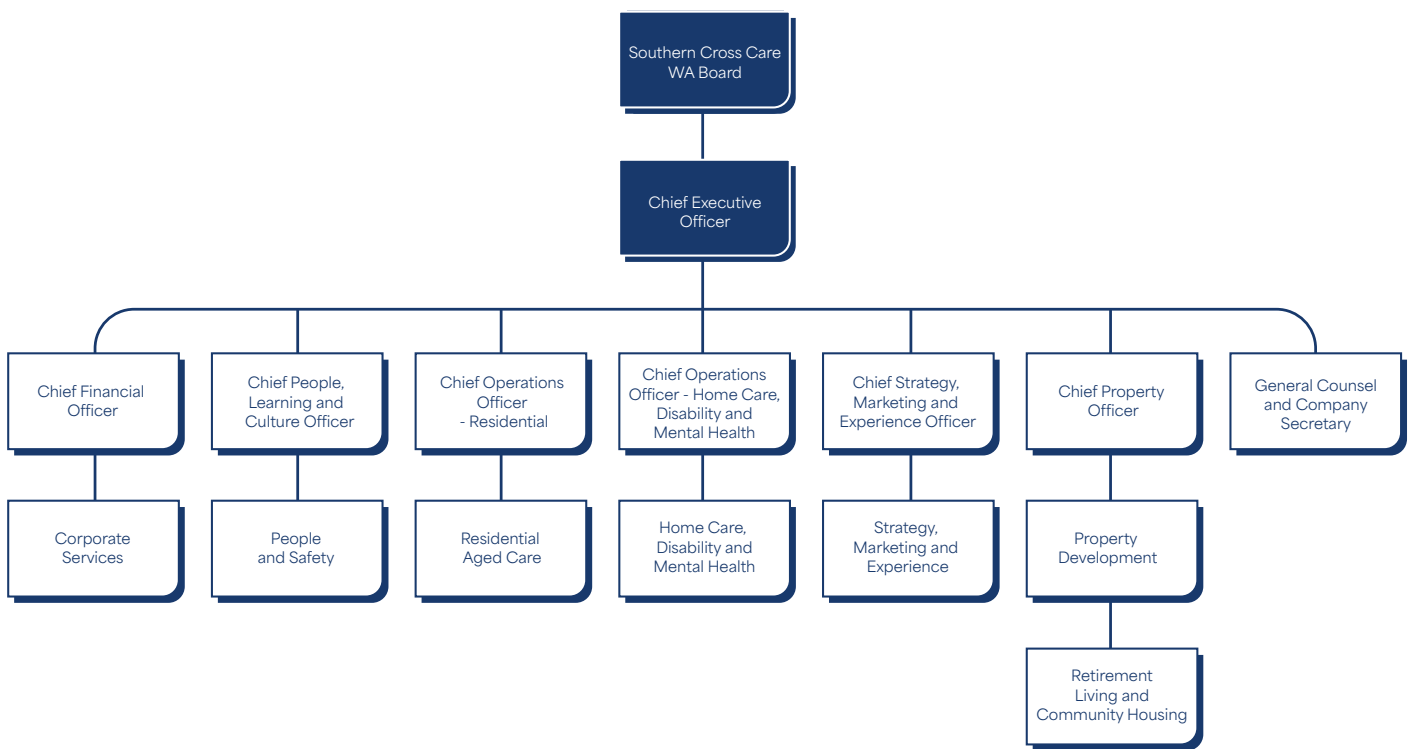
## Central Office

SCCWA's Central Office is located in Rivervale, with all corporate and operational support teams for both SCCWA and Southern Cross Housing.



# Our people

SCCWA is honoured to have the leadership of our Board, which has extensive experience in the corporate, health, and public service industries. Led by Board Chair, Tony Vis, the Board works alongside our Executive team to provide governance and strategic leadership to ensure SCCWA remains true to our vision of providing compassionate, just and equitable services to the whole community.



**1020**  
Direct staff for  
FY 24/25

**110**  
Active  
volunteers

**11,700**  
Volunteer  
hours

## Modern Slavery Working Group

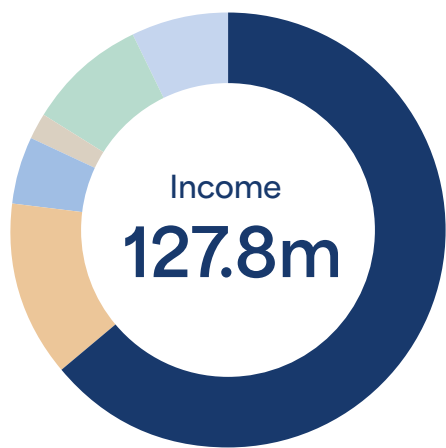
The Modern Slavery Working Group (MSWG) was established in July 2024 and is responsible for facilitating the organisation's response to Modern Slavery legislative requirements, utilising the support and resources developed by ACAN.

This working group regularly informs and advises the SCCWA Executive Leadership Team on Modern Slavery related issues and is responsible for monitoring, managing and mitigating Modern Slavery risks within the organisation.

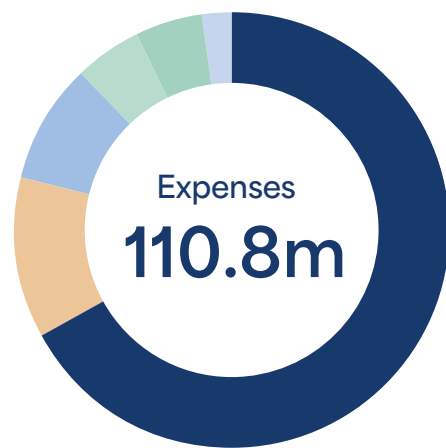
The MSWG is chaired by the Chief Financial Officer (CFO) and meets quarterly to review adherence with the Modern Slavery three-year Action Plan. Other members of the MSWG include the Company Secretary and General Counsel, Senior Manager Risk and Procurement, General Manager People, and the Procurement and Contract Manager.

The Executive Leadership Team informs the SCCWA Board of progress in compliance with the Act, which aligns with the SCCWA Board Work Plan.

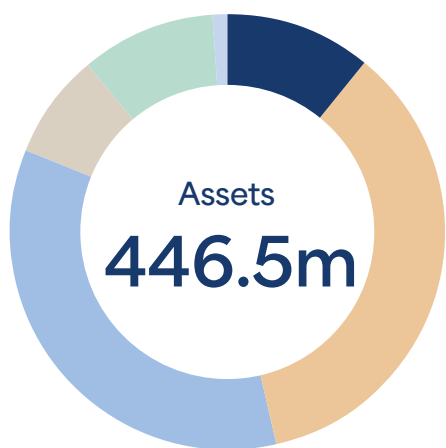
# Financial information



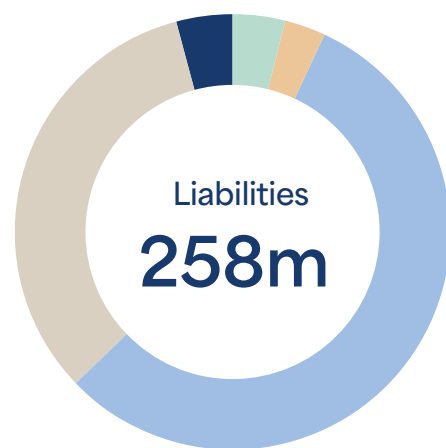
	\$'000	%
Government subsidies & grants	82,019	64%
Fee income	16,246	13%
Rental & lease income	12,006	9%
Other income	8,704	7%
Interest & Investment income	6,032	5%
Sale of lots	2,772	2%
Total expenses	127,779	100%



	\$'000	%
Employee expenses	74,075	67%
Property & depreciation expenses	13,738	12%
Direct care expenses	9,681	9%
Administration expenses	5,075	5%
Inventory cost of sales	5,434	5%
Other expenses	2,835	2%
Total expenses	110,839	100%



	\$'000	%
Property, plant & equipment	161,047	36%
Investment properties	156,580	35%
Cash	49,586	11%
Financial assets	45,328	10%
Inventory properties	29,953	7%
Receivables and other assets	3,961	1%
Total expenses	446,455	100%



	\$'000	%
ILU resident loan	145,553	56%
Resident's accommodation deposit	84,511	33%
Payables	10,485	4%
Other liabilities	9,881	4%
Employee obligations	7,634	3%
Total expenses	258,065	100%

# Our supply chain

To deliver a wide range and scope of care, SCCWA relies on products, goods and services including:

- Medical and related services, such as allied health services and agency staff.
- Building, construction and infrastructure services, including waste management and property development.
- Ancillary services such as food, cleaning, linen and laundry, and security.

- Communications, information technology and support, and software solutions and support.

SCCWA mainly deal with suppliers that have an Australian presence. Given the specialist nature of the services we provide, many of our providers are international suppliers with head offices based all around the world.

## Reporting criteria 3: Modern Slavery risks in our operations and supply chain

### Operational risk

About 1,020 people directly worked for SCCWA in 2024, 84% were women.

WORKFORCE PROFILE	
Category	No.
Direct Female Employees	858
Direct Male Employees	162
Direct Permanent Employees	838
Direct Fixed Term/Temporary Employees	175

Our in-house team manages employees with visas in accordance with our Employee Records Policy, and in compliance with immigration requirements under Australian law. SCCWA engages our employees under a wide range of enterprise agreements and modern awards, as well as under common

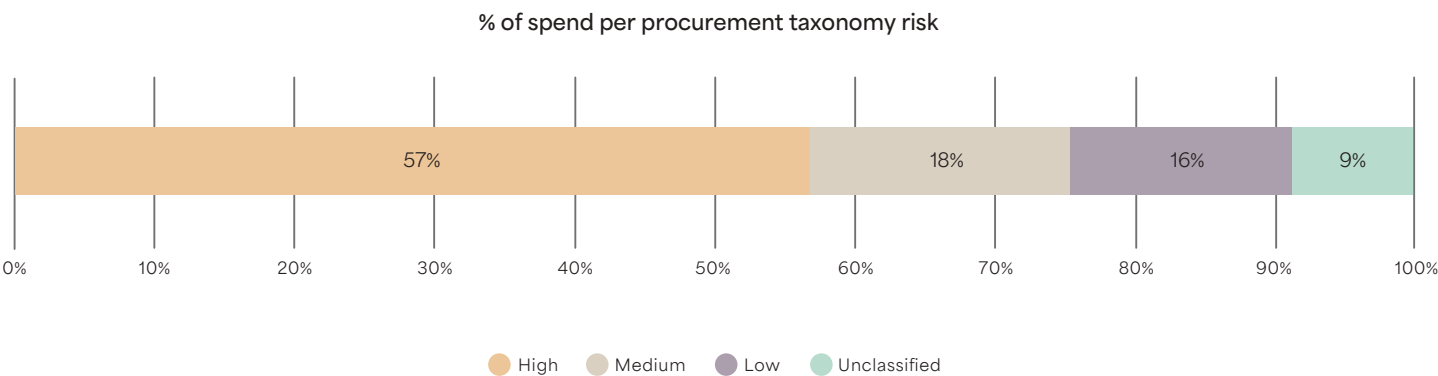
law, and frequently engages with trade unions acting on our employees behalf. Some employees are engaged through agency and other labour hire arrangements. SCCWA has a range of systems to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation. In 2024, 175 staff were employed through temporary and fixed-term arrangements. SCCWA has a Code of Conduct, based on our organisational values, that governs how employees conduct themselves in our organisation’s operations. SCCWA 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 on our website.



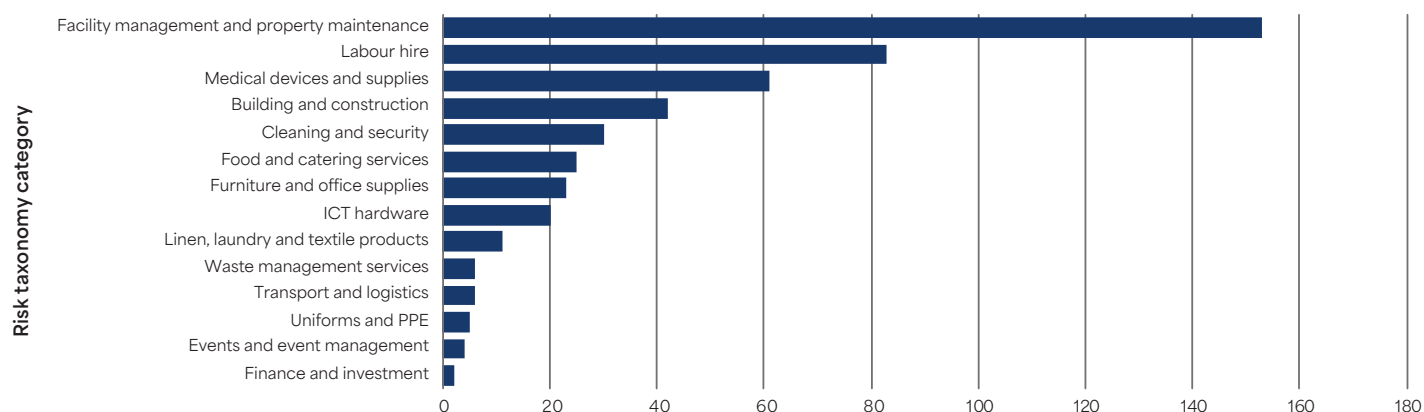
Supply chain risks

The high-risk spend categories are detailed in the following bar chart and table. These procurement categories have an increased risk of Modern Slavery work practices. The graph and table demonstrate that most of SCCWA’s Modern Slavery risk sits within the facility management and property maintenance category. In 2024, SCCWA, with the support of ACAN, undertook a supplier risk analysis based on spend.

The resulting risk dashboard identified that 58% of SCCWA’s spend was within high-risk spend categories. Of the 835 vendors within the SCCWA system, 471 sit within high-risk categories.

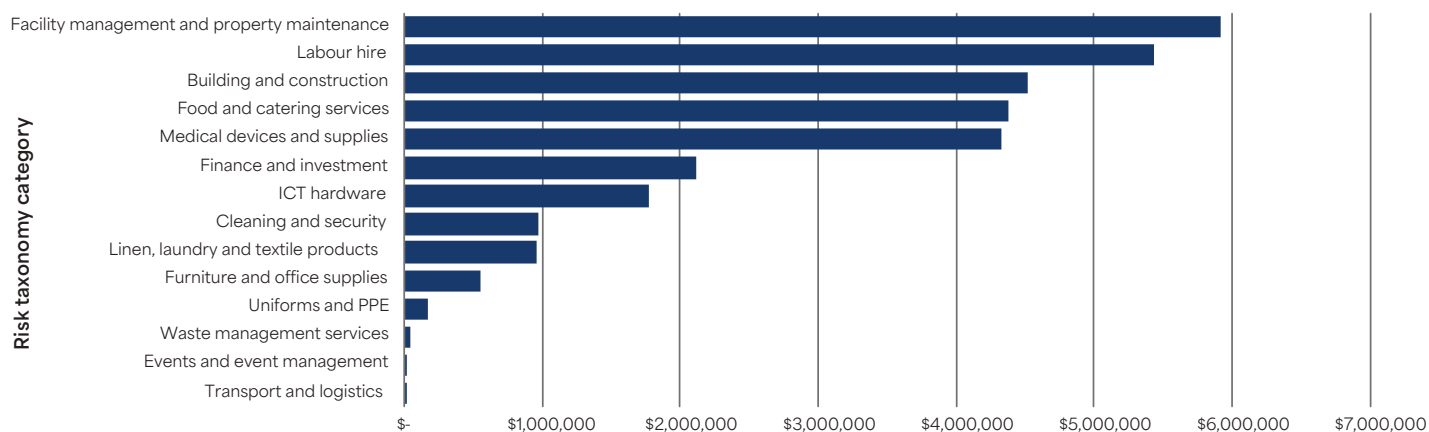


Number of suppliers in high risk procurement categories



Risk taxonomy category	Number of suppliers
Facility management and property maintenance	153
Labour hire	83
Medical devices and supplies	61
Building and construction	42
Cleaning and security	30
Food and catering services	25
Furniture and office supplies	23
ICT hardware	20
Linen, laundry and textile products	11
Transport and logistics	6
Waste management services	6
Uniforms and PPE	5
Events and event management	4
Finance and investment	2
<b>Total</b>	<b>471</b>

Procurement spend in high risk procurement categories



Risk taxonomy category	Spend
Facility management and property maintenance	\$5,920,572
Labour hire	\$5,432,196
Building and construction	\$4,519,613
Food and catering services	\$4,374,256
Medical devices and supplies	\$4,326,031
Finance and investment	\$2,111,830
ICT hardware	\$1,767,937
Cleaning and security	\$974,584
Linen, laundry and textile products	\$957,024
Furniture and office supplies	\$558,235
Uniforms and PPE	\$165,982
Waste management services	\$43,680
Events and event management	\$18,714
Transport and logistics	\$4,553
<b>Total</b>	<b>\$31,175,207</b>

## Reporting criteria 4:

### Actions taken to assess and address the risks

SCCWA established the MSWG to liaise with management to assess and address Modern Slavery risks. In turn, the MSWG and the Modern Slavery Liaison Officer (MSLO) were guided by ACAN.

The MSWG oversaw the establishment and implementation of guiding policies, the creation of the three-year work plan, and the identification of key stakeholders.

#### **Australian Catholic Anti-Slavery Network (ACAN)**

In 2024, SCCWA joined ACAN, which is comprised of more than 90 Catholic organisations around Australia, including large Catholic health and aged care providers.

The SCCWA MSLO attended ACAN conferences and monthly meetings with the purpose of understanding and responding to the potential risks of Modern Slavery at SCCWA and the organisation's supply chain.

SCCWA completed ACAN's maturity assessment for 2024, which provided an insight into the maturity of the organisation's response across key areas of operation, before the implementation of the MSWG and other governance frameworks. This identified key areas for improvement that the MSWG has built into its three-year work plan.

The ACAN maturity assessment identified SCCWA has strong governance frameworks and processes, including adequate risk assessment of business activities. SCCWA received a maturity score of 40%, significantly higher than the benchmark of 15% for a first-year reporting entity.

SCCWA has worked with ACAN to develop our organisational commitment, internal education and training, procedural and policy resources, and other business systems.

#### **Achievements of the Modern Slavery Working Group**

The Modern Slavery Working Group was established, and an MSLO was appointed to work with ACAN to support and enhance our organisational responses to the risks of Modern Slavery.

Working in conjunction with ACAN and under the supervision of the MSWG, the following goals have been achieved in 2024:

- Creation and implementation of a Modern Slavery Policy for SCCWA.
- Joined ACAN.
- Attendance at monthly ACAN meetings to discuss modern slavery risk management.
- Established a Modern Slavery Working Group with an agreed terms of reference.
- Completion of ACAN Modern Slavery 101 training by all MSWG members.
- Created a three-year work plan to direct the MSWG in agreed activities.

- Undertook ACAN maturity assessment.
- Reviewed supplier and vendor data and identified vendors of highest risk.
- Reviewed SCCWA recruitment policies and procedures to refer to Modern Slavery.

### **Internal education and awareness**

The SCCWA Board and Executive Management Team were briefed on Modern Slavery and the associated risks. All five members of the MSWG received training from ACAN on the risks of Modern Slavery and effective supplier engagement and remediation. Further education and awareness are scheduled to occur in 2025, in line with the three-year work plan.

# Reporting criteria 5:

## Effectiveness assessment

The MSWG meets quarterly and will review the effectiveness of the actions SCCWA is taking in addressing the risk of Modern Slavery in our operations and supply chain. The Modern Slavery Three-Year Action Plan will be implemented

and reviewed annually. The table below provides an overview of the effectiveness of risk mitigation activities implemented by SCCWA. This effectiveness has been independently reviewed by ACAN through their annual maturity assessment.

Activity		
Internal / staff	Hours spent on Modern Slavery activities	140
	Individual staff completed e-learning	5
	E-learning modules completed	5
External / supplier engagement	Total number of suppliers	835
	Number of suppliers with visible contact information and ABN	224
	Number of suppliers across high-risk categories	472
	Number of ACAN Supplier Surveys completed (cumulative)	62
	Supplier staff attending capacity building webinars (cumulative)	17
	Number of suppliers invited to join Sedex (cumulative)	16
	Number of suppliers that joined Sedex (cumulative)	23
	Number of Sites with Sedex SAQ completed (cumulative)	0
	Social audits (number of audits completed in 2024)	0
	Corrective actions (Number of non-conformances in 2024)	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 criteria 6: Consultation with owned and controlled entities

SCCWA provides all support and resourcing to SCH. This is managed through an intercompany agreement that has been agreed by SCCWA and SCH.

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## Reporting criteria 7: Any other relevant information

SCCWA, supported by ACAN's resources, allows for continuous monitoring and adjustment to ensure effectiveness and sustainability.

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## Approval

This Modern Slavery Statement was approved by the principal governing body of SCCWA, as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 12 June 2025.

This Modern Slavery Statement is signed by a SCCWA responsible member as defined by the Act.



Tony Vis,  
Board Chair,  
Southern Cross Care (WA) Inc.









St Vincent de Paul Society  
NSW  
*good works*



# 2024 MODERN SLAVERY STATEMENT

1 JANUARY — 31 DECEMBER 2024

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## 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.

## 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 2024 to 31 December 2024



# 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, which is an increase from 15,000 in 2018. The 2023 Global Slavery Index (GSI) 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 NSW 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 2024 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 8 May 2025.

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 'Peter Houweling'.

**Peter Houweling**

President, 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, St Vincent de Paul  
Society NSW



A handwritten signature in black ink, appearing to read 'Anne Stanfield'.

**Anne Stanfield**

Chair, St Vincent de Paul  
Housing

# CRITERION 1

## About the St Vincent de Paul Society NSW

### About us

**The St Vincent de Paul Society NSW 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 close to 400 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 more than 130 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.

### 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 St Vincent de Paul 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 2023/24



Our members supported close to  
**100,000 PEOPLE**  
with food, clothing, household bills, material  
assistance, advocacy and emotional support



**11,800 PEOPLE**  
were supported by our Vinnies Services  
across Homelessness and Housing,  
Health, and Disability and Inclusion



**\$13.7 MILLION**  
in financial and material aid was provided  
to people in need through our members



Our Vinnies Vans assisted  
**102,000 PEOPLE**  
across the state



**\$2.8 MILLION**  
was raised in NSW as part of the  
Vinnies CEO Sleepout



Years of advocacy by our  
members helped to deliver  
**\$6.1 BILLION**  
for social housing in the State Budget

Our Annual Consolidated Revenue for the period 1 July 2023 to 30 June 2024: \$220,742,000.

# CRITERION 2

## Our Structure, Operations and Supply Chain

### Organisational Structure

**The St Vincent de Paul Society in NSW is comprised of four entities:**

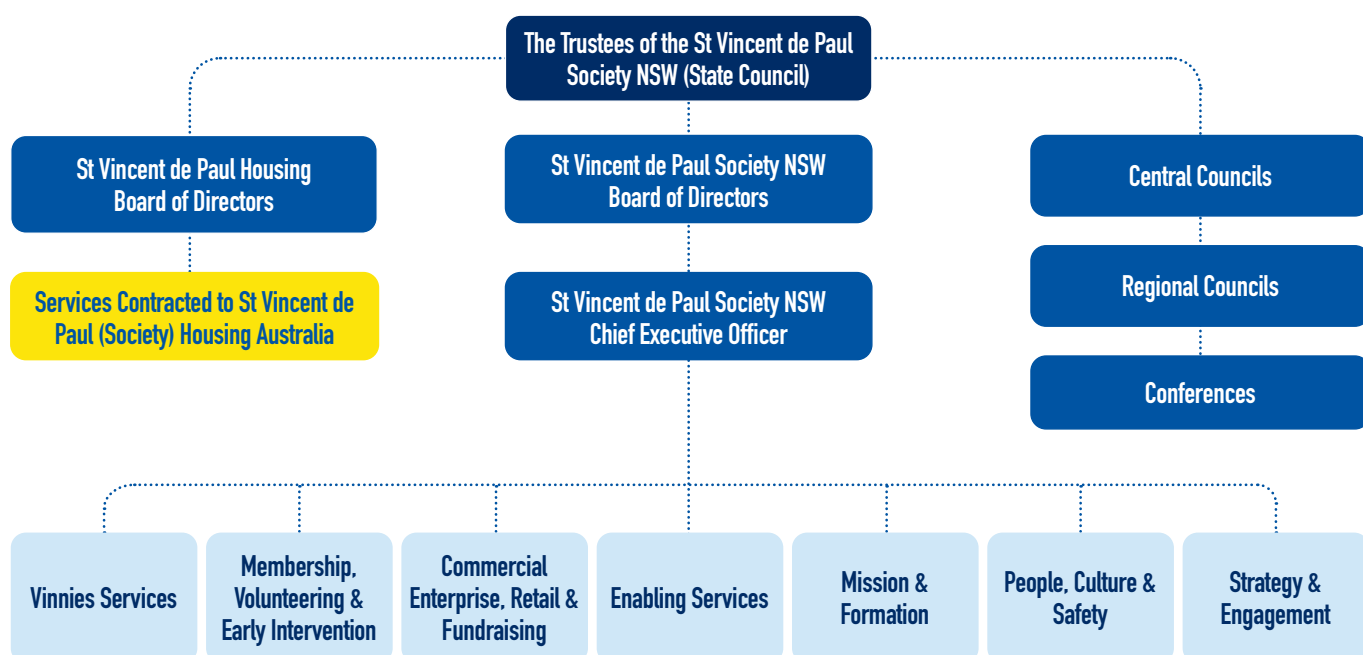
- The NSW State Council of the Society of St Vincent de Paul. The State Council is comprised of democratically elected and appointed members of the Society of St Vincent de Paul in NSW, in accordance with the Rule. Democratic authority and responsibility is vested by the members in each elected Conference President and in each Council President. The NSW State Council is an unincorporated association.
- 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 comprised of members of the NSW State Council.
- The St Vincent de Paul Society NSW is a public company limited by guarantee.
- St Vincent de Paul Housing 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 NSW State Council governs the work of members of the Society of St Vincent de Paul in NSW. The NSW State Council is part of a federated structure, with Councils in each State and Territory, and a National Council. The members of the NSW State Council are the Company Members of St Vincent de Paul Society NSW.

The Trustees of the Society of St Vincent de Paul (NSW) hold property assets on trust for the good works of the Society in NSW. The Trustees of the Society of St Vincent de Paul (NSW) are the Sole Company Member of St Vincent de Paul Housing.

The Trustees of the Society of St Vincent de Paul (NSW), 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.

### Our structure



## 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.

The following arrangements are in place to support the Society to meet its modern slavery obligations:

- 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. The Chief Financial Officer also chairs the cross-functional Modern Slavery Working Group which drives the modern slavery work in the Society in NSW.
- The Director Governance, Risk and Safeguarding is responsible for organisational governance and ensuring that governance policies and procedures are current and compliant, including in relation to modern slavery.
- Executive Directors are responsible for ensuring their staff comply with the organisation's policies and practices.



The Modern Slavery Working Group meets at least 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
- Retail and Logistics
- Membership, Volunteers and Early Intervention
- Mission and Formation
- Legal
- Risk Management and Compliance
- St Vincent de Paul (Society) Housing Australia
- Vinnies Services

## Policies relevant to modern slavery include:

### St Vincent de Paul Society NSW

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Investment Policy
- Whistleblower Policy
- Complaints and Feedback Policy
- Internal Grievance Policy
- Risk Management Framework

### 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 Audit, Risk and Finance 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 St Vincent de Paul (Society) Housing Australia (SVDPSHA) to manage the portfolio of St Vincent de Paul Housing. SVDPSHA is a National Tier 1 Community Housing provider created by SVDP member councils, operating in NSW, ACT, SA and TAS. SVDPSHA's Chief Executive Officer (CEO) and Chief Operations Officer (COO) have contractual responsibility for procurement in respect of St Vincent de Paul Housing. The COO is responsible for organisational governance and ensuring that governance policies and procedures are current, including the Modern Slavery Policy.

The suitability of the Governance Framework outlined above is considered annually, in conjunction with the review of the Modern Slavery Policy and the Risk Management Framework, and any reported concerns of modern slavery.

## 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 membership structure aligns 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 homelessness and housing services; disability and community inclusion services; and health services, including services for people experiencing drug and alcohol issues.

## 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 222 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 \$85.1 million in sales revenue for the 2023/24 financial year.

## Commercial Enterprise and Fundraising

We are a NSW Return and Earn Scheme collection partner for eligible containers and operate 10 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 shops.

## Social and Affordable Housing

As a provider under the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing provides 355 units for social housing and 147 - 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



## CRITERION 3

### Modern slavery risks in operations and supply chain

#### Our People

**The St Vincent de Paul Society is a member and volunteer based organisation that has been assisting people experiencing disadvantage and hardship in NSW.**

The Society aspires to shape a more just and compassionate society for all and offers a hand up to those experiencing disadvantage. The work of the Society is carried out by our members, volunteers and employees.

- **Members** – In NSW we have approximately 4,400 members. The members help people in need in their local communities and conduct visitations to the homes of people we assist and provide household goods including food vouchers and parcels.
- **Volunteers** - The Society has just over 8,290 ongoing volunteers. Many work in our stores while others are involved in our services and preparing and serving meals for our food vans.
- **Employees** - There are approximately 1,500 employees who work for the Society in a variety of roles including homelessness and housing services, health, aged care, drug and alcohol, retail, fundraising, marketing and communications and support services.

#### Operational Risk

**We comply with labour, employment, work health and safety and whistleblower laws. Our policies and procedures are designed to provide protection to our people and other stakeholders.**

Having regard to the nature and location of our suppliers, we do have areas of vulnerability such as: cleaning and security services, waste management services, building and construction, property and facility maintenance.

St Vincent de Paul Society NSW engages third party labour hire agencies to supplement our workforce. This approach provides flexibility, cost-efficiency and the ability to respond and adapt to altering workforce needs. Along with the benefits that using third party labour hire arrangements bring, there are also risks that need to be managed, including the risk of modern slavery.

The inherent nature of the arrangement creates layers of separation between workers, employers (the labour hire agency) and customers (procuring the services of agencies and workers) and can leave workers vulnerable to labour exploitation. Examples of indicators of modern slavery include underpayments, excessive hours, or unsafe working conditions.



## Supply chain

**Our supply chain comprises an extensive network of businesses delivering products and services to support our organisation and its operations.**

We have assessed and identified areas of high risk within our supply chain, with consideration for geographic locations, industries and labour force that are inherently at higher risk of modern slavery. We also reference the ACAN risk taxonomy.

We continue to map our existing suppliers and analyse our supply chain to determine our risk, taking into consideration:

- **Industry risk:** Specific industry sectors deemed as high risk in international and national guidance documentation. This includes industries such as cleaning, textiles and construction.
- **Commodity/product risk:** Products and commodities deemed as high risk by the Global Slavery Index (GSI), the US Department of Labor's 2024 List of Goods Produced by Child and Forced Labor and other international guidance materials. The products and commodities are assessed as high risk due to the way they are produced, processed or used and include electronics, furniture, cotton and textiles, and many foods including coffee, rice, chocolate and fish.
- **Geographic location:** This is based on estimated prevalence of modern slavery and the government responses as outlined in the 2023 GSI. The majority of our suppliers are Australian based, however a number of suppliers have an international presence and are likely to purchase goods and services or conduct activities from regions other than those of suppliers' headquarters.
- **Workforce profile:** We also consider the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used.

This allocation of suppliers in high risk categories guides our focus on appropriate due diligence for particular suppliers or groups of suppliers. We conduct these activities when evaluating a potential supplier and when managing and monitoring existing suppliers.

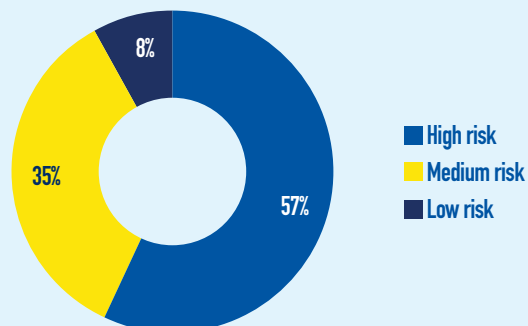
**This graph illustrates the modern slavery risk ratings by our highest spend categories.**

Of the 15 supplier categories that represent our greatest spend, food and catering, finance and investment, property and facility maintenance, building and construction, cleaning and security, furniture and office supplies, waste management and linen, laundry and textile products categories are considered high risk.

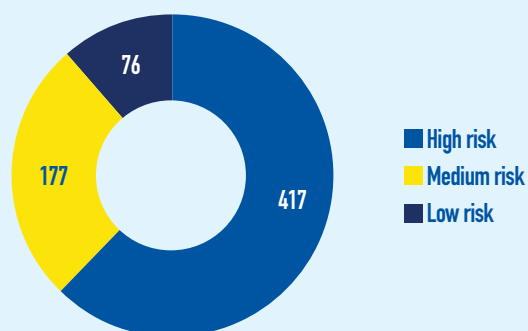
57% of the total spend analysed is considered high risk, and comprises more than 417 suppliers from 10 supplier categories:

- property and facility maintenance
- building and construction
- cleaning and security
- linen, laundry and textile products
- waste management
- medical devices and supplies
- furniture and office supplies
- events and event management
- food and catering
- finance and investment

### Risk by spend



### Suppliers by risk category



### Risk ratings by highest spend categories



## CRITERION 4

### Actions taken to assess and address Modern Slavery Risk

**At St Vincent de Paul Society NSW we are committed to continually improving our practices to identify and address modern slavery. We have continued to develop and embed actions initiated in previous years, as well as introducing new actions and improvements.**

Demonstrating our commitment to continuous learning and improvement, we participated in ground-breaking research with RMIT Business and Human Rights Institute and Behavioural Business Lab focusing on improving remediation of modern slavery in supply chains. While organisations have made significant progress, remediation remains a key challenge. This research aims to produce practical insights to make remediation easier for organisations and better for victim-survivors.

Through the Modern Slavery Working Group, we continue to identify opportunities to raise awareness about modern slavery among our frontline employees, members and volunteers. The resources we have available assist 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.

To coincide with the launch of the Society's Modern Slavery Statement 2023, an education session was held in August 2024 on the topic of tackling modern slavery. The session looked at the impacts of modern slavery and how people could identify and respond to suspected cases. The session featured Jenny Stanger from the ACAN as a guest speaker and covered situations relevant to members, volunteers and employees, where modern slavery could be present in the context of the Society's operations. Approximately 150 members, employees and volunteers attended.

In 2024, we had an increase on the previous year in both the number of individuals trained on ACAN e-learning modules, and the number of staff participating in modern slavery workshops and meetings. We also participated in ACAN events and leveraged their professional support and advice including attending the ACAN end of year event, held on 4 December 2024, which included the following speakers: Australian Anti-slavery Commissioner, Chris Evans and survivor advocate Moe Turaga.



**Within our operations, our actions included:**

#### Contractor Management Project

During 2024 the Society undertook a contractor management project, jointly led by the Property, Procurement and Health and Safety teams. The core purpose of the project was to ensure effective management, compliance and safety of property contractors engaged to perform work for the Society.

An induction program was introduced, which contains two parts which provide education and awareness of modern slavery to our suppliers and their workers:

- An on-site induction for workers attending a Society site. The induction is written for the person undertaking the work and includes education on what modern slavery is as well as support resources and ways to report if they suspect that, they, or someone they know, is a victim of modern slavery; and
- A contractor handbook, which is provided to the organisation that the Society has engaged to do the work. The handbook includes content explaining modern slavery as well as resources to support the organisation in identifying modern slavery within their supply chains. The contractor handbook has been sent to both existing and new suppliers. Contractors are required to acknowledge compliance with Society procedures.



## Procurement and Supply Chain activities

Our Procurement Policy includes information about modern slavery risk, and our procurement procedures provide guidance on the process that should be undertaken to evaluate the risk of modern slavery when engaging with suppliers. The Modern Slavery Policy is periodically reviewed and updated as part of our governance framework. We have developed a series of templates including Request for Proposal (RFP) and contract documents, each of which include modern slavery risk controls. When we use the supplier's standard documentation, we seek to negotiate the inclusion of our standard modern slavery clauses.

We also request our suppliers agree and adhere to our *Supplier Principles of Engagement*. This incorporates the standards required by our suppliers to conduct business with us, including those relating to human rights and child labour practices.

Led by our Procurement team, our activities during 2024 included:

- Continuing to ensure supplier contracts include a contract clause requiring suppliers to make specific commitments to identify and mitigate modern slavery risk within their operations and supply chains. We undertake this activity when negotiating with new suppliers and at contract renewal (if not already captured).
- Maintaining our active membership of ACAN. Our engagement with ACAN assists us to build our knowledge and leverage their resources to manage modern slavery supplier risks. In 2024, this has included seeking their assistance in assessing factory audits from particular suppliers that operate in high risk locations and/or manufacture high risk commodities.
- Development of a Procurement e-learning module, available on our internal learning platform, to increase awareness regarding the Procurement Policy and the approved process for procuring goods and services. This e-learning module emphasises the need for a supplier risk assessment and appropriate due diligence when undertaking procurement activities, including evaluating the risk of modern slavery.

## Case studies

### Stationery and Office Supplies

During 2024 we conducted a procurement category review on stationery and office supplies. We determined that there was opportunity to consolidate to a single preferred and contracted supplier, which was a new approach for the Society in this category.

Consolidating to a single preferred and contracted supplier has enabled us to strengthen our modern slavery approach in the stationery and office supplies category in the following ways:

- Contractual commitments regarding modern slavery from the preferred supplier
- Clearer understanding of our supply chain exposure in this category
- Establishment of an active supplier relationship, providing opportunities to collaborate on monitoring and auditing supply chain practices.



### Solar Panels

The solar panel industry, while contributing to a more sustainable future, is subject to significant modern slavery risks within its global supply chains.

A key area of concern lies with the sourcing and processing of polysilicon, a primary material for solar panel production. Polysilicon has been linked to regions where there are credible reports of forced labour and systemic human rights abuses.

During 2024, the Society undertook a review of the solar panels specified for new installations, reference material included:

- manufacturer documentation including supply chain reports; and
- manufacturer actions taken in relation to supply chain risks; and
- publications such as "In Broad Daylight Uyghur Forced Labour and Global Supply Chains" (Laura T. Murphy and Nyrola Elimä Citation: Murphy, 2021).

This review has resulted in:

- a clearer understanding of our supply chain exposure in this category; and
- an updated specification for solar panels for the Society.



## Labour Hire Working Group

During 2024, the Society established a cross-functional Working Group to review our agreements and process for engaging labour hire staff through external agencies. The Working Group comprised representatives from People and Culture, Enabling Services, Vinnies Services and Commercial Enterprise, Retail and Fundraising directorates.

A primary focus for the Working Group was to determine the labour hire arrangements in place throughout the organisation and the business needs that prompt the use of labour hire. Two of the main areas that use agency staff are Vinnies Services which provides homelessness and housing support, aged care, and health services, and our warehouse operations. These areas of the Society can be impacted by seasonal demands for temporary labour and access to labour hire staff is a cost-effective way to meet the demand.

### Working Group objectives included:

- Identification of labour hire agencies being utilised
- Development of a labour hire contract template
- Development of a recruitment services agreement
- Update the Recruitment Policy
- Business education, including lunch and learn session/s on labour hire and circulation of contract templates, and
- Embedding these activities to become business-as-usual procedure

### Key achievements for 2024:

- Formation of Working Group
- Development of labour hire and recruitment contract templates and checklist for vendors
- Updating the Society's Recruitment Policy as part of the regular review of policies to ensure they meet current organisational needs and legislative requirements
- Consolidated list of labour hire suppliers.

### Our planned actions for 2025 include:

- Education for people leaders including lunch and learn session on labour hire arrangements and contract templates, for key users of labour hire staff.
- Implementation of new contract terms with existing labour hire / recruitment agencies and new suppliers as they are engaged.

## Investment Policy and Portfolio

The Society engages with an external investment firm, through which it can apply ethical screens to its investment portfolio. The ethical screens are ESG (Environmental, Social and Governance) filters that cover various areas, including civil liberties, labour rights – child labour assessment, and child labour. By having these ESG filters, the Society can ensure its investment practices align with its Investment Policy, which details the Society's ethical considerations for where it places its investments, including a nil percentage of allowable holdings in organisations that may be involved in modern slavery.

## Modern Slavery Risk Management Initiatives

As a values-based organisation, the Society has an ongoing commitment to further enhancing its practices to help combat modern slavery.

Initiatives we are undertaking in 2025 include:

- Develop and deliver targeted training
- Ongoing supply chain risk management with assistance from Supplier Ethical Data Exchange (SEDEX)
- Document solar panel manufacturer specifications







## 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 St Vincent de Paul Society NSW or St Vincent de Paul Society Housing is found to have caused or contributed to modern slavery. Where St Vincent de Paul Society NSW and St Vincent de Paul Society Housing are directly linked to modern slavery by a business relationship St Vincent de Paul Society NSW and St Vincent de Paul Society 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 St Vincent de Paul Society NSW and St Vincent de Paul Society Housing to ensure victim centred remediation processes are implemented to the satisfaction of St Vincent de Paul Society NSW or St Vincent de Paul Society 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 whistleblower 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. St Vincent de Paul Society NSW and St Vincent de Paul Society Housing have deployed a “Grievance Mechanisms and Remedy Pathways” module in its Modern Slavery e-learning course.



# CRITERION 5

## Assessing Effectiveness

**The Society continues to develop its capability to identify and manage modern slavery risks, as we seek to measure the effectiveness of the progress that has already been implemented since the inception of our Modern Slavery Risk Management Program.**

Our governance framework, including our modern slavery policies and Risk Management Framework, ensures there is appropriate oversight of our responsibilities, commitment and approach to addressing modern slavery risks. Our Modern Slavery Action Plan continues to be reviewed by the Audit, Risk and Finance Committee and by the St Vincent de Paul Housing Audit, Risk and Finance Committee.

In line with our Modern Slavery Action Plan for 2024, we have implemented the following items to improve our effectiveness in managing the risk of modern slavery:

- labour hire agreements and process for engaging labour hire staff
- contractor management program with a modern slavery induction component
- ongoing initiatives led by our Procurement team.

Additionally, as a participant of ACAN, the Society continues to receive an annual Modern Slavery Maturity Assessment. The Assessment objectively measures maturity across four areas: governance, risk assessment, risk management, and effectiveness, in line with best practice and reporting requirements.

The results of the 2024 Assessment show the Society improved in its maturity across the four areas, which helped improve our overall maturity score. The detailed information provided in the Assessment is considered as part of developing the Society's Modern Slavery Action Plan for 2025, as well as used for identifying any modern slavery risk management practices already implemented that could be enhanced.



## CRITERION 6

### Consultation with Owned or Controlled Entities

**Members of the cross-functional Modern Slavery Working Group responsible for the Modern Slavery Risk Management Program include representatives from St Vincent de Paul NSW and St Vincent de Paul Housing.**

In 2024, seven meetings of the Working Group were held, which 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.

*Note: The Statement does not include the process or activities associated with writing or approving the Statement*

## CRITERION 7

### Other

**St Vincent de Paul Society NSW is engaged in responding to modern slavery beyond the scope of the Modern Slavery Act 2018 (Cth).**

Since 2008, St Vincent de Paul Society NSW has operated North Coast Settlement Services (NCSS) in Northern NSW. NCSS is funded by the Department of Home Affairs under its Settlement, Engagement and Transition Support (SETS) Program to assist refugees and other vulnerable migrants to build local connections and to access mainstream services and supports.

With its Head Office in Coffs Harbour, one of five regional areas where Iraqi and Syrian Yazidi refugees are resettled, NCSS notes the profound impact of the legacy of slavery under ISIS on its large client cohort of Yazidi clients - women, children, and the Yazidi community as a whole - as they rebuild their lives in Australia.

In July 2024 NCSS' Manager, Biba Honnet, was appointed to the NSW Anti-slavery Commissioner's Expert Advisory Panel. In Sydney in September, she joined a delegation from the Office of the NSW Anti-slavery Commissioner (OASC) at NSW Parliament House, speaking to the NSW Parliamentary Modern Slavery Committee about her work with temporary migrant workers in Northern NSW, and in October was a panelist in the OASC Webinar "From Farm to Fork". Through NCSS, St Vincent de Paul Society NSW remains actively involved with the NSW Advisory Panel to address modern slavery in the broader community.

Additionally, 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.

Twining 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.







**St Vincent de Paul Society**  
QUEENSLAND  
*good works*



## Modern Slavery Statement

***1 January to 31 December 2024***



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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	31 May 2025	Approved



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# 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 2024.

It is submitted as a joint statement by the following reporting entity:

St Vincent de Paul Society Queensland

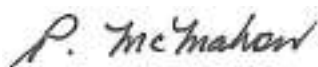
ABN 14 211 506 904

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 the year 2024.

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.



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Patricia McMahon, State President  
St Vincent de Paul Society Queensland



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Dennis Innes, Chair  
St Vincent de Paul Society Queensland  
Housing

**31 May 2025**

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# 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, established 2017, 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 work to continue for the past 131 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 the required levels of assistance Queenslanders in need would not be available.

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## 2024 Modern Slavery Risk Management Initiatives

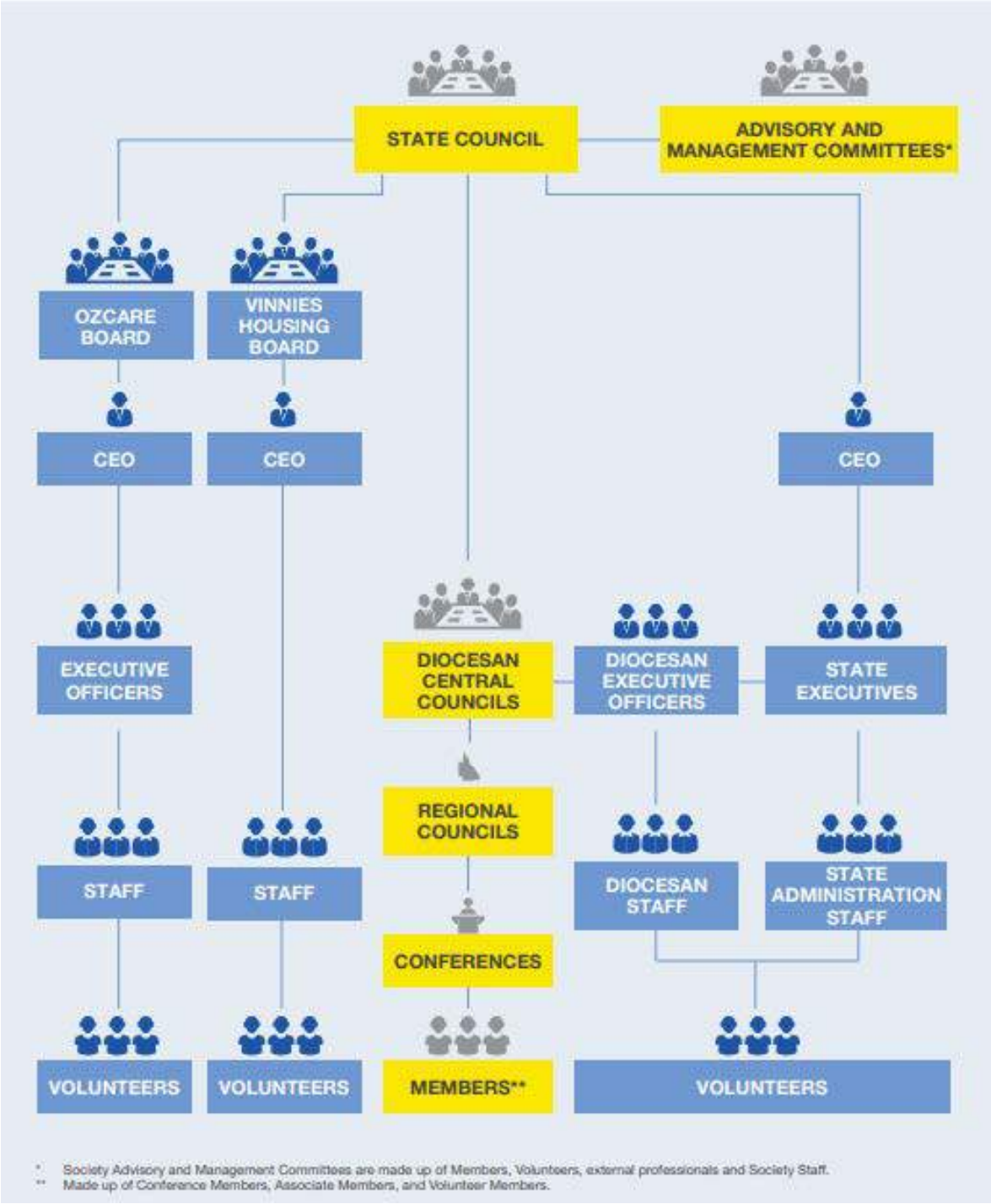
In the reporting period, we continued developing our modern slavery framework, which includes developing our operation and supply chain risk management processes in line with industry best practice.

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 2025 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

## Organisational Chart



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## 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 whom 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 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.

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## 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 new Modern Slavery working group team collaborating closely with the Modern Slavery Liaison Officer (MSLO). The working group consists of key stakeholders throughout the organisation, including representatives from the business functions:

- General Manager Programs, Chair
- Director of Mission
- Learning and Development Specialist, representing People and Culture
- State Program Manager, representing Programs
- Western Executive Officer, representing Retail and Operations
- Risk and Compliance Manager, representing Governance and Risk
- Asset Management Coordinator representing Vinnies Housing
- State Transport and Logistics Manager
- Procurement – Procurement Manager (MSLO)



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## 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 for families to improve the safety and wellbeing of children in their homes.
- 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

## 130 Years of Service Throughout Queensland

Our Members, Staff and Volunteers support communities all over Queensland, from major cities to remote towns.

Our Society in Queensland consists of eight Dioceses which 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	120	10	313	13	2	37	3
Townsville	203	20	689	18	2	17	2
Rockhampton	231	32	580	23	3	111	2
Northern	512	27	795	21	1	79	4
Brisbane	513	37	652	14	1	103	1
Western	431	28	607	16	0	45	1
South Coast	383	27	680	20	0	97	4
Toowoomba	177	25	617	16	2	146	1
State-based Programs	N/A	N/A	268	N/A	N/A	N/A	N/A
<b>TOTAL</b>	<b>2,570</b>	<b>206</b>	<b>5201</b>	<b>141</b>	<b>11</b>	<b>635</b>	<b>18</b>

\* Members include Associate Life Members.

\*\* Our Society operates several domestic violence shelters and drug and alcohol services across Queensland. Their locations have been withheld from this table for privacy.

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## Our Supply Chain

We purchase most 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 spending 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 2,000 suppliers on our books, ranging from tactical suppliers, through to cooperative, strategic partners/alliances. Some suppliers have been providing services for us for a long period of time, while others are 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 of organisational culture similarity, corporate alignment, stability, and mutual understanding.

Our policies and procedures prescribe 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 into our direct tier-one suppliers, but we acknowledge the 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 benchmarked by external providers. We also regularly review employee remuneration practices.

Our people are engaged in regular surveys and feedback processes. The feedback process is outlined in the organisation's Complaint and Compliment framework policy.

Our people are required to adhere to the organisation's Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments,

Policies and procedures are reviewed regularly to ensure best practices and compliance requirements are met. Staff are trained in policies and procedures through our Learning Management system.

## OUR MEMBERS: 2,570

Our 2,570 Vincentians are the backbone of our Society, operating statewide through Conferences, support centres, Programs and committees across the state.

## OUR VOLUNTEERS: 5,201

Our 5,201 Volunteers give their time and expertise to support our Good Works through our retail shops, programs, youth support and offices.

## OUR STAFF: 650

Our 650 Staff Members (455 full-time, 174 part-time and 21 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.

	EMPLOYEES	VOLUNTEERS	VINCENTIANS
SVDPV Vinnies Housing	650	5,201	2,570



# Reporting Criterion 3: Modern slavery risks in operations & supply chain

During the reporting period, we extended supplier risk assessment to most of our active suppliers in our supply chain vendor base. We have mapped out our *significant suppliers* by annual spend (>\$40k AUD), for category risk taxonomy assessments.

Our *significant suppliers* (162 suppliers in total) represent 85% of our total spend on procurement of Goods and Services from suppliers in the year 2024, with 52% of this spend being assessed as high risk, 24% as medium risk and 24% low risk.

The high-risk classified suppliers (109 suppliers) provide goods and services for the categories below:

- Construction and Building (4 suppliers)
- Property and facility maintenance (63 suppliers)
- Furniture and Office supplies (6 suppliers)
- Food and Accommodation (34 suppliers)
- Waste Management (2 suppliers)

Risk Rating Criteria	High Risk	Medium Risk	Low Risk	Total
Spend (\$AUD)	\$23,040,000	\$10,427,000	\$10,488,000	\$43,955,000
Number of suppliers	109	21	32	162
Number of categories	5	8	8	21

## High-risk areas by value



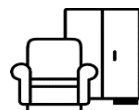
\$8.5m Facility



\$7.7m Building



\$5.0m Food & Accommodation Assistance



\$997k Furniture & Office



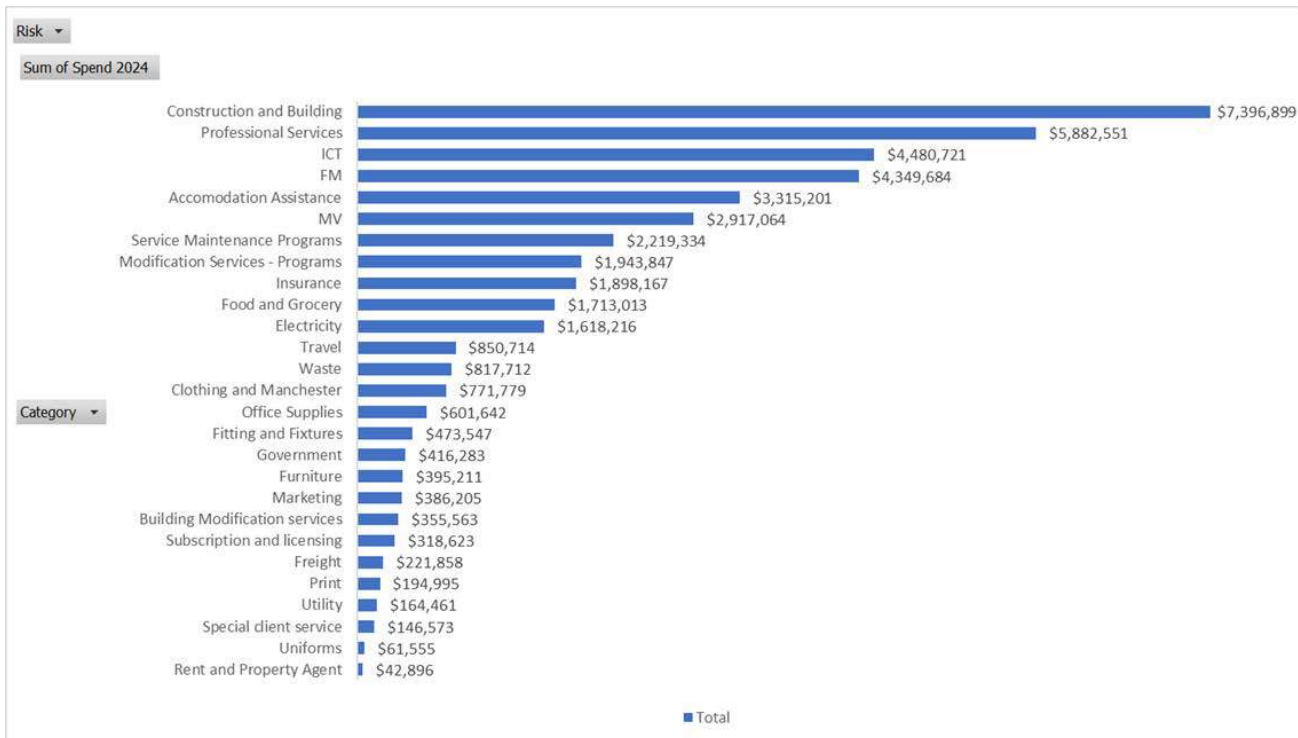
\$850k Waste

We are further investigating the suppliers' capabilities to mitigate the risk of modern slavery in their supply chain network, to understand supplier's internal process and staff awareness about modern slavery risk.

# Supply Chain Risks

## Industry Sector

Our six highest spending categories are Construction and Building, Professional Services, Facility maintenance services (FM), Communications Technology (ICT), Assisted Accommodation services and Motor Vehicle fleet.



(\*) The above spending numbers have been audited for FY23-24 only.

ICT category is considered a medium risk category because the majority of our spending on ICT is related to software services. In the reporting year we appointed a new people management solution 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 risks.

One of the main challenging areas in managing the modern slavery risk is the facility management category. This is due to several reasons:

- The supplier selection process is decentralised and is driven by the 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 centre-led for high-risk spend categories.
- Enhancing the modern slavery risk awareness across the Society's staff and managers who are involved in procurement and supplier selection.



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## 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 Accommodation assistance.
- Waste management
- Furniture and Office supplies

## Operational Risks

Modern slavery represents a significant operational risk for our organisation, 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, decentralisation of procurement. These risks are described below.

### Inflationary Risk

Inflationary risk is a challenge for our organisation, 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 a 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 organisation, and the risk of modern slavery may be greater. We are reviewing our procurement policies and procedures 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 labour. 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.

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## 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 a larger supplier base (162 suppliers) compared to the previous reporting period (108 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 \$40k per year.

### Key Actions in 2024:

- 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
- developed supplier Modern Slavery Questionnaires to streamline the process for supplier hedging
- conducted training on modern slavery risks for senior management and the newly appointed working group
- developed a modern slavery training plan to customise the training suitable for staff and volunteers and extend the training to all relevant staff involved in purchasing
- continued to utilise Sedex platform across our Procurement and Logistics as a risk assessment tool

### Modern Slavery Maturity Assessment

Like the previous year's approach, we completed a survey to provide an overall view of improvements and efforts across six key areas (pillars) of our operation:

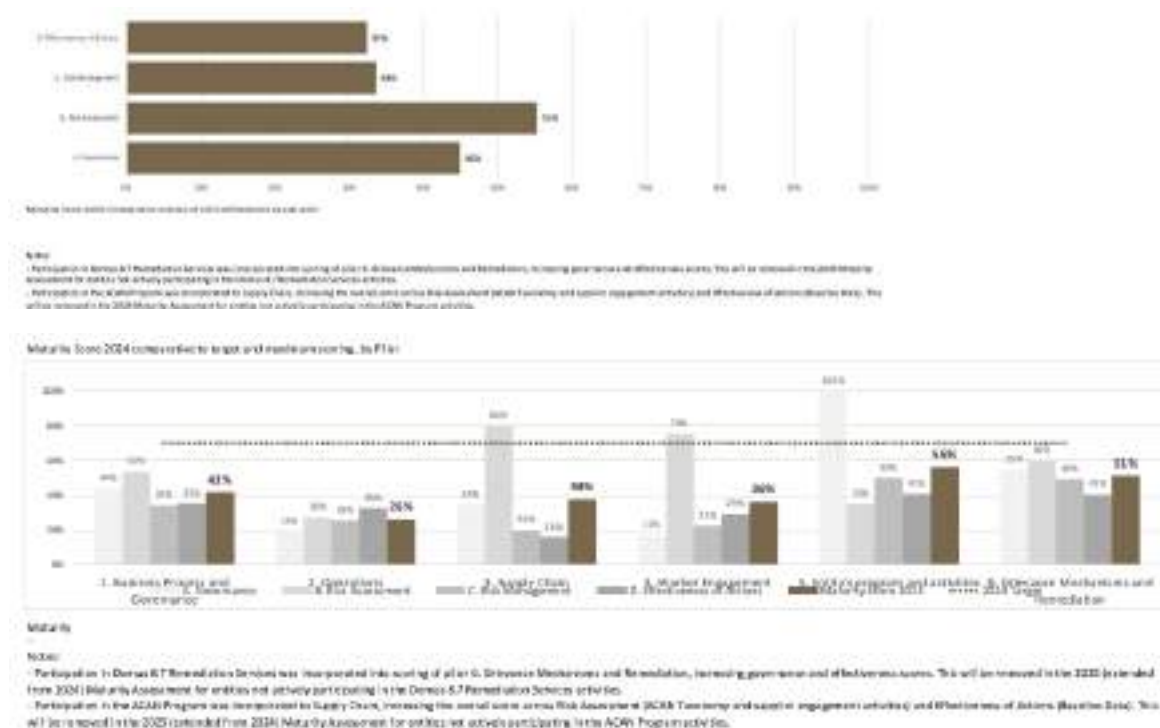
- 1) **Business Process and Governance** – the overarching structure and policies guiding antislavery efforts.
- 2) **Operations** – the Society's internal practices including day-to-day activities.
- 3) **Supply Chain** – external partnerships and mechanisms in place to assess and mitigate risks beyond the Society's immediate operations.
- 4) **Worker Engagement** – the management of worker engagement and standards upheld to prevent exploitation.
- 5) **Entity's Program and Activities** – broader initiatives and engagements undertaken to combat modern slavery; and
- 6) **Grievance Mechanisms and Remediation** – channels available for reporting concerns and processes for addressing them.

The focus of surveys and their analyses has been towards the maturity level of our modern slavery risk management capabilities. The maturity level of each 6 pillars of operation was assessed across four areas, or 'sub-pillars', being **Governance**, **Risk Assessment**, **Risk Management** and **Effectiveness of Actions** of the efforts made to mitigate the modern slavery risks:

Overall Assessment: The overall assessment shows 6% improvement in Maturity Score, which increased from 36% in 2023 to 42% in 2024.

The individual scoring by pillar is presented in the chart below:

- While the maturity score for Entity's program and activities, Supply chain and Business Process and Governance improved considerably, the maturity score for Operations, Worker engagement and Grievance Mechanisms and Remediation remained unchanged.
- In relation to sub-pillars according to the survey response, Governance, Risk Management and Effectiveness of Actions improved and Risk assessment maturity across the four pillars remained unchanged.



As per the above chart, the three pillars of Grievance Mechanisms and Remediation, Business Process Governance and Entity's program activities are considered more mature while Operations, Worker Engagement, and Supply Chain need further attention and effort to improve their maturity in dealing with modern slavery risk.

Overview of the maturity assessment in 2024 shows that our focus for improvement needs to be directed towards the Worker Engagement, Operation's governance, risk assessment and risk management and Supply Chain's risk management and effectiveness of actions.

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## 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 2024

The maturity level across the six key areas of operation (Pillar) is different.

**Governance:** As per the survey, Operations and Worker Engagement have the lowest maturity levels while the Entity's Program and Activities and Grievance Mechanisms and Remediation have the highest maturity levels.

**Risk Assessment:** The highest maturity level across all pillars is related to Risk Assessment, at an average of 55%. Operations and Entity's program and activities require additional effort to improve the maturity level of Risk Assessment whereas for Supply Chain and Worker Engagement, this sub-pillar remains high.

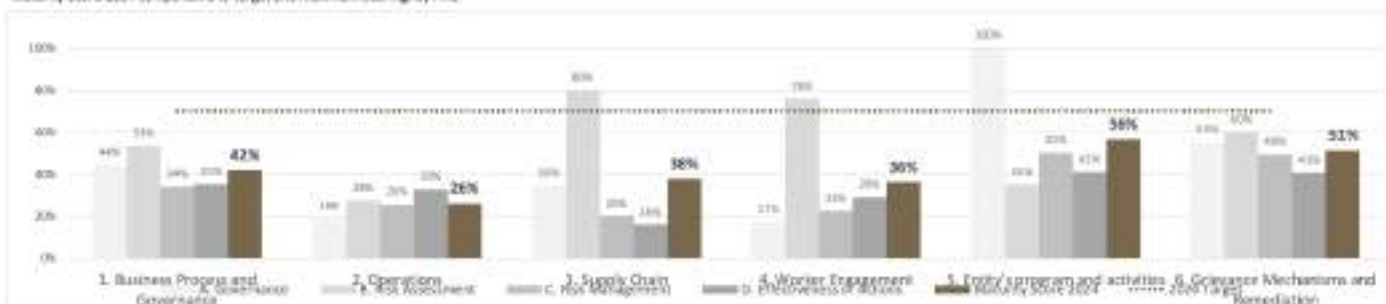
**Risk Management:** Risk Management maturity score improved 8% compared to the maturity score in 2023, with an average of 34%. Supply Chain and Worker engagement obtained the lowest maturity scores.

**Effectiveness of Actions:** The positive impact of our antislavery efforts across the pillars of Operations, Supply Chain and Worker Engagement is lowest. This means that more mature and comprehensive approaches are required for ongoing improvement initiatives and to ensure the effectiveness of our efforts to eradicate modern slavery.

Our focus areas following the 2024 maturity assessment indicate that sub-pillars Risk Management and Effectiveness of Action require improvement relative to the other two sub-pillars. We remain committed to the target of a 75% maturity score for all sub-pillars which will require an increase of 33% on our 42% current maturity score for 2024. **Encouragingly, this score has increased by 6% since the last assessment.**

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	Change
1. Business Process and Governance	44%	53%	34%	35%	42%	↑ 3%
2. Operations	19%	28%	26%	33%	26%	0%
3. Supply Chain	35%	80%	20%	16%	38%	↑ 11%
4. Worker Engagement	17%	76%	22%	29%	36%	0%
5. Entity's program and activities	100%	35%	50%	41%	56%	↑ 22%
6. Grievance Mechanisms and Remediation	55%	60%	49%	41%	51%	-1%
Average	45%	55%	34%	32%	42%	↑ 6%

Maturity Score 2024 comparative to target and maximum scoring, by Pillar



Maturity

Notes:  
 - Participation in Donmus 8.7 Remediation Services was incorporated into scoring of pillar G: Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the Donmus 8.7 Remediation Services activities.  
 - Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Taakonomy and supplier engagement activities) and (Effectiveness of Actions (Baseline Data)). This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the ACAN Program activities.

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The Society (SVDP QLD and Vinnies Housing) will continue to assess its implemented actions on a regular basis. The following key achievements and performance indicators were considered for 2024 assessments:

- Incorporated modern slavery requirements into procurement policies and procedures
- Restructured and formed an effective modern slavery working group with representatives from key operation areas to oversee and implement the action plans
- In the new Procurement Policy, introduced a risk-based approach for categories of spending to engage procurement in sourcing and supplier selection activities
- Included general clauses on modern slavery in all high-risk supplier contracts in year 2024
- 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 (3)
- Number of supplier contracts with modern slavery clauses (2)
- Review of category risk taxonomy assessments; (completed)
- Modern Slavery Capability Maturity Assessment; (completed)
- Implementation of supplier risk assessments for the spending above \$40k.
- Increased members and board awareness and engagement.



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## Modern slavery action plan and road map

In 2025 and beyond, we plan to:

- increase awareness about the risk of modern slavery through providing training courses on modern slavery for all the Senior Management, Modern Slavery Working Group team and staff who are responsible for purchasing and sourcing.
- implement a 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 the maturity level of governance, risk assessment, risk management and effectiveness of continuous improvement initiatives across Operations, Supply chain and Business process and governance
- 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

The following four key action areas have been prioritised as part of our modern slavery risk management approach:

### Governance:

- Ensure a clear governance framework for managing modern slavery risks and assign responsibilities for managing modern slavery risks.
- Approve targets and KPIs for modern slavery risk management
- Develop & Implement processes to review the adequacy and effectiveness of the modern slavery risk management program
- Implementing a Code of Conduct in our sourcing and contracting activities.
- A new Modern Slavery Policy has been drafted and is undergoing consultation process

### Risk Management:

- Implement a due diligence process to continuously identify, manage, and mitigate modern slavery risks. The risk assessments will be undertaken in accordance with the Risk Management Framework
- 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
- Develop targeted communications & engagement programs for high-risk suppliers
- Run pilot project worker voice program for high-risk suppliers

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## Reporting Criterion 6: Process of consultation with entities owned or controlled

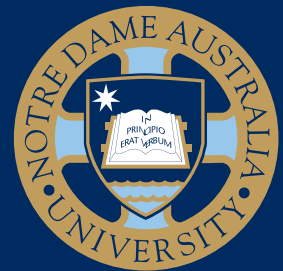
This statement covers St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was approved by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

## Reporting Criterion 7: Other

- Not applicable







The University of Notre Dame Australia

# 2024 Modern Slavery Statement

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. If 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 use our Modern Slavery Feedback Form, or reach out directly to our specialised modern slavery team at [modernslavery@nd.edu.au](mailto: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, please contact Domus 8.7: an independent community organisation for confidential advice and support on 02 9307 8464.

University Student Counselling Services:  
[notredame.edu.au/students/support/health-safety-and-wellbeing/counselling](https://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 000.



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## Introduction

At the University of Notre Dame Australia, we are committed to upholding the highest standards of ethical conduct, integrity and social responsibility in all aspects of our operations. As a Catholic institution, our mission extends beyond academic excellence to fostering a culture that respects human dignity, promotes justice and ensures the wellbeing of all individuals connected to our university—whether they are students, staff, suppliers or broader community stakeholders.

Modern slavery is a significant global issue that affects millions of people, often hidden within complex supply chains and employment practices. As an organisation that engages with a diverse network of suppliers, service providers and industry partners, we recognise our responsibility to identify and address potential risks of modern slavery within our operations and procurement activities.

This Modern Slavery Statement outlines the actions we have taken in 2024 to assess, mitigate and prevent modern slavery risks, demonstrating our ongoing commitment to transparency and continuous improvement. It details the structures, policies and frameworks we have implemented to ensure compliance with ethical procurement standards and legislative obligations. Additionally, it highlights our collaborative efforts with partners such as the Australian Catholic Anti-Slavery Network (ACAN) and the Australian Universities Procurement Network (AUPN), as well as the initiatives we have undertaken to strengthen supplier accountability and workforce protections.

At Notre Dame, education is a powerful tool for social change. Through our teaching, research and advocacy efforts, we seek to equip future leaders with the knowledge and ethical framework necessary to combat exploitation and create a fairer, more just world. By embedding modern slavery awareness into our governance, procurement and academic strategies, we reaffirm our dedication to human rights and our commitment to making a meaningful impact.

This statement reflects our continued efforts to build a responsible and ethical university environment—one where dignity, fairness and respect remain at the heart of everything we do.





Professor Francis Campbell



Hon. Chris Ellison

## Approval and signature from the Vice Chancellor and Chancellor

The University of Notre Dame Australia is deeply committed to the fight against modern slavery. As a Catholic university, we have an institutional duty to proactively respect the dignity of every human being and foster social responsibility, justice and the greater good.

We take seriously our responsibility to identify and address modern slavery risks when engaging with suppliers, service providers and industry partners. We uphold high ethical standards across all of our operations and reject all forms of slavery in our supply chain.

In 2024, we increased scrutiny of indirect suppliers and conducted targeted engagement with subcontractors. Supplier contracts were updated to include stricter compliance measures on modern slavery, with a focus on wage transparency, subcontracting policies and worker protections.

Agreements with partner institutions were strengthened to ensure fair work conditions for students and we introduced additional controls for recruitment agencies to ensure they meet ethical employment practices, particularly for casual and contract workers.

An anonymous reporting tool was launched, giving workers in high-risk supply chain sectors an avenue to raise concerns about unfair, unethical or exploitative practices. We also introduced measures to ensure all major spending decisions take human rights impacts into account.

A comprehensive assessment by the Australian Catholic Anti-Slavery Network indicated our modern slavery risk management framework was deeply integrated into our organisational culture. We progressed from project-focused actions to a more systematic and continuous improvement model across the University. We are proud to be a leader in ethical procurement and modern slavery risk management.

While we are pleased with our progress and the actions we have taken over the past five years, we know modern slavery remains one of the most pervasive violations of human rights in the world. We must remain vigilant and through this statement we reaffirm our dedication to protecting human rights and having a meaningful impact on this global challenge.

We have committed to prioritising greater visibility and traceability across our supply chain, strengthening our engagement with suppliers, building supplier capacity and implementing a Sustainable Procurement Policy and Plan in 2025. We will not tolerate any form of exploitation and will continue to work towards a world where freedom is a right enjoyed by every individual.

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This modern slavery statement is signed by a responsible member of the University of Notre Dame as defined by the *Commonwealth Modern Slavery Act 2018*.



**Professor Francis Campbell**  
Vice Chancellor



**Hon. Chris Ellison**  
Chancellor



## CRITERION 1:

# About us

The University of Notre Dame Australia 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 programs are designed to not only impart knowledge but also to cultivate critical thinking, ethical reasoning and a commitment to social justice.

In 2024, the University reported an annual revenue of approximately **\$250 million**, reflecting the scale and scope of our operations across teaching, research and community engagement.

## 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.

The objects of the University are —

- (a) the provision of university education, within a context of Catholic faith and values; and
- (b) the provision of an excellent standard of —
  - (i) teaching, scholarship and research;**
  - (ii) training for the professions; and**
  - (iii) pastoral care for its students.**

Our objects have guided our growth and development from a small but enthusiastic intake of just 50 postgraduate education students on our Fremantle Campus in 1992 to today's vibrant community of around 12,000 students across all campuses.

## CRITERION 2:

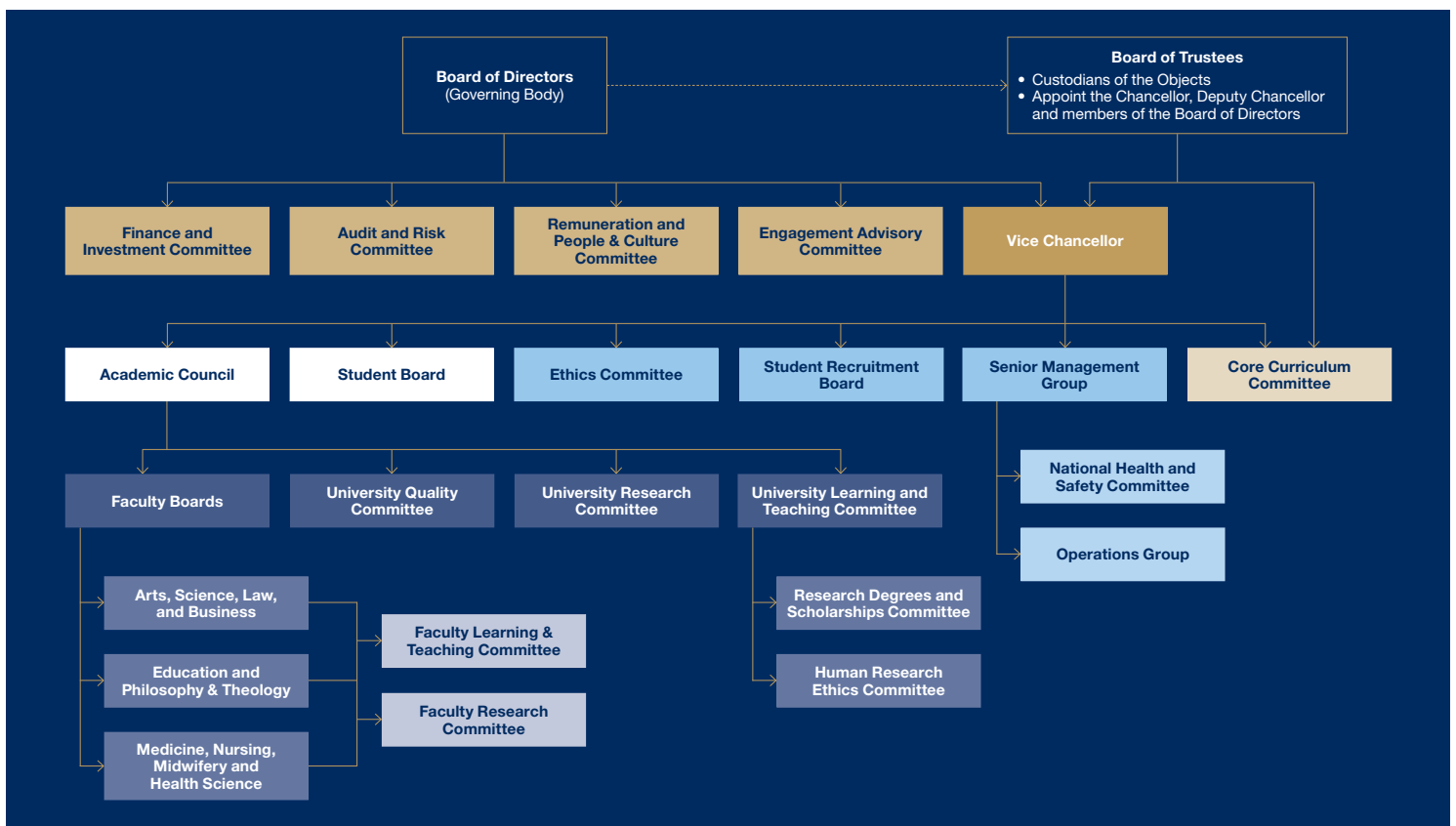
# Structure, operations and supply chains

## 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 2022–26 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 address 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 offerings. Spanning three campuses in Fremantle, Broome and Sydney, alongside eight clinical schools 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, allied health and nursing, 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.

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. 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.

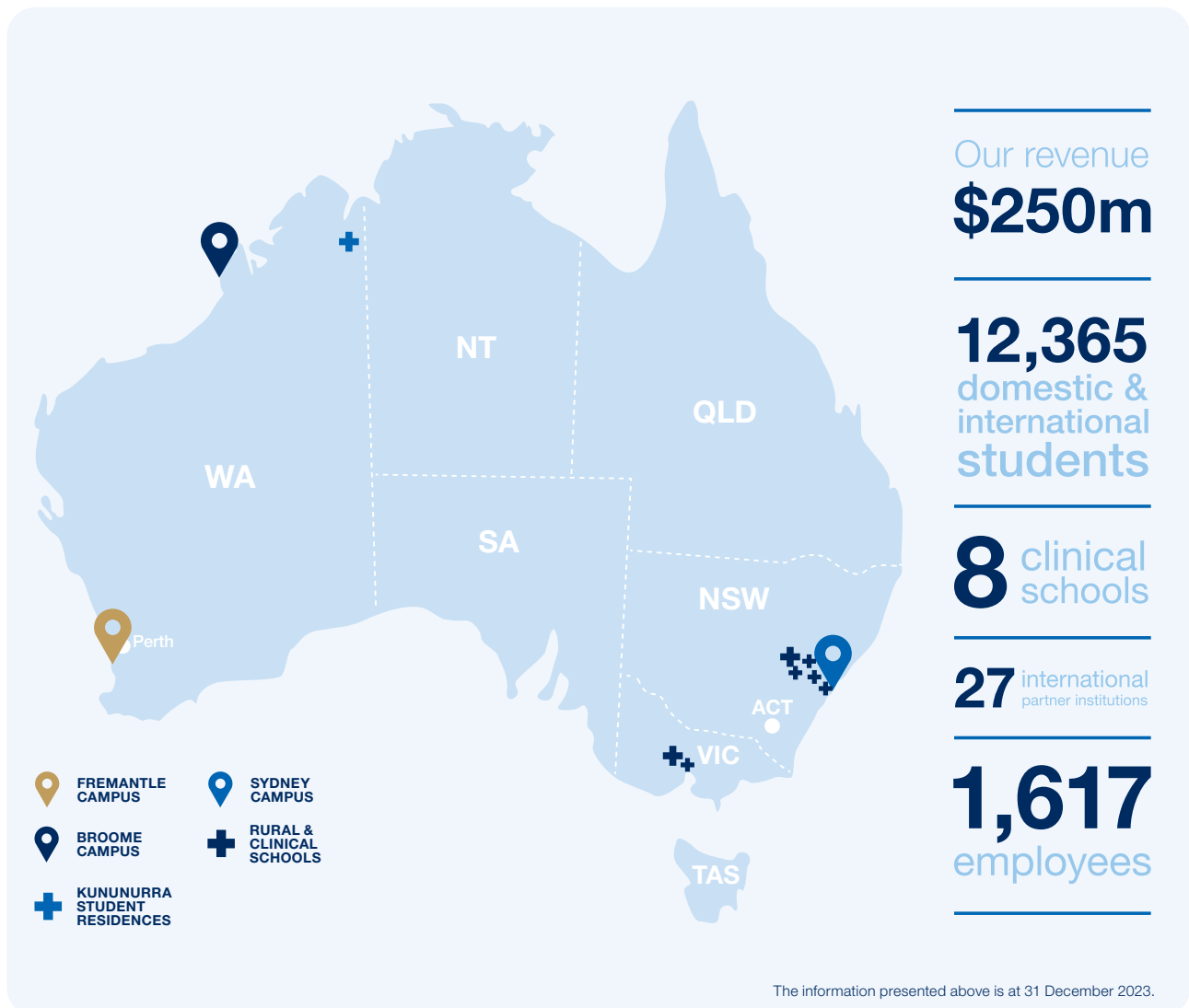


Figure 2 Notre Dame at a glance



## Workforce profile

In 2024, Notre Dame employed 1,617 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:

- Academic Integrity Policy
- Critical Incident Management Policy
- Employee Code of Conduct & Ethical Behaviour
- Equal Opportunity Policy
- Ethics Approval for Research Policy
- Privacy Policy
- Procurement Policy
- Protecting Children Policy
- Research Code of Conduct
- Risk Management Policy
- Sexual Assault and Sexual Harassment Policy
- Staff Grievance Resolution Policy
- Supplier Code of Conduct
- Travel Policy
- Work, Health and Safety Policy
- Workplace Bullying Policy
- Whistleblower Protection 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 Modern Slavery Working Group was established in 2020 and plays a central role in leading the University's response to modern slavery risks. The group is accountable to the Vice Chancellor and includes representatives from Procurement, Legal, Information Technology, Campus Services, Governance, and People and Culture.

The full working group meets every eight weeks, with smaller focus groups—Governance, Supplier and Education—meeting in the alternating eight-week intervals. Together, the group is responsible for coordinating risk assessments, reviewing supplier engagement activities, refining internal procedures and ensuring that Notre Dame's modern slavery obligations are met and continuously strengthened across the institution.



CRITERION 3:

## Modern slavery risks

Notre Dame is firmly committed to identifying, assessing and mitigating modern slavery risks across our institution and supply chain. Our commitment is reinforced through robust governance frameworks, policies and active compliance measures, ensuring that we uphold ethical, transparent and responsible procurement practices

To strengthen our efforts against modern slavery, we have enhanced supplier due diligence and implemented proactive compliance mechanisms. The Supplier Code of Conduct mandates all suppliers to meet minimum ethical standards related to:

- human rights and labour standards
- environmental sustainability
- fair wages and workplace safety
- anti-corruption and bribery.

These mandatory requirements ensure that modern slavery risks are not only identified but also addressed through contractual obligations, audits and compliance reporting.

### Operational and supply chain risks

Notre Dame recognises that modern slavery risks persist in complex global supply chains, particularly within industries such as construction, cleaning, ICT hardware and facility management. In 2024, our risk assessments highlighted the following concerns:

- Increased supply chain disruptions due to geopolitical conflicts and economic instability, leading to heightened risks of exploitative labour conditions in manufacturing and raw material procurement.
- High-risk procurement categories, including contract labour, where inconsistencies in compliance by third-party agencies pose a risk to fair labour practices.
- Challenges in supply chain visibility, particularly in second and third-tier suppliers, making it difficult to ensure ethical labour standards across all touchpoints.
- Potential vulnerabilities in outsourced services, particularly in sectors where subcontracting is common, increasing the risk of wage exploitation and poor working conditions.

To address these risks, Notre Dame has strengthened supplier due diligence requirements and incorporated modern slavery risk assessments into procurement decision-making.



## Our suppliers and expenditure

In 2024, Notre Dame engaged with 3,832 suppliers, with a concentrated group of 249 suppliers accounting for 84% of our procurement expenditure.

As outlined in Table 1, more than 98% per cent of the University's supply chain spend is with Australian-based companies and companies operating in low-risk countries, as determined by the **2023 Global Slavery Index**.

COUNTRY	RISK LEVEL*	% SPEND
Australia	Low	98.19%
Canada	Low	0.01%
England	Low	0.36%
United Kingdom	Low	0.18%
Hong Kong	Low	0.01%
Philippines	Medium	0.04%
Singapore	Low	0.30%
United States of America	Low	0.38%

Table 1 Countries of spend (Risk prescribed by Global Slavery Index\*)

Our financial records from 2024 indicate that our total revenue amounted to \$250 million and our total procurement spend of around \$69.2m. Approximately 30% of this expenditure falls into high-risk categories defined 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	200	\$7,504,506
Cleaning and Security Services	39	\$1,617,456
Facility management and property maintenance	12	\$140,257
Food and Catering Services	147	\$688,397
Furniture and Office Supplies	101	\$2,055,481
ICT Hardware	26	\$4,113,752
Labour Hire	45	\$3,716,602
Linen, Laundry and Textile Products	26	\$445,645
Medical Devices and Supplies	66	\$1,025,901
Waste Management Services	14	\$140,273
TOTAL	676	\$21,448,270

CATEGORY	NO. OF SUPPLIERS	% OF SPEND
Building and Construction	30%	35%
Cleaning and Security Services	6%	8%
Facility management and property maintenance	2%	1%
Food and Catering Services	22%	3%
Furniture and Office Supplies	15%	10%
ICT Hardware	4%	19%
Labour Hire	7%	17%
Linen, Laundry and Textile Products	4%	2%
Medical Devices and Supplies	10%	5%
Waste Management Services	2%	1%

Table 2 High risk category spend

## Modern slavery risks to students

As an institution responsible for student welfare, Notre Dame acknowledges the risk of modern slavery affecting students, particularly those engaged in employment, internships and international placements. In 2024, we identified key areas of concern:

- Student employment risks, particularly in hospitality and service industries where wage exploitation and underpayment remain prevalent.
- Increased vulnerabilities among international students, including risks related to exploitative recruitment practices by third-party agents.
- Ethical concerns in placement programs, ensuring that students engaged in work-integrated learning and internships are placed in organisations that uphold fair labour standards

## Our people

Notre Dame is dedicated to fostering an inclusive and ethical workplace, guided by our Code of Conduct and a suite of policies that uphold fair employment practices and expected standards of behaviour. These policies are publicly accessible and regularly reviewed to ensure compliance with best practices.

Our staff community of 1,617 employees spans a diverse range of roles and responsibilities across our campuses. The University follows a rigorous recruitment process, ensuring all employees—whether hired directly or through third-party agencies—undergo comprehensive verification of their right to work in Australia. This includes background checks and the support of migration lawyers for visa arrangements, mitigating any risks of labour exploitation.

In 2024, Notre Dame's reliance on contract and agency labour amounted to approximately \$3.7 million, reflecting the need for a flexible workforce to support our dynamic academic and operational functions. However, modern slavery risks within employment structures remain a concern due to:

- The complexity of award systems across various sectors, creating challenges in ensuring consistent and fair employment conditions.
- The intricacies of visa frameworks, which can impact international staff and increase vulnerabilities to exploitative arrangements.
- Recruitment agency practices, particularly in international student employment, where gaps in oversight could unintentionally expose individuals to wage theft, contract deception, or exploitative conditions.







#### CRITERION 4:

## Actions taken

The University of Notre Dame Australia remains committed to eliminating modern slavery risks within its operations and supply chains. Throughout 2024, we have taken significant steps to strengthen our ethical procurement practices, align with global sustainability standards and foster transparency across our supply chain. Below is an overview of our actions and progress.

### Collaborative initiatives in combating modern slavery

#### Collaboration with the Australian Catholic Anti-slavery Network (ACAN)

Notre Dame has actively participated in the ACAN Program for assessing and addressing modern slavery risks within our operations and supply chains. In 2024, we followed ACAN's structured supplier engagement plan, which included:

- Identification of suppliers in high-risk procurement categories using the ACAN Procurement Taxonomy.
- Engagement with high-risk suppliers by inviting them to complete the ACAN Supplier Survey.
- Support for suppliers in joining Sedex and assisting them in completing the Sedex Self-Assessment Questionnaires (SAQ) to enhance supply chain transparency.
- Assessment of Entity Profile results by ACAN Program Managers that measures the maturity of our response across governance, risk assessment, risk management and effectiveness measures.
- Development of risk management strategies tailored to suppliers based on identified gaps to improve modern slavery risk mitigation.

The ACAN supplier engagement plan also highlighted shared suppliers across multiple Catholic entities, increasing leverage and reducing duplication of engagement efforts. Furthermore, suppliers from Notre Dame were invited to participate in the 2024 ACAN webinar series, which provided foundational training on modern slavery risk awareness and compliance.

#### Collaboration with the Australian Universities Procurement Network (AUPN)

We have continued working closely with the AUPN to leverage shared resources, industry best practices and insights to improve supply chain transparency. This partnership has enabled the development of enhanced supplier engagement strategies as well as sector-wide discussions on modern slavery risks, facilitating knowledge sharing and solutions development.

## Supply chain insights

Understanding modern slavery risks within our procurement landscape is critical to developing targeted interventions. In 2024, Notre Dame leveraged data analytics and supplier engagement to refine its risk categorisation system, focusing on:

- Enhanced risk mapping using ACAN's Procurement Taxonomy, allowing for better identification of high-risk suppliers and regions.
- Implementation of supplier self-assessments, enabling a more robust evaluation of labour rights protections and ethical sourcing commitments.
- Collaboration with sector-wide networks such as ACAN and AUPN to share insights on supplier performance and compliance trends.
- Expanded participation in Sedex reporting, increasing transparency in labour standards monitoring within high-risk categories.

These initiatives have enabled a more comprehensive understanding of modern slavery risks, providing a foundation for continuous improvement in supplier engagement.

## Supplier engagement and compliance

Notre Dame has strengthened its supplier engagement by integrating modern slavery risk management with environmental and ethical sustainability initiatives. Key actions taken in 2024 include:

- Launching supplier education modules to enhance understanding of ethical obligations.
- Revising our Supplier Code of Conduct to align with global best practices. It is now contractually binding for all suppliers and explicitly addresses compliance, transparency and ethical business conduct.
- Conducting focused reviews and direct engagement with suppliers in high-risk industries such as construction, cleaning and IT hardware.

## 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 to take action against modern slavery and human trafficking. The University aims to achieve this with a multifaceted approach including education, research, public awareness and engagement.

The University has expanded its academic offerings to include a range of undergraduate and postgraduate programs and courses focused on modern slavery and human trafficking as well as associated broader social justice issues.

- 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 undergraduate program in Social Justice provides students with a broad understanding of social issues, including modern slavery and human trafficking

The University has a compulsory undergraduate module on modern slavery for all business students aiming at nurturing future ethical business leaders.

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 educate students on the challenge posed by 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.

As a proactive member of the AUPN Modern Slavery Advisory Board, Notre Dame is at the forefront of formulating strategies to tackle modern slavery and human trafficking within supply chains.

## Contract governance and ethical procurement

Notre Dame operates under a robust governance framework that ensures ethical procurement practices and compliance with modern slavery legislation. A key element of this framework is our contract management approach, which prioritises supplier engagement under formal agreements that explicitly include modern slavery clauses.

Less than 1% of University purchases are processed without formal terms and conditions or agreements, ensuring that nearly all procurement activities are governed by clear contractual obligations that mandate ethical labour practices. This commitment is further strengthened by our strategic approach to long-term supplier engagement, particularly in high-risk procurement categories.

Notre Dame actively favours and encourages multi-year agreements with suppliers, particularly those operating in industries with elevated modern slavery risks. Currently, 80% of our high-value operational spend is directed through suppliers engaged under contracts of 12 months or more, ensuring greater visibility, accountability and compliance with ethical sourcing standards.

This approach not only enhances supply chain stability but also enables deeper supplier partnerships, allowing for ongoing risk assessment, proactive compliance monitoring and improved labour conditions across extended contract periods.

### Internal education

All staff at Notre Dame are encouraged to complete the workshops and training facilitated by ACAN. In 2024, 73% 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.

### Grievance mechanisms and remediation

Notre Dame acknowledges that effective grievance mechanisms are a critical component of a robust modern slavery risk management framework. While our existing workplace complaints and whistleblower policies provide general avenues for raising concerns, the University is currently reviewing how these processes can be adapted or expanded to ensure they are accessible, confidential and equipped to handle modern slavery-related disclosures—particularly those affecting vulnerable workers across our supply chain.

In 2024, the Modern Slavery Working Group commenced discussions on strengthening grievance pathways, with a particular focus on:

- enhancing visibility and accessibility of reporting channels across campuses and supplier networks
- exploring sector-aligned best practices for anonymous reporting mechanisms
- ensuring culturally safe avenues for First Nations peoples, students and third-party stakeholders.

Notre Dame is also considering alignment with the Domus 8.7 Remediation Framework, which outlines expectations for remediation pathways in the Catholic sector. This will form part of our 2025 action plan.

While no formal modern slavery-related complaints or grievances were reported in 2024, we recognise this may reflect a lack of awareness or appropriate mechanisms, rather than the absence of risk. As such, the development of a dedicated grievance framework remains a key priority moving forward.

## Future actions

### Enhancing supply chain transparency and traceability

In 2025, the University of Notre Dame Australia will prioritise greater visibility and traceability across its supply chain, extending beyond direct suppliers to include subcontractors and secondary suppliers. Modern slavery risks often reside deeper within supply chains, where oversight is more challenging, making transparency a critical focus.

To address this, the University will require greater disclosure from suppliers regarding their sourcing, labour practices and subcontracting arrangements. By strengthening supplier reporting requirements and implementing advanced tracking and monitoring tools, Notre Dame will improve its ability to assess, address and mitigate potential risks related to unethical labour practices and exploitative conditions.

These efforts will be supported by the integration of supplier risk mapping, leveraging external benchmarks such as the Global Slavery Index and ACAN Procurement Taxonomy to identify and prioritise high-risk categories. Through regular audits, compliance checks and supplier assessments, the University will ensure ethical procurement principles are upheld at every stage of the supply chain.

This proactive approach will not only enhance supplier accountability but also enable Notre Dame to take early intervention measures when risks are identified, fostering a procurement environment built on trust, ethical responsibility and continuous improvement.

### Strengthening supplier engagement and capacity building

Recognising that collaboration with suppliers is fundamental to combating modern slavery, Notre Dame is committed to deepening engagement, fostering long-term partnerships and enhancing supplier capacity.

In 2025, the University will introduce targeted training programs for suppliers, focusing on ethical labour practices, responsible recruitment and compliance with modern slavery laws. By equipping suppliers with the tools and knowledge needed to identify and mitigate risks within their own supply chains, Notre Dame will foster a culture of shared responsibility and accountability.

To support these efforts, the University will establish ongoing supplier forums and industry collaborations, encouraging best practice sharing, sector-wide discussions and problem-solving initiatives. By engaging in joint initiatives with ACAN and the AUPN, Notre Dame will ensure its procurement strategy aligns with industry-leading ethical procurement frameworks. Additionally, the University will enhance contractual obligations, requiring greater supplier compliance



with modern slavery clauses, grievance mechanisms and remediation frameworks. These measures will strengthen Notre Dame's commitment to ethical sourcing and responsible business conduct while ensuring continuous improvements in supplier performance.

### Development and implementation of a sustainable procurement policy and plan

The University of Notre Dame Australia recognises that ethical procurement is inherently linked to sustainability. In 2025, the University will develop and implement a Sustainable Procurement Policy and Plan to integrate social, environmental and economic sustainability into its purchasing decisions.

This policy will establish clear sustainability criteria for supplier engagement, focusing on:

- ethical sourcing and fair labour practices
- waste reduction and responsible consumption
- carbon footprint minimisation and sustainable supply chains
- supplier accountability and compliance with modern slavery requirements.

Notre Dame will prioritise long-term partnerships with suppliers that demonstrate commitment to sustainability and ethical responsibility, particularly in high-risk procurement categories. Currently, 80% of the University's high-value operational spend is allocated to suppliers on contracts longer than 12-months, allowing for greater oversight, transparency and compliance monitoring. This approach will be strengthened through the new policy, ensuring all future procurement aligns with Notre Dame's social justice, human rights and environmental stewardship commitments.

Through supplier training, enhanced due diligence and cross-sector collaboration, Notre Dame will drive positive change within its supply chains, ensuring procurement decisions support a more sustainable, ethical and socially responsible future.





#### CRITERION 5:

## Assessing effectiveness

The ACAN Modern Slavery Maturity Assessment has played a pivotal role in evaluating Notre Dame's capacity to mitigate modern slavery risks within our operations and supply chains. This comprehensive assessment, derived from the self-reported Entity Profile Survey, serves as a key tool for our Modern Slavery Working Group to define future priorities, establish a multi-year action plan and allocate resources effectively.

Findings from the 2024 maturity assessment indicate that our modern slavery risk management framework is structured, standardised and deeply integrated into our organisational culture. We have progressed from project-focused actions to a more systematic and continuous improvement model across the university.

To drive further progress, we have undertaken targeted initiatives to address identified gaps while reinforcing our strengths. These initiatives include:

- Enhancing supplier training and engagement through expanded education programs and direct supplier forums.
- Strengthening grievance remediation processes to ensure accountability and transparency in resolving concerns.
- Mandating supplier self-assessments in onboarding to proactively manage risks and align procurement decisions with ethical and sustainability commitments.
- Expanding the integration of modern slavery compliance into procurement evaluations, ensuring that decision-making reflects human rights considerations.

This commitment to ongoing development and refinement underscores Notre Dame's role as a leader in ethical procurement and modern slavery risk management.

## Our continuous improvement journey

The following roadmap shows our key actions over the last five years:

### 2024

- Increased scrutiny of indirect suppliers by leveraging reporting tools to improve visibility in high-risk industries such as construction, cleaning and ICT hardware.
- Conducted targeted engagement with suppliers in outsourced services, where subcontracting can obscure unethical labour practices.
- Reviewed and updated supplier contracts to include stricter compliance measures on modern slavery, focusing on wage transparency, subcontracting policies and worker protections.
- Strengthened agreements with partner institutions and employers to ensure fair work conditions and ethical recruitment practices for students.
- Introduced additional controls for recruitment agencies, ensuring labour hire firms meet ethical employment practices, particularly for casual and contract workers.
- Launched an anonymous reporting tool to allow workers in high-risk supply chain sectors to raise concerns about unfair treatment, unethical recruitment or exploitative practices.
- Integrated modern slavery risk indicators into investment and large-scale procurement approvals to ensure all major spending decisions consider human rights impacts.

### 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.
- Established an Operational Level Grievance Mechanism for modern slavery concerns.
- Facilitated internal education efforts via ACAN workshops to increase awareness on modern slavery.

### 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.
- Commenced dedicated programs in Modern Slavery and Human Trafficking.

## 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.

## 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

We have used ACAN Baseline Metrics to benchmark our efforts as follows:

	ACTIVITY	2024
INTERNAL / STAFF	Hours spent on modern slavery activities	394
	Individual staff completed e-learning	1,095
	E-learning modules completed	1,343
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2,227
	Number of suppliers with visible contact information and ABN	2,186
	Number of suppliers across high-risk categories	590
	Number of ACAN Supplier Surveys completed	171
	Supplier staff attending capacity building webinars	14
	Invited to join Sedex in 2023	65
	Joined Sedex	75
	Sedex SAQ completed	23
	Social audits	2
	Corrective actions	26

**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

### Laudato Si' Action Platform integration

In 2024, we strengthened our commitment to Pope Francis's encyclical *Laudato Si'* by actively embedding its principles into our operational and procurement processes. The encyclical provides a contemporary Catholic lens on the relationship between environmental sustainability, social justice and human dignity. Importantly, *Laudato Si'* recognises that modern slavery is intertwined with broader systemic issues such as environmental degradation, global economic inequality and the erosion of labour rights.

By embedding *Laudato Si'* into our institutional practices, the University takes a holistic approach to addressing the root causes of modern slavery. This alignment not only reflects our Catholic identity but also reinforces our social responsibility to protect vulnerable individuals from exploitation.

Key actions included:

- Development and implementation of a *Laudato Si'* action plan across all campuses, incorporating ecological economics, sustainable lifestyles and ecological education into our sustainability strategy.
- Sustainability criteria embedded into procurement processes, ensuring that supplier selection aligns with ethical and environmental commitments.
- Collaboration with campus operations teams to enhance sustainability practices, including responsible waste management and ethical sourcing of university merchandise.
- Facilitation of student and staff engagement programs, incorporating workshops and educational sessions that highlight the connection between modern slavery risks and environmental responsibility.



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# Modern Slavery Statement 2024

## Acknowledgment of Country

We acknowledge the Aboriginal Peoples as the Traditional Owners of each of the Countries on which our schools, centres 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.



*The EREA Community – Robert Paul Designs*

*Robert Paul is of Juru descent, born in Bowen in 1963. His use of contemporary designs and colours, along with his interpretation of Traditional Indigenous Art, allows him to tell a story while educating the public about some of the symbolism used in Indigenous Art.*

## Disclosure Note

This Statement has been made on behalf of Edmund Rice Education Australia (EREA) ABN 96 372 268 340 and its governed entities, overseeing 57 schools and learning centres:

1. **Edmund Rice Education Australia Colleges Ltd** ABN 71 659 944 831
2. **Edmund Rice Education Australia Flexible Schools Ltd** ABN 52 659 978 846
3. **Edmund Rice Education Australia New South Wales Colleges Ltd** ABN 60 661 601 118
4. **Edmund Rice Education Australia St Kevin's College Ltd** ABN 31 659 900 026
5. **Edmund Rice Education Australia Victorian Schools Ltd** ABN 90 659 880 985

EREA National office address: 74 Bridport Street, Albert Park VIC 3206

Website: [www.erea.edu.au](http://www.erea.edu.au)

Contact: [info@erea.edu.au](mailto:info@erea.edu.au)

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Reporting Period 1 January – 31 December 2024

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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



**Dr 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 16 June 2025.

This modern slavery statement is signed by a responsible member of Edmund Rice Education Australia as defined by the Act.

*"There is dignity in work, through work, human beings participate in creation and help realise God's plan on earth."*

**Pope Francis**

## Statement from the EREA NSW Colleges Ltd Board

As the Chair of the Board, I am proud to reaffirm EREA NSW Colleges Ltd's commitment to preventing modern slavery and protecting human rights.

EREA NSW Colleges Ltd oversees a group of seven Catholic schools across New South Wales dedicated to providing high-quality education in line with the EREA Charter. Our operations include teaching, administrative support, and engagement with local and international suppliers across categories such as uniforms, educational resources, facilities management, and IT services.

To address these risks, in 2024 EREA NSW Colleges Ltd:

- Strengthened supplier due diligence processes, including modern slavery questionnaires for key suppliers.
- Updated procurement policies to incorporate human rights expectations.
- Integrated education programs into our curriculum to raise awareness among students about modern slavery and human dignity.
- Commenced internal reviews to monitor the effectiveness of our supplier engagement and training initiatives.

At present, EREA NSW Colleges Ltd does not control any other reporting entities except the seven unincorporated schools. Therefore, no consultation with controlled entities was required in preparing this Statement.

Together with our educators, students, and the broader community, we remain dedicated to fostering a culture of respect, awareness, and active engagement against exploitation. We will continue to assess, refine, and strengthen our practices to champion the fight against modern slavery.

This Statement was approved by the Board of Directors on 13 June 2025.

Signed



Sam Hardjono

Chair of the Board

EREA NSW Colleges Ltd

## CRITERION 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).

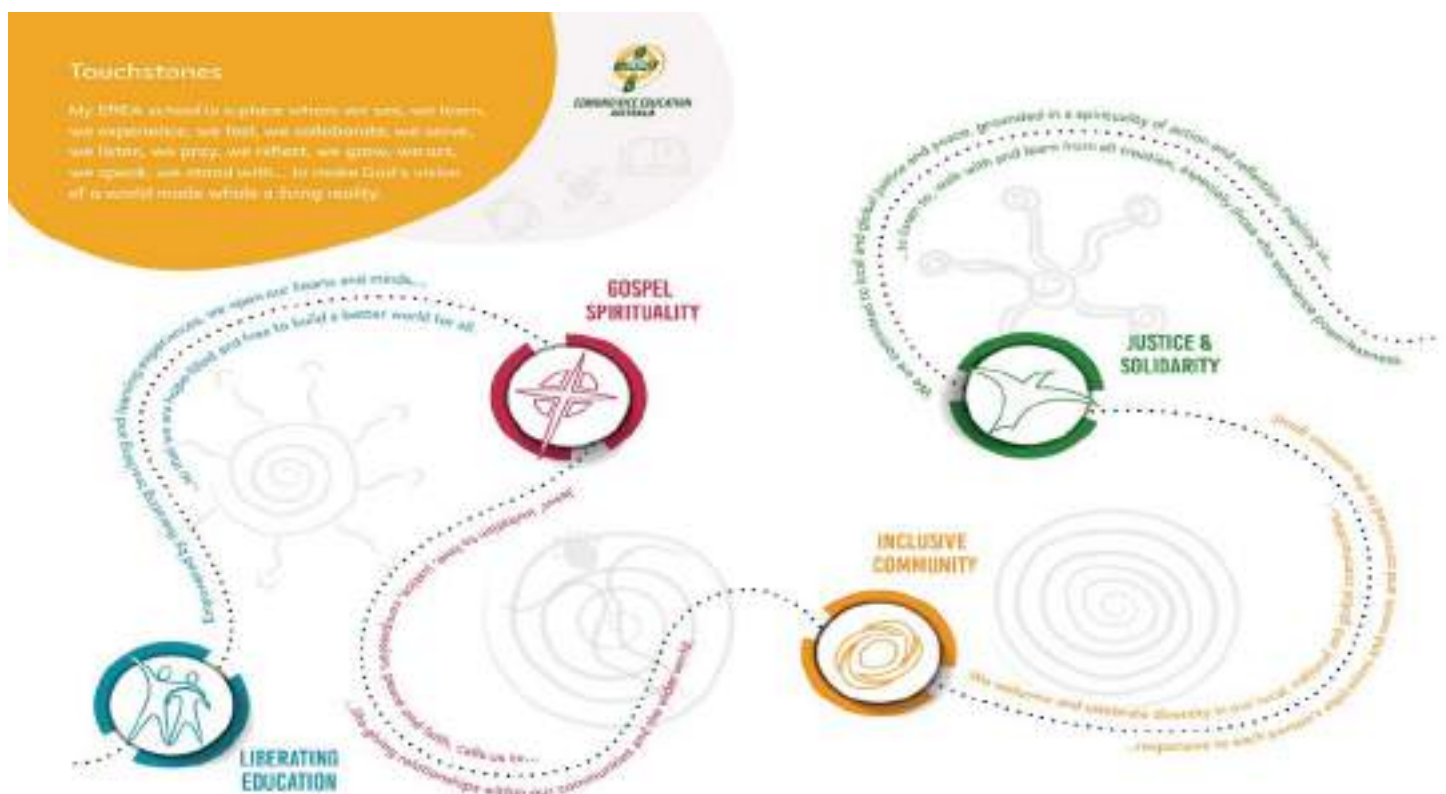
EREA, as part of the mission of the Catholic Church, was initially charged with the responsibility for the governance of Christian Brothers' schools throughout Australia. Today, 57 schools and centres operate to provide an education in the Edmund Rice tradition to young people across all states and territories. Each school and centre has a separate character and history but all draw life from the charism of Edmund Rice and the Gospel.

### Our Charter

The Charter for Catholic Schools in the Edmund Rice tradition is the contemporary educational expression of the charism of Blessed Edmund Rice in Australia.

In 2024, our national community engaged in a process of experience, analysis, reflection and action as a process of renewal of the Charter. In doing so, we embraced a First Nations view of our process, upholding tradition, respect and protocol, depicting the diverse conversations, unexpected turns and perspectives contributing to consensus.

The EREA Charter is informed and enriched by the Scriptures, First Nations Knowings and Catholic Teaching. These three sources of wisdom, woven dynamically through our Charter, call us to both faithfulness and transformation. We are guided by the EREA Charter, with our Touchstones as the measure of our authenticity. Through a *liberating education*, based on a *Gospel spirituality*, within an *inclusive community*, committed to *justice and solidarity*, we co-create a better world for all.



## CRITERION 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.

Through 2023 - 2024, the Trustees of Edmund Rice Education Australia (TEREA) reviewed its governance structure, becoming the sole member of 5 entities established as the governing authorities and active overseers of EREA schools, namely:

1. **Edmund Rice Education Australia Colleges Ltd** – 18 schools and 2 Early Learning Centres located in ACT, Queensland, South Australia, Tasmania and Western Australia
2. **Edmund Rice Education Australia Flexible Schools Ltd**– 22 Flexible Learning Schools and Centres located in NSW, Northern Territory, Queensland, South Australia, Tasmania and Western Australia, along with 2 special schools located in NSW
3. **Edmund Rice Education Australia New South Wales Colleges Ltd** – 7 schools located in NSW
4. **Edmund Rice Education Australia St Kevin's College Ltd** – located in Victoria
5. **Edmund Rice Education Australia Victorian Schools Ltd** – 6 schools located in Victoria (including St Joseph's Special Assistance Schools formerly part of the Flexi Schools network)

### 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 Trustees of EREA 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):

- reviews and approves the acquisition or alienation of the resources of EREA (according to the Constitution).

### The Trustees of EREA:

- 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.

### The EREA Governing Body Boards:

- govern the operation of their schools
- set the operational policy framework
- oversee the financial wellbeing of their schools
- oversee the management of its relevant Governing body
- contribute to the nurturing of key external relationship
- support and guide the Governing Body Executive
- delegate the day-to-day operation and management of the entity's schools to the Executive and Principals and certain other responsibilities to School Advisory Councils.

### The EREA National Executive Director

- implements the strategy and policy approved by the Trustees of EREA
- 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
- ensures the sustainability, growth and development of EREA while complying with statutory obligations

### Roles and Responsibilities

Role	Responsibilities
Trustees of EREA	<ul style="list-style-type: none"> <li>• Approve our Modern Slavery Policy</li> <li>• Ensure our policy is reviewed and updated as needed</li> <li>• Review compliance with our policy</li> <li>• Ensure our policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.</li> </ul>
EREA National Executive Director and Governing Body CEOs	<ul style="list-style-type: none"> <li>• Develop procedures and guidelines supporting adherence with our policy</li> <li>• Monitor Modern Slavery Policy implementation</li> </ul>
Modern Slavery Liaison Officer (MSLO)	<ul style="list-style-type: none"> <li>• Attend ACAN monthly webinars</li> <li>• Deploy ACAN Modern Slavery Risk Management Program resources</li> <li>• Coordinate modern slavery actions and reporting across EREA</li> </ul>
Principals	<ul style="list-style-type: none"> <li>• Implement Modern Slavery Policy, associated procedures and guidelines</li> </ul>



### Our Schools

Across Australia, Catholic Schools in the Edmund Rice tradition have been educating young Australians since 1872 with schools now in every state and territory. 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 only, regional/rural, boarding, early learning centres and flexible education.

As a community of schools we celebrate many strategic, professional achievements in Reconciliation, Care for our Common Home, Charism Formation, Learning, Flexible Schooling, Research, Global Engagement, Leadership Development, sustainable growth and financial stewardship.



Underpinning these achievements and challenges is an ongoing commitment to working with our partners in Catholic Education in sixteen diverse dioceses. We faithfully pursue our mission in Catholic Education and respond to the changing educational and regulatory landscapes in each jurisdiction with young people and children at the centre of our endeavours. In partnership with families, it is our task as Catholic educators to inspire young people with a passion for learning so they are able to make meaning, and contribute to a better world. We do this with humility, resolve and respect.

Our school communities “explicitly co-create the learning conditions, dispositions and relationships which enable deep listening, confidence, agency and freedom” – so that all have a voice, so that all are safe – and all “may have life and have it to the full”.

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## Operations

### EREA – A Snapshot



### Workforce Profile

As at August 2024 Government census, 6,533 staff were employed in a full-time or part-time capacity across EREA operations. In addition, approximately 1,800 staff have been recorded as staff employed on a casual basis. While some schools employ staff in Operational areas, such as canteens, catering, property maintenance and uniforms, in many schools, these service operations are outsourced to contractor services where employees are not directly employed by an EREA entity or school.

### Supply Chains

In 2024, EREA had a total operational turnover of \$1,275M. As an education provider, the majority of expenditure relates to teaching and support staff, with employment costs representing 67% of total recurrent expenditure. Across the group, non-staffing expenditure in 2024 was \$404M with \$183M spend on capital expenditure.

With 57 Schools and learning centres across all states and territories in Australia, our supply chains are very diverse. In total, EREA offices and schools sourced goods and services from over 9,000 providers, a number of whom provide contracted labour.

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.

### CRITERION 3: Modern Slavery Risks

The ACAN Category Risk Taxonomy 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.

In the 2024 reporting period the EREA Group identified a range of procured products and services with diverse profiles from all schools and entities to assess the level of risk. 6,570 distinct suppliers with approximately \$471M of spend were assessed against the ACAN Category Risk Taxonomy. Through this process we have identified \$149M approx. was spent with 3,004 suppliers which were categorised as high-risk. These categories include building construction, facilities management, ICT software, supplies & services, clothing suppliers and food services.

#### Labour hire

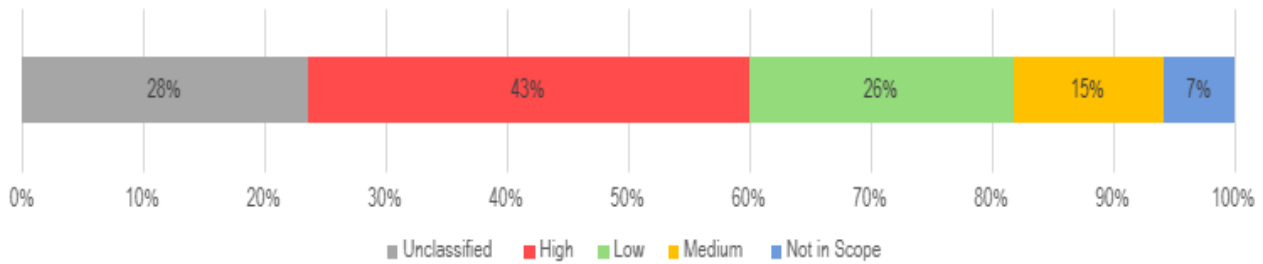
In Australia, people employed via labour hire contractors are particularly vulnerable to labour exploitation such as wage theft, underpayments, cash back schemes, unfair deductions, and more serious forms of modern slavery such as deceptive recruitment, debt bondage or forced labour. For some migrant 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.

Labour 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.

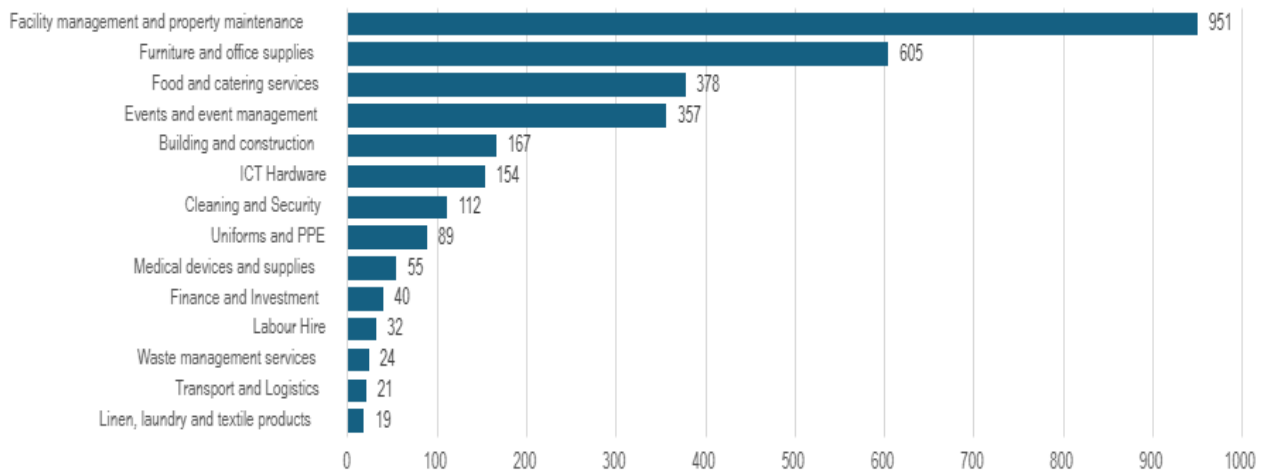
#### Investments

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 Catholic Diocesan Development Funds. These funds play a crucial role in supporting various religious and charitable activities within the community. When it comes to ethical investment of funds, these organisations are increasingly recognising the importance of aligning their financial decisions with their values and principles. Consideration 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 Catholic Diocesan Development Funds, who make a positive impact on society.

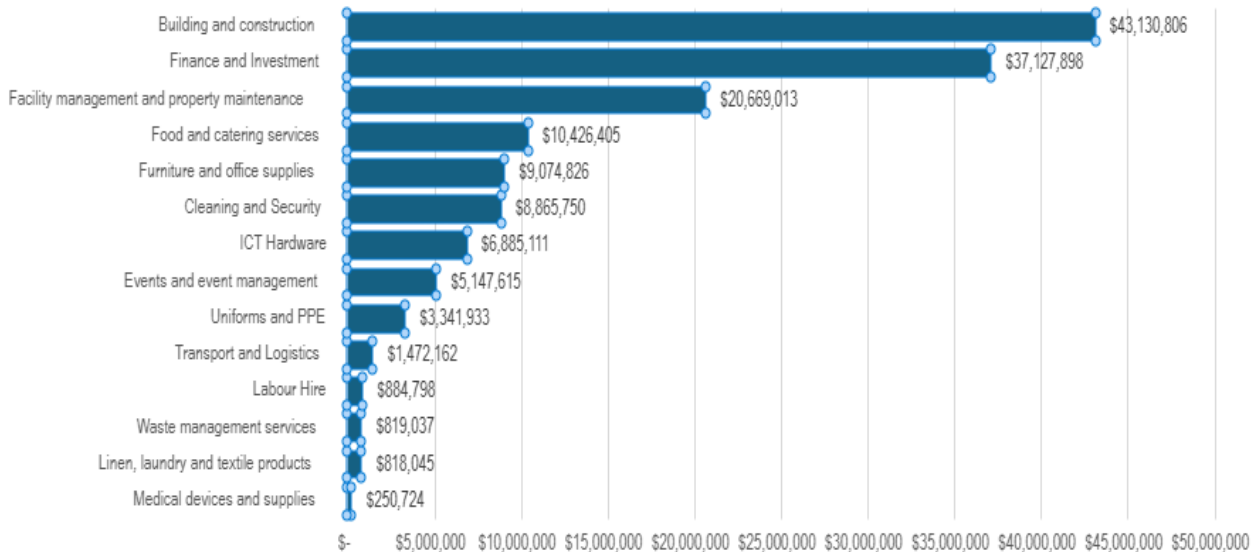
% of Spend per Procurement Taxonomy Risk



Number of suppliers in high risk procurement categories



Procurement Spend in high risk procurement categories



## CRITERION 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 in 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 to assess our supply chain risk.

EREA utilised its membership of SEDEX - Supplier Ethical Data Exchange - platform to manage and improve social and environmental performance in supply chains.

As an organisation, 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 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. Through our participation with ACAN, suppliers have access to training and resources to help them improve their processes and ensure compliance with our standards.
3. **Grievance Mechanisms:** We have established 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.

Ongoing actions include:

- Through e-learning, ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers.
- In line with our Policy, business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are forbidden. Failure to adhere to the Modern Slavery Policy may result in disciplinary action.
- 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 are incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) have been 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.



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 Mechanisms

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 does have a Whistleblower Policy and YourCall service that is accessible to staff, service providers and contractors. In 2025, EREA is working with ACAN to implement the ACAN grievance mechanism and worker voice resources.

EREA's Whistleblower Protection Policy and accompanying Guidelines are available to all current or former:

- EREA Council and Trustees of EREA
- EREA National Executive Director
- EREA National Directors, Stewardship and Mission Team staff members
- Governing Body Board Members
- Governing Body CEOs and Entity 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/or Governing Executive 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 providing 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-centered 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.

*“Although we try to ignore it, slavery is not something from other times.”*

**Pope Francis**

## CRITERION 5: How we assess the effectiveness of our actions

The ACAN 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.

For 2024, EREA's Maturity Assessment has been assessed as 51% demonstrating improvement since the last reporting period especially in the areas of governance and risk assessment.

### Edmund Rice Education Australia - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business Process and Governance	55%	76%	40%	37%	52%	↑ 18%
2. Operations	36%	98%	43%	39%	54%	↑ 25%
3. Supply Chain	52%	80%	42%	47%	56%	↑ 23%
4. Worker Engagement	27%	129%	25%	24%	51%	↑ 32%
5. Entity's program and activities	80%	40%	50%	33%	51%	↑ 13%
6. Grievance Mechanisms and Remediation	72%	30%	39%	28%	42%	-10%
Average	54%	75%	40%	35%	51%	
	↑ 13%	↑ 29%	↑ 12%	↑ 13%	↑ 17%	

Through 2024, EREA undertook to update its profile to confirm the effectiveness of actions taken to address Modern Slavery, as assessed by ACAN. The baseline data table below reflects metrics for the EREA Group, indicating improvements from 2023 through 2024. These key metrics provide a quantitative basis to evaluate actions and results, providing an objective measure of achievements.

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey as well as an increase in Supplier staff attending capacity building webinars. Visibility of self-reported information and modern slavery risks associated with individual suppliers improved with an increase in activity by suppliers for all metrics assessed.

	ACTIVITY	2023 Edmund Rice Education Australia	2024 Edmund Rice Education Australia
INTERNAL / STAFF	Hours spent on modern slavery activities	N/A	32
	Individual staff completed e-learning	N/A	15
	E-learning modules completed	N/A	20
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	N/A	9021
	Number of suppliers with visible contact information and ABN	2665	6570
	Number of suppliers across high-risk categories	789	3004
	Number of ACAN Supplier Surveys completed (cumulative)	246	678
	Supplier staff attending capacity building webinars (cumulative)	16	48
	Suppliers invited to join Sedex (cumulative)		89
	Suppliers joined Sedex (cumulative)	58	94
	Number of sites with Sedex SAQ completed (cumulative)	2	30
	Social audits (number of audits completed in 2024)	N/A	9
	Corrective actions (Number of non-conformances in 2024)	N/A	25
	Contacts made via worker voice / grievance mechanism	N/A	31
DOMUS 8.7 EXTERNAL REFERRALS	Referrals for advice and assistance	N/A	0
	Individuals identified or referred for modern slavery assessment	N/A	0
	Individuals with modern slavery cases remediated	N/A	0

## CRITERION 6: Consultation with controlled entities

Having moved to a new corporate structure, EREA seeks 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 which EREA takes very seriously.

During the reporting period we proactively integrated our strategies, inviting ACAN to present to senior leaders in the group, engaging with entities and schools to provide further information on strategies and available resources at the local level. EREA, as the sole member of these bodies, strives to demonstrate our commitment to prevent modern slavery and establish a culture of accountability and transparency across our organisation.


To effectively address modern slavery under our new structure, we have implemented, or are currently implementing, the following strategies across all our controlled entities:

1. Establishment of a Modern Slavery Working Group (MSWG), meeting regularly to develop and implement a Modern Slavery Action Plan across the group. The MSWG will include representation from all governing bodies as well as schools to ensure diversity of membership and contribution.
2. Policy Development: A comprehensive Modern Slavery Policy has been developed and published on our website. Work continues with development of procedures specifically focused on preventing modern slavery across the group.
3. Training and Awareness: We have worked with ACAN to implement online training resources for staff at our National Office, to be rolled out across the group.
4. 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.
5. 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.
6. Collaboration: Foster partnerships with NGOs, industry groups, and government agencies to exchange best practices, share resources, and collaborate on initiatives to combat modern slavery.
7. Transparency: Maintain transparency in our efforts to address modern slavery by regularly communicating progress, challenges, and successes internally and externally.

## **CRITERION 7: Other relevant information**

No other relevant information





*Edmund Rice Education Australia offers a  
liberating education, based on a gospel spirituality,  
within an inclusive community committed to  
justice and solidarity*

For more information, please contact:  
Edmund Rice Education Australia  
PO Box 33185 Melbourne VIC 3004





Melbourne Archdiocese  
Catholic Schools

MACseye



# Modern Slavery Statement 2024

### **Disclosure Note**

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (the Archdiocese).

This modern slavery statement is a joint statement made on behalf of the below 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 (the Archdiocese)", 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 2024.

This statement was approved by the Most Rev Peter A Comensoli,  
Archbishop of Melbourne on 12 May 2025.

The Catholic Archdiocese of Melbourne, 383 Albert Street,  
East Melbourne (ABN 64 047 619 369)

<https://melbournecatholic.org/>



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Statement from

## Most Rev Peter A Comensoli, Archbishop of Melbourne



As we enter a new year – a Jubilee year of Hope for the universal Church, we renew our commitment as a Catholic community to affirm the inherent dignity and value of every person, recognising that all are made in the image of God. Together, we share the responsibility to protect the rights and freedom of all, with a particular focus on the most vulnerable and forgotten members of our global community.

Modern slavery takes many forms and can affect individuals of all ages and backgrounds, too often lying hidden behind the conveniences and comforts we enjoy in society. Fighting exploitation and striving to end any form of human suffering must remain at the forefront of our shared mission, particularly in the context of our Christian faith and daily living.

The Catholic Archdiocese of Melbourne, along with its agencies, continues to serve as a model of education, advocacy and practical action in addressing this issue. By embedding a commitment to eradicating modern slavery within our own operations and supply chains, we embody the principles of Catholic Social Teaching and take decisive action to end the dehumanising exploitation of others. This is our commitment to protect both present and future generations

Once again, I reaffirm this Statement as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. This Compendium is a crucial record of the collaborative efforts across the Church in Australia to provide actionable ways we can address this pressing issue together.

The Archdiocese remains committed to strengthening its due diligence processes, identifying risks within our supply chains, updating policies, agreements, contracts and templates to reflect our unwavering commitment to human rights. We will continue to drive best practices in all our agencies, working towards the eradication of modern slavery in our time.

I am deeply grateful to those whose wisdom and expertise have contributed to the preparation of this Statement and acknowledge the tireless efforts of the staff across our Archdiocese who are dedicated to implementing lasting change and good practice.

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

May St. Josephine Bakhita, our Patron Saint for all victims of modern slavery and human trafficking, intercede for all those enslaved among us and help survivors find healing from their wounds.

With every grace and blessing,

Yours sincerely in Christ Jesus,

**Most Rev Peter A Comensoli**  
ARCHBISHOP OF MELBOURNE



## CRITERIA 1 AND 2

# About the Archdiocese, 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 (the Archdiocese)	ABN 64 047 619 369
Melbourne Archdiocese Catholic Schools Ltd (MACS)	ABN 18 643 442 371
Subsidiaries of Melbourne Archdiocese Catholic Schools:	
• Melbourne Archdiocese Early Years Education Ltd	ABN 37 653 741 612
• Melbourne Archdiocese 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](http://www.acnc.gov.au).

## The Catholic Archdiocese of Melbourne

The Catholic Archdiocese of Melbourne is devoted to the wellbeing of parishioners across greater Melbourne. Our area of service is communities, located around Port Phillip Bay in an area as vast as Yarraville to Yea, Craigieburn to Croydon, Geelong to Greensborough, Healesville to Hadfield, Bayside to Boronia, Dromana to Deer Park.

Presided over by the Archbishop of Melbourne, the Archdiocese comprises approximately 1 million Catholics and is the largest Archdiocese in Australia with a wide variety of people, cultures and ministries, providing services and support including pastoral, educational, social welfare and administrative support to 206 parishes.

The parishes are the mission of the Catholic Church to the faithful and to the broader community and offer religious services, marriages, baptisms, funerals and other support as part of their outreach.

The Catholic community in Melbourne is made up of a rich tapestry of people, of all ages, cultures and backgrounds. Although we all come from 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.

We draw strength from our parish communities and a wide range of organisations and agencies — where we care for one another — and in the deep love of God. One of our key priorities is to support the poor, the broken, the abused, the marginalised and those living with disability. This informs and animates our actions to eradicate modern slavery.

Founded in the nineteenth century, during a time of great challenge, the Melbourne Catholic community created an enduring system that now numbers 291 schools.

The broad spectrum of schools includes local parish primary schools, regional colleges and special education facilities. The field also includes Catholic universities, chaplaincies, teaching colleges and other academic faculties that service an ever-changing educational enterprise.

## Melbourne Archdiocese Catholic Schools

Archbishop Peter A Comensoli established Melbourne Archdiocese Catholic Schools (MACS) to be responsible for the governance and operation of parish primary schools and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne and Melbourne Archdiocese Early Years Education Ltd (MACSEYE), as a wholly owned subsidiary of MACS, to be responsible for the governance and operation of early childhood education and care services.

Its governance and operation of approximately 291 Catholic primary and secondary schools commenced on 1 January 2021. MACS also provides a range of services to support the 39 congregational and ministerial public juridical person (PJP) schools in the Archdiocese that are not governed by MACS.



Educating more than  
**116,000** students



throughout  
**291** schools

MACS and its subsidiaries are responsible for advancing education and religion through an effective pursuit of Catholic education. This includes primary and secondary schools, kindergartens, preschools, out of school hours programs, boarding facilities and the provision of other services related or ancillary to the operation of MACS Catholic Schools.

## Catholic Development Fund

Since 1956, CDF has been supporting communities and continually improving an approach that allows us to provide a unique level of financial 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 as 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; and
- 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.

# Mission and strategy

## The Archdiocese

Archbishop Comensoli:

*"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."*

## MACS

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).

"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).

This relationship elicits a desire to grow in the knowledge and understanding of Christ and His teaching.

With parents and parishes, Catholic schooling seeks to fulfil this mission by providing an environment in which students are enabled to:

- Encounter God in Christ and deepen their relationship with Him;
- Pursue wisdom and truth encouraged by a supportive academic culture; and
- Grow in the practice of virtue, responsible freedom and serving the common good.

In August 2022, MACS released its inaugural Strategic Plan 2030: Forming Lives to Enrich the World.

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'.

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.

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.

## MACSEYE

Melbourne Archdiocese Early Years Education Ltd (MACSEYE) is a wholly owned subsidiary of MACS, established to provide the governance and operational oversight of early childhood education and care services. MACSEYE commenced operations in October 2024 and is governed by its own Board.

Although MACSEYE maintains a distinct governance structure, it forms part of the MACS Group for the purposes of modern slavery reporting under the Modern Slavery Act 2018 (Cth).

MACSEYE's early operations have focused on establishing the foundational governance, risk and compliance structures necessary to support ethical operations and ensure compliance with legislative and social responsibilities, including modern slavery risk management.

It aligns with MACS' broader commitment to ethical procurement and human rights due diligence and will progressively embed modern slavery risk controls as operations expand in 2025.

## CDF

CDF, in support of the mission of the Catholic Church, provides capital funding and financial solutions for the establishment and operation of Catholic organisations, primarily but not exclusively, within the Archdiocese of Melbourne, Diocese of Ballarat, Diocese of Bunbury and Diocese of Sale.

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.

# Organisational structure and geographic regions

## The Archdiocese

The organisational structure of the Catholic Archdiocese of Melbourne is displayed in Figure 1 of Appendix A – Organisational charts (Page 27). Our work is organised into different entities and agencies. This structure provides clear responsibilities and accountabilities and it also dictates our governance structure.

## MACS

The organisational structure of Melbourne Archdiocese Catholic Schools is displayed in Figure 2 of Appendix A – Organisational charts (Page 28).

MACS Head Office and the Catholic Leadership Centre are based in East Melbourne.

It is supported by four regional offices in the north (West Melbourne), south (Moorabbin), east (Croydon) and west (Werribee) of Melbourne.

Operations commenced on 1 January 2021, including Catholic Education Melbourne ceasing and becoming part of MACS with the 291 schools.

## CDF

The organisational structure of the Catholic Development Fund is displayed in Figure 4 of Appendix A – Organisational charts (Page 29).

The CDF Head Office is based in East Melbourne and is supported by three regional Diocesan locations in Ballarat (VIC), Sale (VIC) and Bunbury (WA), with geographical staffing in these areas.

CDF Head Office also provides a range of services for the 18 Development Funds, situated across Australia and New Zealand, each funding a wide range of Catholic infrastructure to continue the Church's mission and better serve communities, 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

## The Archdiocese

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.

Archbishop Comensoli established MACS to assume the governance and operation of Catholic schools and appoints the members of the MACS Board.

## MACS

The board of MACS was established in 2020 by Archbishop of Melbourne Peter A Comensoli.

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.

The board holds the Executive Director and Executive Leadership Team accountable for the management and delivery of our objectives and implementation of policies.

Archbishop Comensoli appoints the members of the board. The MACS board has established the following six board committees:

- Catholic Mission and Identity Committee
- Child Safety and Risk Management Committee
- Education Strategy and Policy Committee
- Finance and Audit Committee
- Governance Committee and
- People and Culture Committee

## MACSEYE

MACSEYE is governed by a separate board and operates independently of MACS' internal board committees. The MACSEYE board is responsible for the strategic and operational oversight of early years education and care services and for ensuring compliance with relevant laws and standards, including the *Modern Slavery Act 2018 (Cth)*.

MACSEYE is included within the MACS group for the purposes of this Statement. While MACSEYE's first full year of operation will be 2025, the organisation commenced service delivery in the final quarter of 2024 and has begun laying the foundation for modern slavery risk management through ethical procurement practices and alignment with MACS' standards.

## CDF

CDF is governed by the Archdiocese of Melbourne as an undertaking of the Archbishop and has an advisory board to the Archbishop.

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.

# Profile and operations

## The Archdiocese



Throughout the 2024 reporting period, the Archdiocese **engaged with**

**974 suppliers**

with a **total expenditure** of

**\$52.3M.**

MACS **total consolidated income** for the 2024 reporting period was

**\$2.349B**

The **main expenditure** being

**\$1.622B**

on the salaries of employees.

The CDF has an **annual revenue**

**\$163.3M**

and **expenditure** of approximately

**\$97.5M**

excluding the salaries of its 56 staff.

In its operations, the CDF engages principally with other **Catholic entities and banks.**

**MACS**



**CDF**





# Summary of 2024 activities

Throughout 2024, the Archdiocese, MACS and CDF continued participation in the Australian Catholic Anti-Slavery Network modern slavery risk management program (ACAN Program). The ACAN Program provided the Archdiocese, MACS and CDF staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.

Other actions completed in 2024 by all three reporting entities include:

- The continuation of standard procurement practice to invite suppliers to join Sedex (Supplier Ethical Data Exchange), an online 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, the Archdiocese also undertook the following:

- Improved data collection and the number of ACAN supplier surveys completed by suppliers;
- Ensured the new service provider agreement with Cushman & Wakefield embedded requirements to ensure all suppliers, consultants and contractors adhere to the Modern Slavery Act and take reasonable steps to ensure that no Modern Slavery exists in its business or supply chain; and
- Loaded the ACAN Modern Slavery training modules into the Archdiocese training platform ready for users to complete.

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

- Further development of assurance activities and overarching governance and accountability for ethics compliance and modern slavery risk management;
- Included modern slavery as an independent risk on the enterprise risk register;
- Continued utilisation of ACAN resources to identify and engage tier 1 suppliers for Sedex membership and onboarding them onto the Sedex platform;
- Completed procurement process improvements and document enhancements, including standard agreement templates, to ensure that modern slavery risks are addressed throughout the procurement lifecycle; and
- Sourced a Learning Management System (LMS) that will be implemented during 2025. The LMS will make Modern Slavery 101 – Introduction to Modern Slavery training available to all staff and other ACAN e-learning modules available to selected staff.

## CRITERIA 3

# Modern slavery risks in operations and supply chains

## Supply chain risk

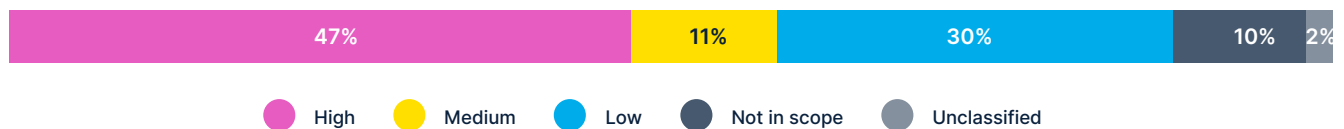
### The Archdiocese

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

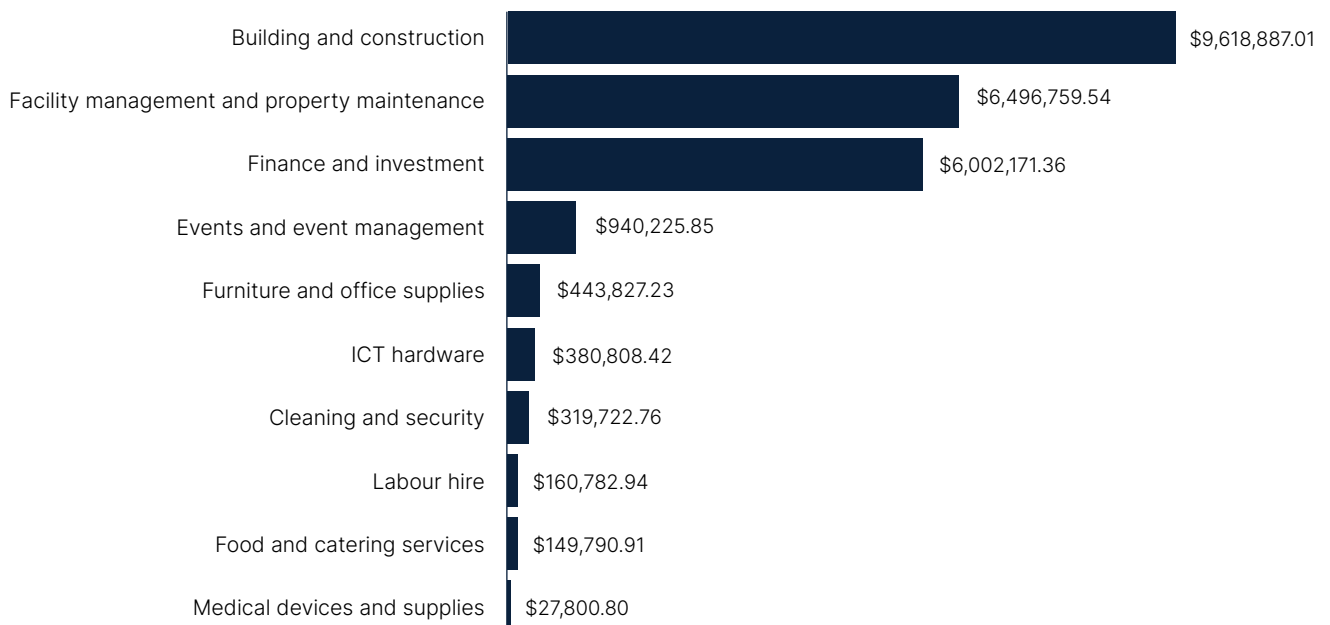
An analysis of the Archdiocese's 2024 spend on goods and services in these categories is represented in the charts below.

### The Archdiocese Spend in High-Risk Categories

#### Spend Profile by Risk Taxonomy Category



### The Archdiocese Spend in High Risk Procurement Categories



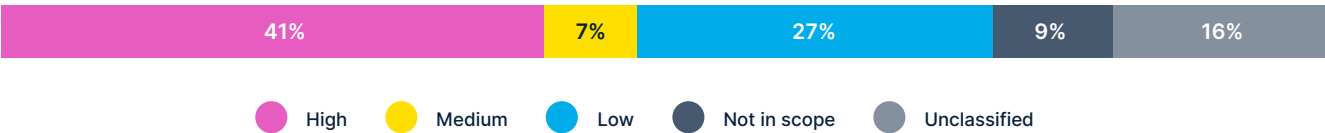
# MACS

An analysis of MACS’ 2024 spend on goods and services in categories at high-risk of modern slavery 2024 is represented in the chart below.

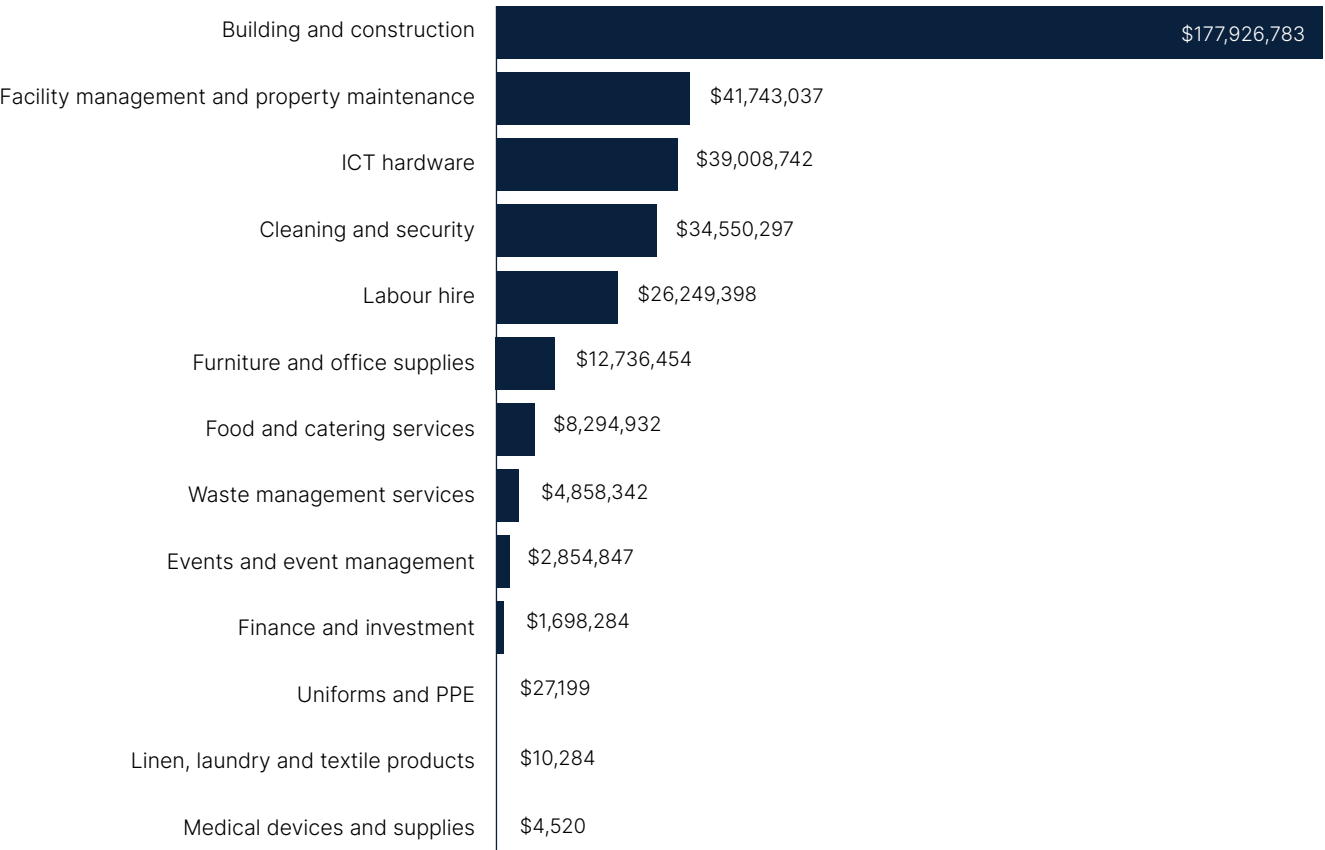
ACAN will continue to support MACS to engage with suppliers to develop a risk profile specific to each major supplier across operational activities and associated with the supply chains of goods.

## MACS Spend in High-Risk Categories

Spend Profile by Risk Taxonomy Category



## MACS Spend in High Risk Procurement Categories



# MACSEYE

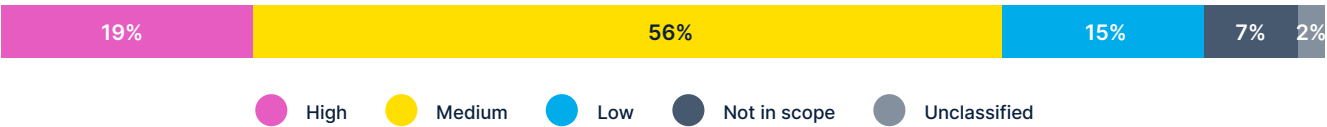
MACSEYE did not undertake a separate supply chain risk assessment in 2024 due to its commencement late in the reporting period as most expenditure was incurred via MACS’ systems and processes and thus factored into the above analysis (except for \$0.28m incurred directly by MACSEYE).

## CDF

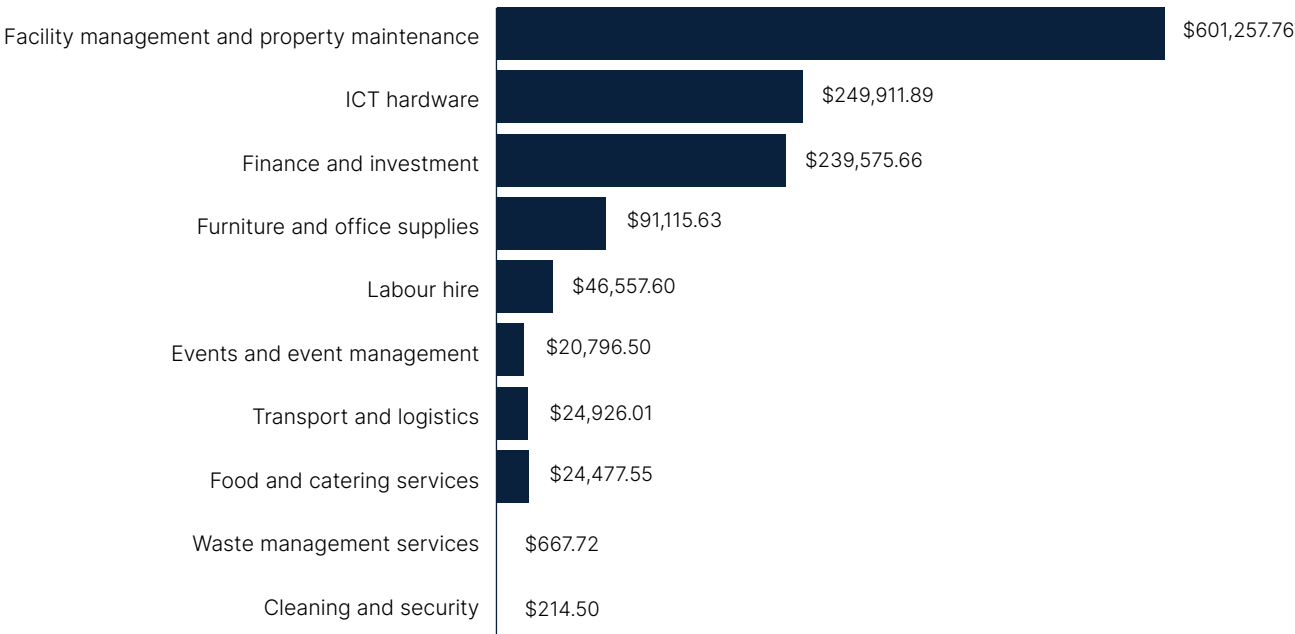
Analysis of CDF supply chains is based on ACAN risk taxonomy across 41 categories of geographic location, industry or sector, commodity, product category and workforce profile.

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 Risk Taxonomy Category



### CDF Spend in High Risk Procurement Categories



## Operational risk

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

### The Archdiocese

#### 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 and from October 2024 Cushman & Wakefield, procure Facilities Management and Property Services on behalf of the Archdiocese. 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:

- A focus on low-skilled, low-paid, seasonal, temporary labour;
- The 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; and
- 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 Work Health and Safety 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 291 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 2024, 18,866 people were employed by MACS, of which a high proportion (94%) work at MACS schools. Of these employees, 81% are women and approximately 98% are Australian citizens or permanent residents. All employees are engaged in Australia and just over 300 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.

## MACSEYE

MACSEYE had minimal additional operational risk exposure in 2024 with most of the expenditure incurred via MACS' systems and processes.



## CRITERIA 4

# Actions taken to assess and address risk

For the 2024 reporting period, the Archdiocese, 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); and
- 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 the Archdiocese, MACS and CDF to attend the 2024 ACAN webinar series. The purpose of the ACAN supplier webinar series was to assist suppliers to gain a fundamental understanding of modern slavery.



Overall, there were 1425 suppliers to the Archdiocese, MACS and CDF that completed the ACAN Supplier Survey and 64 suppliers attended the webinar series.

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

The Archdiocese, MACS and CDF intend that Sedex will be further utilised during 2025 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; and
- 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.

The Archdiocese, 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

The Archdiocese, 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 the Archdiocese, 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, the Archdiocese, 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, the Archdiocese, 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.

The Archdiocese, 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 2025

## The Archdiocese

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

Most of the Archdiocese's risk relates to the Facilities Management and Property Services provided by BGIS for part of 2024 and transferred to Cushman & Wakefield for the final quarter of 2024. Both BGIS and Cushman & Wakefield prepare their own Modern Slavery Statement. Some of the key actions taken by BGIS and Cushman & Wakefield 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	Status
<b>Risk Management</b>	
Modern Slavery was included as an Enterprise level risk for MACS, as well as at a directorate level for Finance by the end of 2024. In 2025 it is being included as a risk for schools to consider as part of their school risk registers, as well as all programs related to international travel.	<b>In progress</b>
<b>Procurement and Supply Chain</b>	
Development of a Procurement Intranet site to include information on modern slavery statements and details of the action plans.	<b>In progress</b>
<b>Human Resources and Recruitment</b>	
Implement Learning Management System and make available the ACAN e-learning module 'Modern Slavery 101 – Introduction to Modern Slavery' available to all staff.	<b>In progress</b>

## MACSEYE

Action	Status
<b>Management Systems</b>	
Develop a Modern Slavery Action Plan aligned with MACS Group expectations and tailored to early years education and care.	<b>Planned</b>
Identify internal roles responsible for modern slavery risk management and governance oversight.	<b>Planned</b>
<b>Risk Management</b>	
Undertake a baseline modern slavery risk assessment for MACSEYE's operations and key supplier categories.	<b>Planned</b>
<b>Procurement and Supply Chain</b>	
Commence integrating modern slavery considerations into procurement activities and supplier onboarding.	<b>Planned</b>
<b>Human Resources and Recruitment</b>	
Identify relevant staff to complete ACAN e-learning modules on modern slavery awareness.	<b>Planned</b>

## CDF

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

## CRITERIA 5

# Effectiveness assessment

During 2025 and beyond, the Archdiocese, 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 the Archdiocese, MACS and CDF. To support the development of KPIs, baseline metrics have been developed to begin assessing the effectiveness of activities and initiatives.

## The Archdiocese Baseline Data

Activity	2023 Catholic Archdiocese of Melbourne	2024 Catholic Archdiocese of Melbourne
<b>INTERNAL / STAFF</b>		
Hours spent on modern slavery activities	50	55
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>		
Total number of suppliers	1156	974
Number of suppliers with visible contact information and ABN	45	889
Number of suppliers across high-risk categories	31	220
Number of ACAN Supplier Surveys completed	4	90
Supplier staff attending capacity building webinars	3	6
Invited to join Sedex	0	18
Joined Sedex	1	29
Sedex SAQ completed	2	7
Social audits	1	1
Corrective actions	0	25

The Baseline Data table above indicates that in 2025 the Archdiocese, needs 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.



## MACS Baseline Data

Activity	2023 Melbourne Archdiocese Catholic Schools	2024 Melbourne Archdiocese Catholic Schools
<b>INTERNAL / STAFF</b>		
Hours spent on modern slavery activities	60	85
Individual staff completed e-learning	0	9
E-learning modules completed	0	45
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>		
Total number of suppliers	30579	31765
Number of suppliers with visible contact information and ABN	13897	1
Number of suppliers across high-risk categories	10254	8369
Number of ACAN Supplier Surveys completed	849	1305
Supplier staff attending capacity building webinars	344	54
Invited to join Sedex	370	183
Joined Sedex	57	151
Sedex SAQ completed	17	111
Social audits	2	17
Corrective actions	0	75

## MACSEYE

Given MACSEYE's operations only commenced in October 2024, modern slavery risk management activities were not yet in operation and therefore effectiveness could not be meaningfully assessed.

In 2025, MACSEYE will focus on implementing foundational actions, such as establishing governance oversight, beginning supplier engagement and developing a tailored action plan.

## CDF Baseline Data

Activity	2023 Catholic Development Fund	2024 Catholic Development Fund
<b>INTERNAL / STAFF</b>		
Hours spent on modern slavery activities	15	15
Individual staff completed e-learning	0	0
E-learning modules completed	0	0
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>		
Total number of suppliers	207	191
Number of suppliers with visible contact information and ABN	0	43
Number of suppliers across high-risk categories	41	45
Number of ACAN Supplier Surveys completed	20	30
Supplier staff attending capacity building webinars	0	4
Invited to join Sedex	0	1
Joined Sedex	5	18
Sedex SAQ completed	0	2
Social audits	0	0
Corrective actions	0	0

The Effectiveness Baseline data shows a need to re-engage staff and a management as the last ACAN training was in 2022. It also shows that supplier engagement can be improved and will be part of the following year's action plan.

## DOMUS 8.7 External Referrals for The Archdiocese, MACS and CDF

Activity	2023 The Archdiocese, MACS and CDF	2024 The Archdiocese, MACS and CDF
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>		
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

# Modern Slavery Maturity Assessment

During 2025, the Archdiocese and CDF will be committed to continually improving our approach to partnering with our stakeholders and working to reduce modern slavery.

The Archdiocese Action Plan is structured around the five 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.

The Archdiocese 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 2025, priorities of the Archdiocese 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 to ensure the action plan is implemented; and
- Identify a Modern Slavery Liaison Officer (MSLO).

MACS' priorities are to:

- Accelerate our increasing maturity in the areas of Business Process and Governance, Operations, Worker Engagement and Modern Slavery Program and Activities;
- Address the effectiveness of action planning and risk management; and
- Review the good progress being made in the areas of Supply Chain and Grievance Mechanisms and Remediation and adopt applicable learnings into areas where maturity needs to accelerate.

MACSEYE's priorities are to:

- Focus on building the necessary internal capability and systems to support modern slavery risk management, including developing a tailored Modern Slavery Action Plan, embedding initial procurement controls and identifying key roles responsible for oversight. These foundational steps will enable MACSEYE to undertake its first formal maturity assessment in a future reporting period, once core systems and processes are in place.

CDF's priorities are to:

- Continue to improve in the support and guidance we provide to our suppliers/contractors during our assessment;
- Roll out the updated ACAN training programs for staff and increase awareness of Modern Slavery risks, with emphasis on staff engaged in 3rd party purchasing activities and contractor engagement;
- Engage suppliers to join SEDEX; and
- Include Modern Slavery as a standard Agenda item for discussion and update at monthly management meetings.

## CRITERIA 6

# Consultation

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

The Archdiocese consulted with different departments including People and Culture, Legal, Risk, Property and Infrastructure, Finance and service provider Cushman & Wakefield 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

### Appendix A

# Organisation charts

## The Archdiocese

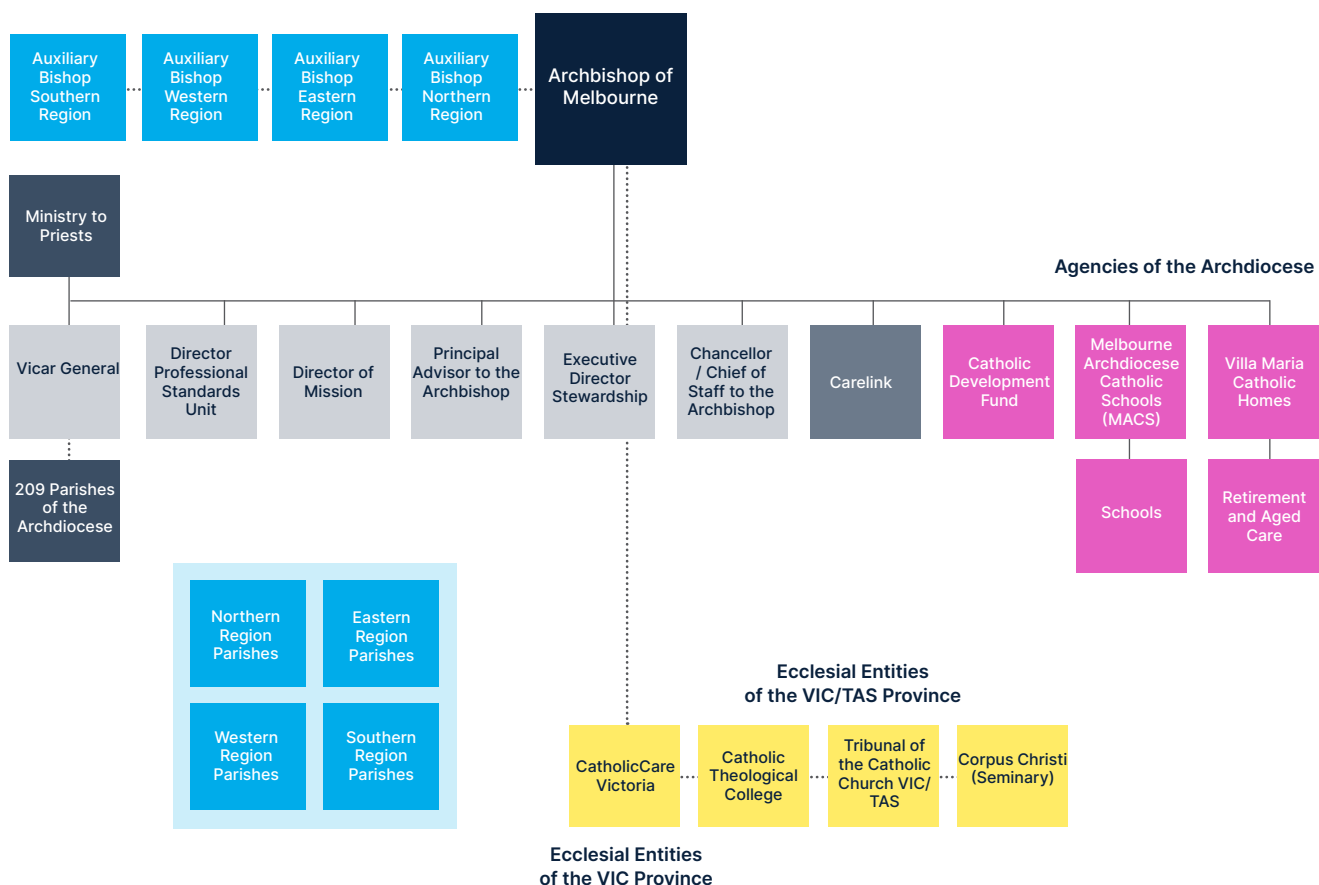


Figure 1: Organisational structure of Catholic Archdiocese of Melbourne (at 31 December 2024)

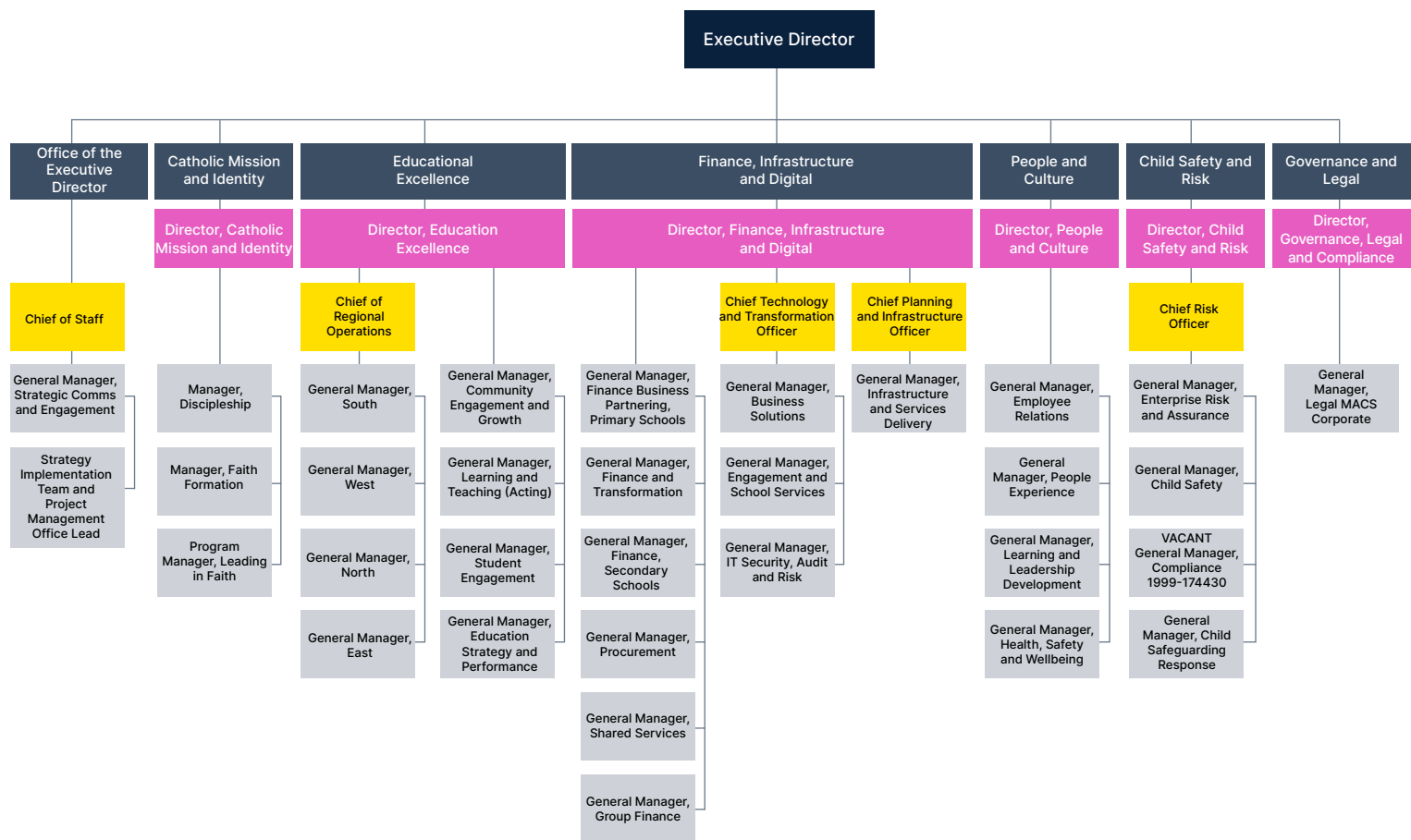


Figure 2: Organisational structure of Melbourne Archdiocese Catholic Schools (at 31 December 2024)



# MACSEYE

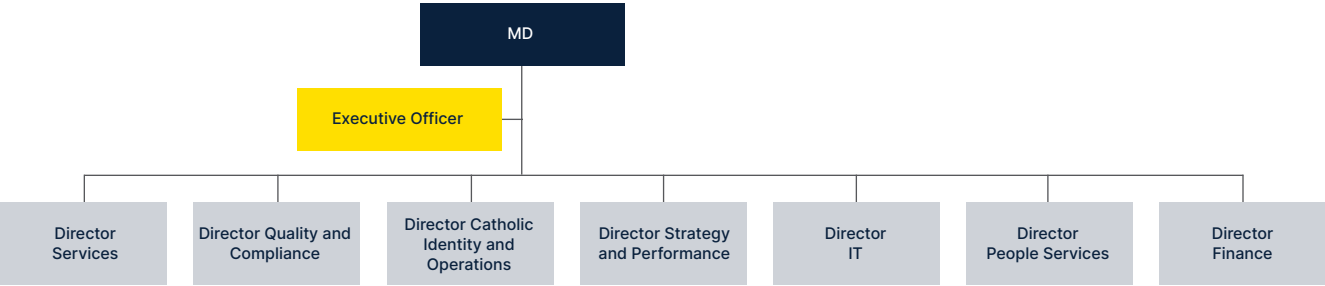


Figure 3: Organisational Structure of Melbourne Archdiocese Catholic Schools Early Years Education (31 December 2024)

# CDF

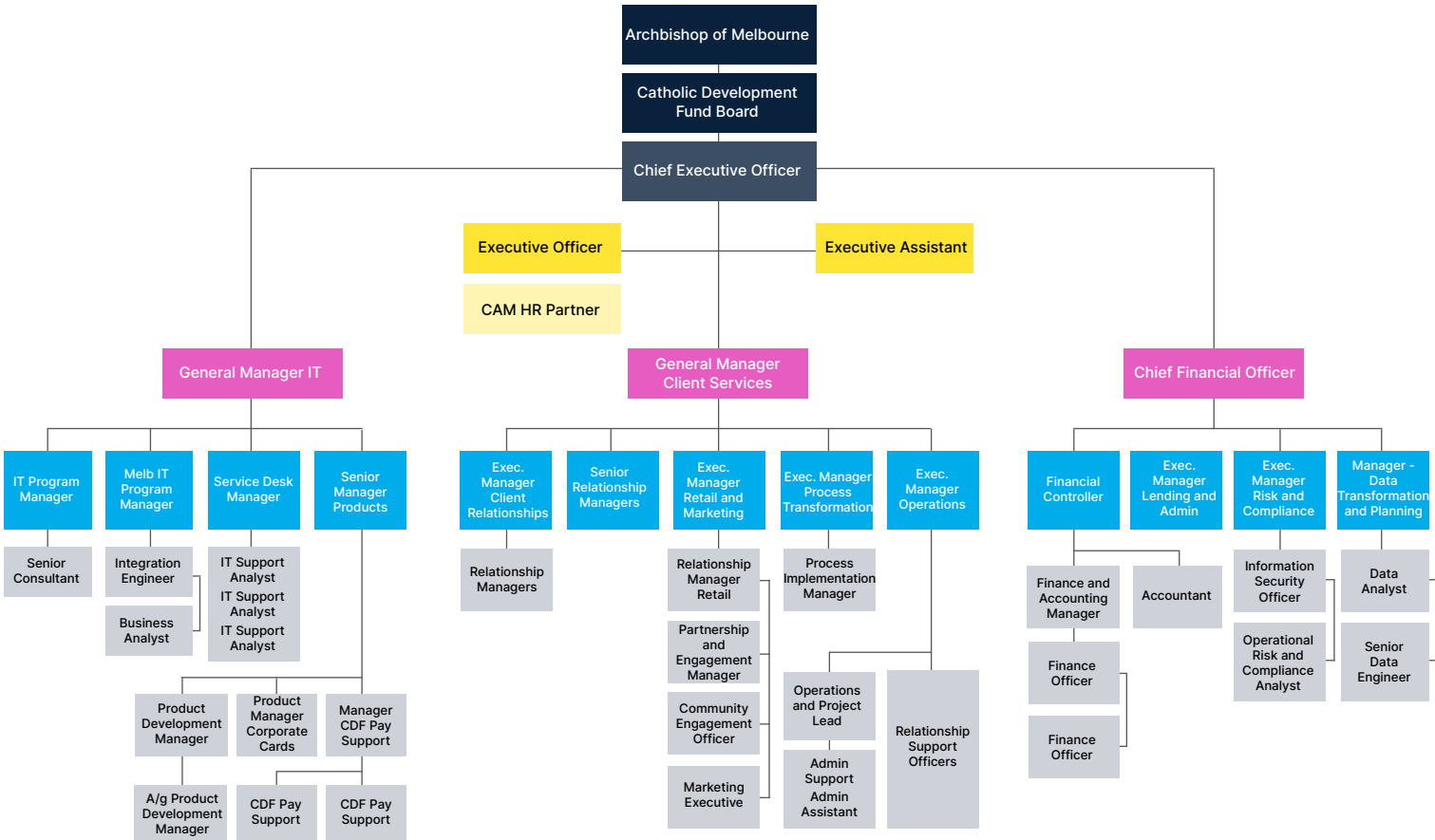


Figure 4: Organisational Structure of Catholic Development Fund (at 31 December 2024)



 Melbourne Archdiocese  
Catholic Schools

 **MACseye**



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ARCHDIOCESE  
OF BRISBANE

# MODERN SLAVERY STATEMENT 2024

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

ABN 88 630 274 434 Romero Centre





# **MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

## **Principal Governing Body Approval**

This modern slavery statement was approved by the *principal governing body* of

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane

as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> ("the Act") on 06/12/2025

## **Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member* of

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane

as defined by the Act<sup>2</sup>:



Mark Coleridge Archbishop of Brisbane

Trustee of The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane

## **Mandatory criteria**

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

<b>Mandatory criteria</b>	<b>Page number/s</b>
a) Identify the reporting entity.	2
b) Describe the reporting entity's structure, operations and supply chains.	10-22
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	23-29
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	30-38
e) Describe how the reporting entity assesses the effectiveness of these actions.	39-40
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	41
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	

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

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

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



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Pope Francis releases his message for the 10th World Day of Prayer and Awareness against Human Trafficking, and urges society at all levels to combat the scourge and to feel moved by the testimonies of victims, as well as those whose voices remain unheard.

Saint Bakhita encourages us to open our eyes and ears to see those who go unseen and to hear those who have no voice, to acknowledge the dignity of each person, and to fight trafficking and all forms of exploitation.

May we listen to their cry for help and feel challenged by the stories they tell.

It is a call to take action, to mobilize 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.

Vatican News 8/02/2024

<https://www.vaticannews.va/en/pope/news/2024-02/pope-francis-message-10th-world-day-against-human-trafficking.html>



## A message from the Archbishop of Brisbane, Mark Coleridge

The Archdiocese of Brisbane is committed to doing whatever we can to eliminate the scourge of modern slavery in Australia and around the world. In this, we are supported by our employees, communities and vendors.

In 2024, the Archdiocese launched a Modern Slavery Parish Toolkit. It has helped educate the Catholic community about the extent and effects of modern slavery, as well as how to prevent it and undo the harm it has done. In addition, we established internal Working Groups. These groups work to align modern slavery with *Laudato Si'* teachings in the workplace, with specific actions undertaken in both the short term and the longer term.

There has been progress in providing welfare and pathways to justice for victims/survivors of modern slavery through the ACAN network; and the Archdiocese now has access to the expertise and independent advice available through Domus 8.7.

This journey is not just about legal compliance and internal policy. They are essential, but they are not the whole story. Any lasting change will be founded on a movement of the human heart, a movement of mercy. This will mean responding with an open and courageous heart to any person or persons who are victims of modern slavery. It will also mean challenging dehumanising attitudes or business practices that are leading to the exploitation of people on Catholic sites and in our supply chains.

The Archdiocese will stand against the scourge of modern slavery until it is eradicated in all its forms. We have a vision for our organisation where every aspect of our operations is free, fair and ethical. This includes the procurement of products and the treatment and remuneration of workers. Much has been done, but there is still much to do to embed our commitment in our governance structures and the culture of the Archdiocese and its agencies.

As Archbishop and sole trustee of *'The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane'*, I wholeheartedly endorse the fifth annual Modern Slavery Statement, which is a sign of our determination to comply with the Modern Slavery Act 2018.

With the intercession of St Josephine Bakhita, may the liberating God bring this good work to fulfilment.

Yours sincerely in Christ,

† 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:



**235** MASS  
CENTRES  
SERVING  
OVER **684,000**  
CATHOLICS



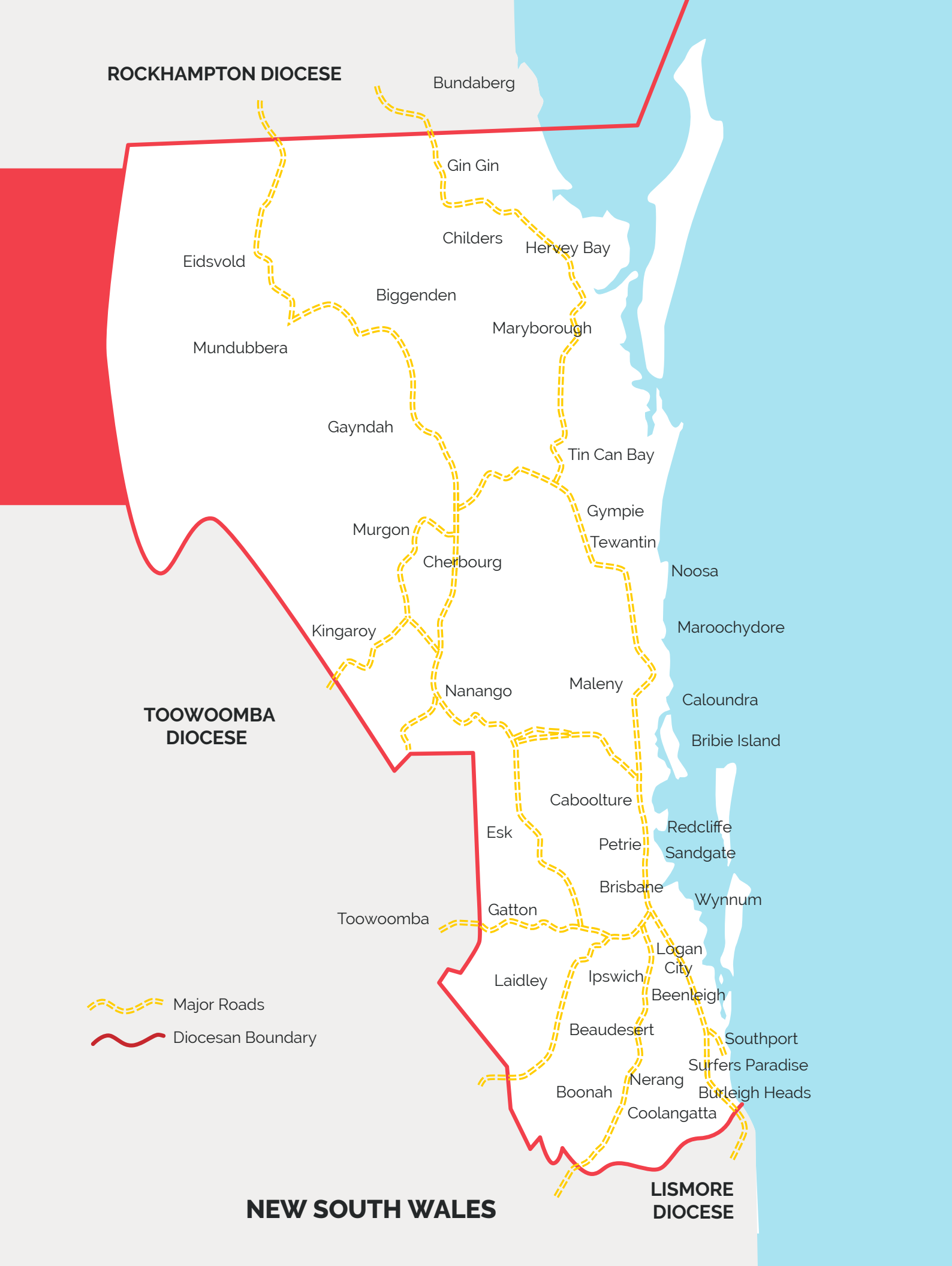
**146** SCHOOLS  
EDUCATING  
OVER **77,377**  
STUDENTS  
EACH YEAR



**190**  
CENTACARE  
SITES  
SUPPORTING  
OVER **64,000**  
PEOPLE EVERY  
YEAR



**40** OFFICES  
EMPLOYING  
OVER **17,000**  
PEOPLE





The Archdiocese is led by Archbishop Mark Coleridge and Vicar General 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.

## 2024 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.

1. The Archdiocese completed further analysis of the supply chain, including analysis through Sedex initiated in October 2023.
2. Brisbane Catholic Education's (BCE's) Procurement has developed processes, 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 BCE with the initial step categorising vendors. In 2024 the same approach was rolled out across the Archdiocese.
4. The results of the Cleaning sector trial created opportunities to improve BCE's due diligence checks during BCE cleaning tenders. This was then extended to include uniforms, office supplies, ICT and furniture. BCE have:
  - Adapted some elements of the Cleaning Accountability Framework (CAF) e.g., cost estimation transparency.
  - Created its own Cleaning Toolkit for schools to use to perform due diligence checks during tenders.
  - Established centrally managed contracts, which has grown from 200 in 2022 to 814 contracts in 2024.
5. In late 2023, BCE formed the Modern Slavery and Laudato Si' Reference Group which will:
  - Inform and advise the Archdiocese 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.
  - With the integration of Modern Slavery and Laudato Si', traction has been gained in converting the Archdiocesan fleet from petrol vehicles to hybrid and EV's. This change commenced in 2024 and has been implemented across the Archdiocese and its Agencies.



## Our plans for 2025 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. Following the Archdiocese's Modern Slavery maturity improvements in 2024, the Archdiocese will be focusing our action plan on two key pillars, worker engagement and operations and two sub pillars, being the effectiveness of our actions and maturing our risk management.

These are summarised below and will be discussed in more detail within this Statement.

1. Expand modern slavery training utilising the updated modules developed by ACAN.
2. Conduct modern slavery seminar/presentation from victims of modern slavery.
3. The Archdiocese in collaboration with BCE will commence a review of its procurement practices in 2025-26 with the view of leveraging off the procurement practices established by BCE.
4. The Archdiocese will establish metrics across the following categories:
  - a. Building and construction
  - b. Facility management and property maintenance
  - c. Furniture and office supplies
  - d. Cleaning and security
  - e. Labour hire

Initial assessments will be based on BCE's review of vendors in the above category with an annual spend greater than \$1m and the Archdiocese's review of vendors with an annual spend greater than \$150k.

5. Establish key risk indicators (KRI's) across our supply chain when undertaking risk assessments of vendors which can be adapted to changing business circumstances and conditions.
6. Complete a detailed review of the goods and services provided by approximately 1,000 vendors with our supply chain which will cover approximately 80 percent of our annual spend. This will also ensure accuracy in mapping vendors to the correct ACAN taxonomy.
7. Progress the Supplier Onboarding Project for implementation in Q4 2025.

## 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 (refer Figure 1):

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Community Services, Centacare Specialist Family Support 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
- Archdiocesan Services
- Archdiocesan Ministries



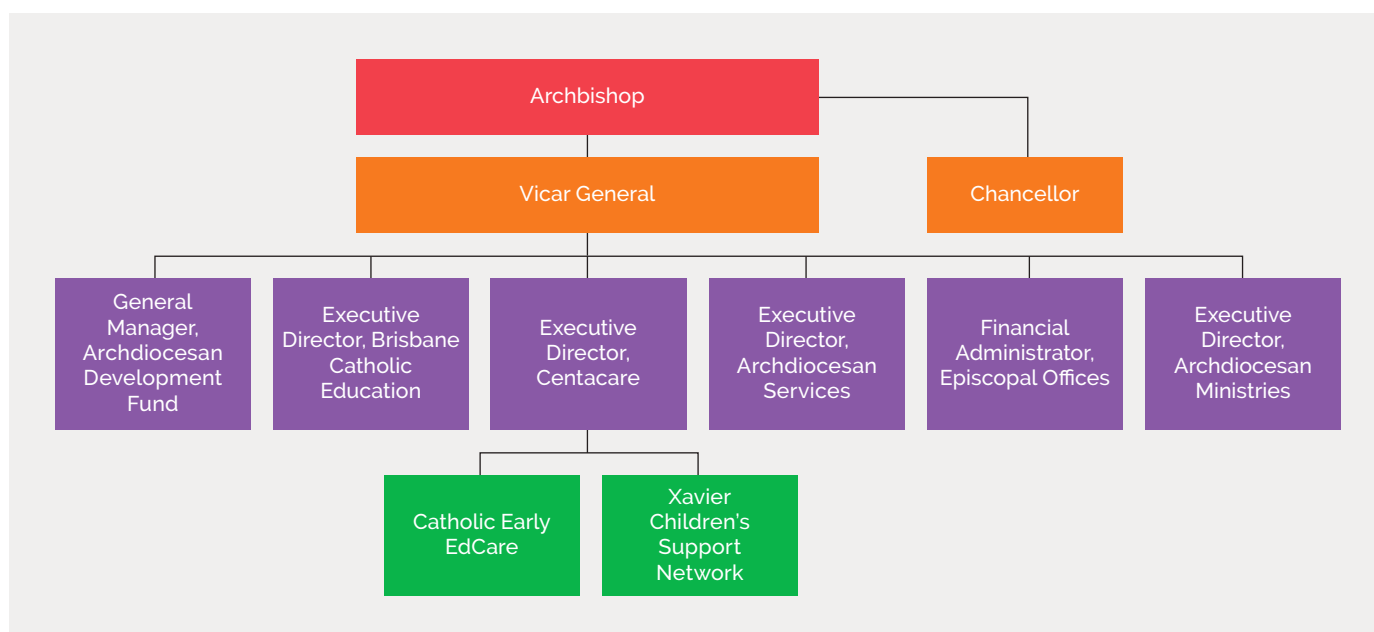


Figure 1: Archdiocese of Brisbane organisation structure

## 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, Vicar General, 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 November 2024 the Archdiocese farewelled Bishop Tim Norton, our Auxiliary Bishop who was appointed as the Bishop of Broome, Western Australia.

Following the successful implementation of the delegation's framework in late 2022, the framework was implemented across the Agencies of the Archdiocese and underwent some minor adjustments and clarity of definitions in 2023.

There were a number of structural changes across the Archdiocese during 2024, with the key changes being:

- Appointment of Fr Peter Dillon to Vicar General
- Evangelisation Brisbane rebranded to Archdiocesan Ministries
- Archdiocesan Ministries taking over operations of the Romero Centre
- Office of Legal, Governance and Risk moving under Archdiocesan Services and rebranded as Safety, Risk and Governance
- New sub-committees created:
  - Finance, Property and Building Committee established under the Catholic Education Council
  - Finance, Audit Working Group established under the Centacare Council
  - Centacare's Practice Governance and Risk Committee was renamed Quality Risk and Governance Committee.

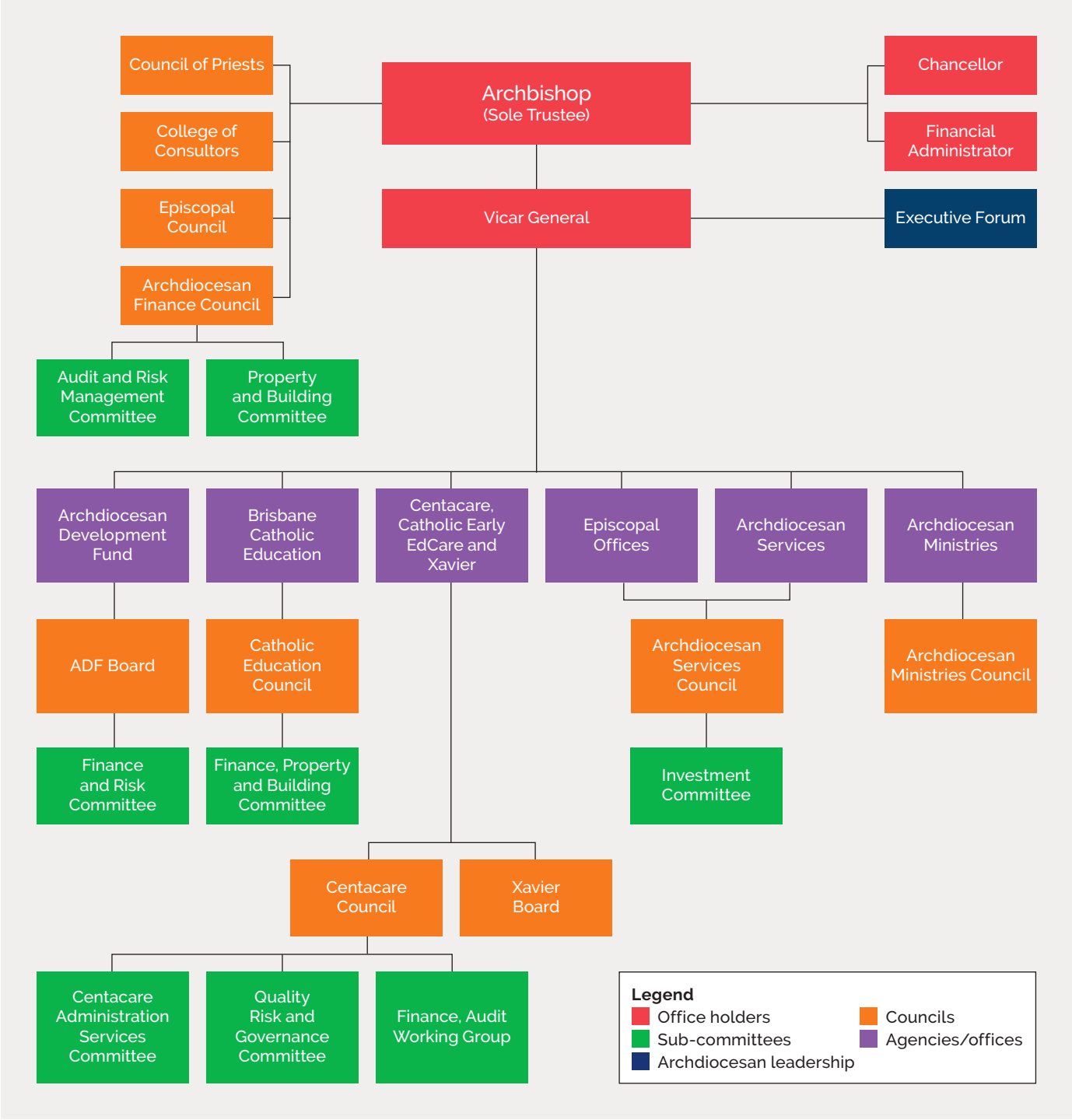


Figure 2: Archdiocese of Brisbane governance framework

## 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 areas of education and social services, being present to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 17,000 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, childcare 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 Vicar General 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 General 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.

## **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
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk
- Compliance
- Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

You can see the Archdiocesan Services' organisation chart in Appendix C.

## Archdiocesan Ministries (Formerly Evangelisation Brisbane)

The mission of Archdiocesan Ministries is to work with, inspire and empower the Archdiocese of Brisbane to encounter Jesus and live the joy of the Gospel.

Archdiocesan Ministries has a vision to see the Catholic Church become a home for every generation. We envisage a Church that:

- Is a welcoming home for all generations, transcending cultural and societal boundaries to embrace every individual with faith, hope, love and peace;
  - Where every person feels safe to come as they are, recognised for their inherent dignity, celebrated in their uniqueness and called into a deep and transformative relationship with God through Christ, guided by the Holy Spirit, and nourished by the sacraments.
  - Engages and responds to the diverse voices and experience of others, discerning the movement of the Holy Spirit as we listen.
  - That reaches beyond its own walls, working towards healing and reconciliation, especially with First Nations Peoples, caring for creation, advocating for justice and support for the vulnerable.
  - Where everyone discovers and lives out their God-given vocation; a Church that looks, sounds, and acts like Jesus.
- Archdiocesan Ministries 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
  - Ministry of Inclusion through:
    - 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
  - Care for Refugees and those seeking asylum through the Romero Centre
  - Santa Teresa Spirituality Centre.

## Our agencies



ABN 35 020 644 975



**1,622**  
EMPLOYEES



**117**  
VOLUNTEERS



ABN 51 626 296 801



**1,653**  
EMPLOYEES



**134**  
LONG DAY  
CARE CENTRES,  
KINDERGARTENS  
AND OUTSIDE  
SCHOOL HOURS  
CARE SERVICES

### Income

To 30 June 2024, Centacare received income of \$257 million of which \$53.4 million was from government funding of aged care and family and relationship services payments. In addition, there was \$186.4 million in fee income from providing community services (NDIS, aged care co-payment and home care services) and childcare. There was other income of \$17.2 million.

**\$53.4M** in government funding

**\$186.4M** in fee income

**\$17.2M** in other income

**31,698** children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

**19,670** older Queenslanders accessed services to help them to live well in their home and community.

**7,129** people affected by domestic and family violence were provided early intervention and crisis response services.

**1,505** people with disability accessed services to help them live the life they choose.

**11,325** people received home maintenance and modification support to help maintain their independence.

**2,280,000** hours of support were provided to older people and people with disability.



ABN 24 547 377 893



**71**  
EMPLOYEES  
(51 FTEs)



**4**  
VOLUNTEERS

## Income

To 30 June 2024, Xavier Childrens' Support Network received income of \$6.7 million of which \$5.9m was NDIS income, \$0.3 million of investment revenue, \$0.1 million of aged care income and \$0.4 million in other income.

**\$5.9M** in NDIS income

**\$0.3M** in investment revenue

**\$0.1M** in aged care income

**\$0.4M** in other income



teaching • challenging • transforming

ABN 49 991 006 857



**14,528**  
EMPLOYEES  
(8,779 FTEs)



**8,638**  
TEACHERS  
(5,628 FTEs)



**77,377**  
STUDENTS

**146** SCHOOLS

**107** PRIMARY SCHOOLS

**28** SECONDARY SCHOOLS

**11** PREP TO GRADE 12  
SCHOOLS

## Income

In 2024 Brisbane Catholic Education received an income of \$1,556 million of which \$1,199 million was Government recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

**12.0%** of students in the Archdiocese attend a Brisbane Catholic Education school

**59.6%** of students identify as Catholic

**3.5%** of students identify as Aboriginal or Torres Strait Islander

**+32** different religious faiths amongst students

**\$1,199M** in Australian and Queensland Government grants

**\$297.4M** in school fees and levies

**\$60M** in other income

## Archdiocesan Services Episcopal Offices and Parishes

ABN 25 328 758 007



**270**  
EMPLOYEES



**5,013**  
VOLUNTEERS



**94**  
PARISHES, 18  
OF WHICH ARE  
RELIGIOUS ORDER  
PARISHES



**80**  
PARISH PRIESTS OR  
ADMINISTRATORS

**27** Priests in the Overseas Priests Program

**684,423** Catholics in the Archdiocese

**49,904** attending Sunday Mass per week  
(measured through Parish census  
in November 2024 which included  
other locations)

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Communication and Engagement
- Clergy Office
- Workplace Health & Safety
- Governance
- Risk
- Compliance
- Insurance
- Safeguarding
- Legal
- Archdiocesan Archives
- Nudgee Cemetery and Crematorium

## Archdiocesan Ministries

ABN 25 328 758 007



**47**  
EMPLOYEES  
(15 CASUAL  
EMPLOYEES)



**34**  
VOLUNTEERS

Providing services across:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office
- Romero Centre

### Archdiocesan operations

In 2024, Archdiocesan Operations (which includes Archdiocesan Services, Archdiocesan Ministries and the Episcopal Offices) received revenues of \$83.8 million. This was represented by an internal distribution of \$31 million by the ADF, fees, rent and investment income of \$25.9 million, sales of \$4.8 million and other income of \$22.1 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



**18**

**EMPLOYEES**



**1,115**

**MEMBERS**

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and other associates under current ASIC exemptions.

### **Income**

In 2024 the ADF generated \$146.4 million in interest income through the provision of internal church treasury. Loan income of \$72.1 and investment income of \$74.3 (net of amortisation).



## Our people

The Archdiocese and its agencies uphold clear standards of conduct to ensure a safe and respectful environment. All employees and volunteers who may work directly with children, young people, or vulnerable adults undergo mandatory background checks.

The Archdiocese's People and Culture department leads the Justice, Equity, Diversity and Inclusion (JEDI) group, which consults regularly with staff on workplace issues related to gender equality, diversity, and inclusion.

Each year, Executive Directors and General Managers certify compliance with Australian employment laws and workplace obligations. Governance councils and external auditors review these certifications to ensure accountability.

Since 2015, the Archdiocese has operated the independent **Stopline** whistleblower service. This platform enables staff, volunteers, and the broader community to report concerns—including those related to modern slavery—in a safe, confidential, and supported manner.

Through these measures, we continue to cultivate a culture that promotes ethical conduct and respect for human rights. This internal commitment directly informs how we manage risk and uphold standards across our supply chain.

## Our supply chain

In 2024, Brisbane Catholic Education (BCE) engaged approximately 10,300 suppliers. While most are Australian-based, a significant portion of products are manufactured overseas, introducing modern slavery risks through global supply chains.

Over the course of the last 3 years, BCE has shifted from a highly decentralised procurement model to a more centralised approach. This involves establishing BCE-wide panel arrangements accessible through the procure-to-pay Buying Platform. Standardised tender toolkits, supported by training and a central procurement helpdesk, are also provided for school-based procurement.

This move supports strategic, category-based procurement, enhances oversight, manages supplier risks, and aligns with our commitments under the Modern Slavery Act, the Reconciliation Action Plan (RAP), and the Laudato Si' Action Plan.

The Archdiocese and its agencies procure a wide range of goods and services, including consumables, ICT equipment, motor vehicles, building and construction materials, uniforms, cleaning, and office supplies. While centralisation increases oversight, schools, parishes, and services still retain the independence to engage local suppliers, supporting local economies while requiring appropriate due diligence as risks are identified.

Several procurement categories have been identified as high risk for modern slavery, including ICT, construction, cleaning, security, uniforms, waste management, and office supplies. In 2024, BCE encouraged high-spend suppliers in these categories to join SEDEX and complete the Self-Assessment Questionnaire (SAQ).

BCE refined its Cleaning Services and Uniform Procurement Toolkits to streamline tendering and increase the pool of pre-qualified suppliers. These updated toolkits were re-launched and supported by one-on-one training and tailored buying guides. The procurement helpdesk played a key role in building capability and supporting ethical sourcing in school-level purchasing.

In 2025, BCE will establish a Cleaning Services Panel to improve transparency, rationalise suppliers, reduce workload for school staff, and ensure value for money. A robust pre-qualification framework, co-developed with the Cleaning Accountability Framework, will support this tender process and enhance compliance with modern slavery requirements.

BCE also plans to onboard its top 50 suppliers from high-risk categories to the SEDEX platform to improve supply chain visibility and strengthen due diligence.

Additionally, BCE will launch the Supplier Onboarding Project, which aims to improve ethical sourcing and supplier lifecycle management. A new IT platform will

automate onboarding, reduce duplication, and ensure compliance with legal requirements, improving governance and streamlining supplier approvals.

Currently, contract management at the Archdiocese remains decentralised across Archdiocesan offices, schools, parishes, and service centres, with varying levels of oversight and contract duration. While a fully centralised contract management system is not yet in place, steps are being taken to improve governance

and transparency through system-wide initiatives.

Complex high-value contracts, such as those for construction, design, consulting, internet, and electricity, are generally managed by senior agency officers. In 2024, the Archdiocese accelerated collaboration with agencies to strengthen vendor engagement and education, and further initiatives are underway to standardise and improve contract management across the Archdiocese.

The following table summarises the Archdiocese vendor analysis for the 2024 financial year.

	2024 Vendor Analysis				
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max. Spend/ Vendor	Min. Spend/ Vendor
Brisbane Catholic Education	6,447	350	79%	\$33,251,287	\$133,000
Archdiocesan Services	766	102	91%	\$14,814,254	\$50,119
Archdiocesan Development Fund	40	40	100%	\$1,011,881	\$52
Centacare - PBI	1,772	192	83%	\$5,205,789	\$30,175
Centacare Administration Services	1,749	137	83%	\$1,797,370	\$20,200
Xavier	24	24	100%	\$132,777	\$10,425
Parishes (*Spend > \$10,000)	549	307	86%	\$839,329	\$25,000
	<b>11,347</b>	<b>1,152</b>	<b>81%</b>		

Table 1: Archdiocesan entities revenue and vendors

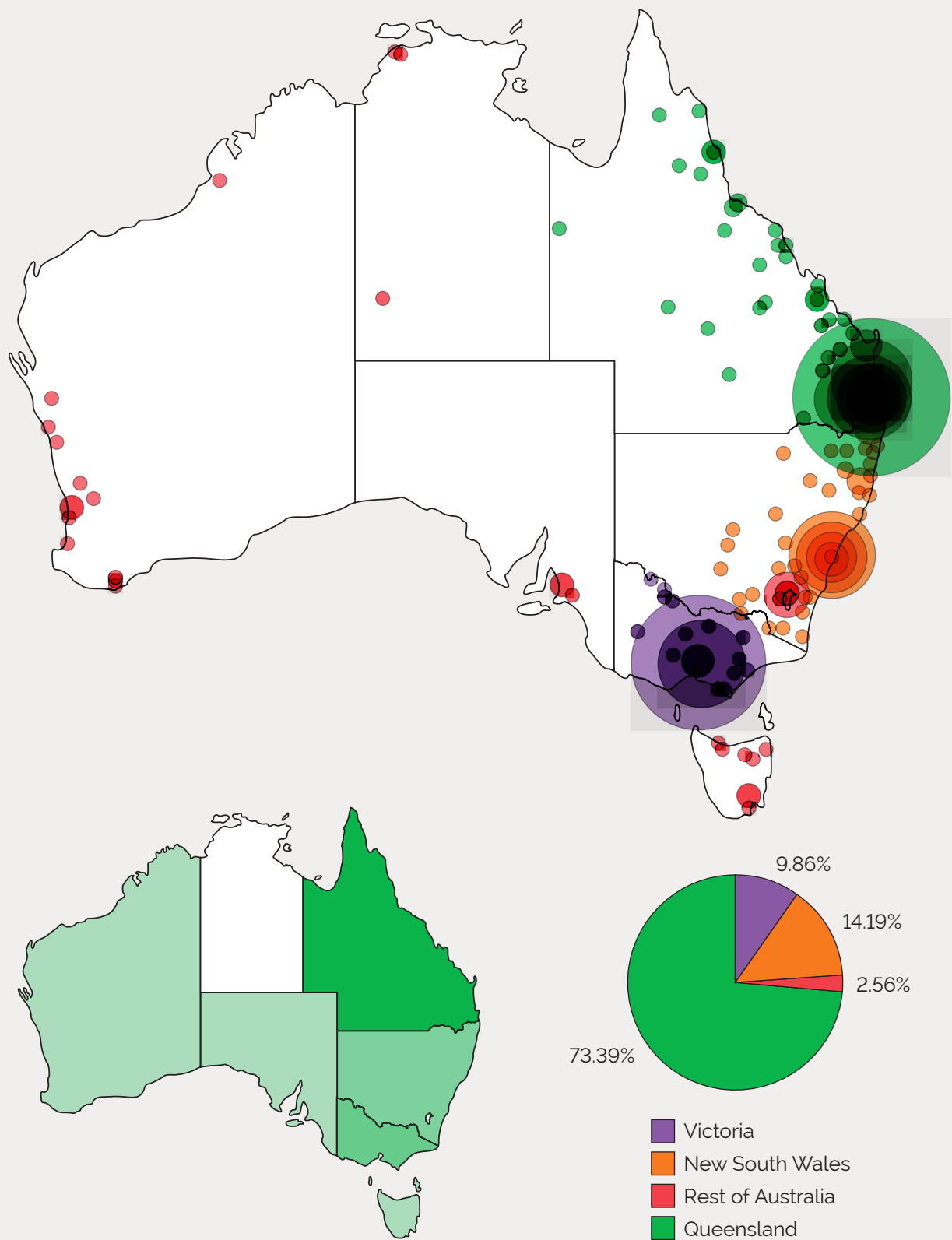
The percentage of the total spend analysis increased from 74% in 2023 to 81% in 2024. Analysis of the Archdiocese’s financial data shows the major spend categories are:

- Building and construction – 19%
- Professional services – 11%
- ICT hardware – 9%

- Facility management, consumables and maintenance – 8%
- Finance and investment – 8%
- ICT software and network services – 7%
- Furniture and office supplies – 5%

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 risks

The Archdiocese continued its development of strategies and processes to ensure continuous improvement with its obligations under the Modern Slavery Act 2018 and Pope Francis's call to take action in combating human trafficking.

***"It is a call to take action, to mobilize 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."***

(Source: Vatican News 8 February 2024)

The implementation of new onboarding process by our People and Culture offices assist the Archdiocese and its Agencies recruitment processes to ensure that all employees are engaged in a fair and equitable manner. This 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, Inclusion Policies and a suite of other policies and programs.

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. To ensure these are identified and reported the Archdiocese enhanced its Whistleblower Policy and Procedures in 2024, which has seen an increase in reporting across a number of human resource related issues.

The key modern slavery risks associated with the Archdiocese's tier one suppliers is non-compliance 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.

Country	Risk	Example of product/service sourced
<b>Australia</b>	Migrant labour exploitation	Cleaning contractors, construction contractors
<b>China</b>	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
<b>Indonesia</b>	Forced labour, bonded labour, migrant labour exploitation	General merchandise
<b>Malaysia</b>	Forced labour, bonded labour, migrant labour exploitation	ICT products, office supplies, electronics, general merchandise
<b>Thailand</b>	Migrant labour exploitation	General merchandise
<b>Vietnam</b>	Excessive overtime	General merchandise, office supplies, electronics

**Table 2: Source country risks**

There are three factors which, if they exist in our tier one supplier's businesses, can increase the risk of modern slavery.

- 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.
- 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.
- 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.

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. With the establishment of a procurement function in 2021, Brisbane Catholic Education have been

effective in reducing the number of vendors across high-risk sectors. This rationalisation of vendors reduces the risk of modern slavery occurring in their supply chain. The numbers has fallen from more than 11,000 in 2021 to under 7,000 in 2024.

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. Subscribing to third-party organisations such as Sedex, we are able to leverage off a network of high value overseas and domestic suppliers, who are required to complete various self-assessment questionnaires and third party audits as required.

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 the Sedex platform in 2024. This will be extended in 2025, with direct requests to vendors with an annual spend greater than \$500k. 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.

### Archdiocese Of Brisbane Consolidated Percentage of Vendor Assessed Spend

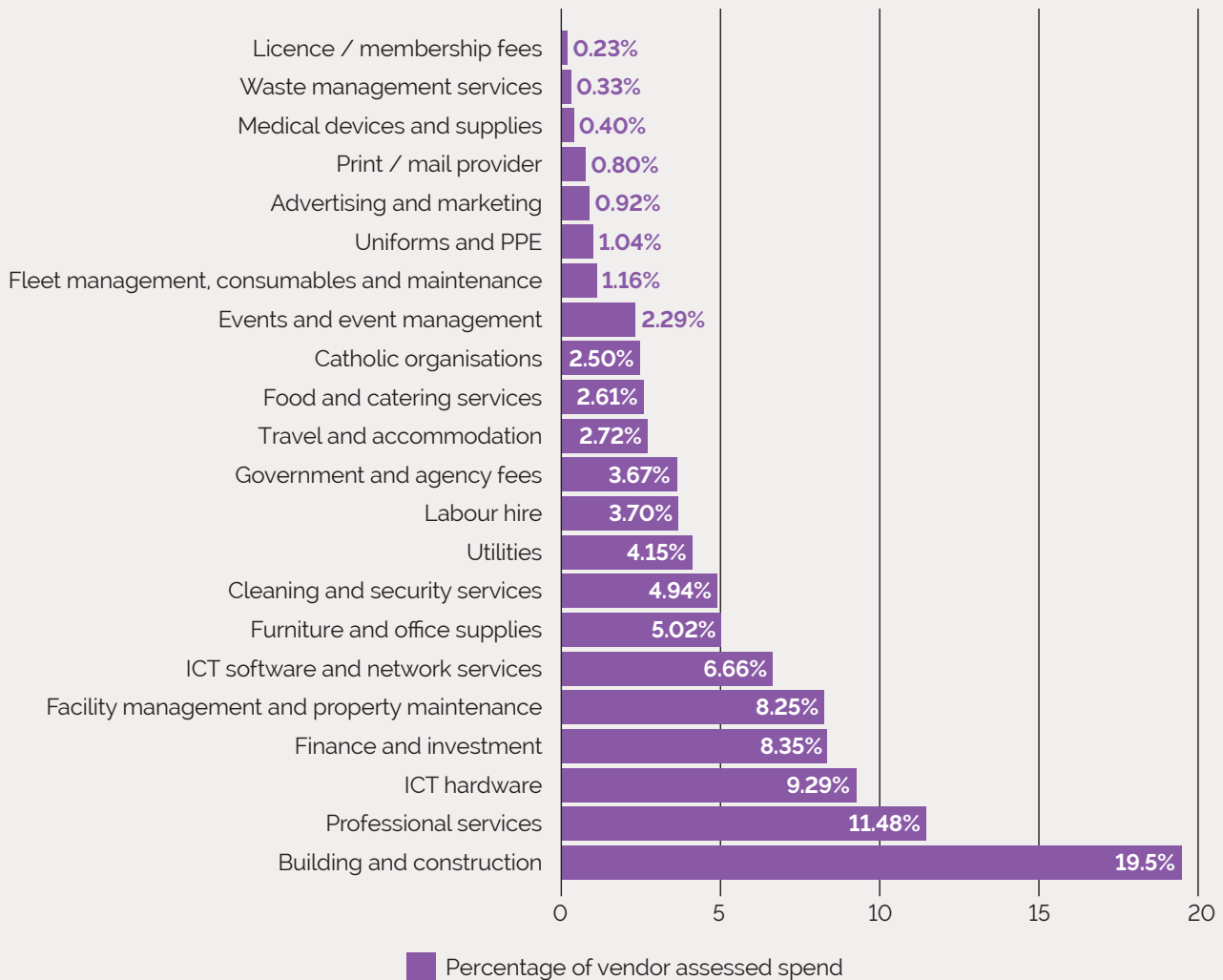


Figure 3: 2024 Consolidated spend profile of the Archdiocese of Brisbane

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 2024 there was a marked increase 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's 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 Table 3 has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers. Significant progress has been undertaken in cleaning and security services. In 2025 it is proposed building and construction and facilities management and property maintenance to be included in separate reviews.

ACAN Category	Count of 2024 High Risk Vendors	Value High Risk Vendors 2024
Building and construction	53	\$76,704,992
ICT hardware	33	\$36,143,855
Facility management and property maintenance	147	\$29,919,488
Finance and investment	10	\$28,903,873
Furniture and office supplies	54	\$19,859,793
Cleaning and security services	63	\$19,482,618
Labour hire	13	\$13,172,694
Food and catering services	30	\$10,324,239
Events and event management	44	\$8,862,597
Uniforms and PPE	18	\$4,133,579
Medical devices and supplies	17	\$1,592,171
Waste management services	4	\$1,300,885
<b>Grand Total</b>	<b>486</b>	<b>\$250,400,784</b>

**Table 3: High Risk Vendor Analysis**

The Archdiocese has identified 486 vendors across 12 high risk industry sectors which have been identified for further analysis over the next three years. Our action plan for 2025 has targeted several of these industry sectors for review with the others to be added during the review cycle. These 486 vendors account for more than 60% of the Archdiocese's 2024 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
<b>Building and construction</b>	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	19.5
<b>ICT hardware</b>	<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> <p>Software and application development, support services, call centres (offshore).</p>	HIGH	9.3
<b>Finance and investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	8.4
<b>Facilities management and property maintenance</b>	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	8.3
<b>ICT software and network services</b>	Software and application development, support services, call centres (off-shore).	HIGH	6.7

Category	Spend description	Risk	% of expenditure
<b>Furniture and office supplies</b>	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	5.0
<b>Cleaning services</b>	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	4.9
<b>Labour hire</b>	Labour hire organisations, specialising in the provision of services to our clients in delivering social services.	High	3.7
<b>Uniforms and PPE</b>	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc).	HIGH	1.0
<b>Other</b>	Categories < 3% requiring further analysis.	MEDIUM	13.8
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	MEDIUM	4.2
<b>Professional services</b>	Other.	LOW	11.5
<b>Government and agency fees</b>	Government expenses and external catholic organisations.	LOW	3.7
			<b>100.0</b>

Table 4: Risk Taxonomy for the Archdiocese of Brisbane

# Reporting Criteria 4:

## Actions taken to assess and address risk

Throughout the 2024 reporting period, the Archdiocese undertook an extensive review of its decentralised supply chain to better understand and address modern slavery risks across operations. This work highlighted the inherent complexity of a federated procurement environment and reinforced the importance of consistent practices, robust governance, and cross-agency coordination.

Our active membership in the Australian Catholic Anti-Slavery Network (ACAN), including participation in monthly webinars, has continued to provide valuable support and guidance throughout the year. In parallel, the rollout of modern slavery e-learning modules aimed to strengthen staff capability to identify and respond to risks. However, participation in 2023 did not meet expectations due to critical staffing and operational changes within Centacare and Brisbane Catholic Education. In response, 2024 has seen a renewed focus on leadership accountability, with senior executives committing to complete the training and encourage uptake among staff with procurement responsibilities.

While 2023 largely focused on establishing foundational systems and frameworks, 2024 has marked a shift toward implementation and capability building. These efforts reflect a strategic commitment to embedding ethical procurement practices across all operations.

### Actions taken during reporting period

In 2024, the Archdiocese transitioned from foundational planning to implementation across key areas of modern slavery risk management. The year was defined by stronger governance coordination, meaningful supplier engagement, and the operationalisation of tools and frameworks developed in prior years.

### Governance and Strategic Alignment

1. The Laudato Si' and Modern Slavery Reference Groups now operate as an effective, efficient and a unified governance body between the Archdiocese and BCE, creating a single point of accountability for ethical procurement and sustainability actions.
2. The appointment of a BCE Modern Slavery Liaison Officer (MSLO) has significantly improved coordination efforts between the Archdiocese and BCE, while other Archdiocesan agencies have benefited from the knowledge shared through central coordination and implementation efforts. The MSLO also maintains regular monthly engagement with ACAN, its Program Managers and Executives.

## Category Management and Contract Lifecycle Management Reform

1. BCE expanded its Category Management Framework beyond cleaning and waste management to include uniforms, office supplies, ICT, and furniture.
2. At BCE, centrally managed contracts grew at a 60% compound annual rate (CAGR) between 2022 (200 contracts) and 2024 (814 contracts).
3. In 2024, an additional 324 contracts were brought under central management, with BCE's standard terms and conditions applied—including embedded modern slavery clauses for high-risk contracts (such as, cleaning services) and removal of high-risk provisions such as auto-renewals and disproportionate termination clauses. The improved contract oversight, strengthened supplier accountability, and reduced BCE's exposure to ethical and operational risk, is testament to the benefits of adopting a category-based approach to managing risks in through structured contract and supplier lifecycle management processes.

## Supplier Engagement and Due Diligence

1. BCE launched a revised Supplier Code of Conduct, reflecting updated expectations in human rights, labour standards, environmental responsibility and safeguarding. It is now embedded in all new RFQ and onboarding documentation and published on the BCE external website.
2. Building on strong supplier relationships established in 2022 and 2023, BCE began mandating, as a tender pre-qualification criterion, that cleaning, groundskeeping, waste and uniform suppliers required to hold and maintain an active SEDEX membership, and must complete 100% of the SEDEX Self-Assessment Questionnaire (SAQ).
3. In 2024, suppliers in high-risk categories with annual spend above \$250,000 were prioritised for enhanced due diligence reviews, supported by internal assessments and ACAN guidance. This critical activity is now imbedded in business-as-usual processes and is continuing in 2025, again focussing on high-risk categories.

## Technology Enablement

1. The Supplier Onboarding Project, which was paused in 2024, is now an established project in 2025 set for implementation in Q4 2025.
2. The supplier onboarding system will automate due diligence, centralise supplier approvals, and integrate with the existing Microsoft D365 supplier master data.
3. Draft RFQ/RFP templates were updated to include mandatory modern slavery risk screening questions, was piloted in 2024, and in 2025, will fully embed as part of standardised templates.

## Education and Awareness

1. The Archdiocese and BCE have adopted some of ACAN's e-learning training modules. These were made available to employees in 2024 through the BCE Learning Management System (LMS).
2. Following lower-than-expected participation in 2023, BCE introduced mandatory modern slavery training for senior leaders in 2024 and began the rollout of updated modules through the LMS to staff with purchasing responsibilities.

## Parish and Community Engagement

1. The Parish Toolkit was formally launched across all 94 parishes, accompanied by an internal communications campaign and social media messaging to improve visibility of ethical procurement responsibilities at the local level.



## Modern slavery action plan and road map

In 2024, BCE launched a three-year Modern Slavery Action Plan (MSAP), aligned with Laudato Si' and ACAN's 2024 program. The MSAP centralises high-risk procurement oversight, embeds risk-based supplier prequalification, and delivers targeted training and engagement initiative.

### Modern Slavery Action Plan and Roadmap

The Archdiocese continues to build a structured and scalable approach to managing modern slavery risk across its supply chains. Since first engaging with Sedex, one of the world's largest ethical audit platforms, the Archdiocese has progressively increased its supplier transparency efforts—growing vendor submissions from 100 in the early stages to approximately 300 by 2024.

The 2023 matching and assessment process, however, revealed inefficiencies due to manual data handling and reliance on external support. In response, 2024 has focused on building internal capability to manage Sedex assessments more effectively.

As part of this evolution, the Archdiocese and BCE established mandatory RFQ and RFP pre-qualification using Sedex's Self-Assessment Questionnaire (SAQ) for suppliers operating in high-risk categories. This initiative proved successful and will continue to expand through 2025, progressively strengthening upstream risk screening at the point of supplier engagement.

In 2024, BCE launched its annual Modern Slavery Action Plan (MSAP), aligned with both the Laudato Si' Action Plan (LSAP) and ACAN's 2024 program of work. The MSAP sets out a clear roadmap for:

- Centralising oversight of high-risk procurement categories,
- Embedding risk-based supplier prequalification, and
- Delivering targeted staff training and supplier engagement activities.

These actions represent a shift from foundational development to full implementation, laying the groundwork for sustained impact, continuous improvement, and measurable outcomes on an ongoing basis.

## 2024 Case Study: Category-based risk management

In 2022, around 90% of contracts operated under supplier terms that posed challenges for BCE. In 2023, BCE addressed this by taking a category-based approach, starting with cleaning and waste management, to improve value and reduce risk.

As a result, nearly 60% of cleaning contracts now use BCE's terms, featuring fair conditions, modern slavery clauses, and the removal of high-risk

provisions like auto-renewals. This shift improved supplier oversight and contract compliance.

BCE also expanded its contracts under management from 200 contracts (in 2022) to 440 contracts (in 2023) and 814 contracts (in 2024), covering categories such as, cleaning, waste, print, uniforms, groundskeeping, tuckshops and office supplies—reinforcing its commitment to ethical procurement.

## BCE 2024 Modern Slavery Action Plan (MSAP)

Action category	Actions for implementation	Status
<b>Business and management systems</b>	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.	Established in 2024 and is ongoing.
	The Brisbane Catholic Education Modern Slavery Action Plan (MSAP) and funding commitment approved by the Executive Director.	Established in 2024 and is ongoing.
<b>Risk management</b>	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.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to complete self-assessment questionnaires (SAQs) and, where relevant, be onboarded into the Sedex platform.
	Establish Sedex as the tool of choice in building modern slavery knowledge, insight and capability, across the Brisbane Catholic Education Modern Slavery Reference Group.	SEDEX is the tool of choice that strengthens early identification of modern slavery risks prior to contract award and execution.

Action category	Actions for implementation	Status
<b>Procurement and supply chain</b>	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.	<p>The Supplier Onboarding Project will be re-established and fully deployed by Q4 2025.</p> <p>The system will enable automated risk-based screening, capture supplier compliance documentation, and create consistent workflows for vendor prequalification, approval, and lifecycle management.</p> <p>This will be a cornerstone of BCE's ongoing supplier rationalisation and due diligence strategy.</p>
	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.	<p>BCE has developed bespoke contract templates for high-risk categories to ensure more robust modern slavery clauses are embedded.</p> <p>Following a compound annual growth rate of 60% in contracts under management from 2022 to 2024, BCE will continue to increase strategic oversight of procurement through centralised contract management.</p> <p>In 2025, further categories—such as construction and ICT—will be prioritised for inclusion, with a focus on applying BCE terms and embedding modern slavery clauses.</p>
	Develop a supplier engagement strategy that includes a refreshed Supplier Code of Conduct.	<p>The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation, especially for high-risk suppliers.</p> <p>Part of the category-based approach is a Supplier Engagement Strategy, which commenced in Q4 2024 with BCE's Top 20 suppliers (by spend), and will be expanded in 2025 to include capability-building activities, FAQs, and guidance for suppliers in navigating BCE's ethical procurement requirements.</p>
	Ensure all contracts contain appropriate modern slavery clauses.	<p>That said, modern slavery clauses have been included in bespoke contracts such as cleaning, uniforms, canteen) due to their classification as high-risk industries for modern slavery.</p>

Action category	Actions for implementation	Status
<b>Human resources and recruitment</b>	Develop a modern slavery communications strategy.	Commenced early 2024 and is ongoing.
	Implement a phased training program for staff with purchasing (buying and approving) responsibilities.	Commenced Q2 2024 and is ongoing.
	Promote awareness of modern slavery internally. Archdiocesan and BCE intranet platforms, ensuring accessibility and visibility to all staff members.	Continuing for 2025.
<b>Customers and stakeholders</b>	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.	RFQ and RFP templates enhanced in 2024 and is now mandated from 2025 for high-risk categories, requiring suppliers to have an active SEDEX membership and have completed the self-assessment questionnaires (SAQs) to 100% and, maintain their SEDEX membership for the duration of the contract with BCE.
	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).	The refreshed Supplier Code of Conduct was published on BCE's external website and systematically embedded into onboarding, tender, and RFQ documentation - especially for high-risk suppliers.

Table 5: Archdiocese's action plan

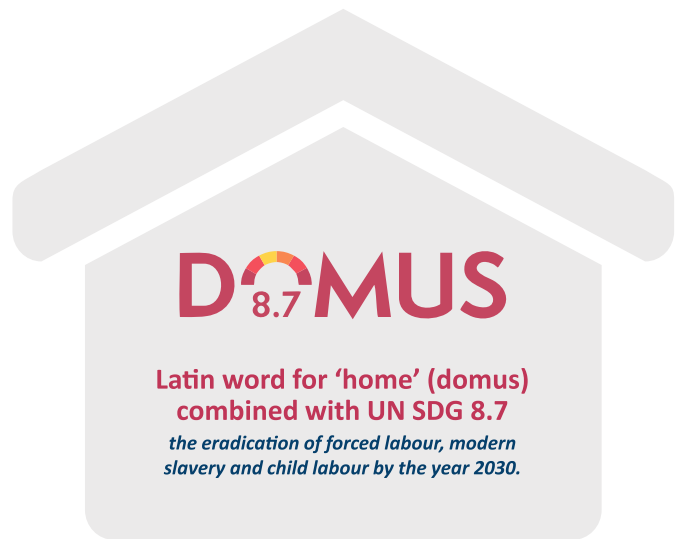
## Domus 8.7

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, a founding partner of Domus 8.7, which is an initiative of the Catholic Church in Australia, offers a comprehensive, expert-led support model for modern slavery remediation. It includes independent grievance mechanisms, policy guidance, incident response, and capacity building—aligning organisations with regulatory and ethical leadership standards.

Domus 8.7 is an initiative established as a not-for-profit in 2020 by ACAN under the leadership of the Archdiocese of Sydney. It provides remediation and prevention services in response to modern slavery in Australia. Assistance includes modern slavery indicator assessments, action planning, victim-survivor case management support and advice, support and guidance to business. Domus 8.7 advocates for systemic policy change that enables both justice for victims and survivor leadership.

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.



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.

Domus 8.7 has received 31 referrals for advice and assistance nationally from its ACAN members and the corporate sector across Australia.

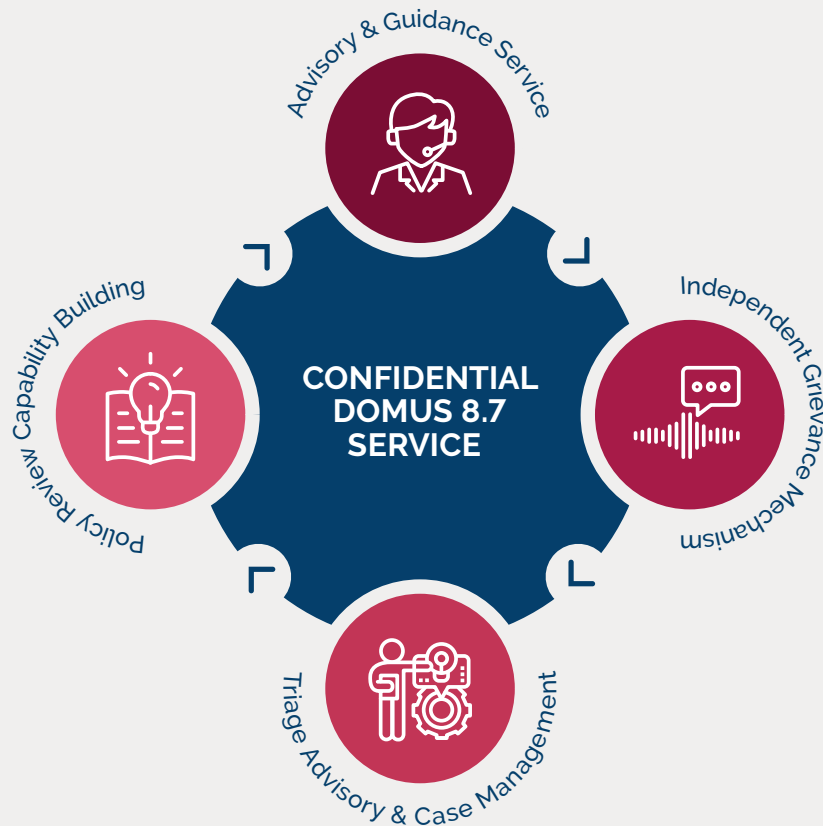


Diagram 1: Domus 8.7 Process

## 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, email [info@acan.org.au](mailto:info@acan.org.au) or send a message to <https://www.acan.org.au>

In cases where there is an immediate threat to life and safety, please dial 000.





Diagram 2: The above diagram identifies the national referrals under the Domus 8.7 program.

## Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stoplevel 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.

In the period 2023 the Archdiocese experienced an increase in the number of disclosures and enquires to the Stoplevel service. In response to this, in 2024 the Archdiocese's Whistleblower Policy and Procedures were updated to provide clarity on disclosures and how the Archdiocese deals with the various disclosures we have encountered.

In 2023/24 the Archdiocese received one disclosure related to modern slavery in the cleaning sector.

This matter was thoroughly investigated in collaboration with Brisbane Catholic Education, and Archdiocesan Services at both the vendor level and across the cleaning category of approximately ten vendors and more than 100 schools. The result of this investigation did not identify any instances of modern slavery, but assisted in developing an internal review mechanism prior to engaging Domus 8.7 as no victim was identified in the disclosure.



**Archbishop Mark presents the Stoplevel and Whistleblower Policy**

<https://www.youtube.com/watch?v=W7oXT83XP-s>

# Reporting Criteria 5:

## Effectiveness assessment

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 fifth 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 as required under the Modern Slavery Act 2018.

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	2023 Catholic Archdiocese of Brisbane	2024 Catholic Archdiocese of Brisbane
<b>Internal / Staff</b>	Hours spent on modern slavery activities	967	867
	Individual staff completed e-learning	383	1,580
	E-learning modules completed	433	1,245
<b>External / Supplier Engagement</b>	Total number of suppliers	14,136	11,347
	Number of suppliers with visible contact information and ABN	7,429	1,152
	Number of suppliers across high-risk categories	479	485
	Number of ACAN Supplier Surveys completed	395	393
	Supplier staff attending capacity building webinars	24	176
	Invited to join Sedex	15	58
	Joined Sedex	5	56
	Sedex SAQ completed	3	49
	Social audits	1	1
	Corrective actions	0	0
<b>Domus 8.7 External Referrals</b>	Contacts made via worker voice / grievance mechanism	0	52
	Referrals for advice and assistance	0	71
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

**Table 5: Baseline Measure of the Archdiocese's Effectiveness Assessment**

Areas identified for improvement in 2025 include:

- Worker Engagement – focussing on improved training to be rolled out in the second half of 2025
- Operations – Further embedding modern slavery in our procurement processes
- Improving the effectiveness of our actions
- Developing a vendor risk management database.

# Reporting Criteria 6:

## Process of consultation with entities owned or controlled

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 2024, following the departure of members of the Modern Slavery Working Group (MSWG) from the Corporation, it was decided that Archdiocesan representatives would participate in the Modern Slavery and Laudato Si' Reference Group coordinated by Brisbane Catholic Education.

In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. In 2024 the Archdiocese expanded its consultation processes across the Archdiocese as we embed the goals outlined in this statement for 2025-2026.

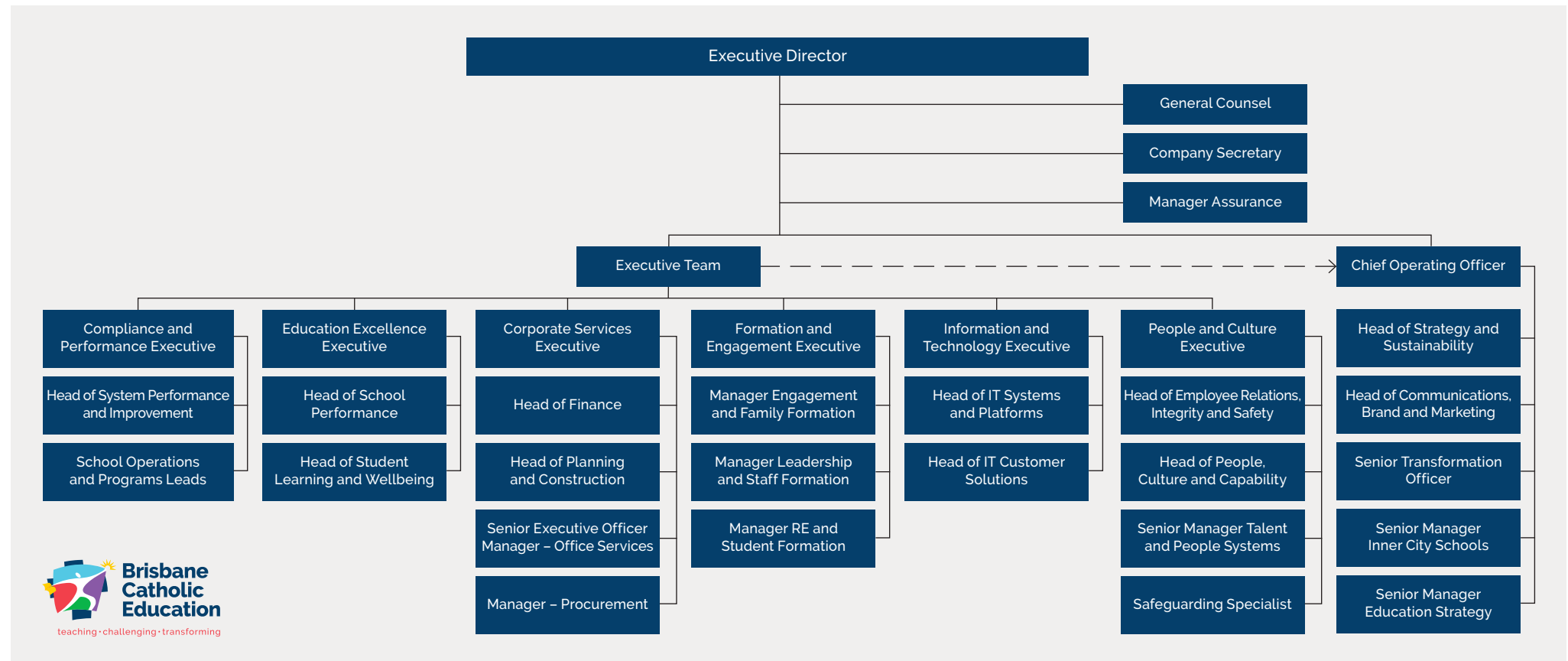
The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Archdiocesan Risk Management Framework.

A third MSLO role was created in 2024 as we continue to engage with ACAN's 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.

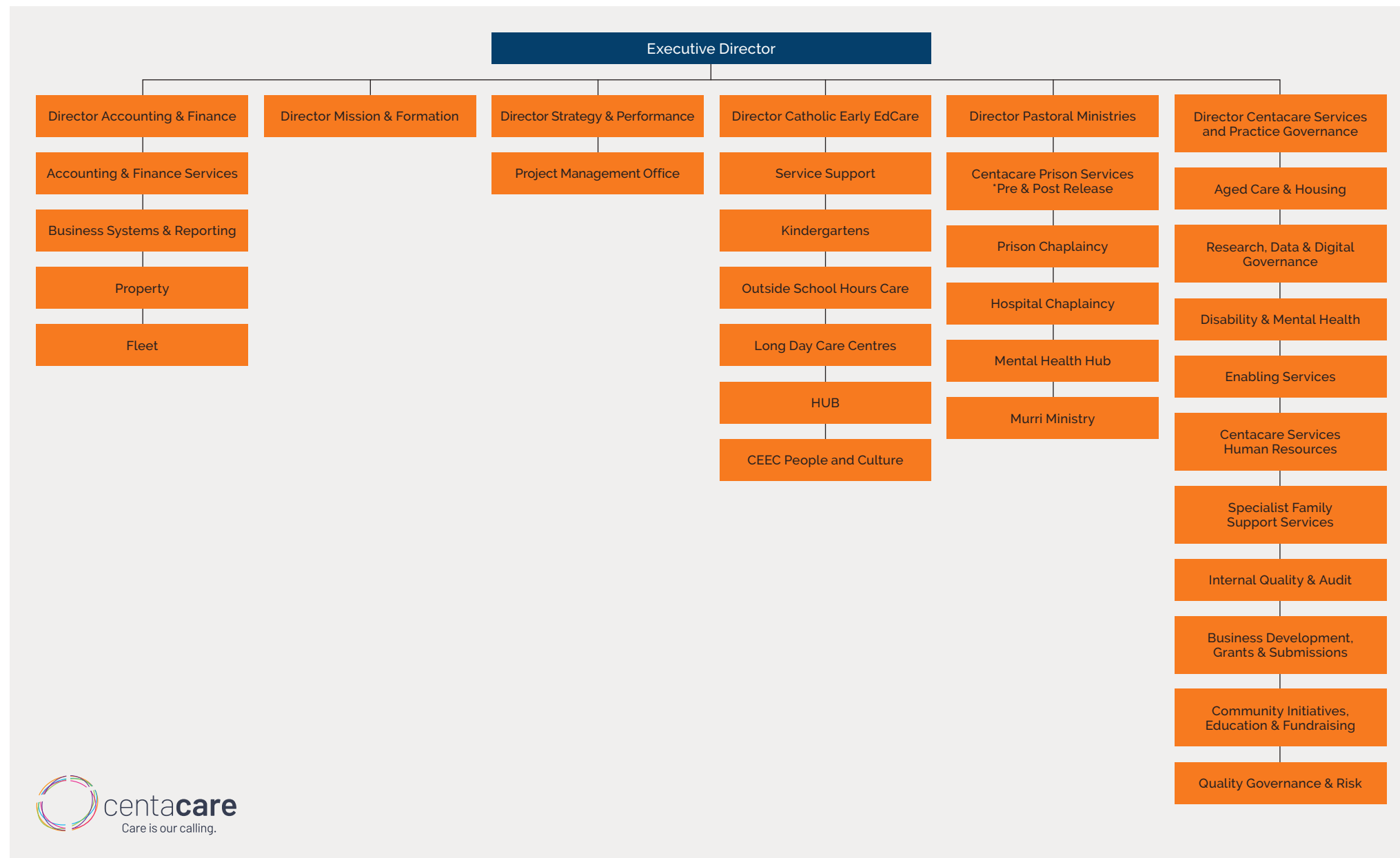
All key stakeholders across the Archdiocese participate in the assessment and approval of the information collated and brought together in approving the Archdiocese's annual Modern Slavery Statement.

# Appendices

**Appendix A:** Brisbane Catholic Education organisation chart

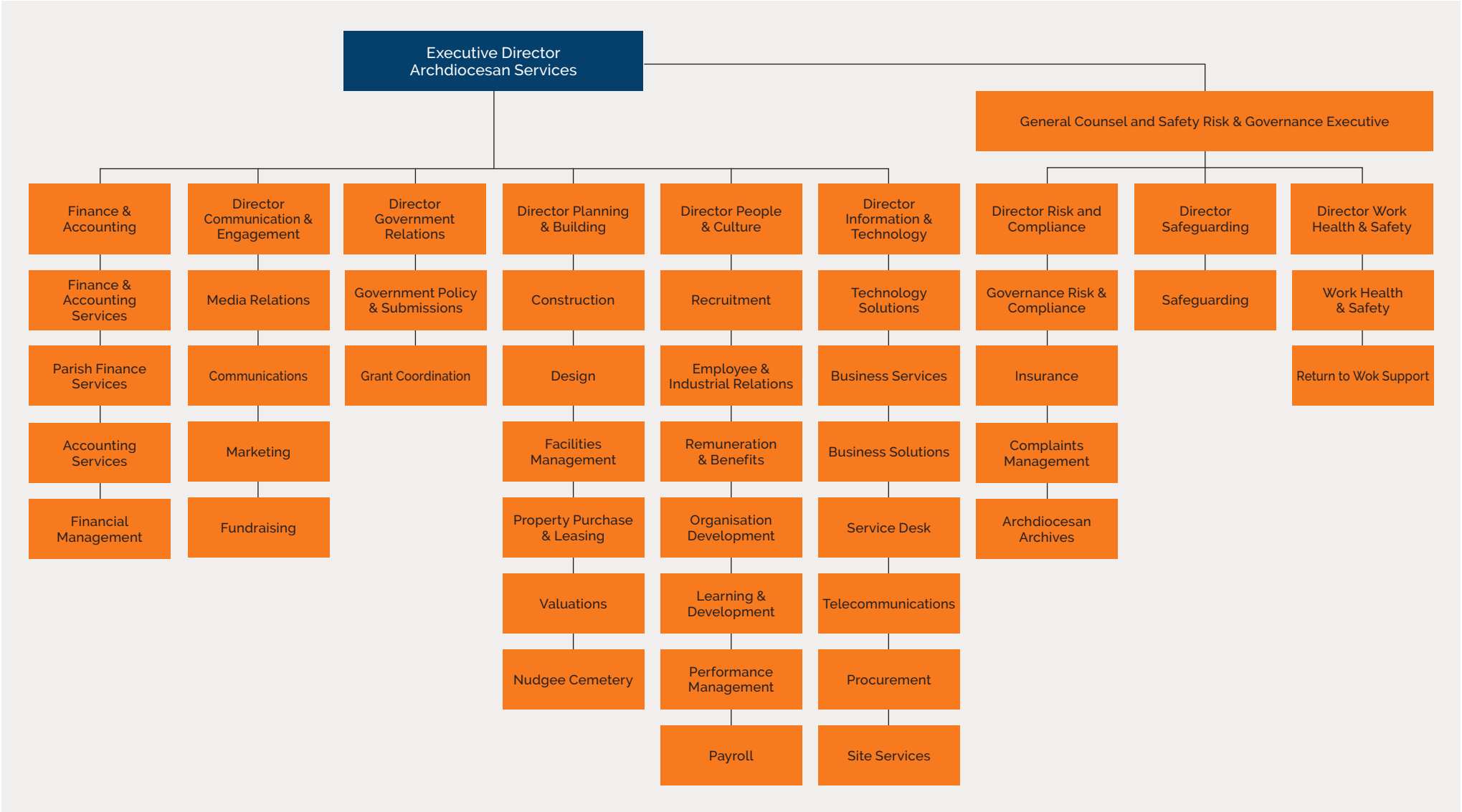


## Appendix B: Centacare organisation chart

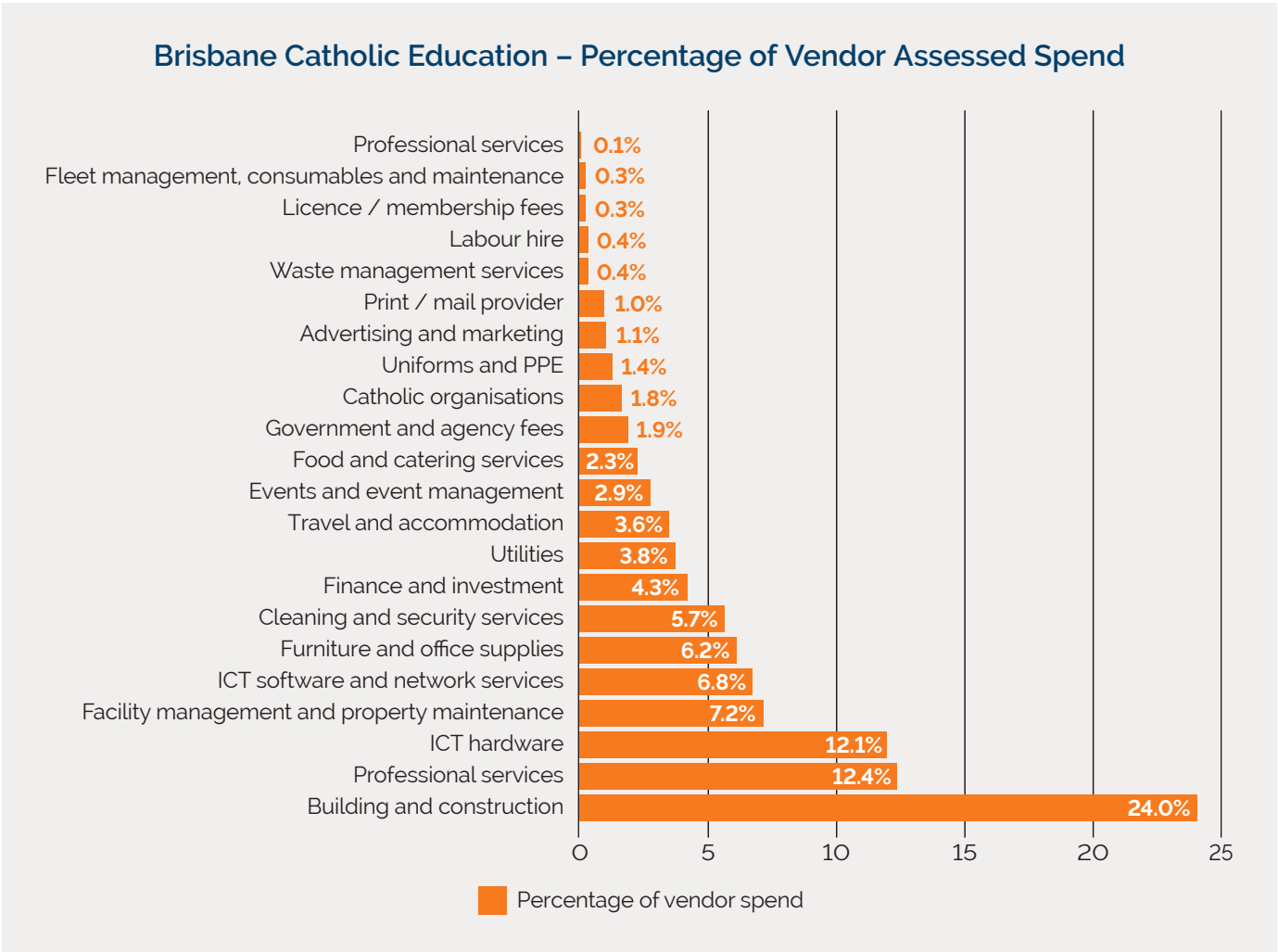




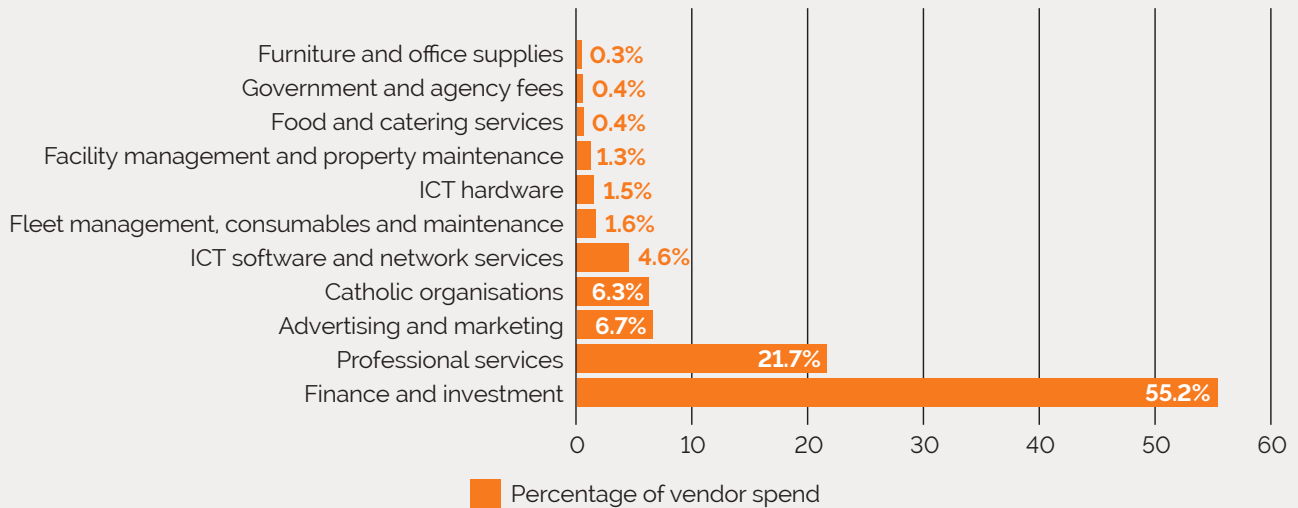
Appendix C: Archdiocesan Services organisation chart



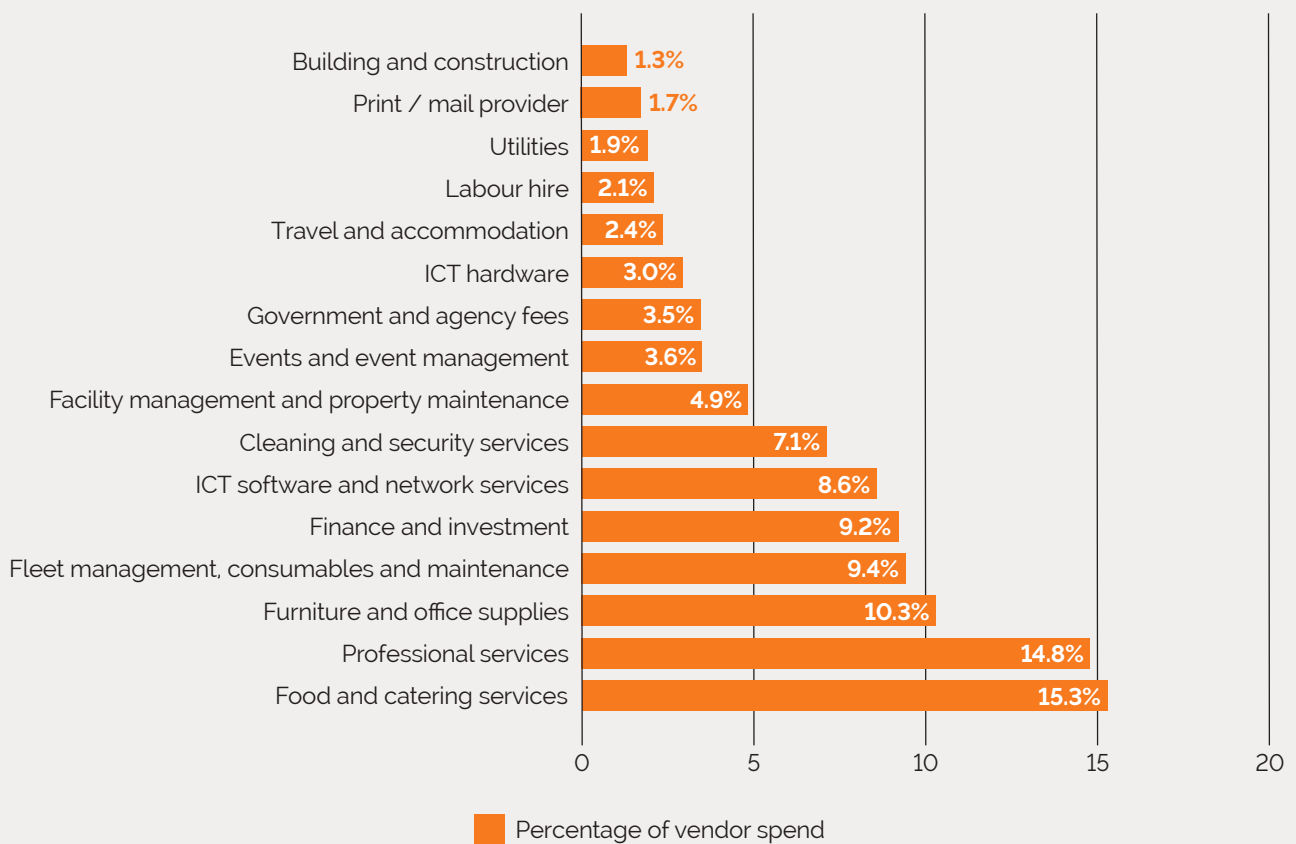
Appendix D: Agency spend by category



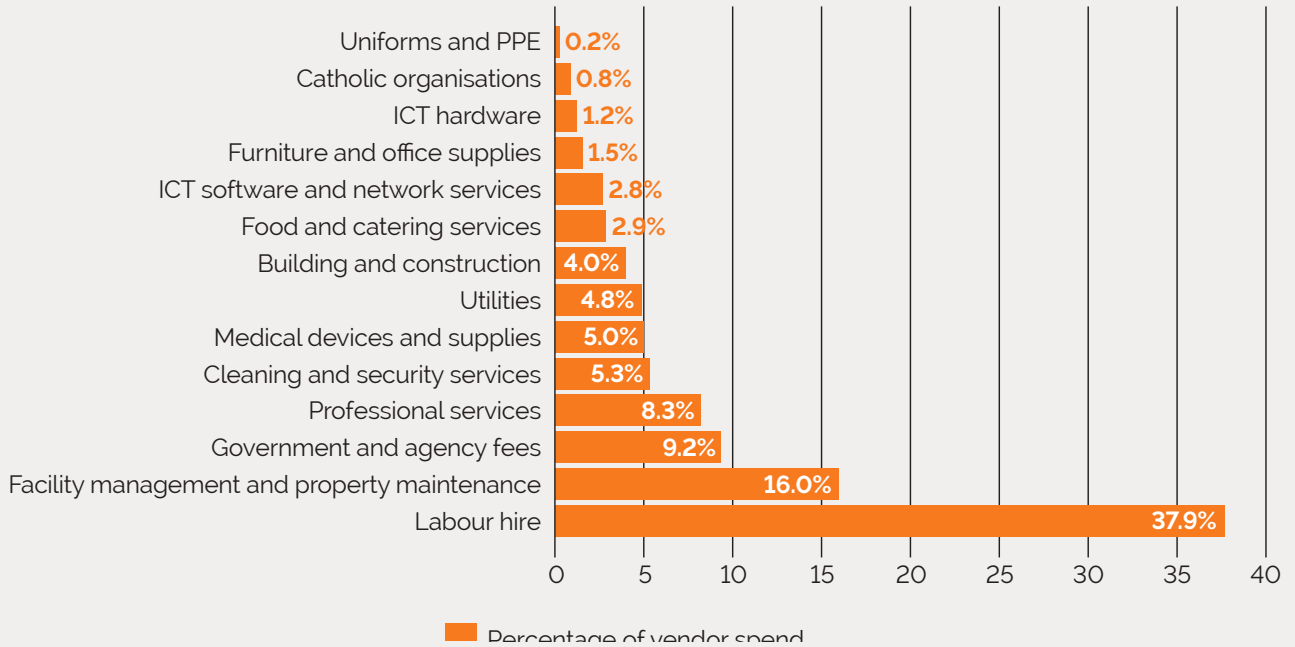
### Archdiocesan Development Fund – Percentage of Vendor Assessed Spend



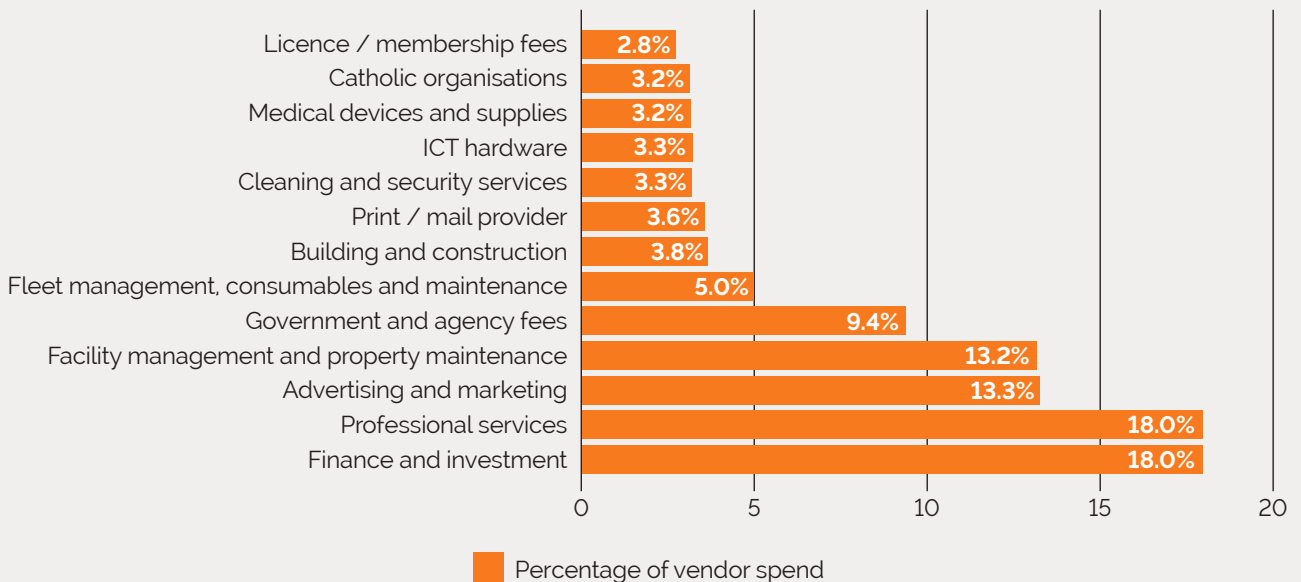
### Centacare Administration Services – Percentage of Vendor Assessed Spend



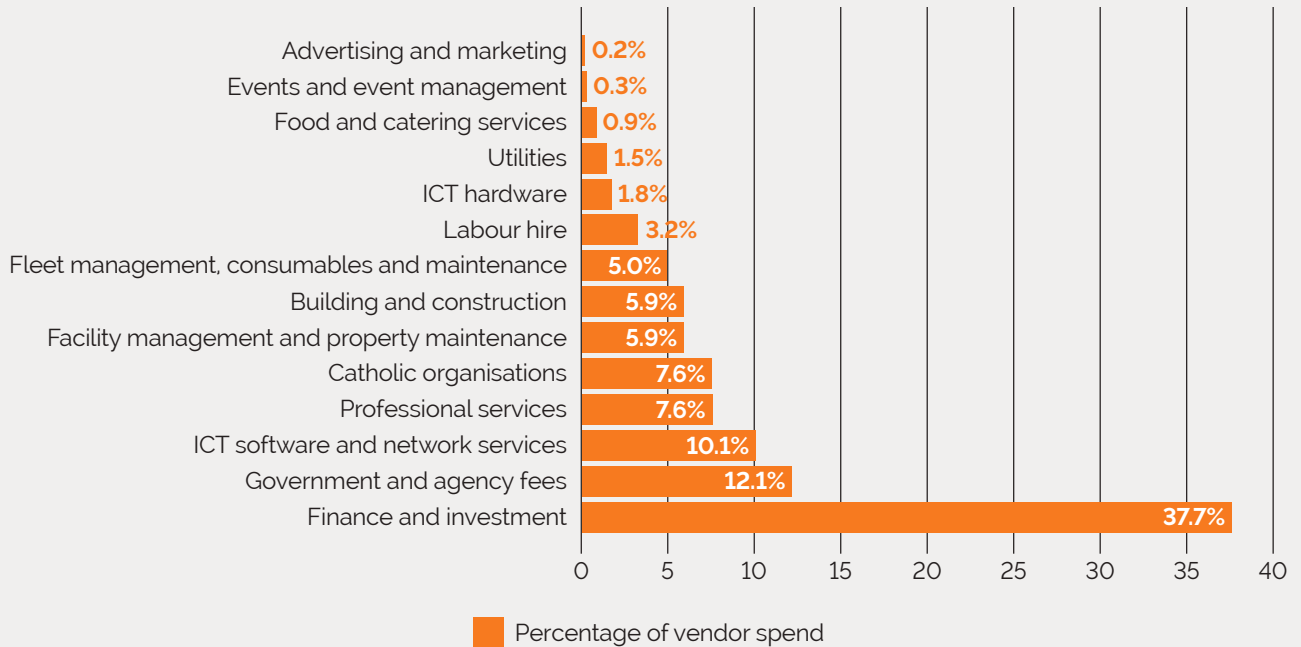
### Centacare PBI – Percentage of Vendor Assessed Spend



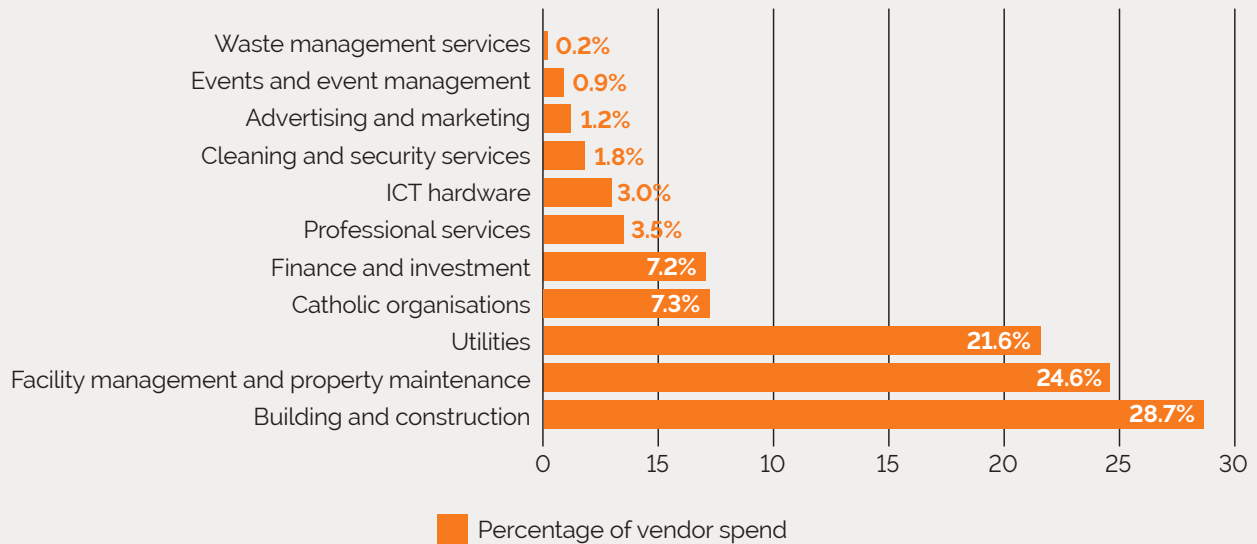
### Xavier Children's Support Network – Percentage of Vendor Assessed Spend



### Archdiocesan Services – Percentage of Vendor Assessed Spend



### Archdiocese of Brisbane – Parishes – Percentage of Vendor Assessed Spend





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policies-and-frameworks/  
eliminating-modern-slavery](https://www.forgov.qld.gov.au/finance-and-procurement/procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery)





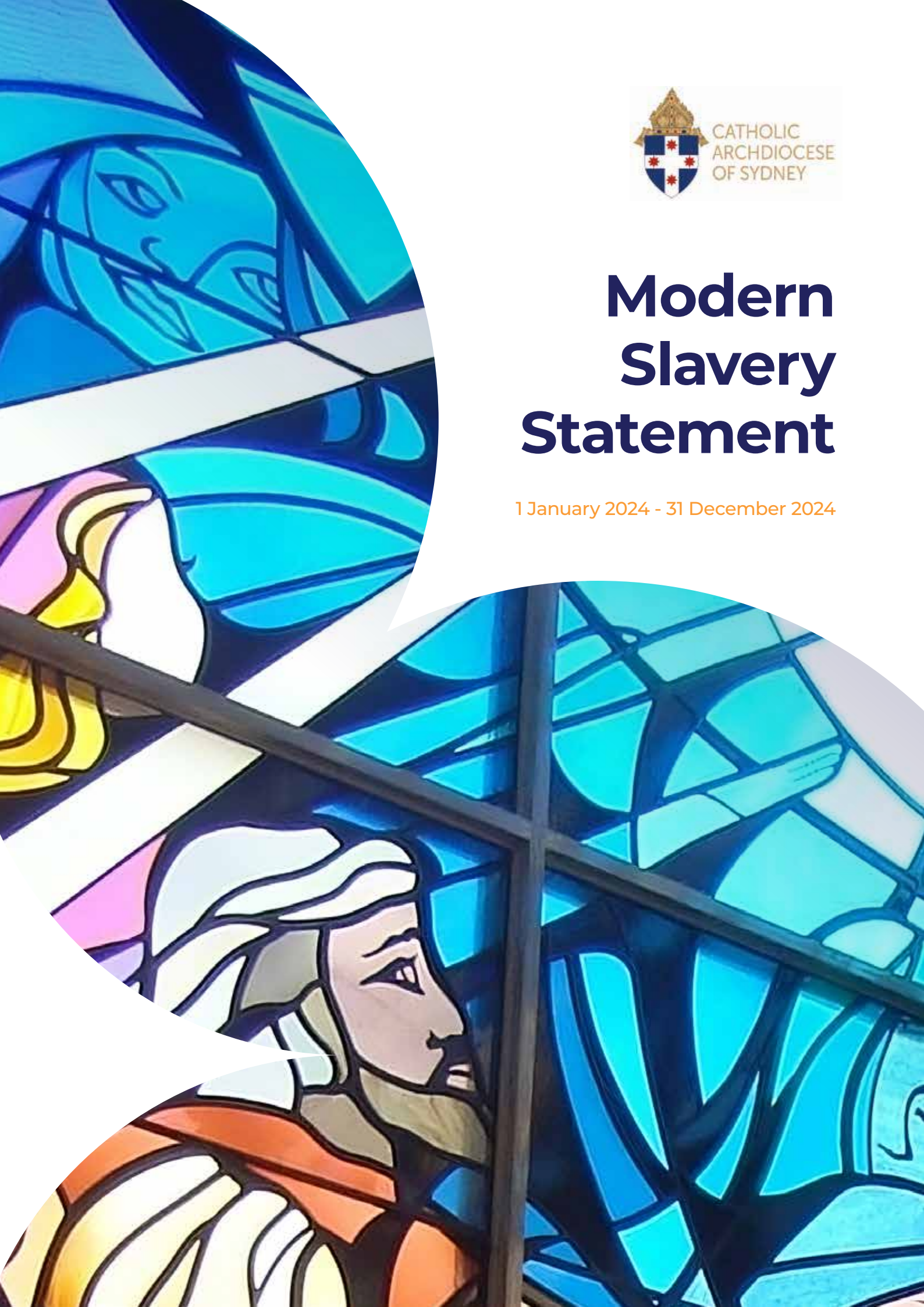
ARCHDIOCESE  
OF BRISBANE





# Modern Slavery Statement

1 January 2024 - 31 December 2024





## 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.

Catholic Archdiocese of Sydney  
ABN 72 823 907 843  
38 Renwick Street,  
Leichhardt, NSW 2040  
[www.sydneycatholic.org](http://www.sydneycatholic.org)

Michael Digges  
Executive Director  
Administration & Finance for the  
Catholic Archdiocese of Sydney



## Approval

# Most Rev Archbishop Anthony Fisher OP



I'm pleased to authorise and submit the fifth annual Modern Slavery Statement for the Catholic Archdiocese of Sydney (CAS) in response to the Australian Government's Modern Slavery Act 2018. This reporting period shows progress in key areas across the Archdiocese. Our Statement stands proudly alongside other Catholic entities in the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements – a collaboration unlike any other in the Catholic Church worldwide.

I am equally proud of the progress made by the Domus 8.7 Remediation Service, an agency of the Archdiocese. I thank the Committee Members for their contributions to this service and look forward to its continued growth.

I extend my heartfelt gratitude to staff across the Archdiocese who implement our modern slavery risk management program. In addressing the grave reality of modern slavery we are called to reflect the very heart of the Gospel. The actions we take to manage and mitigate the risks of modern slavery across our agencies are not mere administrative tasks; they are expressions of our Catholic faith.

The 2024 reporting period includes the realisation of anti-slavery milestones for Australia: the appointment of a Commonwealth Anti-Slavery Commissioner; implementation of the NSW Anti-slavery Commissioner's strategic plan; and increased recognition of survivor expertise. Our advocacy in the Archdiocese has made an impact. Additionally, the appointment of survivor leader Moe Turaga to the Domus 8.7 Committee affirms that the Archdiocese values the lived experience of people impacted by modern slavery.

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 May 21, 2025. 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 goal.

Guided by Pope Francis' exhortation in *Laudato Si'* and the requirements of the Australian Commonwealth Modern Slavery Act, SCS maintains a rigorous approach to challenging injustices, protecting human rights and upholding our ethical responsibilities.

Our goal is to always ensure that risks to people in our operations and supply chains are mitigated through contractual obligations, social compliance audits, training, and stakeholder engagement.

All business managers and financial administration staff in our 147 schools have completed modern

slavery training modules, and we are developing ways to integrate modern slavery studies into the curriculum.

We also collaborate with anti-slavery agencies including Australian Catholic Anti-Slavery Network and the NSW Anti-Slavery Commissioner to build our capabilities and identify how we can best use our resources for impact.

This important work is managed and monitored by the SCS Modern Slavery Working Group, who meets monthly to coordinate initiatives and address ongoing risks in SCS' operations.

We will continue to support our staff, students, communities and suppliers as we work together to create a safe and equitable future for all.

Danielle Cronin  
Executive Director  
Sydney Catholic Schools

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 2024, 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 consolidated suppliers where possible to better assess and monitor risk. Our Modern Slavery Working Group and Modern Slavery Liaison Officer continued

to drive accountability within our organisation and we continued to participate in 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.

Bay Warburton  
Interim 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](http://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.sydneycatholic.org](http://www.sydneycatholic.org)

Catholic Development Fund (CDF) ABN: 73866037848  
38 Renwick Street, Leichhardt, NSW 2040.  
[www.sydneycdf.org.au](http://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](http://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](http://www.stmaryscathedral.org.au)





# About Sydney Catholic Schools

Sydney Catholic Schools (SCS) is a system of 147 Catholic primary and secondary schools operating across the Archdiocese of Sydney providing more than 73,800 students with a 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, the Amadeus Music Program, Arts HQ, and our vocational education offerings.

SCS' commitment is to make sure that every student feels welcome at school and has the support to thrive academically and socially.

CAS Agencies  
employing  
**14,064**  
Staff

**125**  
Parishes Serving  
**590,000**  
Catholics  
spiritually supported by  
**400 Priests**

**147**  
Schools educating  
**73,881**  
Students

**73,881** Students  
**40,823** Primary Students  
**33,058** Secondary Students  
**13,475** Staff  
**147** Total Schools  
**110** Primary Schools  
**31** Secondary Schools  
**6** Combined Primary & Secondary Schools

## Archdiocesan entities

### Annual Revenue

CCS \$62.09m    SCS \$1,480m  
CAS \$67.19m    CDF \$33.20m

### Capital Works

SCS \$237.80m    CAS \$6.56m

### Suppliers

CCS 712    SCS 7404    CAS 1232



# 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 2024 was \$62,089,999.



## 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 to support its works 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 overseen by Sydney Catholic Schools Limited as Trustee for the Sydney Catholic Schools Trust.

The Australian Catholic Anti-slavery Network risk management program (ACAN Program) and the agency, Domus 8.7 modern slavery remediation service, are facilitated by CAS.

CAS employs five modern slavery specialist staff, including a Modern Slavery Survivor Consultant, to manage both the ACAN Program and Domus 8.7.

## Sydney Catholic Schools

Sydney Catholic Schools Limited (Trustee) is the corporate trustee for Sydney Catholic Schools Trust (the Trust) and the Registered Proprietor of Catholic systemic schools in the Archdiocese of Sydney. The Trustee is responsible for ensuring:

*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 Trust Board is supported by the Executive Director, the executive leadership team and Board advisory committees. The SCS Trust Board is responsible for providing leadership and strategic guidance to SCS and for corporate governance. The SCS Audit and Risk Committee (ARC) assists the SCS Trust Board to exercise due care, diligence and skill through the oversight of risk management, compliance and assurance activities and making recommendations to the SCS Trust 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. CatholicCare Sydney is a member of the Australian Catholic Anti-slavery Network (ACAN) and employs a Modern Slavery Liaison Officer. The CatholicCare Modern Slavery Working Group (MSWG), as part of the ESG Committee (under the Audit, Risk and Finance Committee), guides the organisation through modern slavery risk management actions.

## Geographic Area of Operations

## Organisational Structure

The Catholic Archdiocese of Sydney and Sydney Catholic Schools organisation charts are included in Appendix A.





# Agencies

## Sydney Catholic Schools

For the reporting period 1/1/2024 - 31/12/2024, SCS revenue was \$1,480m, the main expenditure being \$1,103m on the salaries of approximately 13,475 employees (school-based, central office, part-time and casual staff). Throughout 2024 SCS engaged with about 5200 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
- Government and agency fees
- Events and event management, including transport services\*
- Furniture and office supplies\*
- Waste management services\*
- Advertising and Marketing

*\* These spending areas are regarded as high risk according to the ACAN Modern Slavery Category Risk Taxonomy.*

## CatholicCare Sydney

In 2024 CatholicCare Sydney supported over 25,700 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, Gamble Aware, 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 more than 95,400 occasions of in-home support, allied health services, and volunteer connections. Disability Services delivered over 19,000 services to 75 clients.

School Wellbeing Services supported students and school leaders in more than 200 schools, with school counselling, onsite critical incident support, family support and remote clinical supervision.

## 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 \$33.2m and expenditure of approximately \$1.4m excluding the salaries of its 13 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 at Catholic Development Fund,  
Catholic Archdiocese of Sydney





## Criteria 3

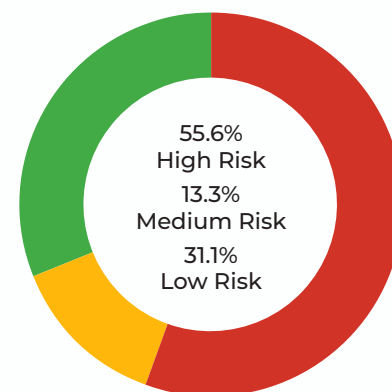
# Modern slavery risks in operations and supply chains

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
- Facility management and property maintenance
- Labour Hire
- Waste management services

### CAS Supply Chain Risk

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

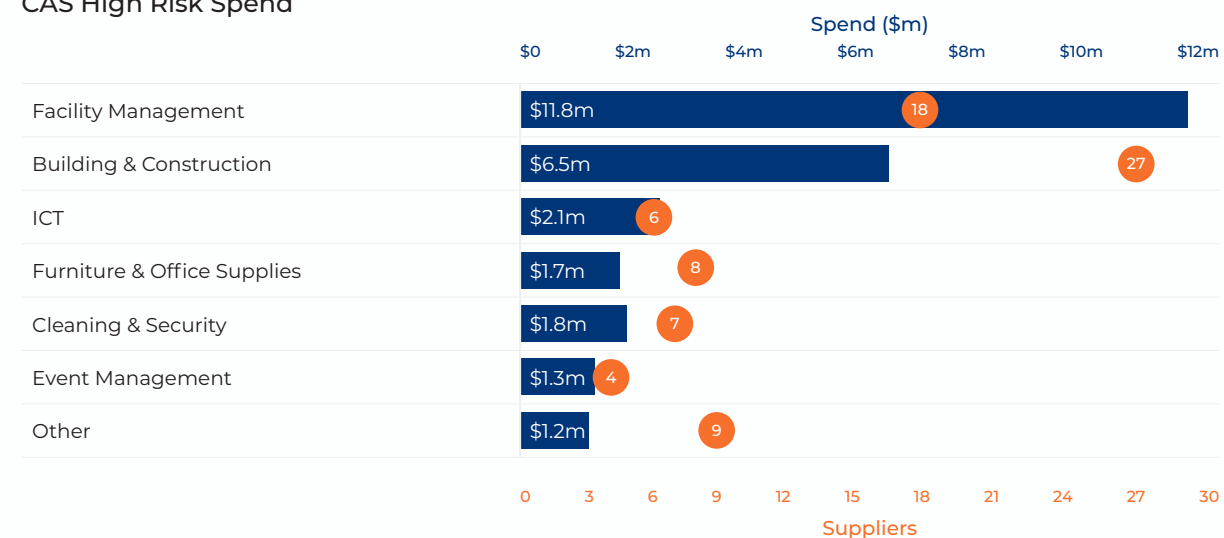


### CAS Supplier Analysis

	Total	High Risk	Medium Risk	Low Risk
Spend (\$m)	\$57.9	\$26.6	\$2.2	\$29.1
Number of Suppliers (> \$45K spend)	142	79	19	44

The total number of CAS suppliers is 1426.

### CAS High Risk Spend



**\$26.6m**  
Total High Risk Spend

**79**  
Total High Risk Suppliers

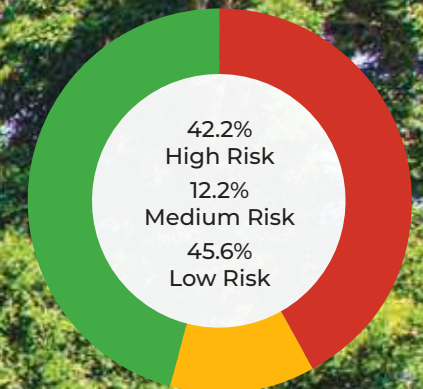
## CRITERIA 3

### CatholicCare Supply Chain Risk

CatholicCare procures products and services from suppliers across a range of industries including:

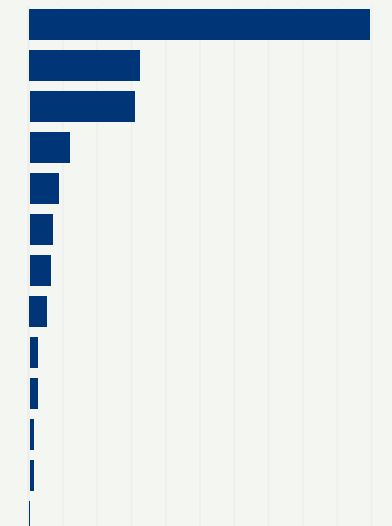
### CatholicCare Supplier Analysis

	Total	High Risk	Medium Risk	Low Risk
Spend (\$m)	\$7.15	\$2.64	\$2.46	\$20.5
Number of Suppliers	502	212	61	229



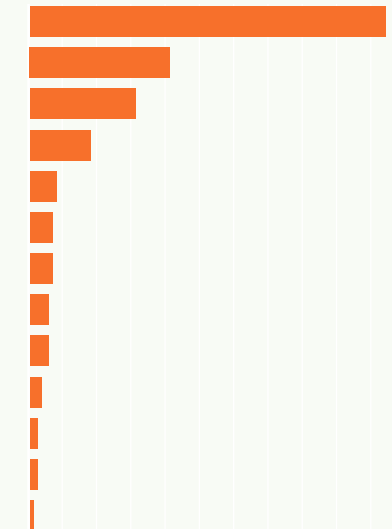
### % of Spend in high risk taxonomy categories

Facility management and property maintenance	17.9%
Medical devices and supplies	5.8%
Finance and Investment	5.5%
Cleaning and Security	2.1%
Building and construction	1.5%
Furniture and office supplies	1.2%
Food and catering services	1.1%
Labour Hire	0.9%
Events and event management	0.4%
Transport and Logistics	0.4%
Waste management services	0.2%
Linen, laundry and textile products	0.1%
Uniforms and PPE	0.0%



### Number of suppliers in high risk taxonomy categories

Facility management and property maintenance	94
Medical devices and supplies	37
Cleaning and Seairity	28
Food and catering services	16
Events and event management	7
Transport and Logistics	6
Labour Hire	6
Furniture and office supplies	5
Building and construction	5
Finance and Investment	3
Waste management services	2
Linen, laundry and textile products	2
Uniforms and PPE	1





# Sydney Catholic Schools

## SCS Operations

To support student learning, school staff, including principals, along with SCS Central Office staff, are responsible for ensuring that schools remain well-maintained and fully equipped. 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
- Build and maintain buildings and facilities
- Procurement of good and services
- Financial management
- Compliance, risk and safety management
- Build and maintain 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 provide a safe work environment for everyone visiting or working on SCS premises.

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 coupled with recruitment practices that ensure a fair and transparent merit-based process of appointment, ensuring additional controls are in place during the hiring process.

SCS recognises that there are areas with heightened risks of modern slavery such as security, cleaning and food and catering services. These functions are outsourced and are managed with other high risk functions. Approximately 530 people work across these functions on SCS sites. A due-diligence project is currently underway to ensure all these indirect on-site staff have up-to-date Working With Children Check (WWCC) credentials.

## 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.

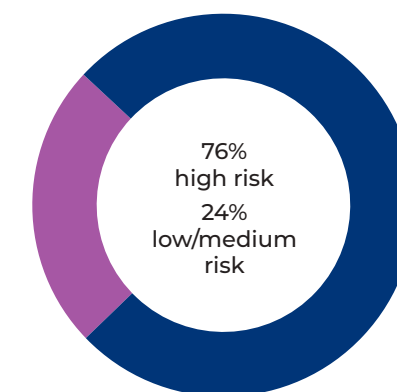
## SCS Supply Chain Risk

Modern slavery risks associated with SCS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories.

2024	Total	High Risk	Low/Med Risk
SCS Spend & Investments*	\$779.8m	\$594.2m	\$183.8m
SCS Number of Suppliers	5,197	2,571	2,626

\*Does not include \$31.2m related to interest on borrowings and merchant facilities.

## CRITERIA 3



## SCS High Risk Spend and Investment Categories

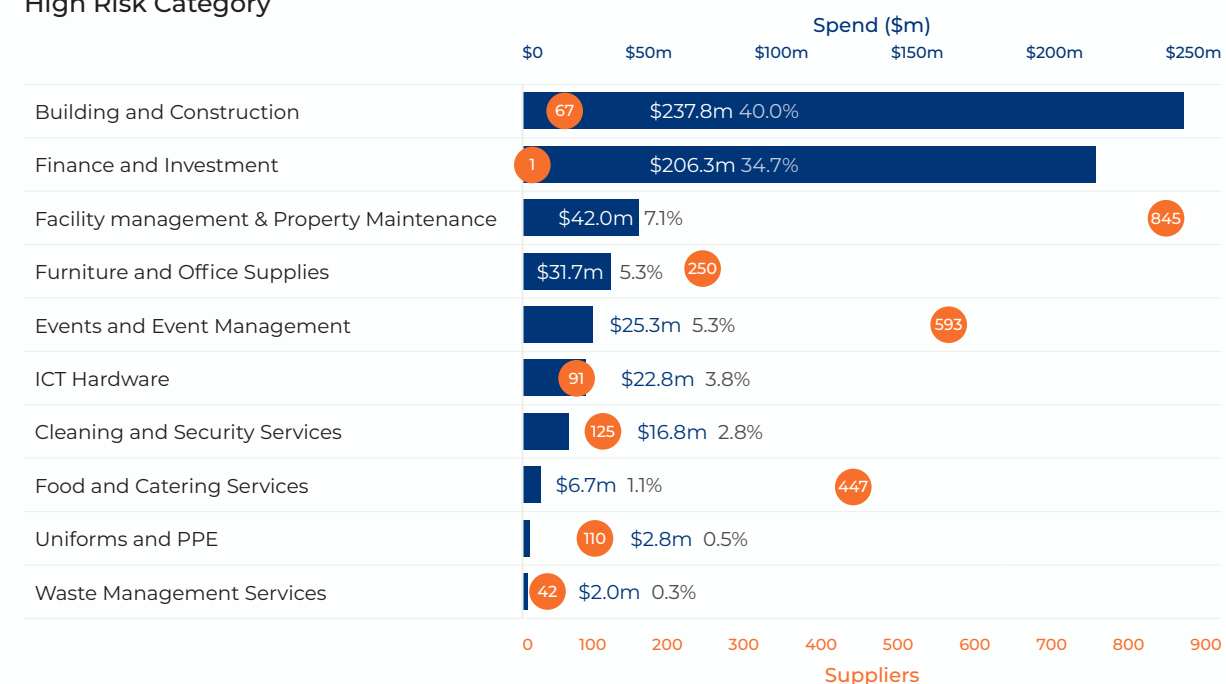
SCS High Risk Spend and Investment Categories for the calendar year 2024 totaled \$594.2m across 2,571 suppliers. The overall spend was divided into 76% high risk and 24% low/medium risk, while the supplier distribution was 49% high risk and 51% low/medium risk.

Building and Construction related spending (\$237.8m) presents the greatest spend risk for SCS at 40% of total high risk spend, although the lower number of suppliers (67) helps mitigate this risk. The Facilities Management & Property Maintenance category accounts for the highest number of high risk suppliers (845) and the second highest spend (\$42m).

SCS also has long-term investments of \$206.3m which are subject to strict ethical investment policies for both Australian and global equities.

Together, these three categories – Building and Construction, Facilities Management & Property Maintenance, and Finance and Investment – account for 82% of SCS' high risk spend and investments.

## High Risk Category



**\$594.2m**  
Total High Risk Spend  
and Investment

**2,571**  
Total High Risk Suppliers



Criteria 4

# Actions taken to assess and address risk

CAS implemented the ACAN Program as follows:

- |  |  |   |
|--|--|---|
| <p>1. Identification of suppliers in high risk procurement areas via ACAN Procurement Taxonomy.</p> <p>2. Suppliers in high risk categories were invited to complete the ACAN Supplier Survey, results were analysed to identify:</p> <ul style="list-style-type: none"><li>• Suppliers with Sedex membership</li><li>• Suppliers willing to join Sedex</li><li>• Suppliers not required by CAS to join Sedex</li></ul> <p>3. Suppliers were assisted to join Sedex and provided support to complete the Sedex Self Assessment Questionnaires (SAQ).</p> <p>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.</p> | <p>As a member of Sedex, CAS agencies benefit from a range of services and tools to manage supply chain risks, improve supplier engagement, and enhance ethical and sustainable business practices.</p> <p>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.</p> <p>The ACAN Program supported suppliers to CAS agencies with onboarding to Sedex and achieving these objectives:</p> <ol style="list-style-type: none"><li>1. Managing the risk of modern slavery with existing suppliers</li><li>2. Validating inherent risk against actual risk</li><li>3. Screening new suppliers as part of tenders and supplier on-boarding processes</li><li>4. Gaining visibility upstream in relevant supply chains</li><li>5. Monitoring and reporting on progress of suppliers</li><li>6. Deployment of an ACAN pre qualified supplier directory.</li></ol> | <p>ACAN Program Managers supported CAS agencies by providing suppliers with clear steps on actions required, as outlined in the supplier engagement plan:</p> <ol style="list-style-type: none"><li>1. Designate a role to drive modern slavery engagement</li><li>2. Complete the 5 minute ACAN Supplier Survey</li><li>3. Watch recordings or participate live in any of the 5 ACAN supplier webinars or two audit forums</li><li>4. Join Sedex as a Supplier Member, complete a Self Assessment Questionnaire (SAQ) and connect with the respective CAS agency</li><li>5. Provide access to Modern Slavery 101 and Modern Slavery Risk Management for Suppliers e-learning modules and which includes completion certificates as evidence of modern slavery training for CAS agencies and other customers.</li></ol> |
|--|--|---|

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 2024 ACAN webinar series. Suppliers who registered to attend the webinar series were sent communications including a link to complete the ACAN Supplier Survey.

CAS Action Plan 2025

For the year 2025, CAS will commence the following activities:

- Reappoint members of the Anti-Slavery Working Group
- Review and relaunch the CAS Modern Slavery Policy and related documents:
  - review and update supplier agreement for goods and services
  - review and update the CAS Guide for Business Practice
- Undertake the ACAN remediation readiness assessment
- Complete the ACAN entity profile
- Consider results of the maturity assessment report
- Review and update the CAS risk management register
- CAS induction of new employees to include completion of the updated ACAN modern slavery e-learning modules.

CAS will continue to implement the following:

- All CAS job advertisements and 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."

CAS will continue to administer, support, lead and drive the ACAN Program and Domus 8.7 remediation service.



# SCS' Summary of 2024 Modern Slavery Risk Management Activities

## 2024 Key Initiatives

### Training



592

SCS Central Office staff completed the MS101 Introduction to Modern Slavery online course.

### Awareness

The Feast Day of St Josephine Bakhita, patron saint of victims of modern slavery and human trafficking, hosted by the Most Rev Archbishop Anthony Fisher OP and Sr Mary Leahy RSJ OAM on February 8.

### Suppliers

537

Suppliers completed the ACAN supplier pre-assessment survey.

186

Suppliers invited to join Sedex.

105

Supplier staff attended ACAN Webinars;

104

Suppliers completed the Sedex Supplier Assessment Questionnaire (SAQ).

### Actions

86%

Successfully completed 13 of 15 key performance indicators based on 2022 gap analysis, with 2 areas in progress.



### Governance

The SCS Modern Slavery Working Group (MSWG) held monthly meetings during 2024 to review and manage the KPI-driven action plan.

### Systems



Implemented supplier categorisation in the SCS Finance system using an updated ACAN risk taxonomy which improves the accuracy of SCS spend data across high, medium and low risk suppliers.

### Processes

Completed desktop social compliance audits of 3 major SCS Cleaning contractors focussing on labour hire and subcontracting arrangements.



## CRITERIA 4



Image A: partnering with ACAN to deliver a workshop for SCS property management staff to raise awareness of the risks of modern slavery and potential worker abuse on SCS capital works sites (April 18).



Image C.



Image D.

Image B: Wollongong Business Forum, April 23, hosted by the Catholic Archdiocese of Wollongong featuring a keynote address from the NSW Anti-slavery Commissioner, Dr James Cockayne.

Image C and D: commemorated the Feast Day of St Josephine Bakhita, patron saint of victims of modern slavery and human trafficking (February 8).

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 executives from all SCS Directorates, continues to focus on the delivery of the Modern Slavery action plan and track progress against key performance indicators.

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 2024, SCS implemented a number of initiatives and reached important milestones. These are summarised below:

- Continued 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).
- The 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 and invitations to relevant suppliers to join Sedex. 537 suppliers completed the ACAN supplier pre-assessment survey and 104 suppliers completed the Sedex Supplier Assessment Questionnaire (SAQ).

- Increased the number of SCS staff completing ACAN eLearning modules via the SCS Learning Management System (LMS), focussing on SCS Central Office staff.

- MSWG staff either hosted or attended the following events to raise awareness of modern slavery including:
  - commemorated the Feast Day of St Josephine Bakhita, patron saint of victims of modern slavery and human trafficking (February 8).
  - partnering with ACAN to deliver a workshop for SCS property management staff to raise awareness of the risks of modern slavery and potential worker abuse on SCS capital works sites (April 18).

- Updated all SCS Business Managers regarding managing modern slavery risks in SCS supply chains and operations.
- Attended the Wollongong Business Forum, April 23, hosted by the Catholic Archdiocese of Wollongong featuring a keynote address from the NSW Anti-slavery Commissioner, Dr James Cockayne.
- Attended the Thomson-Reuters ESG (Environment, Social, Governance) Conference, August 29, covering updates to the Australian Modern Slavery Act and efforts to tackle online child exploitation and human trafficking in Asia-Pacific.
- Attended Sedex Webinars and in-person member sessions throughout the year covering topics such as Self-Assessment Questionnaires, Supplier engagement, SMETA Auditing standards, and remediation services for victims of modern slavery such as Domus 8.7.



- SCS staff and suppliers participated in nine ACAN modern slavery capacity building webinars throughout the reporting period. Webinars addressed sustainable and ethical procurement, and covered industries such as construction, uniforms and textiles, cleaning, waste management, and financial services.
- Collaborated with the SCS Chief Risk Officer to update the SCS Modern Slavery Risk Register and improve risk controls.
- Three SCS staff – the SCS Procurement Manager, Commercial Manager and Modern Slavery Liaison Officer – completed the four-day Compliance Practitioners Initiative (CPI) Lead Auditor Training Course on Social Compliance Auditing, 27 - 30 May 2024. This accreditation provides SCS staff with the skills to conduct desktop and in-person social compliance audits of our suppliers.
- All major SCS cleaning contractors (23 suppliers) and uniform providers (12 suppliers) registered with Sedex. It is now mandatory that all uniform suppliers, cleaning contractors and canteen operators join Sedex and complete the SAQ.
- Initiated **desktop social compliance audits** of 3 major SCS cleaning contractors focussing on labour hire and subcontracting arrangements.
- Ensured 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.
- Improved the accuracy of supplier records and spend data in SCS' enterprise financial management system (CiA) by updating supplier categorisation to align with new areas of the **ACAN Risk Taxonomy categories**.
- Developed a **Suppliers List Dashboard** in CiA (SCS finance system) that easily identifies suppliers across various industry groups that are aggregated into modern slavery risk categories.

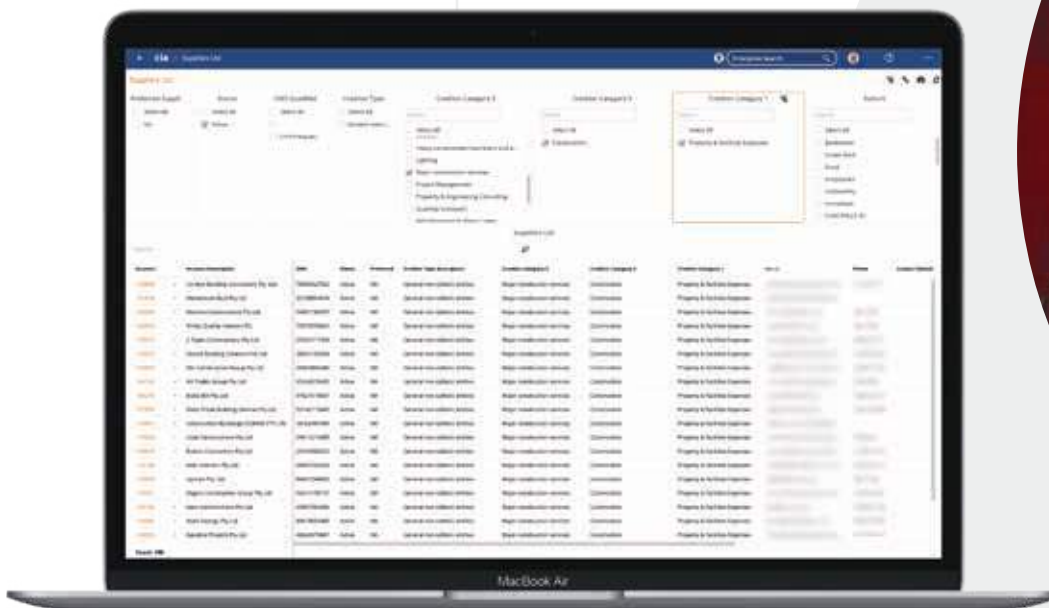


On Feb 8, 2024, SCS welcomed Most Rev Archbishop Anthony Fisher OP, Catholic Archdiocese of Sydney, and Sr Mary Leahy to speak at our commemoration of the Feast Day of St Josephine Bakhita, the patron saint of victims of modern slavery and human trafficking.

Archbishop Fisher spoke of the need to remain steadfastly focused on our mission to challenge any dehumanising attitudes or business practices that may contribute to the exploitation of people. He commended the work of all staff across the Archdiocese who play a role in implementing our modern slavery risk management program, and observed that the 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.

Known as the 'angel of Sydney's waterfront', Sr Mary Leahy cares for the spiritual, social, and material welfare of Seafarers who enter Australian sea ports regardless of colour, race or creed. She spoke of work she does with each ship that docks at Port Botany offering support to those needing communication with loved ones, wage and abuse information, as well as those dealing with loneliness, isolation, illness and mental health issues. Sr Mary was awarded an Order of Australia medal in recognition for her 24-year service with the Archdiocese of Sydney's Stella Maris Apostleship of the Sea.





# SCS plans for 2025 and beyond

- Continued execution of the SCS Modern Slavery Action Plan and achieve specified KPIs.
- Actively engage in, and encourage SCS suppliers to participate in, ACAN webinars and other learning and engagement opportunities.
- The SCS MSWG will actively engage in ACAN action planning workshops.
- Increase the number of suppliers joining Sedex and completing the SAQ.
- Continue investigating supply chains, including Tier 2 and 3 suppliers using the SMETA auditing standard, in high risk areas such as Cleaning Contractors and Uniform suppliers and Canteen operators.
- SCS Procurement plans to conduct a comprehensive investigation into all cleaning contractors to assess compliance with Fair Work and Modern Award payment obligations, Working with Children Checks, and Occupation, Health and Safety (OHS) requirements. The findings will be reported to the Modern Slavery Working Group and the Audit and Risk Committee (ARC).
- Enhance tender documentation for high risk categories, including Canteen, Uniforms, and Cleaning services, to strengthen the identification of subcontracting practices, supply chain transparency, employee Fair Work rights, Workplace Health and Safety (WHS) compliance, and modern slavery risks. This initiative aims to improve due diligence, enhance supplier accountability, and identify high risk suppliers more effectively.
- Develop a structured process to monitor and assess spending in high risk supply chains, including uniform, canteen, and stationery (such as textbooks) to enable inclusion in future Modern Slavery Statements.
- Continue improving data integrity and reporting capabilities by updating SCS Finance systems and supplier onboarding processes. This includes ensuring standard supplier classifications match the appropriate modern slavery risk category aligned with the ACAN Category Risk Taxonomy.

- Continue raising awareness of modern slavery with SCS staff and suppliers by commemorating the Feast Day of St Bakhita across SCS schools and the central office.
- Identify opportunities in the curriculum for including the study of issues relating to modern slavery and human trafficking
- Remain vigilant regarding the mandatory inclusion of Modern Slavery clauses in all new supplier contracts.



## Case Study: Capacity Building in Social Compliance Auditing

From May 27 - 30, 2024 representatives from ACAN member entities, including modern slavery liaison officers, supply chain professionals, and anti-slavery business partners such as Sedex completed a 4-day Compliance Practitioners Initiative (CPI) **Social Compliance Lead Auditor** training course.

The CPI is a global qualification scheme for practitioners in a variety of cross-industrial and cross-functional roles, and is especially suitable for supply chain practitioners. The Social Compliance Lead Auditor accreditation provides ACAN members with the skills to conduct desktop and in-person social compliance audits of our suppliers. The training is also recognised by APSCA (Association of Professional Social Compliance Auditors).

The training course was facilitated by Intertek, a leading quality assurance, testing, inspection and certification provider. Our course trainer, Asim Faraz, demonstrated a solid foundation in both the theoretical and practical aspects of social compliance auditing, stemming from his real-world experience in industry and auditing practice.

The course focused on corporate social responsibility (CSR) audits, which are becoming more important in the global supply chain arena. The training provides a set of skills for practitioners to evaluate corporate social responsibility issues systematically and holistically:

- Understand Corporate Social Responsibility (CSR) programs and their history and importance.
- Understand CSR Audit, the CSR Audit process, Audit types, Auditor Professionalism, safety and security.
- Understand the components of CSR Audits and common Audit standards.
- Understand the Audit process, including effective Audit preparation, opening and closing meetings, social management systems and business ethics, site tours, management and worker interviews, worker records and payroll reviews.
- Interview and worker file review sampling techniques.
- Handling special situations and sensitive cases.
- Understand risk management techniques.
- Understand how to write CSR audit reports and corrective action plans.

Seven of the nine CAS and SCS participants passed the course examination (> 85% exam mark requirement) and attained the Social Compliance Lead Auditor accreditation. It was notable that Moe Turaga, ACAN's modern slavery survivor advocate, became Australia's first modern slavery survivor to achieve accreditation.

Following the course, ACAN members put their new skills into practice. For example, the Sydney Catholic Schools Procurement team conducted desktop audits of school cleaning services providers, uncovering potential issues regarding Fair Work conditions, Working With Children Checks (WWCC), and Modern Slavery obligations arising from subcontracting practices. These issues are subject to ongoing investigations and have resulted in proposed updates to supplier contracts that address subcontracting and labour hire gaps.





# Remediation



Domus 8.7 was established to provide an independent remediation service to anyone impacted by modern slavery.

Domus 8.7 prioritises crisis support, referrals and case management that seeks to address the harms experienced by people impacted and provides guidance to Catholic entities when concerns arise about indicators of forced labour or modern slavery.

Domus 8.7 staff make an assessment to determine if people are eligible for remediation services or require a referral to other social and community services.

The assessment for modern slavery covers 135 indicators across 12 pillars - vulnerability, deception, exploitation, work arrangements, wages and entitlements, living conditions, documents, physical coercion, psychological coercion, financial coercion, choice and control.

Remedy may include transport, accommodation, financial compensation, alternative employment opportunities, back-payment of wages, reimbursement of unfair recruitment fees and training to support new employment opportunities.

Domus 8.7 offers the necessary expertise, training courses and resources to assist Catholic entities to address the challenges and responsibilities outlined by the Act. A thorough analysis is essential to determine the appropriate remedial actions and measures necessary to prevent future harm.

Domus 8.7 has a multidisciplinary team skilled in social and legal services, business and human rights, supply chain management, stakeholder engagement and community outreach.

Domus 8.7 Advisory Committee Members include slavery survivor advocate Moe Turaga, Australia's most experienced legal experts on modern slavery and business leaders.

In 2024 Domus 8.7 deployed a customised digital case management system to manage engagement, tracking, reporting of referrals, clients and member organisation referrals.

All Archdiocesan agencies:

	ACTIVITY	2023	2024
DOMUS 8.7	Contacts made via worker voice / grievance mechanism	0**	0
	Referrals for advice and assistance	0**	1
	Individuals identified or referred for modern slavery assessment	0**	0
	Individuals with modern slavery cases remediated	0**	0

\*\* CAS Agencies only contacts and referrals made to Domus 8.7.





Criteria 5

# Measuring Effectiveness

The baseline data tables below contains metrics for CAS and CatholicCare. These key metrics provide a quantitative basis to evaluate actions and results, providing an objective measure of achievements.

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey. Visibility over self-reported information and modern slavery risks associated with individual suppliers improved with an increase in the number of Sedex SAQs completed.

Catholic Archdiocese of Sydney

	ACTIVITY	2023 CAS	2024 CAS
INTERNAL / STAFF	Hours spent on modern slavery activities	0	20
	Individual staff completed e-learning	0	0
	E-learning modules completed	0	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	1,006	1,232
	Number of suppliers with visible contact information and ABN	3	167
	Number of suppliers across high-risk categories	574	80
	Number of ACAN Supplier Surveys completed	88	22
	Supplier staff attending capacity building webinars	11	0
	Invited to join Sedex	4	1
	Joined Sedex	4	15
	Sedex SAQ completed	4	40
	Social audits	1	0
	Corrective actions	0	0

CatholicCare Sydney

	ACTIVITY	2023 CCS	2024 CCS
INTERNAL / STAFF	Hours spent on modern slavery activities	57	42
	Individual staff completed e-learning	124	9
	E-learning modules completed	208	13
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	709	712
	Number of suppliers with visible contact information and ABN	661	660
	Number of suppliers across high-risk categories	1	137
	Number of ACAN Supplier Surveys completed	8	128
	Supplier staff attending capacity building webinars	85	32
	Invited to join Sedex	29	25
	Joined Sedex	12	25
	Sedex SAQ completed	0	10
	Social audits	1	2
	Corrective actions	0	13



# 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 592 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 2,571 SCS suppliers from modern slavery high risk categories. Of those, 1,576 suppliers completed the pre-assessment survey with 186 of those suppliers invited to join Sedex. Of those invited, 151 suppliers joined Sedex.

	ACTIVITY	2023 SCS	2024 SCS
INTERNAL / STAFF	Hours spent on modern slavery activities	282	260*
	Individual staff completed e-learning	463	592
	Number of MSWG meetings	10	9
	E-learning modules completed	463	959**
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	5,679	5,197
	Number of suppliers across high risk categories	2,445	2,571
	Number of ACAN Supplier Surveys completed	792	1,576
	Supplier staff attending capacity building webinars	86	105
	Invited to join Sedex	267	186
	Joined Sedex	29	151
	Sedex SAQ completed	20	81
	Social audits	1	11
	Corrective actions	28	54

\* Hours attributed to the Modern Slavery Liaison Officer only, excluding work done on producing the 2024 Modern Slavery Statement.  
\*\* Cumulative count of Staff who completed any ACAN Modern Slavery online courses.

## SCS 2024 Key Performance Indicators

2024 KPI	2024 Target	Progress
Number of MSWG meetings in 2024	10 (monthly Feb - Nov)	9 meetings
Deliver SCS MS Statement to ARC and Board	May 2, 2024 (ARC); May 15, 2024 (Board)	Completed
Delivery of MS Briefing Papers, including Risk Register, to SCS ARC	May 2, 2024; Nov 14, 2024	Completed
Number of relevant SCS staff to have completed the MS 101 training module	All SCS Central Office Staff	592 staff (86%)
Number of relevant SCS staff to have completed all 4 MS modules	All SCS Board, ARC, SCS Executive, MSWG, Business Managers, Central Office Procurement staff	Completed
Number of training events attended by MSWG member(s)	Attend 6 MS Webinars (e.g. ACAN)	Completed
Celebration activities for the Feast Day of St Bakhita	Feb 8, 2024	Completed
Social media, schools, students and staff, inclusion in Units of Work	Ongoing	In progress
Number of suppliers who completed the ACAN Supplier Survey	80% of SCS high risk Suppliers > \$50K	1,576
Number of high risk suppliers who have joined Sedex	75	186
SAQ completions in Sedex	50	81
Number of policies and procedures that DO NOT include MS clauses where required.	0	0
Number of non-SCS-standard contracts that DO NOT include MS clauses (where relevant).	0	0
Social Compliance Audits conducted by SCS	1	3
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%	No cases identified

## SCS Future measures of effectiveness

- As part of the SCS Modern Slavery Action Plan for 2025 and beyond, and considering insights from our partnerships with ACAN and the Office of the NSW Anti-slavery Commissioner, 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.
- Conducting social compliance audits for in-school cleaning service providers to assess adherence to Fair Work and Modern Award payment obligations, Working with Children Checks, and Workplace Health and Safety (WHS) standards.
  - Expanding investigations into the supply chains of uniform and canteen suppliers to identify potential risks related to subcontracting, ethical sourcing, and modern slavery.

KPIs will continue to be developed in collaboration with respective MSWG members.



## Criteria 7 Other

No other relevant information.



### 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)
- Chief Financial Officer
- Manager, Property & Facilities
- Procurement Manager
- Contracts Manager
- Legal Counsel, commercial law
- Supervisor: Education Leadership and Research
- Supervisor: People & Culture Operations
- K-12 Religious Education Officer
- ICT Executive Assistant
- ACAN Representative
- Finance Projects Manager (Modern Slavery Liaison Officer)

The CatholicCare Modern Slavery Working Group is comprised of members of the ESG Committee as follow:

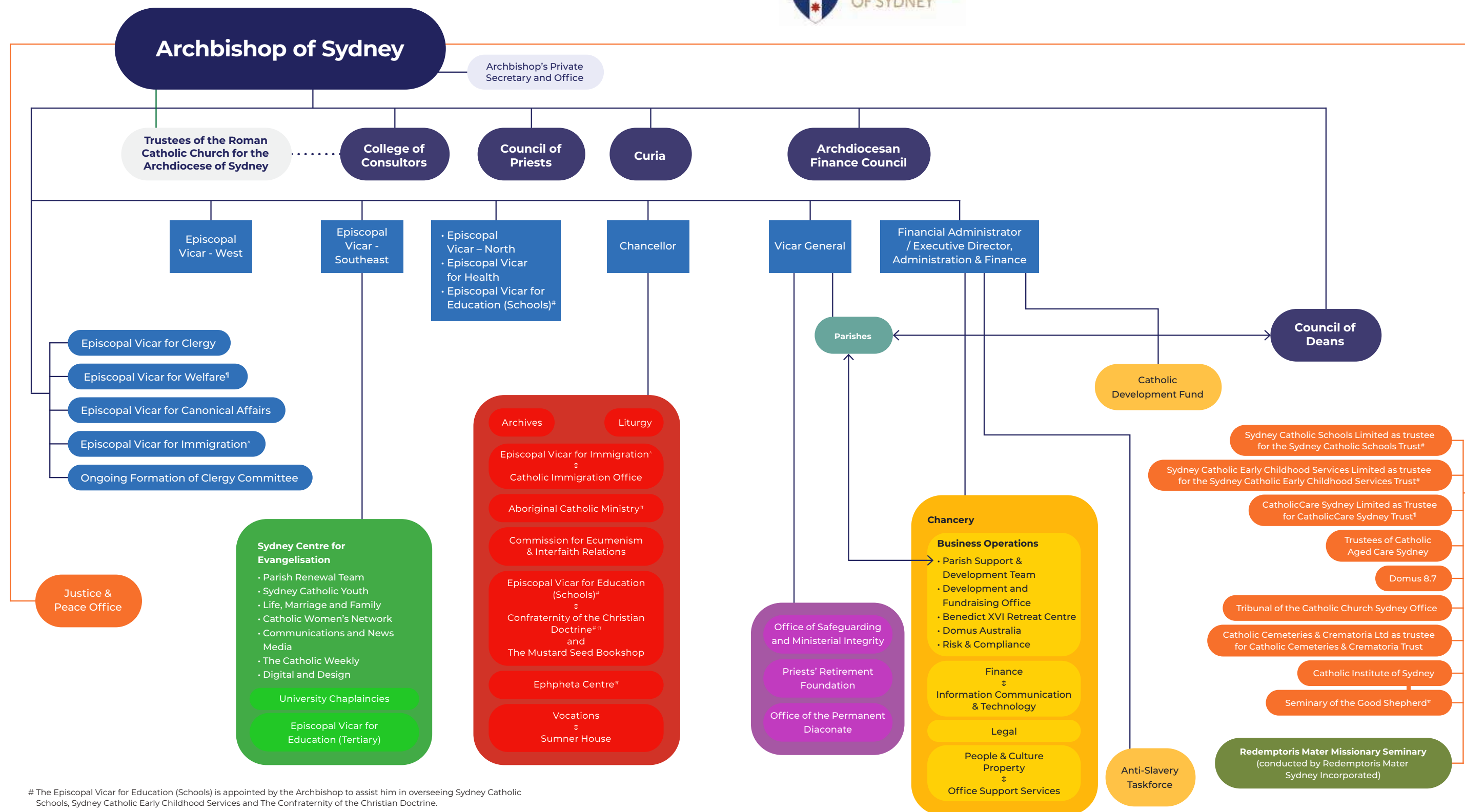
- ESG Chairperson
- Finance
- Risk & Assurance
- People & Culture
- Procurement
- Communications



# Appendix A

## Organisational Charts

Catholic Archdiocese of Sydney Organisational Chart



# The Episcopal Vicar for Education (Schools) is appointed by the Archbishop to assist him in overseeing Sydney Catholic Schools, Sydney Catholic Early Childhood Services and The Confraternity of the Christian Doctrine.

† The Episcopal Vicar for Welfare is appointed by the Archbishop to assist him in overseeing CatholicCare Sydney.

‡ Charitable Works Fund is a centralised fund that supports the charitable and pastoral activities of 6 agencies, including the Aboriginal Catholic Ministry, Confraternity of the Christian Doctrine, Ephpheta Centre and the Seminary of the Good Shepherd.





Appendix B

# Timeline of SCS 2024 Activities

Date	Activity
Feb 8	SCS Modern Slavery Working Group (MSWG) Meeting #1 2024
Feb 8	Celebration and Mass for St Bakhita's Feast Day
Feb 16	SCS completes survey for ACAN Modern Slavery Compendium
Feb 28	SCS MSWG Meeting #1 2024
Feb 29	ACAN Monthly Modern Slavery Working Group Webinar
Mar 6	Modern Slavery update for School Finance and Administration Staff (zoom)
Mar 7	MSWG support for Catholic Education Foundation at International Women's Day
Mar 26	MSLO attended seminar, "The role of debt in migration and forced labour"
Mar 28	SCS MSWG Meeting #2 2024
Mar 28	MSLO attends ACAN MSWG Webinar
Apr 10	Modern Slavery session at Finance Business Managers Workshop, 10/4
Apr 14	SCS MSWG Meeting #3 2024
Apr 18	Toolbox Talks workshop with SCS Property Team
Apr 23	MSLO & ACAN attend the Wollongong Business Forum with the NSW Anti-slavery Commissioner
Apr 24	MSLO attends ACAN MSWG Webinar
May 2	Modern Slavery Risk Register and 2023 SCS and CAS Modern Slavery Statement noted by the Audit and Risk Committee of the SCS Board
May 15	2023 SCS and CAS Modern Slavery Statement approved by the SCS Board
May 23	MSWG members attend ACAN MSWG Webinar
May 23	SCS MSWG Meeting #4 2024
May 27-30	SCS representatives (3) attend Intertek Social Compliance Lead Auditors course
Jun 13	SCS MSWG Meeting #5 2024
Jun 24	SCS procurement contracts incorporating updated MS clauses released

Jun 27	MSLO attends ACAN MSWG Webinar
Jul 3	Modern Slavery talk at Finance & Property Workshop for School Support Officers
Jul 18	SCS MSWG Meeting #6 2024
Jul 19	Distributed 2023 SCS and CAS Modern Slavery Statement to all SCS Directors and School Principals
Jul 25	MSLO attends ACAN MSWG Webinar
Jul 30	MSLO completes NSW Office of Anti-Slavery Commissioner survey
Jul 31	All SCS Central Office staff complete MS101 online course
Jul 31	MSLO attends Sedex webinar on SMETA 7 Auditing protocols
Aug 8	MLSO attends ACAN, Sedex and Cleaning Accountability Framework workshop
Aug 23	MSLO attends ACAN Webinar - Contracting Labour
Aug 28	ACAN Supplier Pre-assessment Survey distributed to high risk SCS Suppliers
Aug 29	SCS MSWG Meeting #7 2024
Aug 29	MSWG members attend ACAN MSWG Webinar
Aug 29	MSLO & ACAN attend Thompson-Reuters ESG Conference
Sept 26	MSWG members attend ACAN MSWG Webinar
Oct 10	ACAN Supplier Webinar - Cleaning and Security Services
Oct 12	SCS develops v1 of Suppliers List Dashboard
Oct 20	MSLO attends Sedex webinar: Focus on trafficking into online scams
Oct 31	SCS MSWG Meeting #8 2024
Oct 31	MSWG members attend ACAN MSWG Webinar
Nov 14	MSWG representatives attend the Intertek Workshop on Supply Chain Transparency and Modern Slavery Risks in the Construction Industry
Nov 14	MSWG and ACAN participates in research experiment with Dr Heather Moore from RMIT University on Modern Slavery remediation
Nov 14	Modern Slavery Risk Register and 2024 Modern Slavery Action Plan noted by the Audit and Risk Committee of the SCS Board
Nov 19	Investigation into reported potential Modern Slavery issue regarding ethical sourcing of uniforms. No issue found.
Nov 21	MSWG and ACAN representatives attend a Sedex member session on modern slavery risk management, social audits and remediation services
Nov 21, 28, Dec 5, 12, 18	Action planning with SCS Procurement team for supply chain due diligence with in-school cleaning services providers and uniform suppliers
Nov 26	MSLO attended the NSW Anti-Slavery Commissioner's Online Anti-slavery Forum
Nov 30	MSWG members attend ACAN MSWG Webinar
Dec 14	MSLO attended the ACAN end-of-year gathering to welcome Dr Chris Evans, Australian Anti-Slavery Commissioner.
Dec 9	SCS MSWG Meeting #9 2024
Dec 11	ACAN Supplier Webinar - Grievance Mechanisms and Remediation - December 2024









# Modern Slavery Statement

1 January 2024 - 31 December 2024

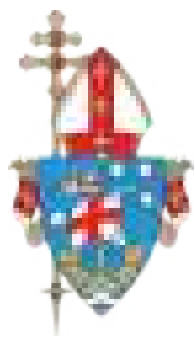
Email: [antislavery@sydneycatholic.org](mailto:antislavery@sydneycatholic.org)

Catholic Archdiocese of Sydney  
ABN 72 823 907 843  
38 Renwick Street,  
Leichhardt, NSW 2040  
[www.sydneycatholic.org](http://www.sydneycatholic.org)

Photo Credits: Giovanni Portelli







Catholic  
Archdiocese  
of Adelaide

# 2024 MODERN SLAVERY STATEMENT

## DISCLOSURE

This statement has been produced on behalf of Catholic Church Endowment Society Inc (CCES) ABN 29 608 297 012. It 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 23rd May 2025.

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's second Modern Slavery Statement and reporting year.

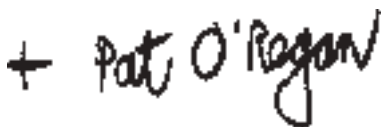
The Archdiocese is already committed to the tenets of Catholic social teaching and recognises alignment with our commitment in this space with the dignity of the human person, in particular the worker and the common good.

In 2023, we formed a working group to progress activities leading to reducing modern slavery risks throughout the Archdiocese which included examination of our supplier network with the support of ACAN.

In 2024, the Archdiocese working group has further progressed these actions, with still more to do.

We look forward to continuing this important work in 2025.

In Domino,



**+Patrick O'Regan DD**  
*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 people 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 56 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 attending 89 Catholic schools in the Archdiocese. Through community and social services, more than 22,000 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

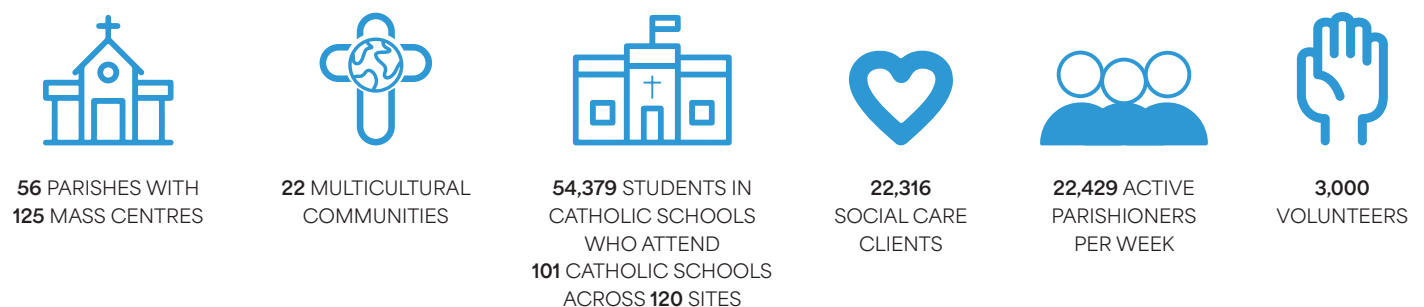
## ABOUT

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 2024 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

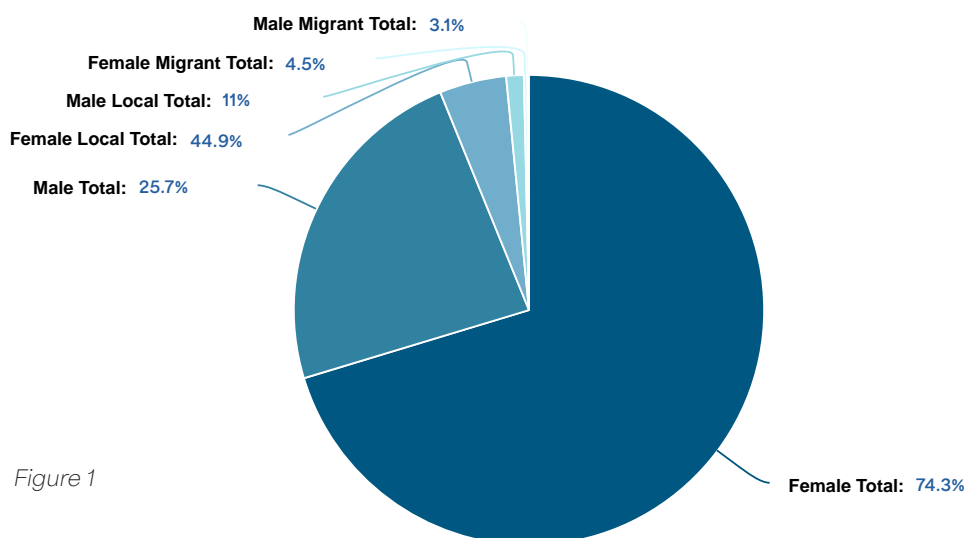


Figure 1

Employees in the Archdiocese total 11,500 and span the industry sectors of education, health, social services and parishes. Not all entities record female and male local and migrant employees (as depicted).

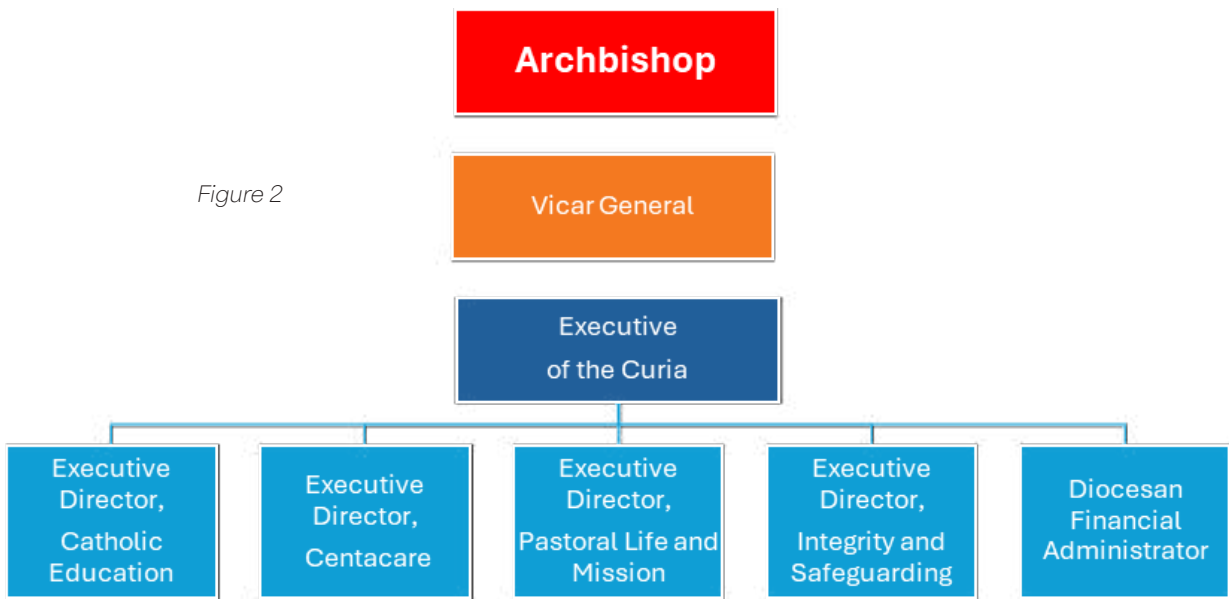
Governance Structure

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**

The Catholic Archdiocese of Adelaide 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 analysis 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).

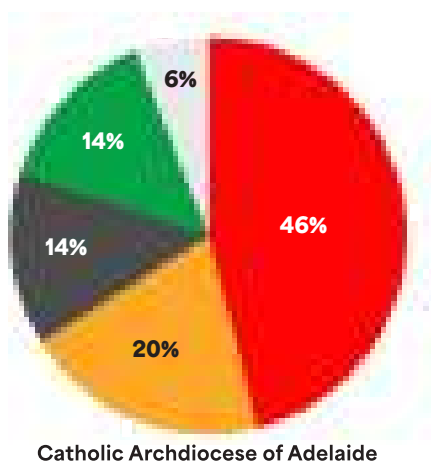
In order to further assess the risk CCES has committed to asking all suppliers to complete the ACAN supplier survey in 2025.

The following table (*next page*) summarises the Archdiocese vendor analysis for the 2024 financial year. **NOTE: All entities only includes top 50 spend.**



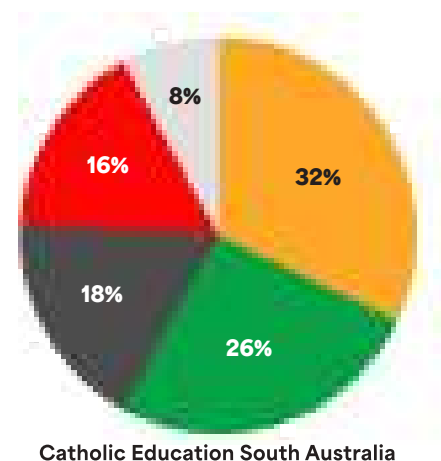
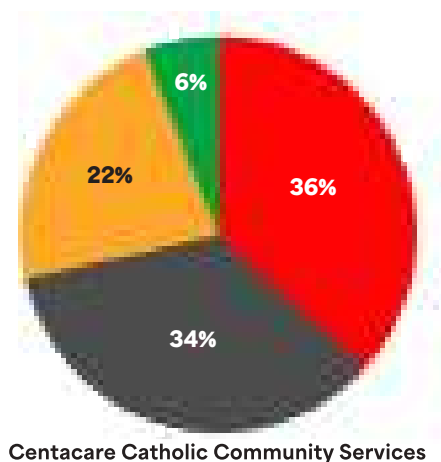
VENDOR ANALYSIS					
	No. of Vendors	Vendors Reviewed	% of Total Spend	Max Spend/ Vendor	Min. Spend/ Vendor
Catholic Education	50	0	0	\$3,332,753	\$169,825
Archdiocesan Services	50	0	0	\$9,092,566	\$47,141
Centacare	50	0	0	\$900,642	\$43,750

## RISK LEVEL SUPPLIERS



The high-risk categories across the Archdiocese of Adelaide including Centacare and Catholic Education SA 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



- Not in scope
- Unclassified
- Low
- Medium
- High

## 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 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, setting future directions.

The data shows engagement by suppliers of goods and services. The ACAN supplier survey was completed by 27 suppliers. Of those suppliers, 5 suppliers were invited to join SEDEX and complete the SEDEX Self Assessment Questionnaire.

### The Modern Slavery Working Group consists of:

<b>Sarah Moffatt</b>	<b>Executive Director</b> , Pastoral Life and Mission   <i>Catholic Archdiocese of Adelaide</i>
<b>James Lloyd</b>	<b>Pastoral Leader</b> , Justice, Healing and Inclusion   <i>Catholic Archdiocese of Adelaide</i>
<b>Rebecca Whellum</b>	<b>Senior Policy and Quality Officer</b>   <i>Centacare Catholic Community Services</i>
<b>Jarden King</b>	<b>Manager</b> , Governance and Quality Assurance   <i>Centacare Catholic Community Services</i>
<b>John Favretto</b>	<b>Director</b> , Governance, Quality and Assurance   <i>Catholic Education SA</i>

	ACTIVITY	Total 2024
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	12
	Individual staff completed e-learning	0
	E-learning modules completed	0
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	150
	Number of suppliers with visible contact information and ABN	148
	Number of suppliers across high-risk categories	49
	Number of ACAN Supplier Surveys completed (cumulative)	27
	Supplier staff attending capacity building webinars (cumulative)	1
	Invited to join Sedex (Number of suppliers invited to join Sedex, cumulative)	22
	Joined Sedex (Number of suppliers that Joined Sedex, cumulative)	14
	Sedex SAQ completed (Number of Sites with Sedex SAQ completed, cumulative)	5
	Social audits (number of audits completed in 2024)	0
	Corrective actions (Number of non-conformances in 2024)	0
	Contacts made via worker voice / grievance mechanism	0
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

In 2024, the following actions have been undertaken by CCES:

- Continued active participation Modern Slavery Risk Management Program through Australian Catholic Anti Slavery Network (ACAN), in particular, engagement with Kate Hopper from ACAN.
- The Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education, has met on 4 occasions.
- 2024 Modern Slavery Statement developed.
- Further assessment of supplier spend and associated risks.

For 2024 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

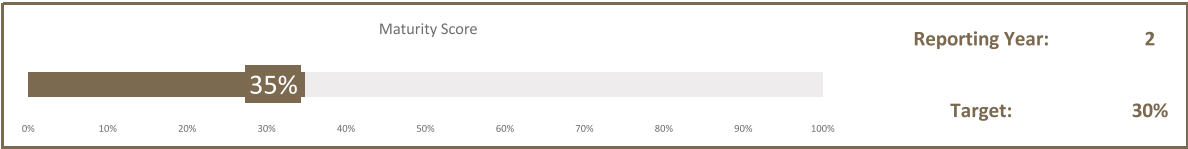
## Effectiveness of Steps Undertaken

CCES completed the ACAN 2024 Entity Profile as part of ACAN’s Modern Slavery Maturity Assessment process. CCES’s overall assessment score of 35% is above the benchmark 30% for a Year 2 reporting entity; the assessment has identified areas that will need to be of focus for the year ahead.

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 2024

### Catholic Archdiocese of Adelaide - Overview



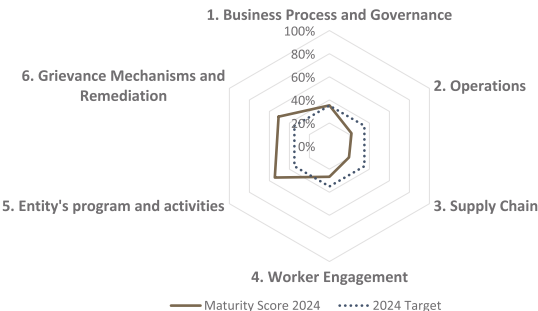
### Catholic Archdiocese of Adelaide - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024
1. Business Process and Governance	40%	49%	31%	21%	35%
2. Operations	24%	28%	25%	12%	22%
3. Supply Chain	8%	50%	14%	6%	20%
4. Worker Engagement	0%	60%	25%	22%	27%
5. Entity's program and activities	100%	30%	50%	38%	55%
6. Grievance Mechanisms and Remediation	70%	60%	42%	31%	51%
Average	40%	46%	31%	22%	35%

↑ 2%  
↑ 3%  
↑ 7%

↑ 2%  
↑ 2%  
↑ 2%

Maturity Score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score





## Action Plans

The following activities are planned for 2025:

- Continued invitation for staff to complete the e-learning modules on Modern Slavery
- Introduce the Modern Slavery Working Group to SEDEX
- Continued invitation of high risk suppliers to complete the ACAN supplier survey
- Development of ethical sourcing initiatives, including further development of a contract clause for suppliers and as part of prospective new tender process.
- Continued connection with key staff from ACAN to provide ongoing support and expertise.
- Regular connection with ACAN local support.
- Through the Archdiocesan Council for Integral Ecology, continue the work of divestment options for CCES.
- Event planned for *United Nations World Day against Trafficking in Persons*, 30 July 2025.

## CRITERIA 6

### Process of Consultation

- The Executive of the Curia determined in November 2024 that it would continue with producing a Modern Slavery Statement for the 2024 reporting period.
- Continued work with the Modern Slavery Working Group with members from the Archdiocesan Office, Centacare and Catholic Education. This working group has met 4 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](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 and are promoted through social media.

- Centacare's Diversity, Equity and Inclusion Committee continues to 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. The portal shared the Modern Slavery Statement in July 2024.



## Centacare's Commitment to Combating Modern Slavery



Jonathon Louth  
Director

### Centacare's Commitment to Combating Modern Slavery

Centacare is committed to preventing and ultimately eradicating modern slavery within our operations, business partnerships, and supply chains. We have taken important steps to ensure that our practices are ethical and comply with the [Modern Slavery Act 2018](#).

#### What is Modern Slavery?

Modern slavery is a severe violation of human rights where individuals are exploited through practices such as forced labour, human trafficking, debt bondage, and child labour. Victims are often coerced, threatened, or deceived into situations from which they cannot escape, stripped of their freedom and dignity. Procurement networks can contribute to modern slavery when businesses unknowingly source goods and services from suppliers who exploit their workers. This is where Centacare's work is focused—ensuring that our supply chains are free from such unethical practices.

#### Establishing a Working Group

In February 2024, we joined with the Catholic Archdiocese of Adelaide and Catholic Education SA to form a Modern Slavery Working Group. This group was created to coordinate our response to modern slavery and ensure that we meet all legislative requirements. Representatives from all three organisations are working together to tackle this critical issue.

#### Key Actions Taken

Since the formation of the Modern Slavery Working Group, we have made significant progress:

- **Joined the Modern Slavery Risk Management Program:** We are now active members of the [Australian Catholic Anti-slavery Network](#) (ACAN). This membership allows us to participate in a process specifically designed to manage and reduce modern slavery risks.

- **Drafted Terms of Reference:** We have established clear guidelines for the working group, ensuring that everyone understands their roles and responsibilities in fighting modern slavery.
- **Published Our First Modern Slavery Statement:** Our inaugural statement, released in May 2024, outlines our commitment to combating modern slavery and details the steps we are taking to address this issue.
- **Conducted Initial Risk Assessments:** We have begun assessing the risks associated with our suppliers to identify any areas where modern slavery might be a concern. This helps us ensure that our supply chains are free from unethical practices.

The Modern Slavery Working Group will continue to identify risks, implement best practices and promote ethical standards across all our operations. By collaborating with our partners and participating in programs like ACAN, we are taking concrete steps towards a safer and more just society.

For more information and to view the statement please visit our [Modern Slavery portal page](#).

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134 Centacare staff viewed this story.

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## APPENDIX A - TIMELINE OF ACTIVITIES

2020	Joined ACAN
October 2023	Commitment from Executive of Curia to develop a Modern Slavery Statement
4th July 2024	In-person meeting with Sarah Moffatt and Kate Hopper, Program Manager, ACAN
28th November 2024	Modern Slavery Working Group Meeting
30th January 2025	Modern Slavery Working Group Meeting
6th February 2025	Modern Slavery Working Group Meeting
8th April 2025	Met with Kate Hopper, Supplier Engagement Manager, ACAN
9th May 2025	Modern Slavery Working Group Meeting
23rd May 2025	Confirmation of report - Executive of Curia









Archdiocese  
of Hobart

# 2024 MODERN SLAVERY STATEMENT

1 January 2024 – 31 December 2024

Archdiocese of Hobart  
ABN 24 097 986 470  
Catholic Diocesan Centre  
35 Tower Road, New Town, TAS 7008  
[hobart.catholic.org.au](http://hobart.catholic.org.au)

## Disclosure

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 for the respective reporting period.

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 20 June 2025. 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." The signature is written in a cursive, flowing style.

**Chris Ryan**

Executive Director, Administration & Finance  
Archdiocese of Hobart

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From Archbishop Julian Porteous – Archbishop of Hobart

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## From the Archbishop

I am pleased to endorse this fifth annual Modern Slavery Statement for the Catholic Archdiocese of Hobart. In response to the Australian Government's Modern Slavery Act 2018, the reporting period demonstrates our continued work to embed practical anti-slavery measures across our activities in Tasmania.

The victims of modern slavery come from all walks of life but most commonly from among the poorest and most vulnerable in communities around the world. Consistent with the Church's mission to sustain justice and mercy in all aspects of society, we continue to encourage governments and organisations to work toward the eradication of human poverty and acknowledgment of dignity of every human person as critical to addressing human exploitation.

In the Archdiocese of Hobart, we continue to urge all who contribute to our mission, in whatever fashion, to work together to create conditions that prevent exploitation of the vulnerable in our society, especially women and children.

Through practical action, education, advocacy, and the prayerful intercession of Saint Josephine Bakhita, may our efforts bear the necessary fruits.



**Archbishop Julian Porteous**

Archbishop of Hobart

## CRITERIA 1 & 2

# 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

**Loreto Community Housing Ltd**

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**

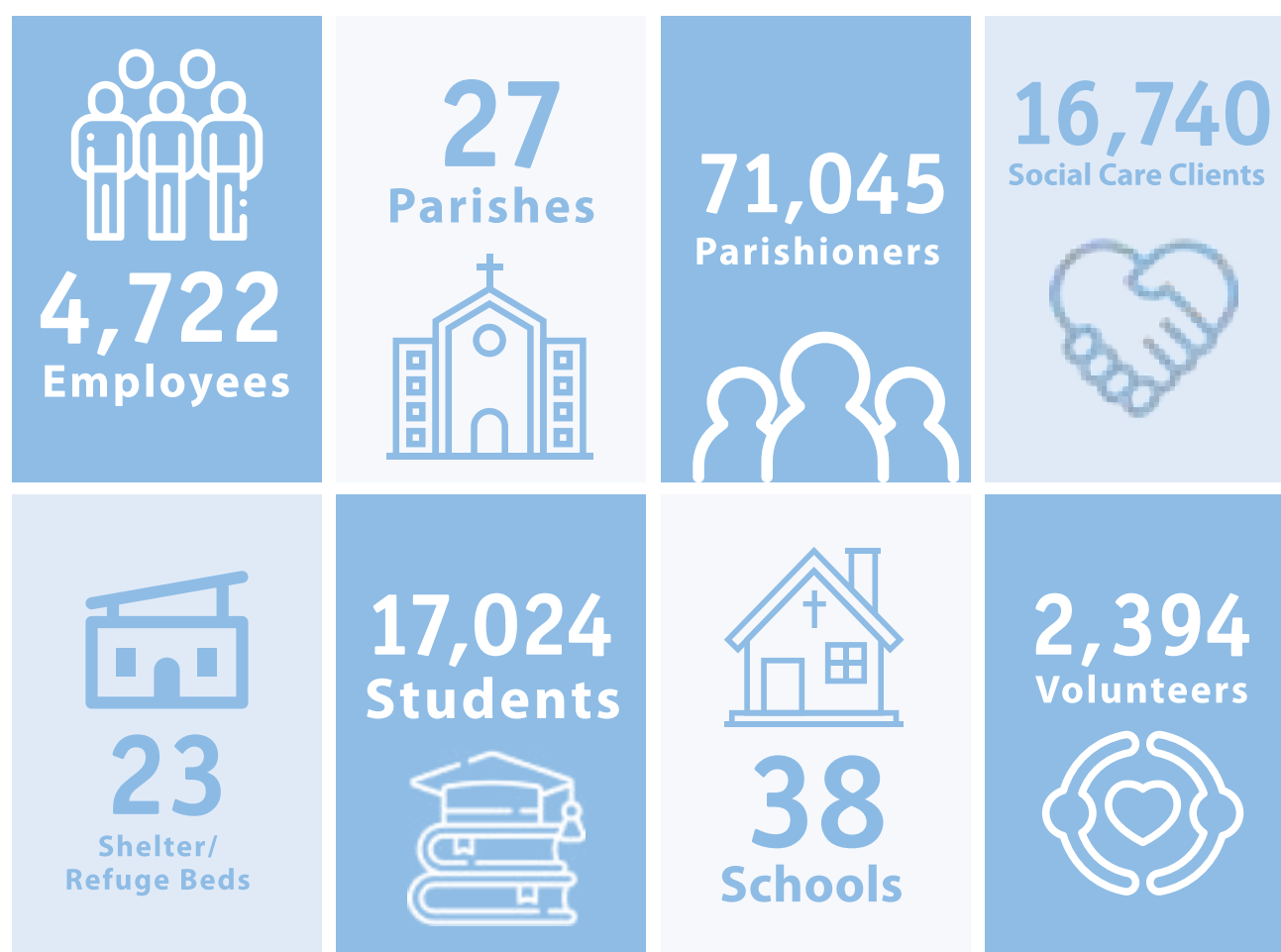
ABN 24 165 090 763

# About Us

The Catholic Archdiocese of Hobart is a Church in mission. The Diocese of Hobart was established in 1842 before being elevated to the dignity of an Archdiocese in 1888. Serving the people of Tasmania since the arrival of its pioneer priest Fr Philip Conolly in 1821, the ministry of Fr Conolly and other pioneering clergy and religious, and the first Bishop of Hobart, Robert Willson, was initially directed to helping the male and female convicts living across Tasmania.

The Archdiocese is committed to giving expression to its Catholic identity and pursuing its mission in Tasmanian society. Faithful to the teachings of the Church, which present the vision of life necessary for human flourishing, we place the person of Jesus Christ at the centre of all that we do, in a spirit of humility and service.

Guided by the principles of Catholic Social Teaching, our works and agencies embody a preferential option for the poor, and a respect for life and the dignity of the human person. Promoting a culture in our operations and supplier relationships that values respect, truthfulness, integrity, hospitality, forgiveness and justice, the ambition to eradicate modern slavery is understood as a reflection of our identity and mission.



## 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', is a body corporate constituted by act of the Tasmanian Parliament (Roman Catholic Church Property Act 1932) amended in 2005, conferring upon the Roman Catholic Archbishop of Hobart and his appointed trustees a legal identity with authority under civil law to manage the affairs of the Church in Tasmania.

The Act provides for The Trust to be the employer as appropriate, and more readily facilitate dealings with Federal and State governments with respect to contracts for services and grant obligations. The Act provides for functional agencies and operations of The Trust including:

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

Three enterprises referred to in the Governance Chart in Figure 1 although controlled by the Archdiocese are not entities of The Trust:

- Blueline Laundry Inc.
- Loreto Community Housing Ltd; 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 consultative body for The Trust for matters associated with finance and administration. It prepares an annual budget, provides counsel directly to the Archbishop on a range of issues, and where prescribed in the Church's Canon law, consents to 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.

Annual  
Revenue  
\$524M

Annual  
Procurement  
Spend  
\$268.68M

Suppliers  
2,611

# Our 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 Loreto Community 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.

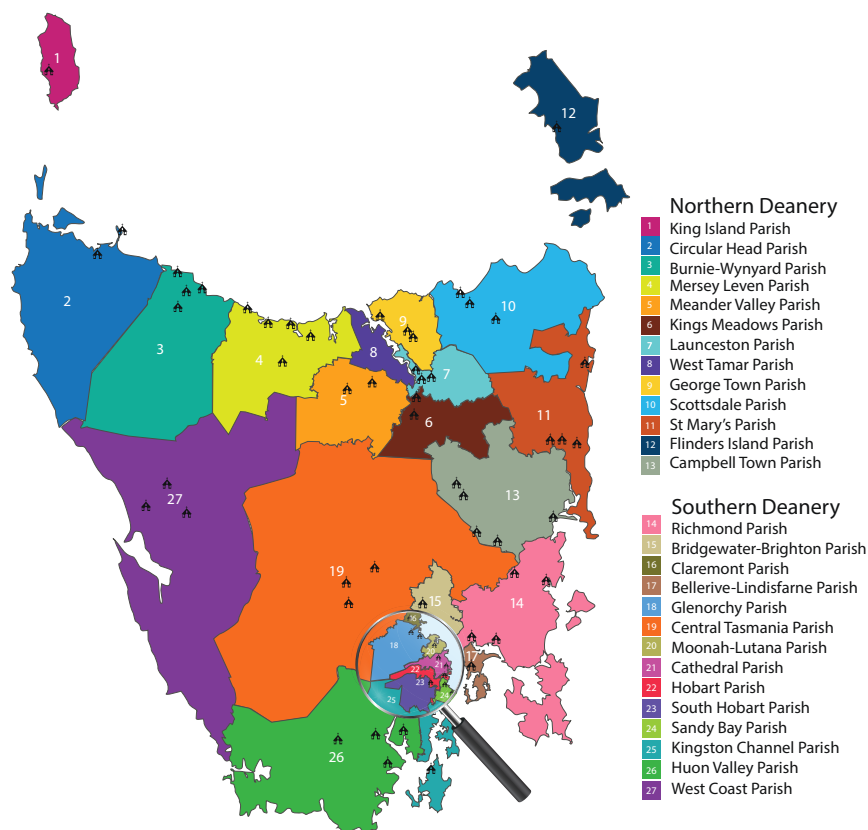
The Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) was formed in the 2019. It comprises representatives from all Archdiocesan agencies and entities and reports to the Executive Director, Administration & Finance. The Committee's role includes:

- 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 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. Parishes in general 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.

## Catholic Development Fund (CDF)

For over 60 years, the 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. With 400+ employees located across the state, they 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 professional services, building and construction and maintenance services. They have short term supply arrangements in place in the food and beverage area.

## 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 17,024 students across Tasmania. In 2024, CET had 2561 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.

## Loreto Community Housing (LCH)

Established in 2014, Loreto Community Housing operates as an entity of the Archdiocese of Hobart. As such, the overarching principles of the Archdiocese of Hobart guide the vision, purpose and values of the enterprise. 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. LCH has offices in New Norfolk and Launceston with its head office and most of its 60 employees based at Bridgewater. At the 2024 Tasmania Community Achievement Awards LCH was recognised with the Blueline Laundry Empowerment through Diversity and Inclusion Award for its Build Up Tassie team impact helping young Tasmanians overcome barriers to employment, especially in trades and apprenticeships. With its own in-house maintenance team and a significant pipeline of new social and affordable homes LCH engages nearly 30 long-term suppliers across building, construction and maintenance.



## St Joseph Affordable Homes Inc. (SJAH)

St Joseph Affordable Homes is a Catholic building and construction social enterprise with a dual purpose; to provide substantial and sustainable employment opportunities for young Tasmanians with barriers to employment, and to alleviate housing stress and homelessness. Established in July 2020, St Joseph Affordable Homes delivers an in-house apprenticeship scheme that currently employs 38 young people across a range of trades: carpentry, plumbing, painting, bricklaying and carpet laying. In addition to employment, it offers a range of coaching, mentoring and wellbeing supports to its apprentices and qualified trades in partnership with LCH's Build Up Tassie program to enable successful and fulfilling employment. It has established a supply chain involving 93 long-term suppliers for key building materials and trade services.

## Blueline Laundry Inc (BLL)

With a purpose to create meaningful employment for people of diverse abilities, cultures and backgrounds, Blueline Laundry Inc 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 285 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.



## CRITERIA 3

# Modern Slavery risks in operations and supply chains

At the heart of our mission lies a steadfast commitment to ethical conduct and the fundamental rights of every individual. As part of this commitment, we are working to confront the risks of modern slavery across our operations and supply chains.

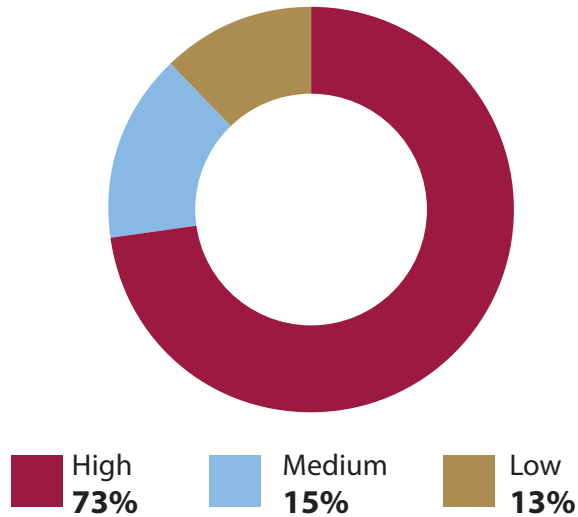
Modern slavery remains a pervasive issue in today's global economy, and we recognise our responsibility to identify, assess, and address these risks with diligence and integrity. We continue to work with our suppliers and partners to build a supply chain that upholds human rights and rejects all forms of exploitation. Guided by principles of fairness, respect, and shared humanity, we are working to implement robust frameworks to detect and mitigate these risks and foster a supply chain environment where modern slavery has no place, and where every person is valued and protected.

## 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
CDF	Professional services, insurance, financial services, office supplies and ICT services	Australia	Unknown
CET	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
CCT	Professional services, insurance, building and construction, maintenance services, office supplies, utilities, ICT services and fleet management	Australia	Unknown
LCH	Professional services, insurance, building and construction, maintenance services, office supplies, cleaning services, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
SJAH	Professional services, insurance, building and construction material, trade services, office supplies and fleet management	Australia	Unknown
BLL	Laundry chemicals, linen, utilities, uniform supplies and PPE	Australia	Europe, Pakistan

## Supply Chain Risk

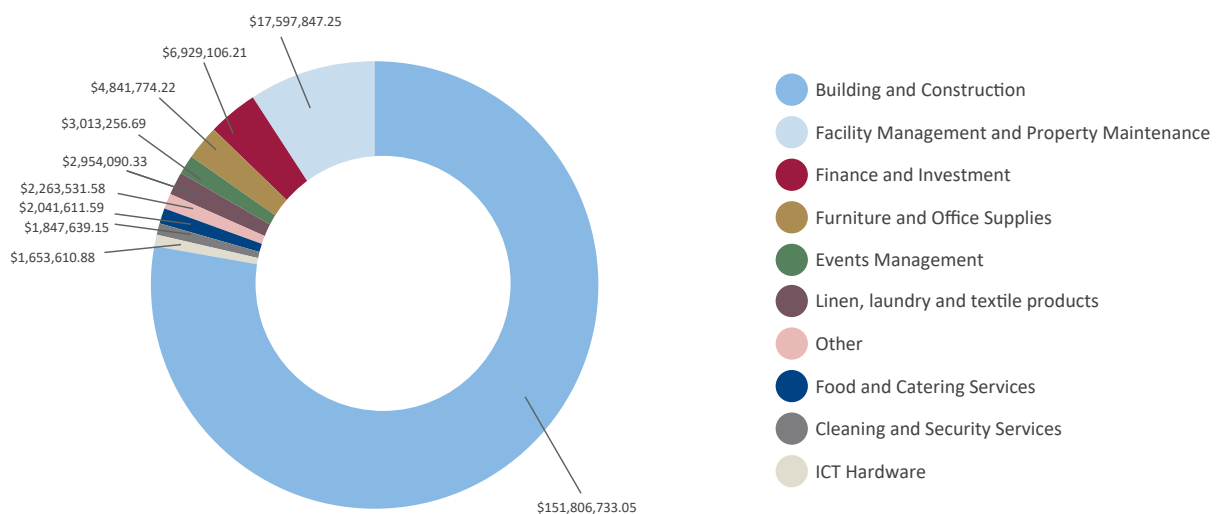


### AOH Supplier Analysis

		High	Medium	Low
	Total	Risk	Risk	Risk
<b>Spend (\$m)</b>	\$268.70	\$195.10	\$39.90	32.7
<b>Number of Suppliers</b>	2611	1494	369	836

## Our Spend Categories

The Archdiocese continues to develop its visibility and assessment of modern slavery risks in its supply chain and operations. The risk taxonomy across 23 categories of geographic location, industry/sector, commodity, product category and workforce profile developed by the Australian Catholic Anti-Slavery Network has proven a reliable tool for categorising our supply chain risk exposure in terms of high, medium and low risk. We continue to work closely with ACAN and with our contractors in the building and construction industry especially, which represent areas of greatest spend in terms of procurement.



## CRITERIA 4

### Actions taken to assess and address risk

During 2024, the Archdiocese of Hobart continued to commit time and resources to assess or address risks within its supply chain and has made some very pleasing progress. Membership of the Australian Catholic Anti-Slavery Network (ACAN) continues to be a critical aspect of our compliance program. The Archdiocese of Hobart participated in the ACAN Program for assessing and addressing the risk of modern slavery and followed the supplier engagement plan including:

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:
  - a. Suppliers already members of Sedex
  - b. Suppliers willing to join Sedex
  - c. 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 members within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement.

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. As 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 we 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. The Archdiocese of Hobart commits almost \$2M each year to the acquisition of these services. Since 2023, the Archdiocese's Blueline Laundry enterprise has extended its offerings to include cleaning services. Blueline Laundry actively employs workers with a disability or experiencing disadvantage. Blueline provides cleaning services for our Head Office and Archives building, as well as a number of our Churches and Presbyteries. As an internal service provider we have complete control over this service and look forward to continuing to grow this capacity to include cleaning services across all our agencies as practical.





# Supplier Engagement



**247** Suppliers completed the ACAN supplier preassessment survey.



**44** Suppliers invited to join Sedex.



**46** Supplier staff attended ACAN Webinars;



**53** Suppliers completed the Sedex Supplier Assessment Questionnaire (SAQ).

As the single biggest contributor to our most significant supply chain risk, St Joseph Affordable Homes leverages the building and construction environment to improve individual, family, and community wellbeing. This includes providing sustainable life skills, training, employment opportunities, and apprenticeships for young Tasmanians.

To mitigate the risk exposure SJAH requires all partners, including trade contractors and suppliers, to adhere to codes of conduct aligned with the Church's Mission, Vision, and Values, regardless of their faith, tradition, or belief system. The Archdiocese ensures suppliers are aware of our Modern Slavery obligations during the induction process with contractors signing a Period Trade Contract that includes a Modern Slavery clause, which requires them to:

- a) Not knowingly cause or contribute to modern slavery.
- b) Actively identify and eliminate modern slavery from their operations.
- c) Conduct due diligence on their suppliers and subcontractors to ensure modern slavery is not present.
- d) Comply with all applicable legislation and regulations.
- e) Adhere to State, Australian, and international anti-slavery and human trafficking laws.

We will continue engaging with contractors regarding their Tier 2 and Tier 3 suppliers in 2025 and beyond.

## Modern Slavery Prevention Policy

Our Modern Slavery Prevention Policy underscores our commitment to integrity and ethical conduct. Supported by our Anti-Slavery Guiding Principles for Suppliers, it provides clear standards for employees and stakeholders, emphasising zero tolerance for exploitation.

This policy also aids in identifying and mitigating risks. By thoroughly assessing supply chains and operations, the Archdiocese and its Agencies can proactively address areas vulnerable to modern slavery.

## Modern Slavery Risk Controls

We continue to work toward embedding 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



225 new inductees completed the MS101  
Introduction to Modern Slavery online course.

During 2024 the Archdiocese of Hobart continued its commitment to E-Learning for our employees across all agencies. The training unit rolled out on our Salt platform provided by GRC Solutions 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 dedicated to providing timely and appropriate remediation for individuals affected by modern slavery, in line with the Modern Slavery Act 2018. A documented remedy pathway is a crucial requirement of the Act.

Through the ACAN Program, Archdiocese of Hobart agencies can access expertise and independent advice from Domus 8.7. Our agencies or parishes can refer individuals impacted by modern slavery to receive support, advice, and guidance on addressing concerns.

The right to remedy is a fundamental principle of international human rights law. Providing remedy involves implementing actions and processes to investigate and redress negative impacts on individuals within business operations and supply chains, ensuring 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](https://acan.org.au/domus87)

## Action Plan 2025

For the year 2025, the Archdiocese of Hobart will undertake the following activities:

**Ongoing**

- Renew our membership of ACAN and Sedex.
- Reappoint members of the Archdiocese Modern Slavery Act Compliance Committee.
- Complete the ACAN entity profile for all agencies and enterprises
- As part of the induction of new employees ensure the completion of the updated ACAN modern slavery e-learning modules.
- Circulate the updated ACAN Modern Slavery 101 e-learning module for all staff and members of Archdiocesan boards.
- Provide modern slavery update to all Archdiocesan agency boards.

**Review**

- Review Terms of Reference for the Archdiocese Modern Slavery Act Compliance Committee.
- Consider results of the maturity assessment report
- Review and update the supplier agreement for goods and services
- Review and relaunch the Tier 1 - Modern Slavery Prevention Policy & Principles.
- Review and update the Archdiocese Risk Management Register.
- Communication and awareness strategies for staff and students of Catholic Schools.

**Commence**

- Conduct a comprehensive review of all high-risk Tier 1 suppliers across the supply chain of the Archdiocese and its agencies.
- Develop a Modern Slavery Parish kit for implementation in 2025.
- Develop a Modern Slavery School kit for implementation in 2025.
- Embed Modern Slavery Risk Controls in purchasing practices.



## CRITERIA 5

### Effectiveness

In the previous reporting period (2023) the Archdiocese of Hobart made some serious ground on increasing education and training for our employees and volunteers including Board members. In 2024 E-learning modules directed to new inductees were rolled out across most agencies with further worked to be undertaken on this front in the forward reporting period.

As our Modern Slavery Prevention program matures, we are working on developing tools and processes to identify and act on our modern slavery risks. An increased focus on our Modern Slavery response and updates are now embedded as part of Executive updates to Boards and the Diocesan Finance Council. Our Modern Slavery Response and Program are available on our intranet and website.

The forthcoming review of the Modern Slavery Act Compliance Committee membership and Terms of Reference will further consolidate its established place as a consultative committee that drives action in the areas of greatest need and risk, providing direction in relation to activities. As part of the process, consistent with our desire to embed the previously mentioned 7 Modern Slavery Risk Controls, KPIs will continue to be developed in collaboration with frontline staff engaged in the purchase of supplies and contracting of services.

### Measuring effectiveness

The baseline data tables below contain key metrics that provide a quantitative basis to evaluate actions and results, providing an objective measure of progress. Data analysis shows during the reporting period a significant increase in the number of suppliers with visible contact information and an ABN. An increase in the number of suppliers completing the ACAN supplier survey is also evident. The improved data sets are assisting the Archdiocese to better understand their risk exposure to modern slavery threats, inform changes and set future direction.

	Activity	2023 Catholic Archdiocese of Hobart	2024 Catholic Archdiocese of Hobart
Internal / Staff	New Inductees completed e-learning	0	225
	E-learning modules completed	0	675
External / Supplier Engagement	Total Number of suppliers	1027	2611
	Number of suppliers with visible contact information and ABN	0	2539
	Number of suppliers across high-risk categories	0	1494
	Number of ACAN Supplier Surveys completed	40	247
	Supplier staff attending capacity building webinars	0	46
	Invited to join Sedex	0	44
	Joined Sedex	1	42
	Sedex SAQ completed	5	53
	Social audits	5	8
	Corrective actions	1	43



## CRITERIA 6

# Consultation and Awareness Activities

### Archdiocese Modern Slavery Act Compliance Committee

The Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) was formed in the 2019. Comprises representatives from all Archdiocesan agencies and entities it provides an appropriate forum for interagency consultation and communication to inform planning and policy formation, progressing Modern Slavery Prevention initiatives, advance education and awareness initiatives to staff, boards and volunteers, and oversight efforts to educate suppliers and stakeholders on Modern Slavery Compliance.

### International Day of Prayer and Awareness Against Human Trafficking

On 8 February 2024 the Archdiocese of Hobart again marked the Feast Day of St Josephine Bakhita. Writing to clergy, staff and volunteers of the Archdiocese the Chief Financial Officer observed:

Feast Day of St Josephine Bakhita - 8 February

Cody Burdon  
To: AOHTAS Users

Reply Reply All Forward

Thu 8/2/2024 5:41 AM

*Today, 8 February, is the Feast Day of St Josephine Bakhita, patron saint of victims of human trafficking and modern slavery.*

*Across Australia, Catholic organisations pray and reflect on actions they can take to end modern slavery and bring awareness to the International Day of Prayer and Awareness Against Human Trafficking.*


*Modern Slavery - including human trafficking, forced labour and forced marriage are abhorrent crimes that involve the exploitation of the most vulnerable in our communities. These women, men and children are being deprived of their freedom and their rights, and through awareness activities and training, we are attempting to bring a voice to those who have felt trapped or helpless. In Australia, just last month, a QLD man was charged with torture and slavery offences (news report link provided), and late last year, a Melbourne doctor was found guilty of forced labour at a confectionary shop (news report link provided).*

*I encourage you to read the attached prayer for victims of modern slavery and human trafficking, and if you hold any meetings today, encourage the group to join in reading it together.*

*May we pray that the Church will continue to defend and free victims of human trafficking and be a source of love, hope and faith to bring the vulnerable and enslaved to find healing for their wounds.*

SAINT JOSEPHINE BAKHITA 1869-1947

PATRON SAINT OF SOUTH SUDAN AND SUDAN



PATRON SAINT OF VICTIMS OF MODERN SLAVERY AND HUMAN TRAFFICKING

8TH FEBRUARY

XX

PRAYER FOR VICTIMS OF MODERN SLAVERY AND HUMAN TRAFFICKING

*We 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.

*We pray* that St Josephine Bakhita, sold into slavery as a child, intercedes with God for those trapped in a state of slavery, so that they will be released from the shackles of captivity.


*We pray* for all those who are dedicated to eradicating modern slavery and human trafficking that they will have the courage and strength to reach out and overcome challenges.

*We pray* that by our actions as consumers we always reject as gravely wrong any goods or services tainted with slavery.

*We pray* for our governments that their laws will protect victims of human trafficking and reject goods and services from sources associated with slavery and forced labour.

*We pray* that the Church will continue to defend and free victims of human trafficking and be a source of love, hope and faith to bring the vulnerable and enslaved to find healing for their wounds. Amen.

*St Josephine Bakhita, Patron Saint of Slavery Victims, Pray for Us.*



acan.org.au

## Anti-Poverty Week 2024

The victims of modern slavery come from all walks of life but most commonly from among the poorest and most vulnerable in communities around the world. Consistent with the Church's efforts to encourage governments and organisations to work toward the eradication of human poverty and acknowledgment of dignity of every human person as critical to addressing human exploitation CatholicCare sponsored Anti-Poverty Week events including supporting an eye-opening event featuring video interviews of community members impacted by low income, the rising cost of living, and homelessness. The event included a panel of support workers as they discuss the challenges they face and participate in an audience discussion and a special screening of the feature film *Rosie*, a powerful story of a family's struggle to find a home after losing theirs.



## Celebrating Volunteers and Bicultural Workers

CatholicCare Multicultural Programs celebrated the remarkable contributions of our dedicated Volunteers and Bicultural Workers. These teams play an essential role in empowering individuals and families from migrant and refugee backgrounds, helping them develop new skills and independence to confidently settle in Tasmania.

The 2024 celebration was bittersweet as we bid farewell to some special volunteers, some who have been volunteering with us for almost 20 years. Their contributions have sown seeds of growth, connection, and empowerment within our community. They were thanked for their unwavering dedication, passion and kindness which will have a lasting impact on our team, participants, and the wider community.



## CRITERIA 7

### Other

#### **CatholicCare Tasmania (CCT) Multicultural Programs**

CatholicCare Tasmania offers various multicultural programs and services aimed at supporting individuals from diverse backgrounds and helping them integrate into the Tasmanian community. Our client cohort 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.

Our programs focus on providing assistance with settlement, employment, and social inclusion, and are delivered in partnership with other organizations. Specifically, CatholicCare's multicultural programs include:

- **Multicultural Service Programs (MSP):**

MSP provides support to individuals from multicultural backgrounds to help them feel a sense of belonging and participate confidently in society. This includes support for various visa holders such as humanitarian entrants and those on temporary protection visas.

- **Multicultural Employment Services:**

This program offers tailored support to help new arrivals from multicultural backgrounds overcome barriers to employment, education, or training. CatholicCare Tasmania provides assistance with job searching, resume writing, interview preparation, and pathways to further education and training.

- **Settlement Engagement and Transition Support (SETS):**

SETS is a program that supports refugees and migrants in their settlement journey.

- **Multicultural Start-Ups Market:**

This initiative supports people from multicultural backgrounds in launching their own small businesses, like the recent market featuring Eritrean and Middle Eastern cuisine.

- **Support for entrepreneurs:**

CatholicCare also provides support to entrepreneurs from multicultural backgrounds to help them navigate regulations and realize their business dreams.

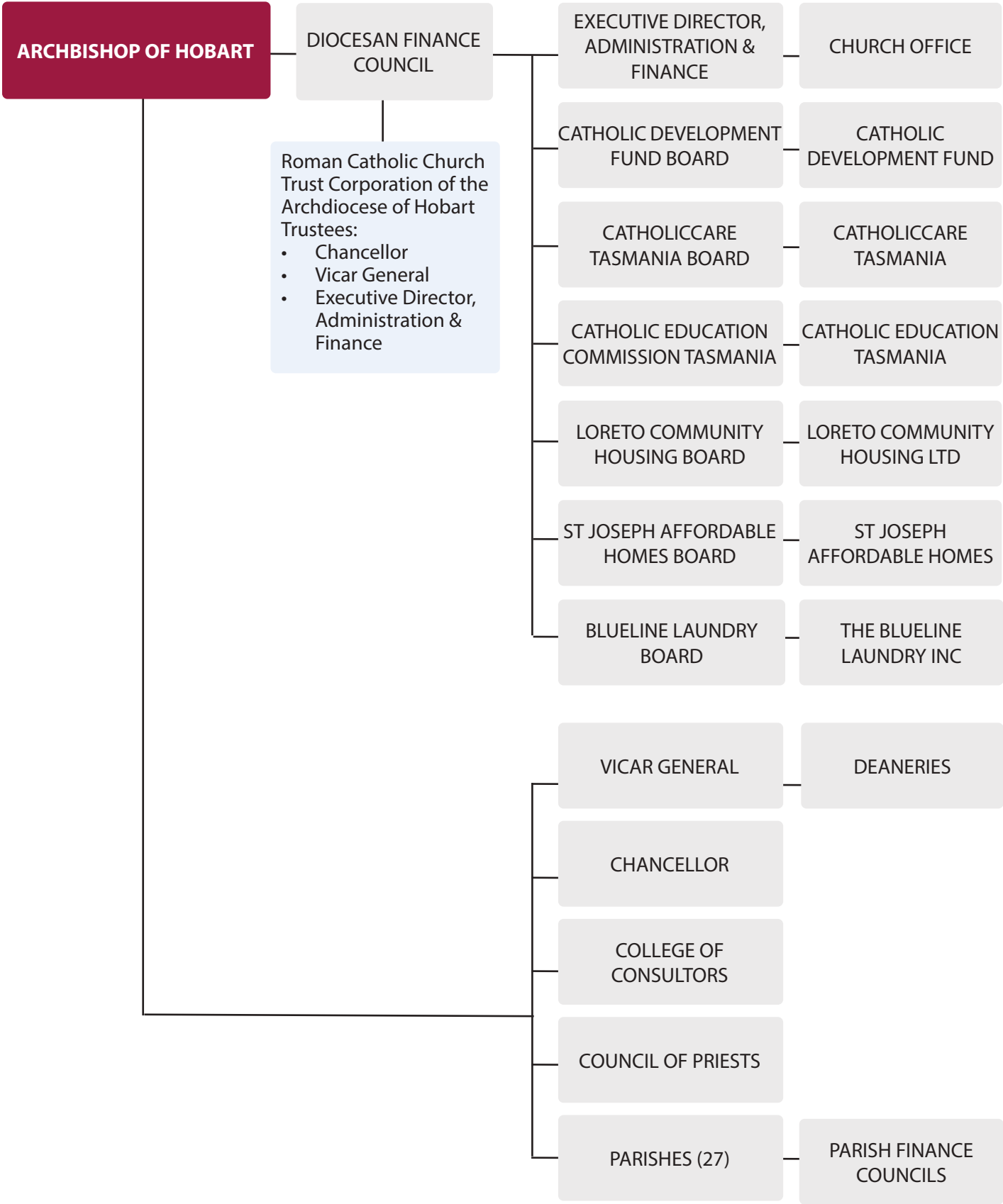
These programs are designed to be inclusive and to foster a sense of community for people from all backgrounds. They also emphasise the importance of community support and collaboration in helping individuals thrive in their new environment. CatholicCare remain active and engaged in this area in relation to their clients and raising awareness. In the reporting period 235 clients were assisted with job applications, 67 supported for job interviews, 85 commenced employment and 7 were supported to start their own business.

#### **Blueline Laundry**

In addition to supporting the 35% of our staff who are working with disabilities, a further 35% of our employees are culturally and linguistically diverse, mostly migrants with refugee history. This diverse workforce is considered our most valuable asset. People with a disability work alongside and learn from people without disabilities, and every member plays a vital and valued role in delivering our high-quality laundry and cleaning services.

Annexure A

Governance Chart









# Archdiocese of Hobart

**For further information**

Archdiocese of Hobart  
35 Tower Road, New Town, TAS 7008  
Ph: (03) 6208 6222  
[www.hobart.catholic.org.au](http://www.hobart.catholic.org.au)

icons: freepik, flaticon, slameticon







# **Catholic Education Canberra Goulburn**

## **Modern Slavery Statement 2024**

ABN: 478 2412 7996

55 Franklin Street Manuka ACT 2603

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

[mslo@cg.catholic.edu.au](mailto:mslo@cg.catholic.edu.au)

*Disclosure: This statement has been produced on behalf of Catholic Education 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. Effective 1 January 2025, CECG was incorporated as Catholic Archdiocese of Canberra and Goulburn Education Ltd (ABN: 60 675 797 734). The following statement has been endorsed by the newly established entity and governing body. All disclosures contained herein pertain to the governance framework in effect as of 2024.*

## Approval

This Modern Slavery Statement was approved by the principal governing body of the Catholic Archdiocese of Canberra and Goulburn Education Ltd as defined by the Act on 1 May 2025. This Modern Slavery Statement is signed by a responsible member of the Catholic Archdiocese of Canberra and Goulburn Education as defined by the Act.



Patrick McArdie  
Chair

Catholic Archdiocese of Canberra & Goulburn Education Limited  
15 May 2025



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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 9 Catholic Early Learning Centres in the Archdiocese:

### ACT

- 24 Primary Schools
- 5 Secondary Colleges
- 9 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 4,165 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."*

\*22,253 Students as of Nov 2024. Staff count as at Oct 2024

## 2024 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 made significant strides in further centralising goods and services across all schools, focusing particularly on high-risk categories. Key initiatives include the establishment of service panels for Cleaners, Security Services, and Office Supplies. These panels have undergone a comprehensive and rigorous screening process, ensuring overarching assurance in the following areas:

- Payment accuracy
- Compliance with award wage mechanisms
- Validation of contractual terms and conditions
- Supplier reporting obligations
- Verification of worker visas on demand
- Confirmation of 'rights to work' documentation
- Payslip audits

As part of this assurance process, CECG terminated one cleaning supplier who failed to provide evidence of adequate payment to its staff. This centralisation effort has provided CECG with enhanced oversight and strengthened assurance over its suppliers, significantly mitigating the risks of modern slavery within its supply chains.

A standout achievement has been the inclusion of revised contractual terms, which enable CECG to conduct payment and wage audits at any time. With these strengthened measures, CECG is confident that continued centralisation of goods and services will substantially reduce the risks associated with modern slavery in its supply chains.

## Our Plans for 2025 and Beyond

Building on the significant progress made in 2024, CECG is committed to expanding its efforts to eliminate the risk of modern slavery across its supply chains in 2025 and beyond. Our upcoming initiatives focus on strengthening oversight, refining supplier engagement, and addressing risk within high-priority categories.

Key planned initiatives include:

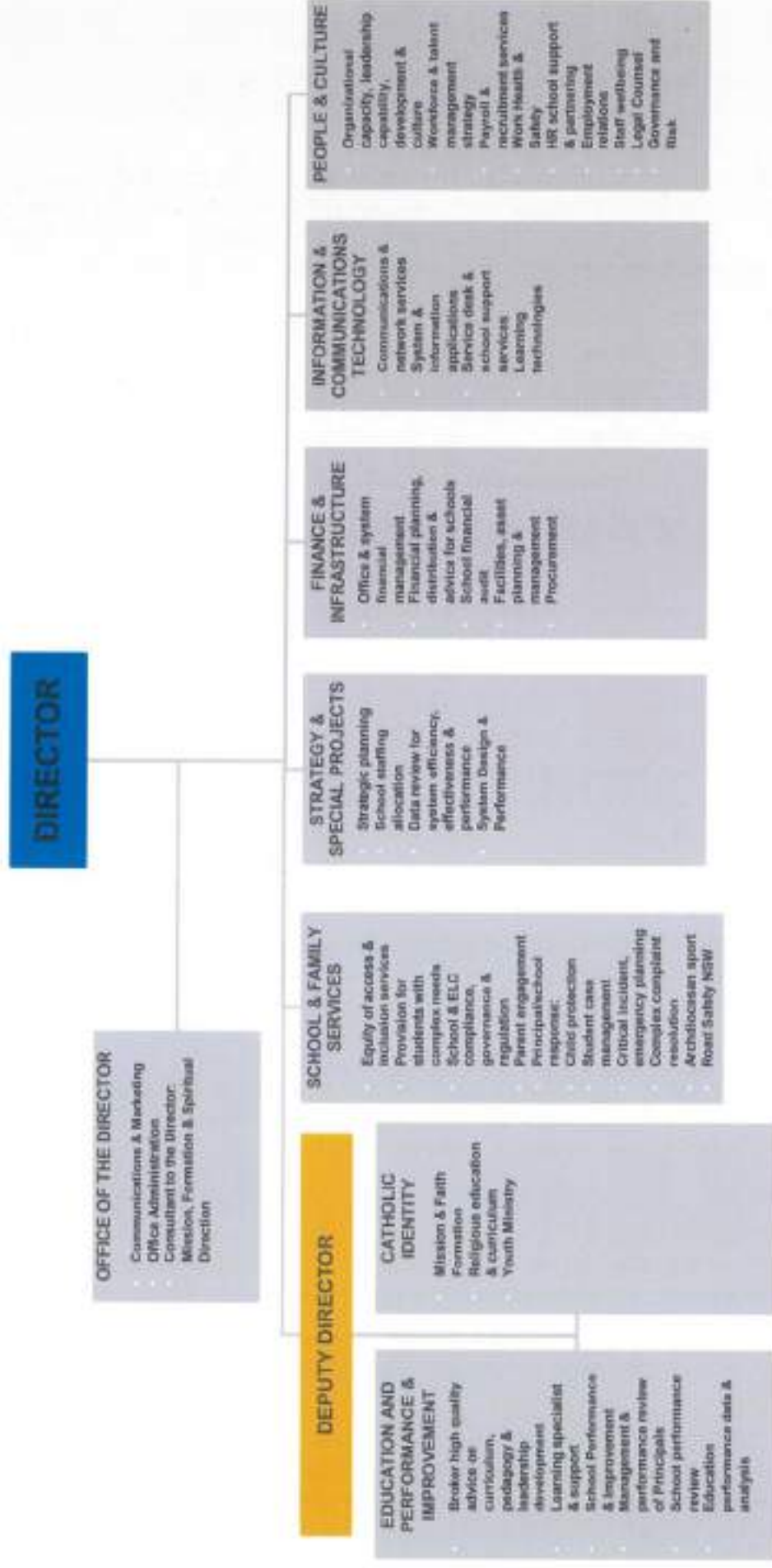
- **Recruitment Services:** Establishing a preferred supplier panel for recruitment services, underpinned by enhanced contractual terms to ensure compliance with right-to-work documentation and other ethical recruitment practices.
- **Travel:** Transitioning to a single portal for booking travel services, with potential to minimise risks by increasing transparency and oversight in this category.
- **Furniture Centralisation:** Streamlining procurement for school and office furniture supplies under a centralised model to enhance accountability and reduce risk exposure.
- **Facilities Spend Review:** Conducting a thorough review of expenditures in high-risk categories within the facilities management space such as maintenance activities, school refurbishment and construction.

CECG's aspirational goal is to eliminate all risks of modern slavery from its service providers and suppliers, addressing even the most complex multi-layered supply chains across the diverse industries we engage with to deliver educational services. This vision underpins our ongoing commitment to ethical practices and social responsibility, ensuring that the communities we serve are supported by a framework of equity and human dignity.



# Catholic Education Canberra Goulburn

## Organisational Overview



## Our Workforce Profile

4,165

Total headcount including casual employees.

2,595

FTE excluding casuals

Workforce cohort	FTE	Headcount
CEO		
CEO	178	184
Casual	-	10
Board		7
ACT SCHOOLS		
Teacher	1088	1205
Learning Support	197	324
Other	175	203
Casual Teacher	-	221
NSW SCHOOLS		
Teacher	628	715
Learning Support	128	223
Other	87	123
Casual Teacher	-	214
EARLY LEARNING CENTRES (ELC)		
ELCs	114	132
ELC Casual	-	117
CECG SYSTEM		
General Casual system wide	-	382
<b>TOTAL</b>	<b>2,595</b>	<b>4,111</b>

\*Data as at Oct 2024



## 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

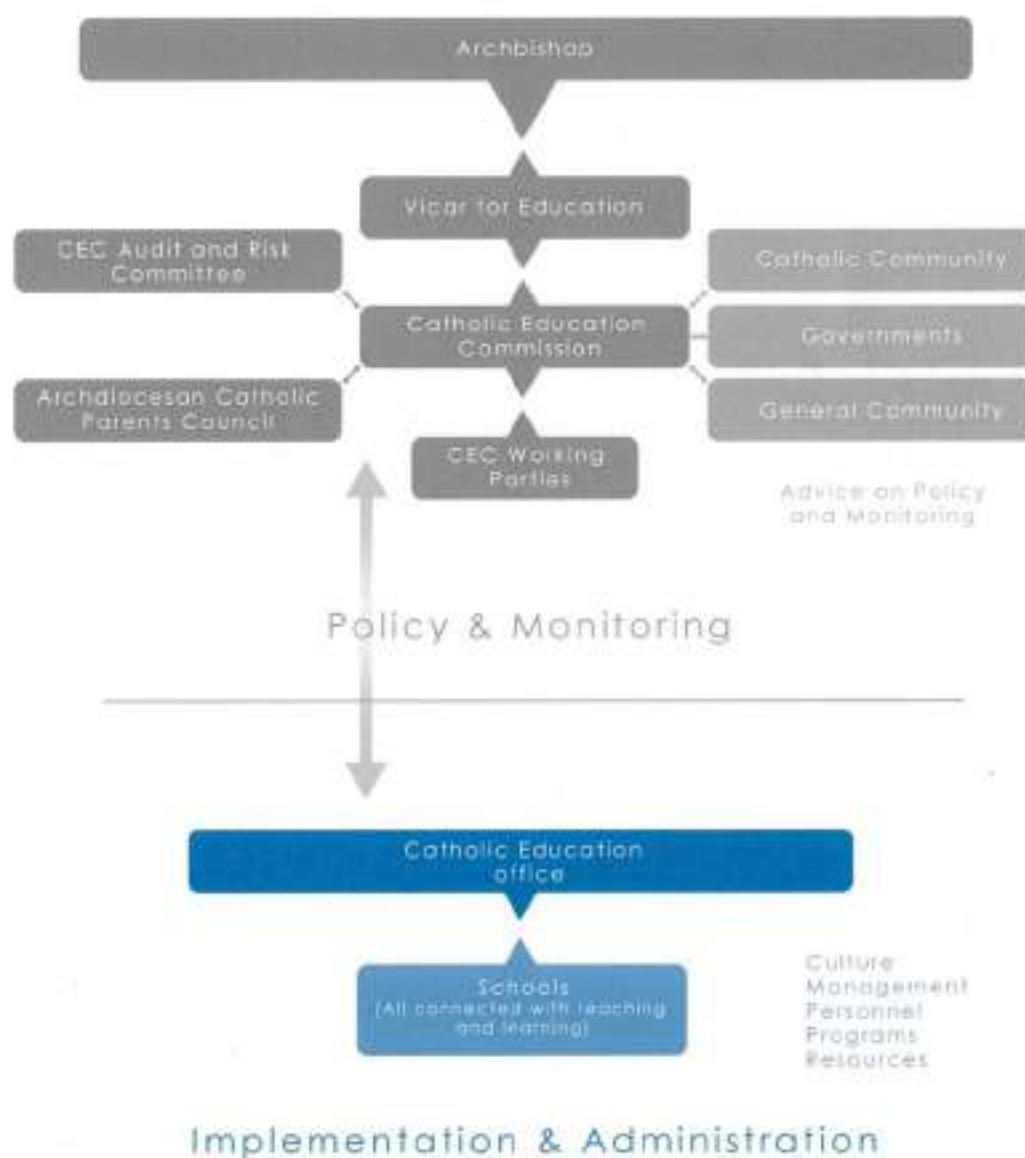
Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG) was formally launched on the 21 February 2014. CSPACG is the peak body representing the interests of all Catholic school parents in the Archdiocese of Canberra and Goulburn and is the largest non-government school parent body in the 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 9 Early Learning Centres supported by 4,165 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 5712 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) which are being moved centrally over time.

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 additional categories that may benefit through increased coordination. Some examples include those outlined on page 5 of this statement.

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 2024 CECG has expanded significantly dedicated procurement resources who will assist in the streamlining of supply chain risks and actively involved in CECG's Modern Slavery Working Group.

22,255 Students as at Nov 2024  
Staff count as at Oct 2024  
Supplier count as at Nov 2024



## 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
- Furniture & Office Supplies
- Labour Hire
- Waste Management
- ICT Software and Network Services
- Finance & Investment
- Linen, Laundry, & textile products
- Cleaning & Security Services
- Facility Management & Maintenance
- Food & Catering Services
- ICT Hardware
- Uniforms & PPE
- Printing / Mail Services
- Medical devices and supplies
- Transport, Logistics and warehousing

The areas of risk noted above have been assessed against percentage of annual spend and respective Modern Slavery potential risk exposure. In 2024, CECG has continued focus on engaging our suppliers of elevated risk such as cleaners, office suppliers and security services.

The category risk taxonomy has been specifically developed for ACAN based entities based on analysis of participating entity supplier datasets. It includes 16 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
<b>CECG Supplier Spend</b>	<b>\$328.1M</b>	<b>\$173M</b>	<b>\$155.1M</b>
<b>Number of Suppliers</b>	<b>5712</b>	<b>1412</b>	<b>4300</b>

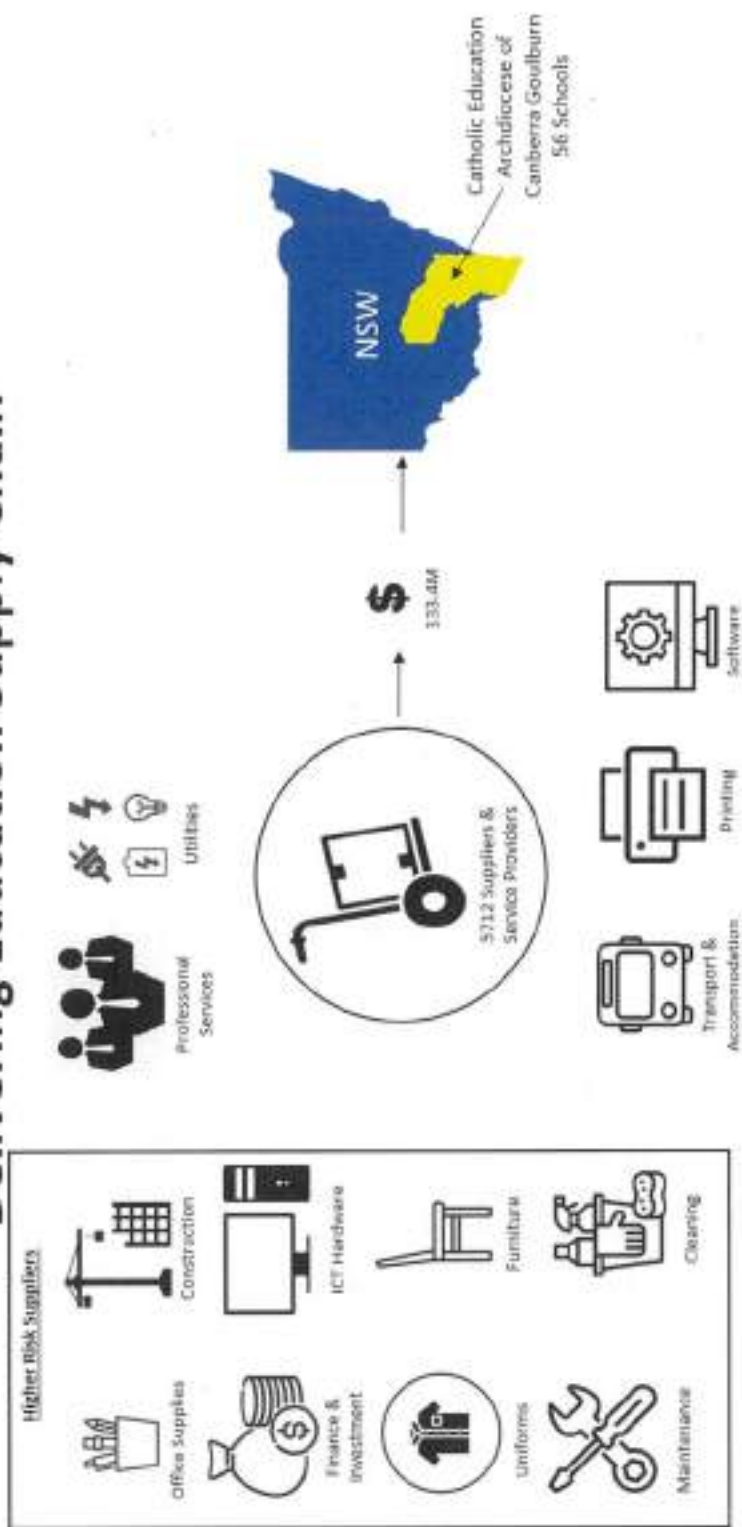
Percentage of spend in high-risk categories:

Category	Spend Description	% of Expenditure
<b>Building and construction</b>	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	<b>48.8%</b>
<b>Cleaning and security services</b>	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	<b>3.9%</b>
<b>Clothing Uniforms and PPE</b>	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	<b>&lt; 1%</b>
<b>Facility management and property maintenance</b>	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	<b>7.8%</b>
<b>Furniture and office supplies</b>	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	<b>6.1%</b>
<b>Food &amp; Catering Services</b>	Sub-contracting and labour hire services	<b>1.6%</b>
<b>ICT</b>	<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>	<b>9.5%</b>
<b>Labour Hire</b>	Outsourcing of workers through third-party agencies, which can create risks of exploitation, forced labour, and deceptive recruitment practices	<b>2%</b>
<b>Recruitment &amp; Labour Hire</b>	Wide range of traditional low-skilled / low paid work	<b>&lt;1%</b>
<b>Waste management services</b>	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	<b>&lt; 1%</b>
<b>Finance &amp; Investment</b>	Funds are allocated to entities or projects that fail to conduct adequate due diligence on supply chains, potentially enabling or indirectly supporting exploitative labour practices.	<b>17.3</b>

\*Data as at Dec 2021



# Delivering Education Supply Chain



## 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 8 times in 2024 and had 5 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 now contain enhanced Modern Slavery clauses*

In 2024, new contract Modern Slavery clauses now include that at CECG's discretion, the supplier will permit auditors to undertake independent audits of supplier payments to employees and workers employment conditions information.

CECG executed its right under this clause which resulted in the termination of an agreement with a service provider.

In 2024, CECG signed 220 new agreements of which all contain CECG's newly enhanced 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. *Centralisation of goods and services*

Significant work was undertaken by CECG's procurement division to centralise high risk goods and services across our 56 schools and head office. These included:

- 3.1 Cleaning Services: Cleaning services are widely recognised as a sector with an elevated risk of modern slavery. In response, CECG implemented a comprehensive request for tender program to rigorously assess both existing and prospective cleaning service providers. This process resulted in the establishment of an authorised panel of vetted providers, each required to meet stringent compliance and due diligence criteria. To be

included on the panel, providers must demonstrate and maintain adherence to a robust verification framework, including:

- Compliance with award wage mechanisms
- Validation of contractual terms and conditions
- Submission of regular reports detailing obligations to employees and contractors
- Verification of workers' visas upon panel entry, with ongoing validation as required
- Confirmation of 'right to work' documentation
- A contractual provision granting CECG the right to conduct payslip audits and independently substantiate employee remuneration.

This rigorous procurement and monitoring process enhances transparency and accountability within the cleaning services supply chain, significantly reducing the risk of modern slavery. By embedding stringent compliance measures and proactive oversight, CECG strengthens its commitment to ethical labour practices and reinforces protections for vulnerable workers.

3.2 Office Supplies: The delivery of education to over 22,000 students, supported by more than 4,000 staff, necessitates substantial procurement of stationery and office supplies, amounting to several hundred thousand dollars annually. An internal review identified that many schools had been sourcing supplies from exceptionally low-cost offshore online suppliers, where verification of supply chain integrity was either unknown or exceedingly difficult. This posed a significant risk in terms of ethical sourcing and potential exposure to modern slavery.

In response, CECG's procurement team conducted an extensive process to identify a reputable and verifiable office supplies provider with full transparency over its multi-tier supply chain. The successful supplier demonstrated robust processes to mitigate modern slavery risks, including:

- An annual supplier audit program assessing its suppliers' sustainability and ethical sourcing commitments;
- A mandatory Ethical Sourcing Questionnaire for all suppliers, requiring documentation on business operations' impact on modern slavery, including factory working conditions; and
- Comprehensive reporting mechanisms to ensure continued transparency and accountability.

While the transition to the new office supplies provider has resulted in a modest cost increase, the documented evidence and assurances provided have strengthened CECG's confidence that modern slavery risks are being effectively monitored and mitigated. This initiative underscores CECG's commitment to ethical procurement and reinforces its responsibility to ensure that essential resources for education are sourced in a socially responsible manner.

3.3 Security Services: Similar to cleaning services, CECG has centralised security services across its 56 schools and head office to ensure greater oversight and compliance with ethical labour standards. The security sector is widely recognised as carrying an elevated risk of modern slavery, particularly in relation to subcontracting practices, worker exploitation, and non-compliance with fair wage provisions. In response, CECG implemented a rigorous procurement and vetting process to establish an authorised panel of security providers who meet strict ethical and operational standards as highlighted in section 3.1.



#### 4. 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 2024, CECG made inroads with supplier engagement, summarised:

- 295 suppliers shared information via the ACAN supplier survey.
- 61 suppliers were invited to join SEDEX.
- 64 joined SEDEX.
- 69 suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- 20 non-conformances identified
- 28 suppliers participated in ACAN modern slavery capacity building webinars:



295 ACAN Supplier  
Surveys completed



28 suppliers attending capacity  
building webinars



64 new SEDEX  
applications

## 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.



## Criteria 5: 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 604 suppliers where the completion of the SEDEX SAQ would support managing modern slavery risk in their own operations and supply chains.

	ACTIVITY	2023 Catholic Education Canberra Goulburn	2024 Catholic Education Canberra Goulburn	Notes
INTERNAL / STAFF	Hours spent on modern slavery activities	19	136	Hours spent on modern slavery activities
	Individual staff completed e-learning	8	8	Individual staff completed e-learning
	E-learning modules completed	8	8	E-learning modules completed
	Total number of suppliers	5334	5506	Number of suppliers
	Number of suppliers with visible contact information and ABN	2617	5126	Number of suppliers with visible contact information and ABN
EXTERNAL / SUPPLIER ENGAGEMENT	Number of suppliers across high-risk categories	2	591	Number of suppliers across high-risk categories
	Number of ACAN Supplier Surveys completed	-	694	Number of ACAN Supplier Surveys completed (cumulative)
	Supplier staff attending capacity building webinars	1	30	Number of Supplier staff attending capacity building webinars
	Invited to join Sedex	-	56	Number of suppliers invited to join Sedex (cumulative)
	Joined Sedex	0	74	Number of suppliers that joined Sedex (cumulative)
	Sedex SAQ completed	-	79	Number of Sites with Sedex SAQ completed (cumulative)
	Social audits	1	4	Number of social audits completed in 2024
DOWNS & EXTERNAL REFERRALS	Corrective actions	0	25	Number of non-conformances in 2024
	Contacts made via worker voice / grievance mechanism	0	0	Contacts made via worker voice / grievance mechanism
	Referrals for advice and assistance	0	1	Referrals for advice and assistance
	Individuals identified or referred for modern slavery assessment	0	0	Individuals identified or referred for modern slavery assessment
	Individuals with modern slavery cases remediated	0	0	Individuals with modern slavery cases remediated

In 2023 ACAN created an updated assessment utilised by CECG which has continued through to the 2024 statement. This assessment introduced 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.

CECG made gains in the areas of Business process and governance, operations, supply chains and grievance mechanisms. Areas where setbacks were identified included worker engagement. Overarching staff awareness of Modern Slavery will be a greater focus for 2025. There has been an overall maturity score improvement of 2% since last year.

## Maturity Assessment 2024

### Catholic Education Diocese of Canberra Goulburn - Overview



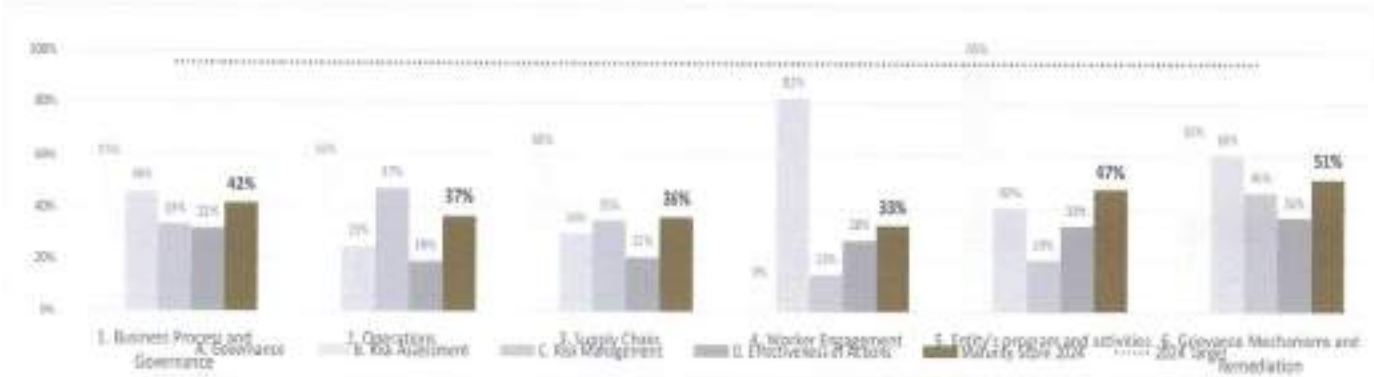
### Catholic Education Diocese of Canberra Goulburn - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024
1. Business Process and Governance	55%	46%	33%	32%	42%
2. Operations	56%	25%	47%	19%	37%
3. Supply Chain	60%	30%	35%	21%	36%
4. Worker Engagement	9%	82%	15%	28%	33%
5. Entity's program and activities	95%	40%	20%	33%	47%
6. Grievance Mechanisms and Remediation	63%	60%	46%	36%	51%
Average	56%	47%	33%	28%	41%

Maturity Score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score:



Maturity Score 2023 coparitive to target and maximum scoring by 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 2025 (extended from 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 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the ACAN Program activities

Catholic Education Diocese of Canberra Goulburn - 2024 Assessment by Sub-Pillar



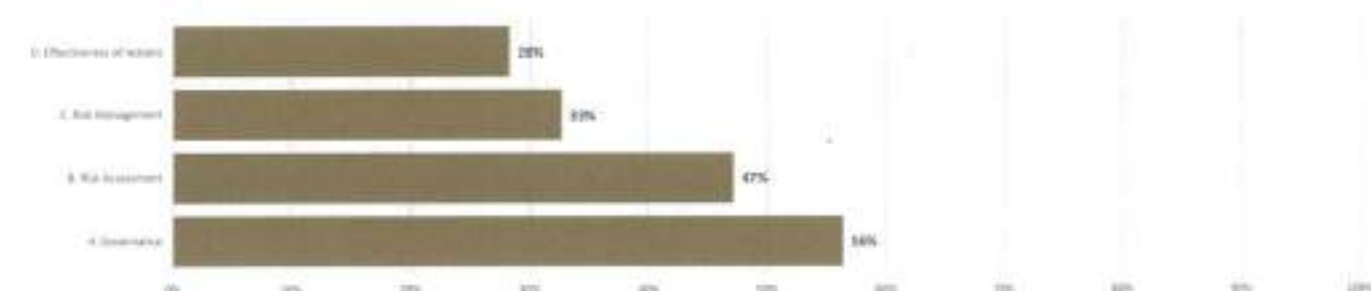




#### D. Effectiveness of Actions:

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: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description



Maturity Score 2023: Comparative analysis of 2023 performance by sub-pillar

**Notes:**

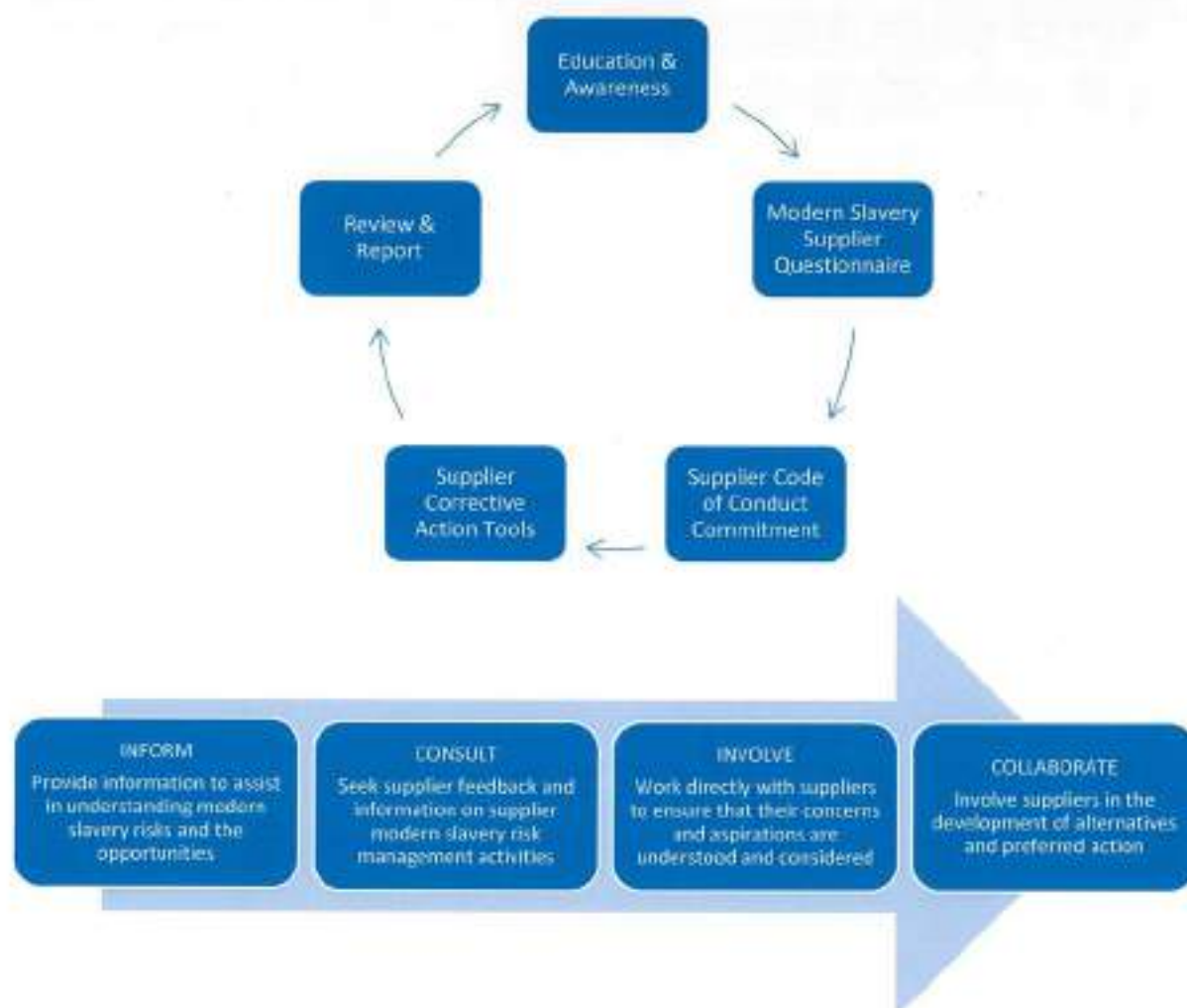
- Participation in Dorus 8.7 Remediation Services was incorporated into scoring of pillar 6, Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Dorus 8.7 Remediation 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

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 2025 we will continue to execute the plan to all high-risk suppliers.

### SUPPLIER ENGAGEMENT ACTION PLAN



### 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.



**CATHOLIC EDUCATION**  
Archdiocese of Canberra & Goulburn

[cg.catholic.edu.au](http://cg.catholic.edu.au)







CATHOLIC EDUCATION  
WESTERN AUSTRALIA



# Modern Slavery Statement

1 January – 31 December 2024



Catholic Education Western Australia Limited





## 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 Catholic Education Western Australia Limited. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers Catholic Education Western Australia Limited as a single reporting entity.

Cover photo: St Mary MacKillop College  
(Busselton), Our Lady of the Cape Primary  
School (Dunsborough) and St Thomas More  
Catholic Primary School (Margaret River)  
Left/right: St Patrick's Primary School (Fremantle)

CEWA Office:  
50 Ruislip Street  
West Leederville WA 6007

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# Leadership Message

## Approval and Signature

### Eva Skira AM

*Chair, Catholic Education  
Commission of Western  
Australia*



As Chair of the Catholic Education Commission of Western Australia, I am pleased to present this updated Modern Slavery Statement. At Catholic Education Western Australia Ltd we are deeply committed to operating with the highest standards of integrity, transparency, and accountability. Modern slavery, which encompasses practices such as human trafficking, forced labour, and exploitation, is a grave violation of human rights, and we recognise the significant responsibility we bear in ensuring that our operations, supply chains, and business relationships do not contribute to such practices.

This statement outlines the steps we have taken, and continue to take, as a system to prevent and address modern slavery. It reflects our ongoing efforts to ensure that every action we take is aligned with our Catholic values of respect, dignity, and fairness. We believe in creating a positive, ethical environment for all those with whom we interact, whether they are our employees, suppliers, or customers.

CEWA has developed robust policies and systems designed to identify, prevent, and respond to any risks related to modern slavery. We continue to commit ourselves to ensuring our governance, procurement, investment and other practices are cognisant of the shame of modern slavery.

I encourage everyone to consider what personal contribution they can make to prevent modern slavery; the practice of ethical decision making in commercial and private pursuits is a critical way forward in ensuring long-lasting and positive change.

I would like to extend my gratitude to our employees, partners, and stakeholders for their commitment to this important cause. Particularly to those leaders and employees who have been directly involved in the preparation of this updated statement. Together we will continue working towards a future where modern slavery has no place in any aspect of our operations.

On behalf of the Catholic Education Commission of Western Australia, I commend this statement and welcome your participation in this ongoing process.

### Eva Skira AM

*Chair*

*Catholic Education Commission of Western Australia*

*This Modern Slavery Statement was approved by the principal governing body of Catholic Education Western Australia as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 2 May 2025. This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.*



# Leadership Message

## Approval and Signature

### Wayne Bull

*Executive Director,  
Catholic Education  
Western Australia Limited*



I am privileged to be able to present Catholic Education WA's updated Modern Slavery Statement.

As a community grounded in the teachings of Christ and guided by the principles of justice, dignity, and solidarity, we recognise the profound moral imperative to confront and prevent the evils of modern slavery in all its forms. CEWA's Modern Slavery Statement is a further step in our ongoing commitment to protecting the most vulnerable members of society and ensuring that their human dignity is upheld in every aspect of our work and beyond.

This new statement builds upon the work our community of Catholic schools and offices have undertaken to deepen our understanding of modern slavery, and to identify and prevent its root causes. In the last twelve months there has been particular focus on preparing for the rollout of CEWA's new procurement system, Zycus. Once implemented this system will allow for identification of high-risk categories and better equip CEWA to develop strategies to mitigate supplier risks.

The Church has long taught that every human person is made in the image and likeness of God, deserving of respect, freedom, and the opportunity to flourish. Modern slavery, whether through forced labour, human trafficking, or any form of exploitation, violates this sacred truth. It strips individuals of their God-given dignity and perpetuates a cycle of suffering that we, as followers of Christ, are called to dismantle.

In reflecting on this issue, we draw inspiration from the words of Pope Francis, who has consistently spoken out against the scourge of modern slavery, urging us to build a culture of encounter, solidarity, and mercy. In his message for the World Day of Peace, he reminded us, *"No one can be saved alone. We must learn to live as one family."*

It is within this spirit that we commit to ensuring that our practices are free from the stain of exploitation and that we stand in solidarity with those whose voices have been silenced. Since launching the first Modern Slavery report in 2021, CEWA has worked with groups such as Caritas Australia and Catholic Mission to grow our collective understanding of Modern Slavery and to identify and eliminate its root causes.

As we take another step together on our journey of understanding and tackling the scourge of modern slavery, I encourage you all to promote best practice and live out Catholic values in support of vulnerable members of our society.

### Wayne Bull

*Executive Director  
Catholic Education Western Australia Limited*



# 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 all students with Christ-centred, child-focused learning environment, to empower young people to actively live the Gospel and to become responsible 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 16.6% of the State's total school-age population, including 19% of all secondary students. In 2024, almost 82,000 students were enrolled in 162 Catholic schools across Western Australia, including Catholic schools with governing bodies other than CEWA.

CEWA provides employment for more than 12,000 staff, making it a significant contributor to the Western Australian economy.

In 2024, the Catholic Education Commission of Western Australia (CECWA) launched the [Strategic Initiatives 2030](#), which focus on providing effective faith formation (Formation for Mission), ensuring all CEWA does is of the highest quality (Excellence for Success), elevating our Catholic Story (Witness for Impact), and providing more students with a Catholic education (Growth for Access).

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 young people 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: Mel Maria Catholic Primary School (Attadale / Myaree)





# Criterion 2

## Our Structure, Operations and Supply Chains

### Our Organisational Structure

In 2024, CEWA was the governing body for 149 CEWA schools and provided registration oversight for an additional nine Catholic schools with their own governing body. The Members of CEWA are the diocesan Bishops of Western Australia.

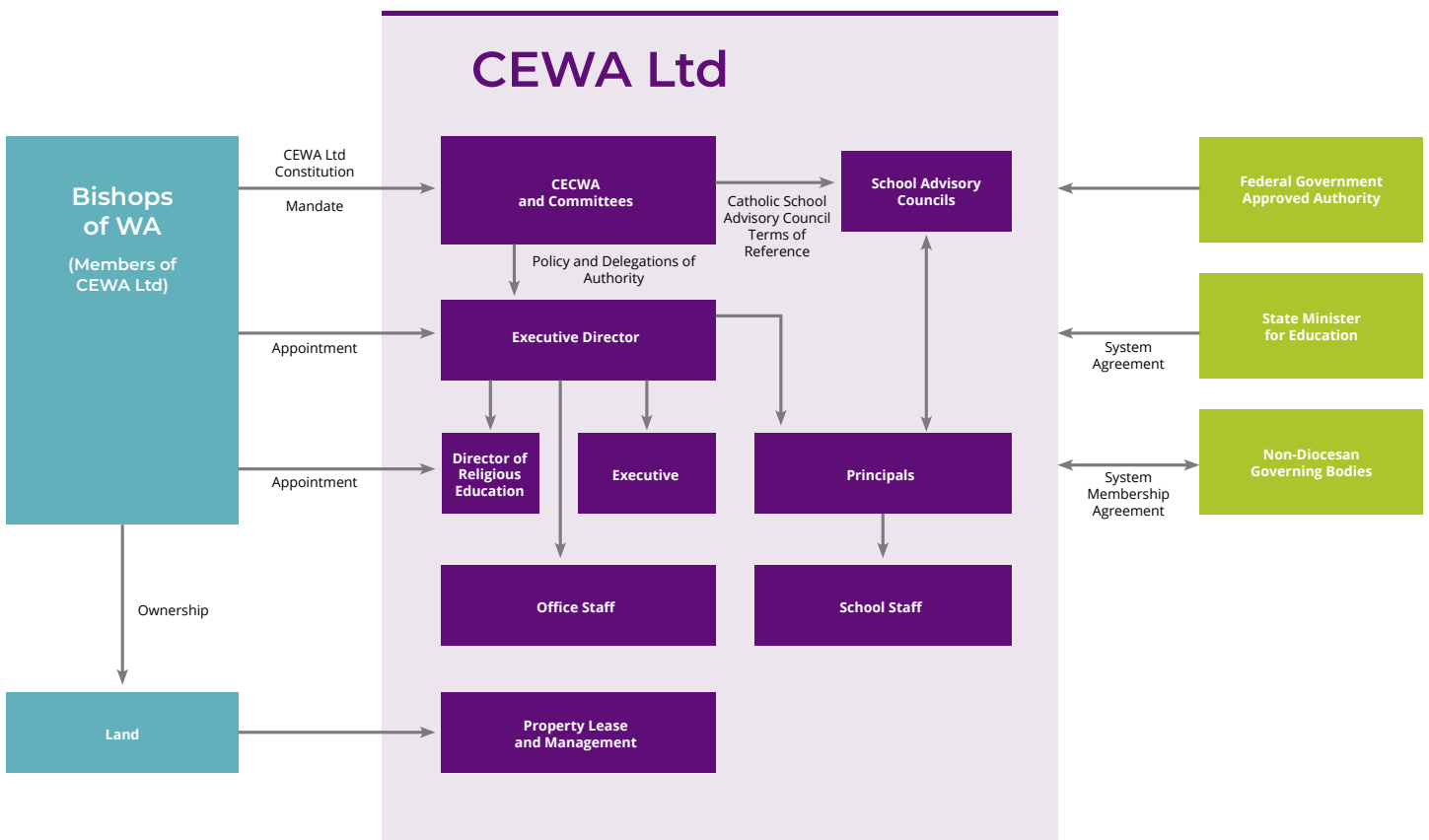
CEWA's annual consolidated revenue in 2024 was \$1,366,479,563.

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 communities 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 2024, 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:



## 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 nine schools that are governed by five governing bodies other than CEWA. For the purposes of school registration in Western Australia, the nine 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

The Executive Director of CEWA in 2024 was Wayne Bull. The Executive Director was supported by the following Directors within the CEWA Executive Team:

Deputy Executive Director	Annette Morey
Director Finance, Infrastructure and Digital Technology	Dr Glennda Scully
Director Leadership and Wellbeing	Dr Tony Curry
Director People and Culture	Paul Andrew
Director Teaching and Learning	Mandy Connor
Director Religious Education	Rev Mark Powell

The CEWA Executive Team is based in CEWA's West Leederville office (Perth) and is supported by approximately 380 office staff working across the four Catholic dioceses in Western Australia: the Archdiocese of Perth, the Diocese of Bunbury, the Diocese of Broome, and the Diocese of Geraldton.



## 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.



## 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.

## 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.

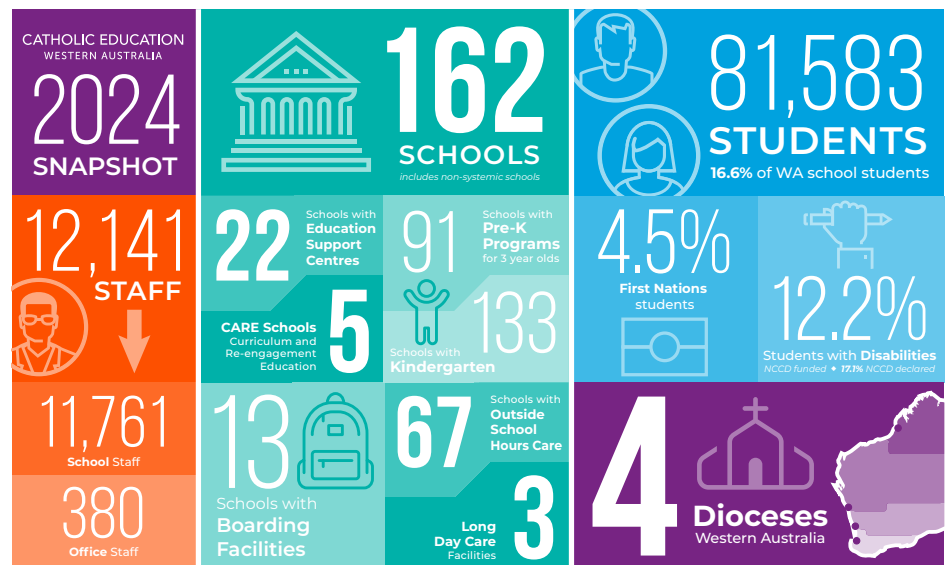


CEWA's wide range of operations include:

- 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 peoples;
- 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 of working in the region offers;
- delivering professional learning experiences to teaching and non-teaching staff throughout Catholic Education Western Australia, including programs and courses in leadership development and accreditation; and
- facilitating research in Catholic schools and informing education policy making and practice.

## Criterion 2: Our Structure, Operations and Supply Chain (continued)

An overview of CEWA's reach in 2024 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, environmental, and ethical expectations of suppliers, including the requirement that forced, involuntary or under-age 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, it is anticipated that future ethical purchasing decisions will be made by the system, with schools operating through a preferred suppliers' program.







# Criterion 3

## Modern Slavery Risks

In 2024 CEWA procured

**\$289m**

of goods and services

These goods and services were  
sourced from approximately

**26,900**

predominantly Australian suppliers

In 2024, CEWA procured \$289,706,259 of goods and services from approximately 26,900 direct suppliers\* (predominantly Australian). Services procured included building, cleaning, facilities management, security services and waste management services, 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. Uniform purchasing continues 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 offices purchase 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.

### Criterion 3: Modern Slavery Risks (continued)

As of December 2024 CEWA supported

# 11,508

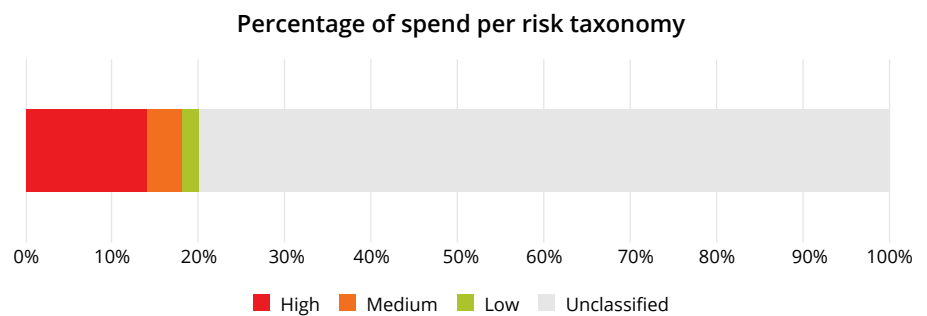
teaching and non-teaching jobs

# \$2.37bn

GVA contribution in 2021; 17% of total  
WA Education & Training sector

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.

The table below illustrates the percentage of spend per risk taxonomy for 2024, with 14% of spend identified as high risk, representing \$40,922,323 across 862 suppliers. In addition, 4% of spend has been identified as medium risk, and 2% of spend as low risk.



## Operational Risks

### CEWA's people

As at December 2024, CEWA Ltd supported 11,508 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.

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:

\* These figures include staff in CEWA schools and offices, including casual staff.



### Criterion 3: Modern Slavery Risks (continued)

CEWA had investments of  
**\$161.2m**  
during the reporting period.

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

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 \$162.1 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 CECWA that include their commitment to responsible investing.



### 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 2024 Investment Report, from the total 52 Australian and International equity holdings invested in, 58% of these have not been involved in any major recent controversies regarding modern slavery/labour rights; 27% have been involved in recent moderate level controversies; and 15% 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.

The onboarding of suppliers through CEWA's procurement system will commence in March 2025 including an increased compliance with Modern Slavery and supplier categorisation. This will be followed by the full implementation of the procurement system commencing from June 2025, which will bring improved conformance, reporting and data capabilities.

CEWA continues 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 extended supply chains, especially beyond Tier 1 suppliers.



## Criterion 4

### Actions Taken to Assess and Address Modern Slavery Risks

#### Actions taken in 2024

Throughout 2024, CEWA continued its commitment to modern slavery prevention, aligned with both the CECWA Strategic Initiatives 2030 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 Modern Slavery Prevention Executive Directive. The wider implementation of the CEWA strategic risk framework, redeveloped in 2023, ensured inclusion of modern slavery risks within the system-wide risk framework.

Throughout 2024, CEWA worked on developing its first CEWA Laudato Si' Sustainability Strategy, called to action by Pope Francis' Encyclical Laudato Si' and the Fifth Plenary Council Decree 8. The CEWA Laudato Si' Sustainability Strategy will be supported by a 2025 Action Plan, based on the framework provided by the Vatican Dicastery for Promoting Integral Human Development via the Laudato Si' Action Platform. Input from schools, offices, and First Nations and Church agencies will build the Strategy and Action Plan. The 2025 Action Plan will include CEWA's commitment to modern slavery prevention as one of the actions under Laudato Si' Goal 2: Cry of the Poor.

Based on ACAN's analysis, CEWA's maturity assessment score increased with 4% from 2023 to 2024, mainly due to increased supplier engagement, as part of the continuation of the phased implementation of the Zycus procurement system. The introduction of this centralised procurement system will ultimately reduce supplier risk across the organisation, at CEWA schools and offices. 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. Supplier onboarding, to enable the categorisation of suppliers and assessment against key risk criteria that include Modern Slavery, commences in March 2025, with CEWA offices scheduled to go live with the full functionality from July 2025, followed by a phased rollout to all CEWA schools over the course of 2025 and 2026.





## Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks (continued)

### Our Plans for 2025

For 2025, 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 continues to operate within its Risk Appetite Statement, eliminating opportunities for modern slavery practices in its supply chain and operations;
- 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;
- go live with full functionality of the Zycus procurement system at CEWA offices;
- start the phased rollout to all CEWA schools;
- continue to strengthen engagement with suppliers to communicate the expectations relating to the prevention of modern slavery at the onboarding process;
- categorisation of suppliers, as well as identification of high-risk categories, which will enable a system-response;
- enact the 2025 Action Plan supporting the CEWA Laudato Si' Sustainability Strategy;
- 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.

Photo: Holy Cross College (Ellenbrook),  
St Helena's Catholic Primary School  
(Ellenbrook) and Emmaus Catholic  
Primary School (Dayton)



## Criterion 4: Actions Taken to Assess and Address Modern Slavery Risks (continued)

### Our Plans Beyond 2025

To ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention, CEWA maintains the following focus areas:

Focus Area	Intent
<b>Governance</b>	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. Reinforce CEWA's commitment to modern slavery prevention as one of the actions under Laudato Si' Goal 2: Cry of the Poor, in the CEWA Laudato Si' Action Plan.
<b>Procurement and Supplier Management</b>	To increase CEWA's understanding and oversight of its supply chain risks through the phased rollout of the procurement system to CEWA schools.
<b>Legal Documentation</b>	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery including purchase order terms.
<b>Facilities Management</b>	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.
<b>Investment</b>	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.
<b>Research</b>	To introduce considerations around modern slavery prevention into the approval process for research applications.
<b>Engagement and Education</b>	To continue to educate the CEWA community on modern slavery and how, individually and collectively, work can be undertaken for eradication.
<b>Schools Engagement</b>	To share information, learning and best practice, as appropriate, across the CEWA System as well as to encourage schools to adopt responsible procurement practices.
<b>Capital Development</b>	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.
<b>Human Resources</b>	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.
<b>Student Safety and Wellbeing</b>	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.

Photo: Mel Maria Catholic Primary School  
(Attadale / Myaree)



# 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
- advancing procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2024, 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 2024, compared to 2023.

2024	Activity	2023 CEWA	2023 CEWA
Internal / Staff	Hours spent on modern slavery activities	10	20
	Individual staff completed e-learning	0	14
	E-learning modules completed	0	11
External / Supplier Engagement	Total number of suppliers	22,687	26,942
	Number of suppliers with visible contact information and ABN	261	261
	Number of suppliers across high-risk categories	4,878	2,396
	Number of ACAN Supplier Surveys completed (cumulative)	484	630
	Supplier attending capacity building webinars (cumulative)	111	50
	Invited to join Sedex (cumulative) <i>Number of suppliers invited to join Sedex</i>	96	160
	Joined Sedex (cumulative) <i>Number of suppliers that joined Sedex</i>	23	93
	Sedex SAQ completed (cumulative) <i>Number of Sites with Sedex SAQ completed</i>	12	79
	Social audits <i>(Number of audits completed)</i>	6	12
	Corrective actions <i>(Number of non-conformances)</i>	3	53
Domus 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	8	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





## Criterion 6

CEWA does not own or control any entities.

### Consultation with Owned or Controlled Entities

## Criterion 7

No other relevant information.

### Any Other Relevant Information

Photo: St Mary's College (Broome)



This Modern Slavery Statement 2024 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 2 May 2025, 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 2024

Eva Skira AM	CECWA Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Commissioner
Gladys Demissie	Commissioner
Wojciech Grzech	Commissioner
Celia Hammond	Commissioner
Dr Frank Malloy	Commissioner
John Palermo	Commissioner
Michelle Shafizadeh	Commissioner
Jonathon Woolfrey	CECWA Deputy Chair
Peter Yensch	Commissioner

#### CEWA Executive Team 2024

Wayne Bull	Executive Director
Annette Morey	Deputy Executive Director
Paul Andrew	Director People and Culture
Mandy Connor	Director Teaching and Learning
Dr Tony Curry	Director Leadership and Wellbeing
Rev Mark Powell	Director Religious Education
Dr Glennda Scully	Director Finance, Infrastructure and Digital Technology





**CATHOLIC  
EDUCATION**  
WESTERN AUSTRALIA

**in f @ X**

**(08) 9380 1800**  
**cewa.edu.au**

20250502





# Modern Slavery Statement

1 January–31 December  
2024



Victorian  
Catholic  
Education  
Authority

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

Victorian Catholic Education Authority Limited (VCEA)

ABN: 92 119 459 853

Level 6, 486 Albert St, East Melbourne, VIC 3002  
[vcea.catholic.edu.au](http://vcea.catholic.edu.au)

Email: [secretary@vcea.catholic.edu.au](mailto: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. 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 2024 reporting period, during a period of significant organisational transformation. This is VCEA's second statement in its restructured 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 26 May 2025.**

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

A handwritten signature in black ink, appearing to read 'J. Merlino'.

**James Merlino**  
**Chair**  
**26 May 2025**

# Criteria 1

## About the Victorian Catholic Education Authority Limited (VCEA)

---

VCEA is the peak body for Catholic school education in Victoria. VCEA 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, VCEA will advance a Catholic vision of education where every student's life is understood as a gift. Each student in a Catholic school throughout Victoria will be afforded every opportunity to come to the fullness of life. VCEA will strive for excellence in education through the delivery of responsive and quality educational practices.

Central to VCEA'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, VCEA'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. VCEA:

- 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.

VCEA works in close collaboration with all incorporated school governing authorities responsible for the operation and governance of Victorian Catholic schools. The Catholic education sector in Victoria comprises approximately 500 schools operated by 33 proprietors.

Schools are located across the four dioceses of the Catholic Church in Victoria – the Archdiocese of Melbourne, the Diocese of Ballarat, the Diocese of Sandhurst and the Dioceses of Sale. The largest proprietors are governing authorities established in each diocese. These companies are;

- Melbourne Archdiocese of Catholic Schools (MACS)
- Diocese of Ballarat Catholic Education Limited (DOBCCEL)
- Diocese of Sale Catholic Education Ltd (DOSCEL)
- Catholic Education Sandhurst (CES)

In addition, there are Catholic schools in Victoria governed by Religious Institutes (RI) or Ministerial Public Juridic Persons (MPJP). These are known as RI/MPJP schools. There are 29 RI/MPJP school proprietors operating in Victoria.

## Governance structure

Following the adoption of new governance arrangements for VCEA at the Annual General Meeting on 5 December 2023, VCEA undertook a significant refresh of its governance structure, which included the appointment of a skills-based board and new board committees.

### Company members

- Most Rev Peter A Comensoli DD Archbishop of Melbourne
- Most Rev Paul Bird CSsR 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

## Board

- James Merlino, Chair
- Patricia Cowling, Director (*appointed from 1 March 2024*)
- Lynn Glover, Director
- Brian Loughnane, Director (*appointed from 23 September 2024*)
- Marcelle Mogg, Director (*appointed from 1 March 2024*)
- Damian Murphy, Director
- Chris O’Grady KC, Director (*appointed from 15 May 2024*)

## Board Committees

- VCEA Consultation Committee
- Catholic Mission Committee
- Education and Performance Excellence Committee
- Finance, Risk and Audit Committee
- People and Employment Relations Committee
- Review Body and Compliance Committee
- Nominations Committee

## Executive Leadership

- Professor Elizabeth Labone, Chief Executive Officer (*appointed from 20 May 2024*)
- Bruce Phillips, Chief Strategy Officer, 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
- Chris Ingham, Chief Education and Integrity Officer (*appointed from 23 September 2024*)
- Geoff Bell, Acting Chief Education and Integrity Officer (*from 10 June 2024 to 22 September 2024*)
- Stefanie Veal, Chief Education and Integrity Officer (*appointed from 25 September 2023 to 7 June 2024*)



## Services and Functions

VCEA provides 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

## Strategy

VCEA developed its inaugural strategic plan in 2024, setting out the organisation's direction, goals, outlining strategies to achieve them and aligning all organisational efforts towards a shared vision. The strategic plan encompasses a roadmap for decision-making and resource allocation for the 5 years ahead.

## Criteria 2

# Operations, supply chains and organisational structure

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Information on the operations of VCEA can be found in the Financial Report included in the VCEA 2024 Annual Report. This document can be found on the [VCEA website](#).

The Annual Report outlines the operations of VCEA throughout 2024 and the initiatives completed throughout the year in line with VCEAs interim strategic plan. The Annual Report will also be available on the Australian Charities and Not-for-profits Commission (ACNC) website.

It is noted that of VCEA's \$3.62 billion expenditure for 2024, 99.5% relates to direct distributions of government grants to Catholic schools in Victoria, Catholic school proprietor companies and contributions of central costs such as copyright and technology costs paid on behalf of the schools.

VCEA's operational expenses, excluding depreciation and amortisation, totalled \$19.2 million, which accounts for 0.53% of the organisation's total operational expenditure.

NB: Salaries are included in the operational expenses but are not reflected in the supplier data.

## 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 views risk management as 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. 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.

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

In 2024 the Board was supported in its risk management role by the Finance, Risk and Audit Committee (FRAC), which was responsible for the review and endorsement of the Risk Management Framework, Risk Appetite Statement and Risk Management Policy, each of which was approved by the Board during 2024.

The FRAC met six times during 2024. At each meeting it considered the enterprise risk register. The register was developed and refined throughout 2024. It 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 assessed and considered against VCEA's risk framework in 2024. The exposure to modern slavery risk was found to be within appetite and tolerance and as such, did not trigger an exposure that requires reporting to FRAC at each meeting. Modern slavery exposures and progress against the action plan are reported to FRAC bi-annually.

## **Organisational Structure and Workforce Profile**

As of 31 December 2024, VCEA employed 73 employees, an increase from 45 employees the previous year.

VCEA is committed to nonbiased and ethical recruitment. All hiring processes are conducted through transparent external channels, such as Seek and executive recruitment firms, ensuring fair selection based on standardised position descriptions and key selection criteria.

During 2024, as VCEA experienced substantial growth, external agency staff were engaged to support daily operations. However, as part of VCEA's ethical recruitment strategy, there was a focus on reducing reliance on agency and temporary employees to promote fair and stable employment conditions. By the end of the reporting period, agency staff were fully phased out, with only two contractors remaining, compared to a peak of twelve combined agency and contractor staff earlier in the year and eight during the previous reporting period.

Employees work in the one office location with flexibility to work up to two days remotely per week (pro rata).

Throughout 2024, VCEA also managed a Master Service Agreement (MSA) with Melbourne Archdiocese Catholic Schools Ltd (MACS) for the delivery of key business functions such as accounts payable, payroll, and IT services. VCEA relies on MACS' modern slavery control environment for the delivery of these services to VCEA. MACS operates a mature policy and human resources environment, with a

well-established approach to modern slavery risk management, as evidenced by their 2023 reporting to ACAN (Australian Catholic Anti-Slavery Network).

The VCEA workforce profile and management structure are shown below.

Figure 1.1 Workforce Profile data (as at 31 December 2024)

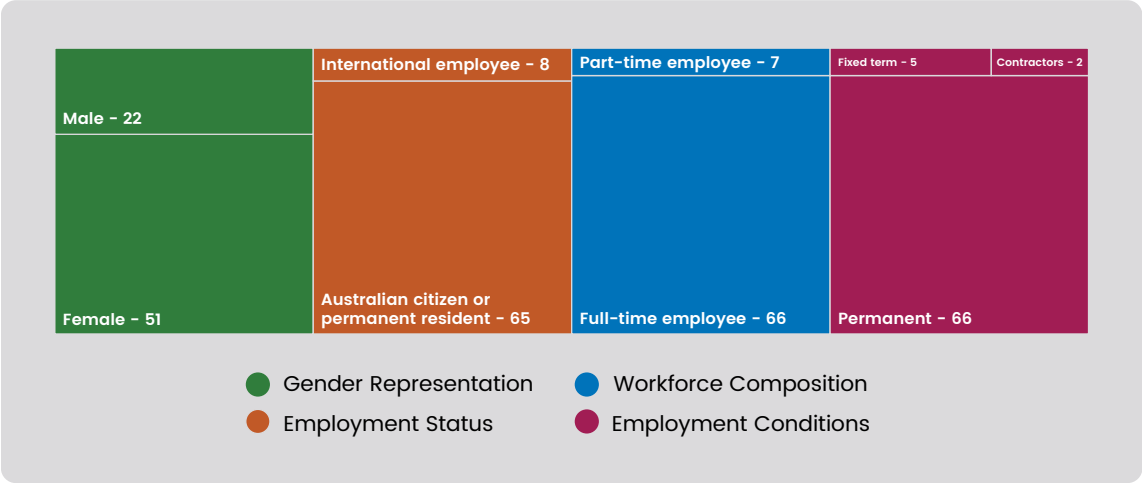
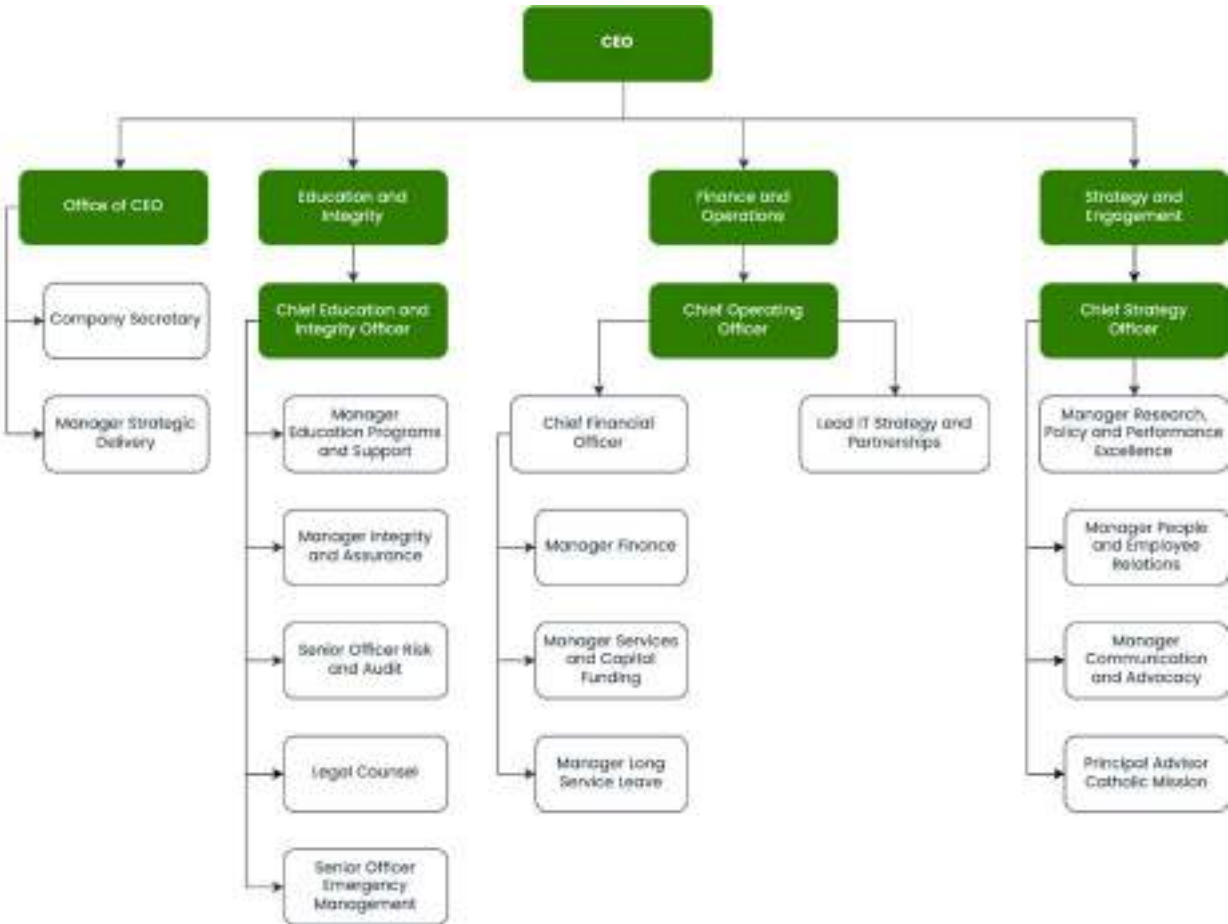


Figure 1.2 Portfolio and Management Structure (as at 31 December 2024)



# Summary of 2024 activities

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Strategic actions taken by VCEA during 2024 to enhance its robust management processes for the management of modern slavery risk include;

- Development and implementation of a suite of related new VCEA policies approved by the Board and Management
- Establishment of a Modern Slavery risk management capability including;
  - formation of a foundational Modern Slavery Working Group (MSWG) with formalised Terms of Reference (ToR)
  - development and adoption of a Modern Slavery Action Plan 2024-2026
  - biannual Modern Slavery risk reporting to the newly established Finance, Risk and Audit Committee
  - completion of a modern slavery risk and control assessment by management
- New e-learning platform LITMOS implemented (to deliver Modern Slavery learning modules)
- Annual employee engagement survey initiated
- Strengthening of financial delegations, contract and supplier engagement processes
- 100% VCEA suppliers mapped against ACAN Risk Taxonomy and 14 suppliers onboarded to Sedex (Supplier Ethical Data Exchange) platform, covering 23% of VCEA's total spend.

VCEA did not identify any incidents of exposure to modern slavery, real or potential, during the reporting period.

Throughout 2024 VCEA continued participation in the ACAN modern slavery risk management program (ACAN Program). The ACAN Program provided VCEA access to monthly webinars and e-newsletters, tools and templates, guidance materials and supplier engagement activities.



## Criteria 3

# Modern Slavery risks

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### Risks in Operations and Supply Chains

VCEA assesses the risks of modern slavery practices in its operations and supply chain by considering its potential to cause, contribute to, or be directly linked to modern slavery through its operations or 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 resident in Australia and are predominantly service related. As such, VCEA has rated its inherent exposure to modern slavery risk as low, its control environment as acceptable and the risk within the appetite established by the Board. VCEA recognises, however, that it is possible 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 ACAN assists us in gaining insight into our operational activity partners and suppliers. With ACAN's support we continue to operate an ongoing assessment system of our suppliers.

VCEA as a peak body provides services and undertakes various functions for Catholic school proprietors and Catholic schools in Victoria. VCEA, in turn, procures a range of goods and services to support its operations and these services. All new suppliers introduced in 2024 underwent modern slavery risk identification and assessment.

The risk profile of VCEA’s supplier base remained stable throughout 2024, with one area of exception. VCEA faced an elevated risk of encountering modern slavery practices as a result of a building and construction project for new corporate offices that ran throughout 2024. Detailed assessment, supplier assertions and controls were put in place for the suppliers involved in this project (see below Building and Construction).

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 197 VCEA suppliers engaged in 2024, 47 suppliers have completed the ACAN supplier survey.

- 14 suppliers have joined Sedex (Supplier Ethical Data Exchange) platform which significantly covers 23% of total VCEA spend.
- VCEA percentage of spend in high-risk category areas is 8%, a reduction from 2023.
- Based on the ACAN Category Risk Taxonomy, 25 suppliers (12%) have been identified as a high-risk procurement category with a further 2 suppliers having self-declared through the ACAN supplier survey.

Figure 1.3 Percentage of \$ Spend by Taxonomy Risk

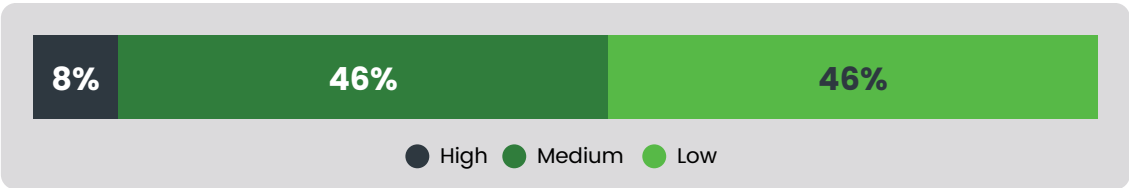
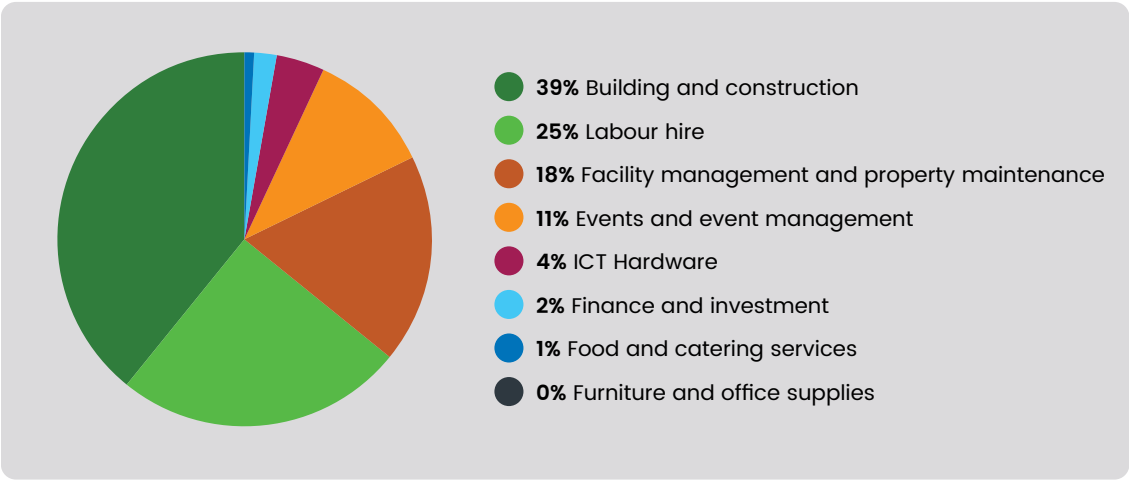


Figure 1.4 % Spend in High-Risk Procurement Categories



In 2024, VCEA's largest categories of expenditure were in the following areas.

- Professional Services and Consultancy
- IT Software and Network Services
- License Fees
- Labour Hire and Recruitment
- Building and Construction

A total of 25 suppliers were identified within the high-risk category (ACAN Category Risk Taxonomy), of which 8 provided labour hire and recruitment services to VCEA.

VCEA's top 10 suppliers by spend (each >\$1M), equated to approximately 66% of total expenditure to external suppliers. The largest procurement categories included Professional Services and Consultancy (low risk) and IT Software and Network Services (medium risk).

## IT Procurement

VCEA recognises an elevated risk of modern slavery exposure within the IT hardware supply chain and takes a responsible sourcing approach. When sourcing IT hardware, VCEA prioritises well established large companies who meet their own stringent modern slavery obligations in their supply chains.

VCEA procures software and provides consultancy services, as a service supplier, to schools for their student management, financial and payroll systems. As a supplier, VCEA ensures compliance with ethical sourcing and modern slavery obligations. VCEA provides these software and consultancy services under ITC Software and Network Services agreements that reference our modern slavery obligations.

## Building and Construction

VCEA engaged in a design and fit-out project in 2024 establishing permanent premises. Aware of modern slavery risks prevalent in the construction sector, VCEA sought to actively mitigate risk through the initial procurement process and in regards outsourcing, which increases the complexity of operations and supply chains and decreases the visibility of labour risks.

Actions included;

- Implementation of robust due diligence in procurement processes including reviewing vendor code of conduct;
- Communicating VCEA's commitment to upholding human rights and zero

tolerance for modern slavery through the procurement process and supplier pre-qualification including sharing the ACAN Code of Conduct with secondary suppliers to reiterate supplier compliance with labour standards and modern slavery policies;

- Ensuring supplier acceptance of clauses in contracts explicitly prohibiting modern slavery and requiring adherence to ethical labour practices.
- Engagement of a building and construction project management firm to monitor all aspects of the delivery of the project including labour practices and overtime.

## **Employment Risk**

### **Employment Risk & Modern Slavery Mitigation**

VCEA maintains a directly employed workforce and engages labour hire or professional consultancy support for specialist projects or periods of increased demand.

The People and Culture team oversees compliance with labour, employment, and immigration laws through a structured framework of policies and procedures. VCEA is committed to maintaining strong governance measures to mitigate modern slavery risks within its employment practices. This includes ensuring that policies, procedures, and guidelines are in place to safeguard employee rights, workplace safety, and overall wellbeing.

### **Strengthening Employment Governance**

Throughout 2024, VCEA conducted comprehensive reviews of its employment related policies, structures, and remuneration frameworks to ensure compliance with employment laws and alignment with best practice conditions and fair remuneration. These reviews reinforce VCEA's commitment to preventing exploitation and fostering an ethical and transparent workplace.

As part of this commitment, VCEA undertook a remuneration framework review and also engaged an independent payroll audit to assess compliance with legal requirements, industry benchmarks, and fair pay practices. The audit identified key recommendations focused on documenting and validating existing payroll processing, rather than requiring changes to current practices. To support continuous improvement, an action plan has been commissioned to enhance process transparency and maintain strong governance and risk mitigation measures.

VCEA employs staff under two primary instruments:

- Catholic Education Multi-Enterprise Agreement 2022 (CEMEA 2022) – covering approximately 14% of staff in 2024.

- Individually negotiated employment contracts – for roles outside the enterprise agreement scope. These contracts are legally endorsed to ensure they are aligned with legislative requirements.

### **Safe & Ethical Recruitment Practices**

VCEA enforces competency-based position descriptions, supported by clear policies and procedures, to ensure transparent and ethical recruitment, selection, and appointment of employees. As part of VCEA's pre-employment compliance processes, all employees, must provide:

- Valid and current Working with Children Check
- Criminal record history check
- Proof of working rights in Australia

The People and Culture team collaborates closely with external labour hire agencies (when required) to verify consultants and short-term temporary staff, ensuring all workers have valid working rights and meet ethical employment standards.

VCEA engages internal legal counsel or external specialist immigration lawyers as needed to support visa holders, ensuring compliance with applicable Department of Home Affairs requirements.

### **Labour Hire Oversight & Risk Management**

VCEA procures Information Technology (IT) consultancy services and support, which are managed by MACS under a Master Services Agreement on behalf of VCEA. As a participant in ACAN and an entity bound by the Act, MACS operates within a well-established policy framework designed to identify, mitigate, and manage modern slavery risks. As MACS operates a robust risk management approach and commitment to ethical employment practices, this arrangement has been assessed as low risk in relation to modern slavery concerns.



## Policy Review

During 2024 VCEA undertook an extensive review of its suite of Board approved policies. The table below sets out the relevant policies and the action taken for each by the Board during 2024.

Policy	Purpose
<b>Board Charter including a Director Code of Conduct</b>	To ensure high standards of behaviour are observed by the Directors in the context of their role. <i>(Reviewed)</i>
<b>Whistleblower Policy</b>	To govern and promote ethical behaviour at VCEA and to encourage and manage appropriate and responsible whistleblowing. <i>(Revised)</i>
<b>Modern – Slavery Policy</b>	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. <i>(Revised)</i>
<b>Workplace Bullying Discrimination and Harassment Policy</b>	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. <i>(Revised)</i>
<b>Privacy Policy</b>	To ensure VCEA protects and handles personal and sensitive information lawfully. <i>(Revised)</i>
<b>People and Culture policies</b>	<p>A range of policies and procedures to support the safety and wellbeing of employees including;</p> <ul style="list-style-type: none"> <li>• Code of Conduct for Employees <i>(New)</i></li> <li>• Employee Complaints and Grievances Policy <i>(New)</i></li> <li>• Employee Lifecycle Policy</li> <li>• Equal Opportunity Policy <i>(New)</i></li> <li>• Injury Management and Rehabilitation Policy <i>(Revised)</i></li> <li>• Leave Policy</li> <li>• Performance Planning and Review Policy</li> <li>• Probationary Review Process</li> <li>• Work Health, Safety and Wellbeing Policy <i>(Revised)</i></li> <li>• Working from Home Guidelines <i>(Revised)</i></li> </ul>
<b>Employee Assistance Program ('EAP')</b>	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.
<b>Risk Management Policy &amp; Framework</b>	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 tolerance, appetite and processes for managing risk. <i>(Revised)</i>

## Criteria 4

# Actions taken to assess and address Modern Slavery risks

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Throughout the 2024 reporting period, VCEA continued its participation in the ACAN Modern Slavery Risk Management program. With the support of ACAN, VCEA achieved the following actions to address modern slavery risks in its operations.

Establishment of an internal Modern Slavery risk management capability including;

- formation of a foundational Modern Slavery Working Group (MSWG) with formalised Terms of Reference (ToR)
- development of agreed and endorsed Modern Slavery Action Plan 2024-2026
- appointment of a new Modern Slavery Liaison Officer
- biannual Modern Slavery risk reporting to the newly established Finance, Risk and Audit Committee

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.

Improving procurement processes for potential suppliers and service providers to include confirmation of their compliance with contractual obligations that address Modern Slavery risks at the tendering stage.

Enhancing risk assessments by utilising the ACAN Taxonomy to identify high-risk suppliers and addressed their risks during the procurement due diligence process.

Continued to recruit a permanent workforce to reduce the reliance on short-term labour hire.

Development and implementation of a suite of new and revised VCEA employment, conduct and risk policies approved by the Board and Management to ensure a safe working environment, including renewal of the Modern Slavery Policy.

Completion of a modern slavery risk and control assessment, across all VCEA operations, as directed by VCEA's Risk Management Framework (2024).

Participation of VCEA staff and directors in Modern Slavery risk mitigation activities including Statement preparation and approval, MSWG meetings, reporting of progress against the action plan, risk assessment and training preparation. Approximately 15 staff and directors had direct involvement in these activities in 2024.

Regular reporting to management and FRAC on risks associated with operations, including modern slavery, through the enterprise risk register. The register is tabled quarterly at meetings of the FRAC and is focused on those risk rated high or extreme and/or those activities operating outside of risk appetite.

Bi-annual reporting of progress against the Modern Slavery Action plan to FRAC.

Implementation of a new e-learning platform (LMS) to enable delivery of whole of organisation Modern Slavery e-learning in 2025 which will provide an important framework for Modern Slavery risk management.

Through ACAN, invited suppliers to complete the ACAN Supplier Survey and to join Sedex (Supplier Ethical Data Exchange) platform.

The VCEA Legal Counsel has reviewed the proposed strengthening of the Act, including introducing a requirement for a modern slavery due diligence system, introducing penalties for non-compliance such as providing false information in a modern slavery statement and failing to submit a modern slavery statement and additional mandatory reporting requirements. It is noted that the Commonwealth government has chosen to undertake further consultation before introducing changes to the Act.

VCEA has noted the appointment of the first Anti-Slavery Commissioner in November 2024.

## Supplier Engagement with Sedex

In 2024, 47 suppliers completed the ACAN supplier survey. As a result, 14 VCEA suppliers covering 23% of total spend, were onboarded to Sedex.

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.

VCEA benefits from ACANs supplier engagement model that identifies common suppliers across multiple Catholic entities within ACAN. 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
- Validate inherent risk against actual risk.

# Criteria 5

## Measuring effectiveness

### Maturity Assessment

VCEA has completed its second maturity assessment with an overall maturity score of 40%. Given the significant transformation in the operations of VCEA throughout 2024 including renewed governance, direct employment of staff, and the development of VCEA policies and procedures, VCEA is confident that it has laid the foundation for effective management of modern slavery exposure in its operations.



Table 1.5: Maturity Score 2024: Comparative analysis of performance by pillar and sub-pillar

Pillar	2023	2024	+/-
<b>Business process and governance</b> Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities	34%	42%	+8
<b>Operations</b> Focuses on internal practices and how effectively we manage risks within our day-to-day activities.	33%	38%	+5
<b>Supply chain</b> Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.	40%	38%	-2
<b>Worker engagement</b> Addresses how we manage worker engagement and the standards upheld to prevent exploitation.	33%	35%	+2
<b>Entity’s programs and activities</b> Looks at the broader initiatives and engagements we undertake to combat modern slavery.	16%	36%	+20
<b>Grievance mechanisms and remediation</b> Evaluates the channels available for reporting concerns and the processes for addressing them.	43%	51%	+8



Sub Pillar	2023	2024	+/-
<b>Governance</b> Sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.	38%	49%	+11
<b>Risk Assessment</b> 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%	61%	+4
<b>Risk Management</b> 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%	22%	+3
<b>Effectiveness of Actions</b> Measures the impact of anti-slavery efforts and is what holds us accountable.	20%	29%	+9

VCEA will continue to strengthen its management of modern slavery risk in 2025 through targeted actions with a focus on operations, monitoring the effectiveness of actions, education and training and risk management.

## Looking ahead

VCEA commits to monitoring and continued refinement (with support from ACAN) of its multi-year Modern Slavery action plan. The plan will be regularly reviewed to ensure that actions remain relevant and effective and contribute to its modern slavery risk management approach. Feedback from FRAC on the biannual Modern Slavery Risk Reporting will contribute to the refinement of the action plan.

The VCEA MSWG is scheduled to meet four times during 2025 with priorities to:

- Review the maturity assessment results with a particular focus on areas for continued improvement and update the Action Plan accordingly.
- Support the implementation and track progress against the revised Modern Slavery Action Plan.
- Support monitoring, assessment and reporting of Modern Slavery risk.

VCEA is committed to continuous improvement in partnering with our stakeholders to proactively work to reduce modern slavery. In this regard, the 2025 Modern Slavery Action Plan includes the following commitments:

<b>Operations</b> <i>(systems and processes)</i>	<ul style="list-style-type: none"> <li>Recruitment of a dedicated Procurement Officer</li> <li>Implement a revised Procurement Policy and procedures</li> <li>Communicate and embed revised procurement related delegations</li> <li>Establish a remedy pathway to address and respond to Modern Slavery practices identified in operations or supply chain</li> </ul>
<b>Risk management</b>	<ul style="list-style-type: none"> <li>Monitor progress and effectiveness of actions (existing and new) and bi-annual reporting to FRAC</li> <li>Annual modern slavery risk assessment and testing of the effectiveness of VCEA's control structures that address modern slavery risk</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>Execute screening processes for 100% of new suppliers as part of tenders and supplier on boarding processes</li> <li>Invite new high and medium risk category suppliers to complete the ACAN supplier survey and join Sedex</li> <li>Encourage suppliers to join the 2025 ACAN supplier webinar series</li> </ul>
<b>Effectiveness of Actions</b> <i>(engage, educate &amp; respond)</i>	<ul style="list-style-type: none"> <li>Introduce Modern Slavery e-training modules for all staff and the VCEA Board and Finance, Risk and Audit Committee</li> <li>Increased engagement with ACAN liaison officers and participation in the ACAN Modern Slavery Risk Management Program.</li> </ul>

## Remediation

When suspicions of modern slavery practices come to VCEA's attention through internal employee relations processes, whistleblowers or other channels, VCEA's policy and processes call for it to 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.

Staff awareness of modern slavery risk in VCEA operations is one of our strongest preventative controls. In 2025, online training (Modern Slavery Awareness) 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. This training will be extended to the Board with FRAC committee and MSWG members also to undertake Business Relevance, Implementing a Modern Slavery Risk Management Program and Grievance Mechanisms and Remedy modules.

# Criteria 6

## Consultation

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VCEA has no controlled entities that require internal consultation.

In preparing the 2024 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.

Team or function	Input
Finance	Operations and supplier spend
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

Consultation has also occurred with MACS throughout 2024 in regards the provision of services to VCEA under the MSA.

## Criteria 7

### Any other relevant information

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No further information at this time.



## **Modern Slavery Statement**

1 January–31 December 2024

[vcea.catholic.edu.au](http://vcea.catholic.edu.au)







# Modern Slavery Statement

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# 2024

*O God, who made Saint Peter Claver a slave of slaves  
and strengthened him with wonderful charity and patience  
as he came to their help,  
grant, through his intercession,  
that, seeking the things of Jesus Christ,  
we may love our neighbour in deeds and in truth.  
Through our Lord Jesus Christ, your Son,  
who lives and reigns with you in the unity of the Holy Spirit,  
one God, for ever and ever.*

Catholic Schools NSW Limited  
ABN 46 619 593 369  
and its wholly owned subsidiary  
Catholic Employment Relations Ltd  
ABN 37 643 423 885

*Artwork on next page: Reconciliation of the 11 Catholic dioceses within NSW  
Artist: Lewis Hennessy  
Year: October, 2017  
Medium: Acrylic on Canvas.  
Dimension: 16X20  
Country/Mob: Bundjalung<sup>®</sup> North-Eastern, New South Wales*

*A campfire/yarning circle that is based in the centre of the painting represents Aboriginal communities. This is where the knowledge is shared and stories are learned, respect is taught, responsibility is told and culture is grown. The second outer circle represents Aboriginal peoples and communities that hold and share the knowledge and respect that is passed along. The outer 11 Circles represent the 11 Catholic Dioceses and their journey to the campfire to learn knowledge, building relationships, respect, understanding of culture and connections to communities. Reciprocity is formed between communities and Catholic Dioceses working together for reconciliation within all communities.*







# 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 skies.

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 in Christ's loving embrace.



# Chairman's Statement



Catholic Schools NSW Ltd (CSNSW) is an organisation based on service whose care extends to everyone we meet in our daily work and especially the students, parents, and staff in our school communities. CSNSW strives to be a leader in Catholic education by its transparency and readiness to combat modern slavery, evidence of which is supported in this fifth statement.

CSNSW affirms the inherent dignity of every human person. This dignity is affronted in modern slavery by the cruelty of some and the indifference of many. When Pope Francis proclaimed the 2025 Jubilee, he held out a message of hope to the world. Hope for the suffering, for those in captivity, and for the forgotten. Importantly, this hope, Pope Francis said, "is born of love".

Pope Benedict XVI emphasised the importance of hope when he wrote about St Josephine Bakhita, a slave who, with a strength made possible only by Christ's love, heroically forgave her captors. Pope Benedict wrote that she discovered a hope which "redeemed" her and which "she could not keep to herself; this hope had to reach many, to reach everybody."

In this Jubilee year, a special focus must be given to the source of hope. Pope Benedict XVI wrote: "Jesus, who himself died on the Cross, brought...an encounter with the Lord of all lords, an encounter with the living God and thus an encounter with a hope stronger than the sufferings of slavery, a hope which therefore transformed life and the world from within."

In this fifth Modern Slavery Statement, CSNSW's due diligence processes are outlined, along with information about training initiatives and several key indices. CSNSW has maintained its practice of continuous improvement, evident in the creation of the Modern Slavery Working Group during 2024, these achievements, and others, are detailed in this document.

Mark Dorney KMG (Ob)



## 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 10 April 2025.

This Modern Slavery Statement is signed by the Chairman as the responsible member of Catholic Schools NSW as defined by the Act.



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# Criteria 1:

## About Catholic Schools NSW

Catholic Schools NSW Limited (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). Each of the nine diocesan bishops of NSW, the Archbishop of Sydney, and the Archbishop of Canberra and Goulburn are Members of the Company (Bishop Members).

The aim and mission of CSNSW is to support the eleven Bishop Members in bringing to life the Church's evangelising mission through Catholic schools. The aims and powers of CSNSW are set out in section 7 of the Company's Constitution



*“The charitable objects for which the Company is established are to act as an overarching entity for the purpose of advancing education and religion in Catholic schools in NSW and ensuring that Catholic schools meet their compliance requirements and can measure their activities in such a way as to maximise the educational and faith outcomes of students.”*

The functions, authority, and responsibilities of CSNSW are derived from the CSNSW Constitution, the Bishop Members' Canonical Mandate (through the exercise of their jurisdiction as local ordinaries), and pursuant to Australian and NSW legislative and regulatory instruments.

CSNSW neither owns nor operates schools, rather, CSNSW works in partnership with a wide range of stakeholders, particularly the directors of Catholic education in each diocese, not simply to discharge legislated compliance obligations regarding government funding, but also to advance the common good in support of the Mission of the Church in education and evangelisation.



# Our mission

To advance God’s Mission through our leadership and service to Catholic education.

# Our values



## Our functions and responsibilities

The responsibilities of CSNSW include acting as:

- the Approved System Authority (ASA) under Commonwealth and NSW legislation, responsible for distributing recurrent funding in excess of \$3 billion each year;
- the Block Grant Authority under Commonwealth and NSW legislation in respect of capital funding;
- the designated non-government schools' representative body for Catholic education in NSW;
- the peak advocate for Catholic education in NSW; and
- the single approved registration authority for systemic Catholic schools in NSW.

Consistent with these responsibilities, CSNSW operates in several key areas, as outlined below.

### Advocacy

CSNSW presents a single voice advocating for and representing Catholic schools to state and federal governments, public bodies, the media, parents, and society. CSNSW is the designated Non-Government Representative Body (NGRB) for the sector. It advocates publicly for Catholic schools as an education choice by contributing to discourse and debate. Its advocacy follows evidence-based research and is informed by extensive consultation throughout the sector.

The Bishop Members have tasked CSNSW to liaise with other key Church stakeholders in education, including the Council of Catholic School Parents, the Association of Catholic School Principals, the Federation of Religious Institute and Ministerial PJP Catholic School Authorities in NSW and ACT (known as the Catholic Religious Institute and Ministerial Public Juridic Persons NSW and ACT School Authorities from 1 January 2024), the National Catholic Education Commission, and other state and territory Catholic education commissions.

### Compliance

Governments continue the trend of increased oversight and supervision of Australian schools, resulting in increased compliance and reporting obligations. CSNSW develops policies and procedures that aid systems and schools in fulfilling their statutory and regulatory obligations concerning financial audits, reporting to the government, regulation of charities, and other matters requiring compliance, especially those arising from the statutory roles of the NSW Education Standards Authority (NESA).

Working with systems and schools, CSNSW develops and shares policies and procedures for data collection, reporting, and audit requirements that apply to Catholic schools in NSW. It also offers an advisory service that covers existing, new, and revised regulatory obligations, including providing standardised documentation and training opportunities.

### CSSA

CSSA is a division of CSNSW that provides high-quality trial Higher School Certificate (HSC) examinations to schools in NSW and the Australian Capital Territory (ACT), and to international secondary schools. Previously operating as an unincorporated association under the name 'Catholic Secondary Schools Association', CSSA was integrated into CSNSW in January 2021 and is now a registered business name of CSNSW. The CSSA trial HSC examination programme has been in place since the HSC examinations were introduced in 1967.

## Education Policy and Programme Management

CSNSW is the lead agency for engagement with governments and regulators on all education policy matters affecting Catholic schools in NSW. It provides expert policy advice to regulators and governments on behalf of the sector, as well as to diocesan school systems (DSSs) and religious institute and ministerial public juridic persons (RI/MPJPs). Policy areas include preschool education and post-school pathways, curriculum, assessment, Aboriginal education, vocational education, diverse learning, wellbeing, safe and supportive schools, teacher accreditation, and school registration.

CSNSW is also the chief agency for coordinating Commonwealth and state ‘targeted’ programmes, including vocational education and training (VET) delivered to secondary students, and road safety. As the NGRB for the Catholic school sector, it also manages an extensive programme of work to support the National School Reform Agreement (NSRA) through the Non-Government Reform Support Fund (NGRSF). NGRSF focus areas include:

- supporting student outcomes
- supporting teachers, school leaders, and school improvement
- improving governance and compliance
- enhancing the national evidence base
- supporting improved engagement and practices related to NAPLAN Online and the Nationally Consistent Collection of Data on Students with Disability (NCCD)

To enhance the quality of education in Catholic schools and the preservation of Catholic identity, CSNSW works with DSS and RI/MPJP schools to engage with education policy reform and implementation. It does this through extensive advisory structures that include reference groups, time-limited working groups, and policy networks. CSNSW also publishes discussion papers, policy documents, and research briefs, and offers benchmarking capability and a broad range of Professional Learning and training opportunities.

## Efficiency and Effectiveness

In line with its constitutional obligations, CSNSW has developed and implemented a well-established framework for reporting on the educational effectiveness of Catholic schooling in NSW and provides regular State of the System reports to the Bishop Members. These reports are developed in consultation with DSSs.

## Registration

On 11 November 2022, the Bishop Members endorsed a proposal from NESA for CSNSW to operate as the single approved registration authority for systemic Catholic schools in NSW. After extensive consultation, the NSW Education Minister appointed CSNSW as the single Catholic registration system authority from 1 July 2023.

This change aims to reduce the overall regulatory compliance burden on Catholic school systems and support the unity of the sector. CSNSW will monitor the compliance of schools and dioceses through visits, audits, and training. Along with receiving and evaluating schools’ registration applications, CSNSW is required to report annually to NESA on its registration process.



## Funding

CSNSW is responsible to the Australian and NSW governments for distributing recurrent funding to DSSs in accordance with the requirements of the Australian Education Act 2013 (Cth) and the Education Act 1990 (NSW). In doing so, CSNSW works to ensure that schools comply with the terms and conditions of funding grants and adhere to not-for-profit guidelines. CSNSW also allocates and oversees funding for several targeted government programmes in schools.

CSNSW, in its role as the Catholic Block Grant Authority (CBGA), administers both the Australian Government's Capital Grants Program and the NSW Government's Building Grants Assistance Scheme for Catholic schools in NSW. Working with CBGA Members, which includes the 11 DSSs and several RI/MPJP schools, CSNSW ensures capital is distributed, used, managed, and accounted for in compliance with government guidelines.

## CSNSW Sport Services

CSNSW Sport Services is a division of CSNSW that is responsible for sports pathways for the Catholic school sector. More than 24 sporting pathways are available for Catholic school students. The two major pathways are:

- NSW Combined Catholic Colleges (NSWCCC), which enables Catholic secondary school students to compete at NSW All Schools Championships and events.
- NSW Catholic Primary Schools (NSWCPS), which consists of MacKillop (southern NSW) and Polding (northern NSW). NSWCPS enables Catholic primary school students to compete at NSW Primary Schools All Schools Championships.

## Catholic Employment Relations Ltd

Catholic Employment Relations Ltd (CERL) is a professional, service-based, legal practice that provides advice on Australian law, employment relations, industrial relations, and human resources to Catholic agencies.



# Criteria 2: Our structure, operations and supply chains

## Structure and Operations

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Sydney, Australia. CSNSW is a company whose members are the eleven diocesan Bishops of NSW. Collectively these systems are recognised by governments as the NSW Catholic schools system.

CSNSW derives its authority and mandate from the Catholic Bishops of NSW. In particular, a company Constitution and 'Canonical Mandates' from the Bishops of NSW outline the functions and authority of CSNSW.

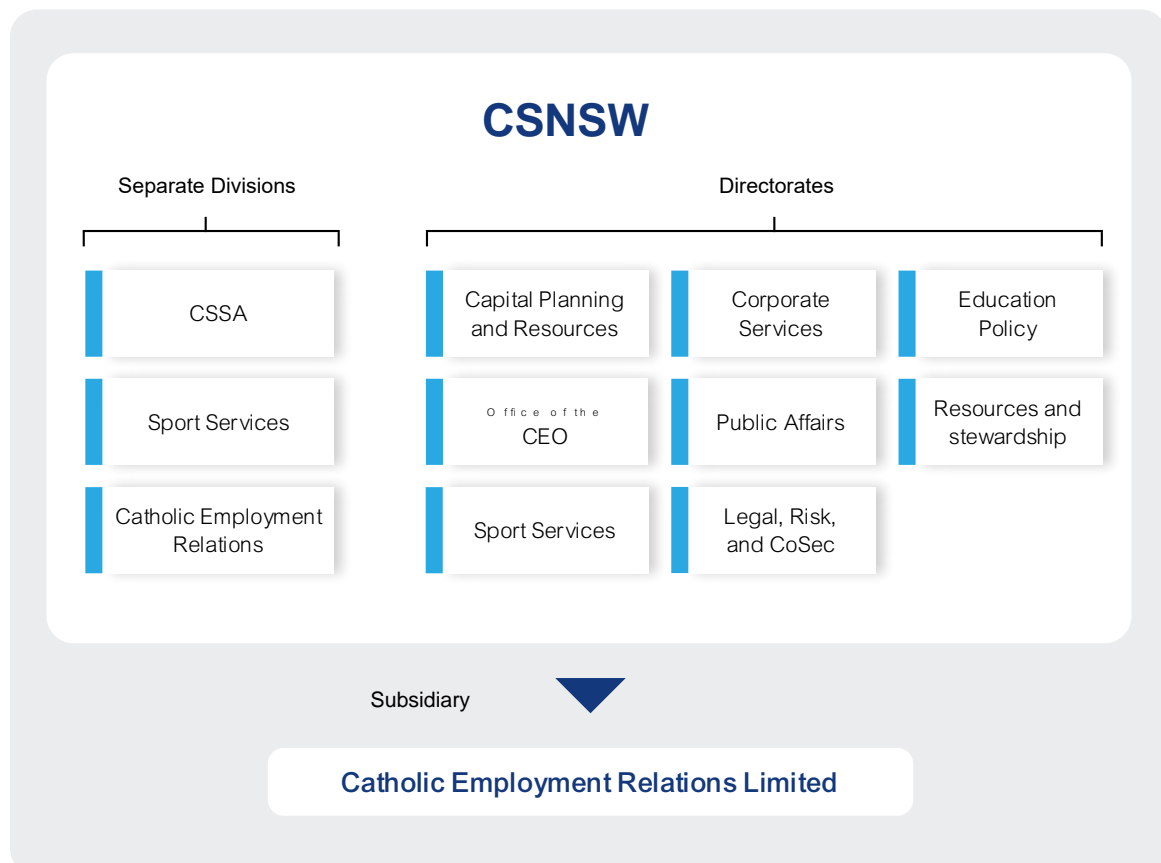
As of 31 December 2024, CSNSW's workforce consisted mainly of full-time employees. Further details are set out below.

In 2023, CSNSW relocated its head office to Angel Place, 123 Pitt St, Sydney.

CSNSW's annual consolidated revenue for 2024 was reported at \$38,284,882. This figure includes revenue from its subsidiary company, Catholic Employment Relations Limited (CERL).

CERL was established on 12 August 2020 and is a wholly owned subsidiary of CSNSW.

This statement incorporates CERL, which is located within CSNSW's offices in Angel Place.





## Board of Directors

The 2024 CSNSW Board had 10 Directors, including the chair. The CSNSW Directors bring a wide range of skills to their positions and provide informed decision-making.

Mark Dorney KMG (Ob) assumed the role of chair from 1 January 2024.

The CSNSW Directors in 2024 were:



Mark Dorney KMG  
(Ob) (Chair)



Anna Dickinson



The Most Rev  
Danny Meagher



David Robinson



Julian Widdup



Michael Lee



Jenny Allen



Emeritus Professor  
Toni Downes



Vince Graham AM



Gráinne McCormack



To assist in the execution of its role, the Board has eight committees, each with its own charter. In 2024 the Committees of the Board were:



## Management team

- 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 and 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.



Dallas McInerney  
Chief Executive Officer



Bernard Ryall  
Chief Operating Officer



Audrey Bower  
Chief Legal and Risk  
Officer



Kevin Morrison  
Director of Capital  
Planning and Resources



Daniel Cronin  
Deputy Chief Executive  
Officer



Joseph Watson  
Director of Public Affairs  
and Engagement



Peter Yates  
Director of Resources  
Policy, and Stewardship



Robert Rush  
Director of Sport  
Services



## Governance, leadership and culture

At CSNSW, governance, leadership, and culture shape how the organisation operates and is perceived by both employees and stakeholders. Ultimately, the Board is accountable for ensuring good governance.

CSNSW uses an online SaaS enabled software platform for its governance, risk and compliance needs. Our governance, risk and compliance (GRC) system assists in meeting all governance, risk, compliance, and policy management obligations whilst operating in a highly regulated environment.



CSNSW is dedicated to embedding risk management as a fundamental capability and integral aspect of its operations.

The Board is ultimately responsible for the risk management framework, recognising effective risk management as essential to achieving both strategic and operational goals.

The governance framework ensures the objectives of the organisation are met through a systematic, consistent, and practical approach to identifying, analysing, mitigating, and reporting risks.

Day-to-day risk management responsibilities, including engaging new suppliers and ensuring compliance with policies and procedures, are led by the management team and supported by the Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group (MSWG).

CSNSW employs a “Three Lines of Defence” model to actively manage risks.

- **First line**

Management and risk owners are responsible for day-to-day operational risks.

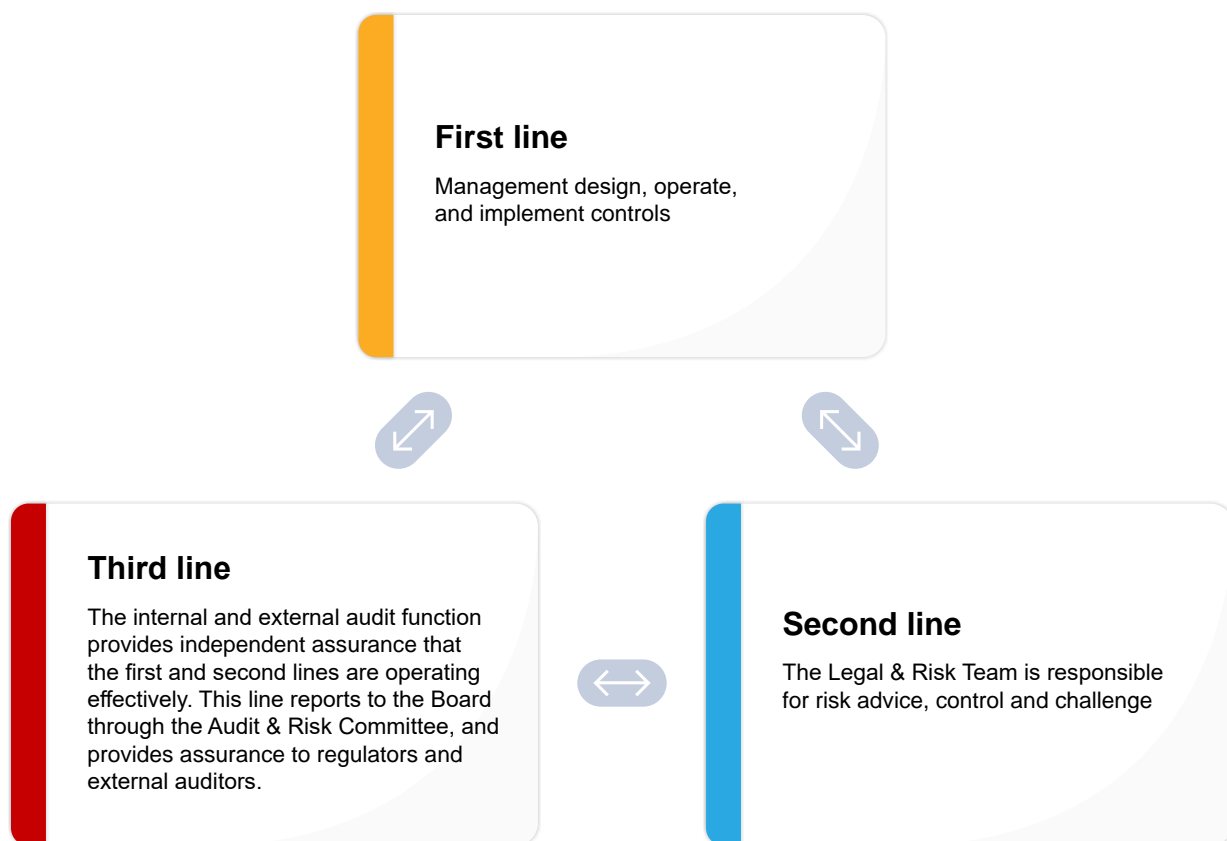
Management design, operate, and implement controls.

- **Second line**

The Legal & Risk Team, headed by the Chief Legal & Risk Officer is responsible for risk advice, control and challenge. It develops policies, monitors adherence, and oversees the first line.

- **Third line**

CSNSW's internal and external audit function provides independent assurance that the first and second lines are operating effectively. This line reports to the Board through the Audit & Risk Committee and provides assurance to regulators and external auditors.



We adopt a continual improvement model through which we document policies and procedures and train and test key risk areas through our staff learning system.

Our assurance program allocates responsibility for key risks and compliance tasks to individuals across CSNSW.

We identify areas that require improvement and then make appropriate adjustments to our policies and procedures.

In this way, we are continually improving our processes and developing our risk maturity levels over time.

## Our operations and supply chain

Our procurement arrangements have not varied greatly from year to year. They range from one-off purchases with non-contracted suppliers to large value strategic partnerships governed by formal agreements.

Most of CSNSW's suppliers are low risk and provide professional services such as research and consulting services. This category together with licence and membership fees makes up 74.47% of CSNSW's supplier spend.

CSNSW's direct suppliers are almost all located in Australia, a low-risk region. However, we recognise that:

- our suppliers' supply chains may extend outside of Australia; and
- modern slavery is still present in Australia.

# Criteria 3:

## Modern Slavery risks in operations and supply chain

### Operational risks

#### Our people

A breakdown of employees by employment type and Directorate is set out below-

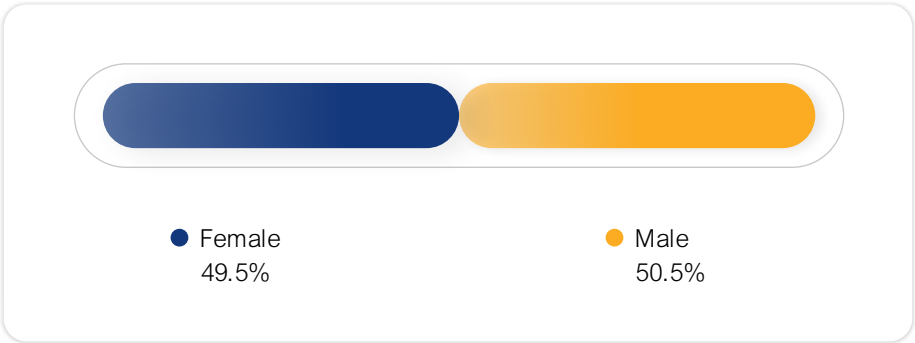
#### Employee breakdown

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

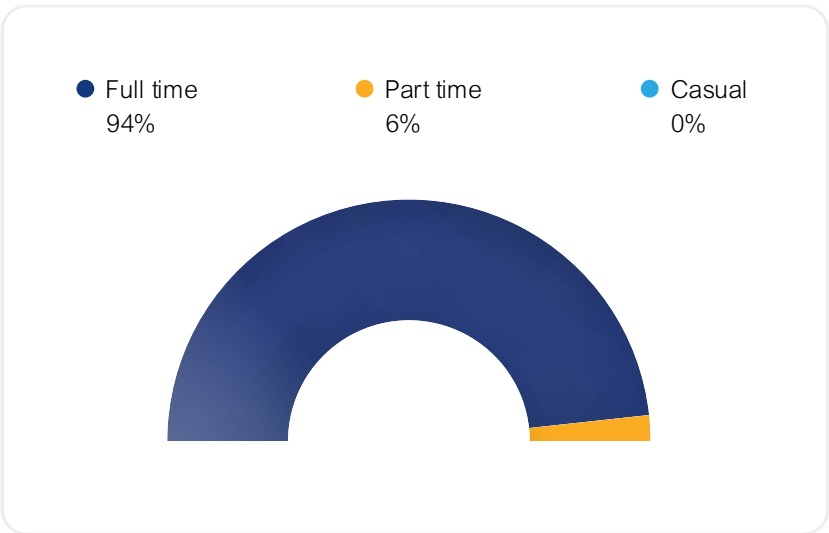
From time-to-time Directorates utilise casual resourcing to accommodate busy periods of work. These casual resources are not included in the below table. CSNSW employs nine casuals on modest hours as below:

Sports Services	Casual Sport Assistants	7
Legal Risk & Company Secretary	Paralegal	2

A breakdown of employee type by gender is set out in the below graph-



A breakdown of employment type is set out in the graph below-



CSNSW employs a full time Human Resources Manager to ensure compliance with labour, employment and immigration laws through a variety of HR Policies and Procedures.

CERL is also a professional service-based legal practice that provides advice on Australian law, human resources, employment and industrial relations to CSNSW and sits within the Legal, Risk and Company Secretary directorate.

The table below sets out some of our key frameworks and policies that support commitment and approach to managing the risk of modern slavery across our operations and supply network:

Policy	Purpose
Risk Management Program	Describes our approach to managing risk and aims to proactively manage risks to protect CSNSW's goals and value. Key elements of the framework include our Strategic and Business Plan, and our approach to managing, monitoring, and responding to material and emerging risks.
Work Health & Safety Program	To comply with WHS laws and to ensure that we maintain a safe workplace.
Whistleblower Program	Our standards and expectations for our people to confidentially report behaviours or instances that are not in accordance with our Code of Conduct, procedures, processes and regulatory requirements.
Employee Handbook including Code of Conduct	Articulates the values and principles we expect our people to adhere to when performing their responsibilities.
Modern Slavery Policy	To assist in the prevention and eradication of modern slavery.
External Complaints Handling Policy and Procedures	Our approach to fairly managing external complaints and grievances.
Fraud and Corruption Control Program	Helps our employees and other people who deal with CSNSW to prevent, detect and report suspected fraud and corruption.
Child Protection Program	The Program is made up of work systems, practices, policies and procedures designed to embed an organisational culture of child safety.
Vendor Management Policy	To establish clear guidelines for all stakeholders involved in the vendor selection, onboarding, monitoring, and termination processes of CSNSW while mitigating information security risks posed by vendors to ensure that the supply chain remains resilient and secure.

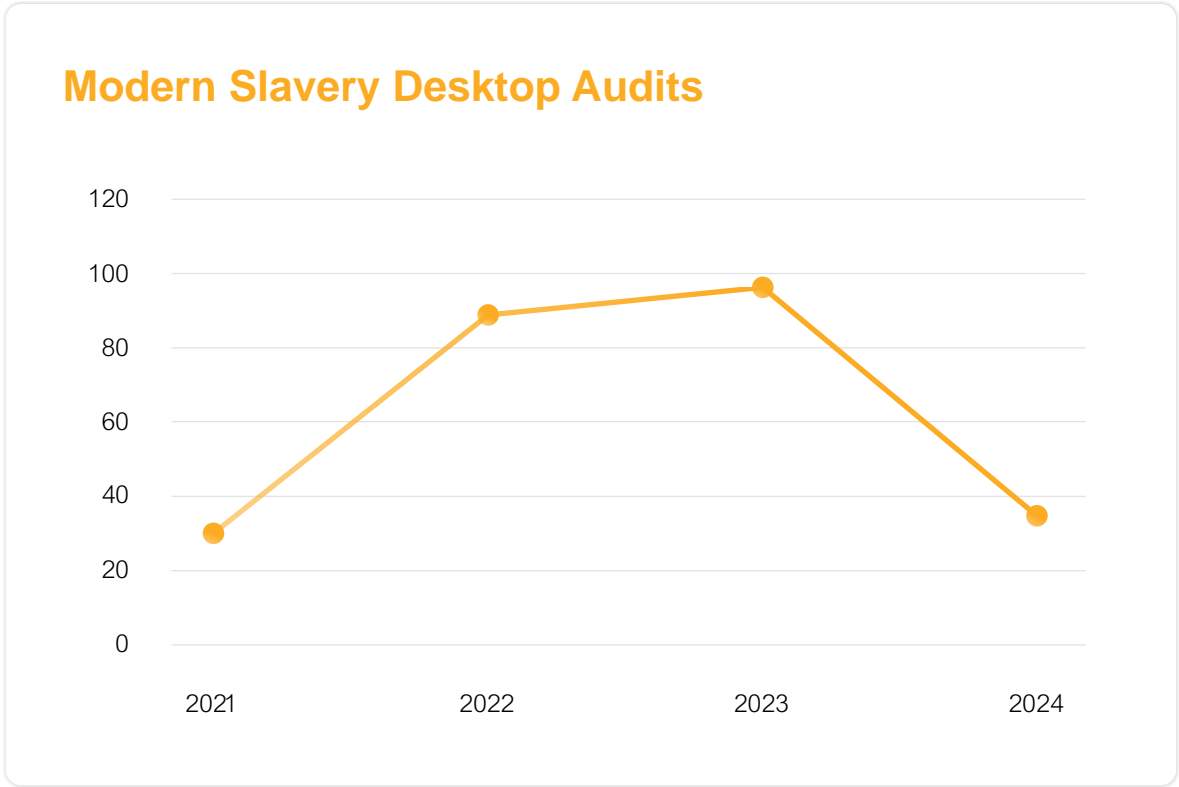


Due Diligence in CSNSW’s Supply Chain

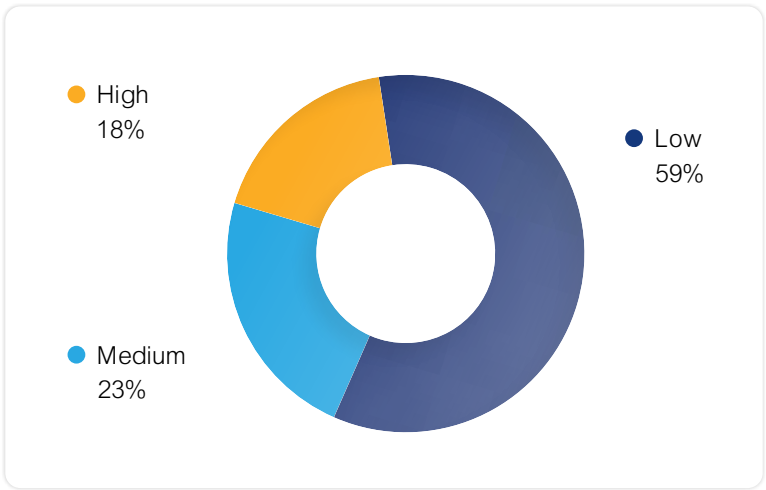
CSNSW’s risk of encountering modern slavery practices in our operations remains low. However, we continue to have a due diligence process to assist management with identifying the risk of modern slavery.

All suppliers engaged by CSNSW have no reportable concerns to date.

We have continued our desktop audits with new suppliers and revisited some prior years’ audits. The numbers are depicted below-



Our desktop audits by risk category is depicted below-



## Supply chain risks

We continue to analyse our supplier risks using the Australian Catholic Anti-Slavery Network (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).

The categories align with the United Nations Standard Products and Services Code (UNSPSC), facilitating integration and equivalency to a range of procurement systems used by Catholic organisations.

As in prior years our suppliers are traditionally from predominately low-risk industries (professional services).



## Analysis of our supply chain

We have analysed our supply chain to help identify and manage modern slavery risks. Our analysis is set out on the next page-

### Suppliers by risk category as a percentage of transactions



● High 11%
 ● Medium 7.81%
 ● Low 81.19%

### Suppliers by risk categories as a percentage of spend



● High 8.29%
 ● Medium 16.18%
 ● Low 75.53%

## CSNSW's 2 largest category spends are low risk



Professional services  
represents 48.50% of  
total spend

Risk category is low



License/Professional fees  
represents 25.97% of  
total spend

Risk category is low

These 2 supplier categories make up some 74.47% of CSNSW's total spend for 2024.



## Criteria 4:

# Actions taken to assess and address risk

The actions CSNSW takes to address modern slavery risks focus on policies, procedures, due diligence, training and awareness. Our policy commitment articulates our position with respect to modern slavery and is supported by the Board and Management Team.

CSNSW's modern slavery risk management program is underpinned by ethical business practices and consideration of all stakeholders (including people who are at-risk of and/or experience modern slavery practices).

### Initiatives undertaken

Key components of our initiatives and ongoing commitment to combat modern slavery include:

1. In 2024 a Modern Slavery Working Group (MSWG) was established with its own Terms of Reference;
2. Adherence to the Modern Slavery Policy which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain;
3. Communication of this policy and related program initiatives to employees and business partners;
4. Our finance system was upgraded to automate the supplier spend category and risk taxonomy on engagement for our main suppliers;
5. Assessment of modern slavery risks within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks;
6. Integrating anti-slavery requirements into relevant tenders and contract terms and conditions;
7. Adopting due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk;
8. Raising awareness, engaging and educating employees and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk;
9. Established processes for the external reporting process via our Whistleblowers Hotline;
10. Access to Domus 8.7, an independent program that provides remedies to people impacted by modern slavery;
11. Membership of the Modern Slavery Risk Management Program with the ACAN; and
12. Identification of common suppliers, supplier risk assessments, analysis, due diligence and supplier engagement strategy and outcomes via our ACAN membership.

## Supplier engagement

Supplier engagement is important in combatting modern slavery and to assist us in ensuring ethical practices throughout our supply chain. By actively working with suppliers, we can reduce the risk of modern slavery and build a more ethical supply chain.

Supplier engagement process includes:

1. Evaluation of the modern slavery risk within operations and supply chains, using the ACAN Risk Taxonomy;
2. 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 high risk areas, sourcing goods from overseas, grievance mechanisms and remediation pathways;
4. Onboarding suppliers to the Sedex platform;
5. Sedex Self-Assessment Questionnaire (SAQ) helps suppliers to evaluate their practices against established standards and identify areas for improvement; and
6. Corporate Social Compliance Audits provide a point in time, objective and independent verification process of supplier alignment with local laws and worker wellbeing standards.

## What can our suppliers do?

1. Designate a staff role for modern slavery engagement;
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 Act and the expectations of CSNSW;
5. Register for a live ACAN Webinar;
6. Download and present the 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 Prequalified Supplier Directory; and
9. Visit [www.acan.org.au/suppliers](http://www.acan.org.au/suppliers) for further information.





## Supplier risk identification

As in previous years, CSNSW's procurement expenditure continues to be on suppliers of professional services and licence and membership fees. CSNSW takes the approach of separating operations into high, medium and low-risk categories, and prioritising any high-risk categories.

In 2024, we continued with our supplier risk identification process through a category risk taxonomy that is based on analysis of participating entity supplier datasets. It includes 23 high level procurement categories identified across the various sectors involved in the ACAN network. The risk taxonomy helps inform supplier risk prioritisation and engagement activities and enables entities to work with the highest priority suppliers to more effectively manage and mitigate modern slavery risks.

Sources that inform the taxonomy are the Global Slavery Index (2023), the Global Estimates of Forced Labour (2022), the Global Right Index (2024), the International Labor Affairs Bureau (ILAB), and the US State Department Trafficking in Persons Report.

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

## CSNSW's Risk categorisation: Classification by industry

High Risk	Medium Risk	Low Risk
<ul style="list-style-type: none"><li>• Building and construction</li><li>• Cleaning and security</li><li>• Events and event management</li><li>• Facility management and property maintenance</li><li>• Finance and investment</li><li>• Food and catering services</li><li>• Furniture and office supplies</li><li>• ICT hardware</li><li>• Labour hire</li><li>• Linen, laundry, textile products</li><li>• Medical devices and supplies</li><li>• Transport and logistics</li><li>• Uniforms and PPE</li><li>• Waste management services</li></ul>	<ul style="list-style-type: none"><li>• Advertising and marketing</li><li>• ICT software and network services</li><li>• Utilities</li><li>• Fleet management, consumables and maintenance</li><li>• Travel and accommodation</li><li>• Print/mail provider</li></ul>	<ul style="list-style-type: none"><li>• Professional services</li><li>• Financial expenses</li><li>• Government and agency fees</li><li>• License and membership fees</li></ul>

## 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 the following due diligence process:

### Contract management

We continue to use a GRC system for 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 2024, we carried out 34 desktop audits. The process also provided an opportunity for CSNSW to educate our suppliers about modern slavery risks.

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.

CSNSW had two high value contracts, classified as medium to high risk, scheduled for renewal in 2024. A Modern Slavery due diligence process was undertaken which included:

- Requesting the supplier become a Sedex member;
- Obtaining an updated Sedex Members Ethical Trade Audit (SMETA) (a widely used social audit methodology that assesses a company's ethical business practices across aspects like labour standards, health and safety, environmental impact, and business ethics, primarily used to evaluate working conditions within a company's supply chain and ensure responsible sourcing practices); and
- Inclusion of anti-slavery clauses into the contracts.



## 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; and
- Comply with all applicable state, Australian and international anti-slavery and human trafficking laws, statutes, regulations and codes.



## Project Gradeo

CSNSW is the owner of the intellectual property in certain trial HSC exam test material, which has been created over a number of years and sold to schools and educational entities through CSNSW's operating brand, the CSSA.

During 2024, CSSA engaged Gradeo (a medium risk supplier) to enable online exam preparation and to digitise its past test material so as its stakeholders, and other interested parties, may access past test material on a subscription basis, with the intention of providing a resource which will improve student revision, reduce teacher workload and improve HSC exam outcomes.

Gradeo developed an online product, with input from CSNSW, which is capable of hosting CSNSW's past test material, and can be used to provide access to the test material on a subscription basis.

This is a high value contract and included a due diligence process undertaken by CSNSW.

## Modern Slavery Working Group (MSWG)

During 2024 a MSWG was established with the objectives to:

- Provide input and advice to CSNSW on issues related to modern slavery;
- Actively support the development and implementation of CSNSW's modern slavery action plan;
- Assist CSNSW 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 CSNSW meets the requirements of the Act.

The MSWG meets at least two times per year.

The MSWG has been assigned specific responsibilities, such as:

- Providing a forum to facilitate information flow and debate on modern slavery risks across CSNSW's operation and supply chain;
- Coordinating efforts to assess and address modern slavery risks across CSNSW's operations and supply chain;
- Together with the MSLO ensuring CSNSW's participation in regular ACAN workshops and webinars;
- Modifying (where required) and distributing ACAN modern slavery tools and resources to relevant personnel within CSNSW;
- Providing feedback and advice on policies, programs and other initiatives aimed at mitigating and ultimately eradicating modern slavery within CSNSW's operations and supply chain;
- Fostering collaboration across CSNSW and more broadly across ACAN participating entities to share ideas, initiatives and information regarding modern slavery risk management approaches; and
- Assisting with preparation of CSNSW's Modern Slavery Statement to be submitted as part of the ACAN participating entities' Compendium of Statements.

## Training

All employees have undertaken mandatory Modern Slavery training. New employees are also allocated the training to be completed within 90 days.

There are three compulsory modules assigned to all employees:

### Modern Slavery 101

This module provides a comprehensive overview of modern slavery practices - who is vulnerable, how and why it occurs. 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 those within the cleaning, security and hospitality sectors are also explained.





## Business Relevance

This module 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 Australia's modern slavery criminal offences and key reporting requirements for the *Modern Slavery Act 2018* (Cth) are included.



## Grievance Mechanisms & Remedy

This 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*.

CSNSW's suppliers and stakeholders can also access ACAN's comprehensive e-learning modules with links and downloads to additional modern slavery resources via the [Domus 8.7 e-learning page](#).



## Board commitment

The Board approves CSNSW's annual Modern Slavery Statement and is fully committed to actively working to eliminate modern slavery from our operations and supply chains.

## Membership of ACAN

CSNSW continues to participate in the ACAN Modern Slavery Risk Management Program (ACAN Program) and membership with ACAN.

The professional services, modern slavery expertise, tools and resources provided by ACAN Program Managers supports CSNSW to achieve regulatory compliance. The size and scope of the collaboration also creates opportunities to leverage engagement and impact with all stakeholders. This can create efficiencies (including savings) in procurement and promotes ethical and sustainable business management practices within Catholic entities.

## Remediation

As a participant of ACAN, CSNSW has access to Domus 8.7, a Modern Slavery Remediation Service.

Domus 8.7 prioritises safety, consent and support for victim survivors. This includes crisis support, referrals and case management that seeks to address the harms the victim survivors have experienced.

Domus 8.7 also provides strategic guidance, technical assistance and resources to equip Catholic entities to prevent, identify and remediate modern slavery.

## 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:

- Support for the work and mission of CSNSW's MSWG;
- Ongoing engagement and monitoring of existing suppliers;
- Inclusion of anti-slavery clauses whenever possible when entering into contracts with our supplier;
- 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;
- Celebration of St Bakhita's feast day (the patron saint of victims of human trafficking) across CSNSW to raise awareness of her important work and mission; and
- Continued upgrade and review of our finance system to better capture spend and risk categories.

# Criteria 5:

## Effectiveness assessment

CSNSW is dedicated to continuously improving its approach to modern slavery obligations, seeking opportunities to enhance its practices and procedures over time.

CSNSW conducted its second Modern Slavery Maturity Assessment and increased its maturity score in 5 out of the 6 areas noted below. This new approach focuses on evaluating the maturity of our modern slavery risk management framework, assessing governance, risk identification, risk management, and effectiveness in line with best practices and reporting requirements.

The maturity scorecard provides a comprehensive overview of our efforts across key operational areas:

1. **Business Process and Governance** - Establishes policies and structures that guide our approach, emphasising oversight and clear accountability;
2. **Operations** - Assesses internal practices and the effectiveness of risk management in day-to-day activities;
3. **Supply Chain** - Examines external partnerships and the measures in place to identify and mitigate risks beyond our direct operations;
4. **Worker Engagement** - Evaluates how we engage with workers and uphold standards to prevent exploitation;
5. **Entity's Program and Activities** - Reviews broader initiatives and commitments in the fight against modern slavery; and
6. **Grievance Mechanisms and Remediation** - Assesses reporting channels and response processes for addressing concerns.

The assessment identifies strengths and areas for improvement across four key dimensions:

1. **Governance** - Establishes a strong foundation through policies, oversight, and accountability to ensure a structured and effective approach;
2. **Risk Assessment** - Identifies high-risk areas within our operations and supply chain, enabling proactive monitoring, prioritization of resources, and mitigation efforts;
3. **Risk Management** - Evaluates the effectiveness of mitigating actions, with a mature approach being proactive, adaptable, and impactful; and
4. **Effectiveness** - Measures the impact of our anti-slavery efforts, ensuring continuous improvement and meaningful contributions toward eradicating modern slavery.

By assessing our maturity across these areas, CSNSW seeks assurances that our strategies are both effective and sustainable.

The analysis, feedback and recommended focus areas will be considered in CSNSW's 2025 action planning activities.

## Modern Slavery summary of key activities

	Activity	2024
<b>Internal/Staff</b>	Hours spent on modern slavery activities	470
	Individual staff completed e-learning	85
	E-learning modules completed	255
	Number of suppliers	74
	Number of suppliers across high-risk categories	64
<b>External/Supplier Engagement</b>	High risk suppliers as a percentage of spend	8.29%
	Number of ACAN Supplier Surveys completed (cumulative)	14
	Number of suppliers invited to join Sedex in 2024	3
	Number of suppliers that Joined Sedex (cumulative)	5
	Number of Sites with Sedex SAQ completed (cumulative)	3
	Number of non-conformances in 2024	0
<b>Domus 8.7 External Referrals</b>	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

## Continuous improvement

Continuous improvement enables CSNSW to strengthen and refine our approach to addressing modern slavery before issues develop.

The following actions include:

- CSNSW appointed a MSLO and established of a MSWG;
- Continuous monitoring of compliance tasks via our assurance program;
- Assigned training for all new employees as part of their induction program;
- 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 and Modern Slavery Policy.

## Criteria 6: Process of consultation with entities owned or controlled

This Statement includes CERL.

CSNSW's policies and procedures apply across both entities and CSNSW's MSLO acts in a combined role.

During the reporting period this statement covers, we actively engaged and consulted with all employees of CERL. We discussed details of the reporting requirements and ensured compliance with our Modern Slavery Policy.

CERL employees undertake the same modern slavery mandatory training as CSNSW employees and CSNSW will continue to prepare an annual statement for both entities.



## Criteria 7: Other relevant information

No other relevant information is reported.







Catholic  
Schools  
NSW







**Catholic Education**  
Diocese of Rockhampton

# **2024 Modern Slavery Statement**

**(Reporting period:  
1 January 2024 – 31 December 2024)**

ABN: 21528592597

Catholic Education – Diocese of Rockhampton  
143 West Street, Rockhampton, Qld, 4700  
[reception@rokcatholic.edu.au](mailto:reception@rokcatholic.edu.au)





## Statement from Diocesan Director Catholic Education

I am pleased to authorise the 2024 Modern Slavery Statement for Catholic Education - Diocese of Rockhampton (CEDR).

We have been privileged to contribute to previous Modern Slavery Statements for The Roman Catholic Trust Corporation for the Diocese of Rockhampton and are proud to present our first standalone Modern Slavery Statement for Catholic Education - Diocese of Rockhampton (CEDR).

CEDR continues to support and contribute to the prevention of modern slavery in our operations and supply chains and unequivocally denounce the crime of modern slavery.

We recognise our responsibility to uphold human rights and ensure that our business practices do not contribute to any form of exploitation.

I would like to acknowledge the support and guidance provided by the Australian Catholic Anti-Slavery Network (ACAN).

On behalf of everyone at Catholic Education - Diocese of Rockhampton, we look forward to continuing our efforts to the creation of a just, equitable and compassionate world.

Michael McCusker  
Diocesan Director Catholic Education

## 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 22 May 2025.

Most Reverend Michael McCarthy DD  
Bishop of Rockhampton



## Reporting Criteria 1 and 2: About Catholic Education – Diocese of Rockhampton

### About Us

Catholic Education - Diocese of Rockhampton (CEDR) is committed to high quality teaching and learning for around 19,000 students who are enrolled in our kindergartens, schools and colleges in the Diocese of Rockhampton, from Bundaberg to Mackay and west to Longreach.

CEDR has a proud tradition, stretching back some 150 years and ours is a story of courage, sacrifice, struggle, vision, commitment and above all of faith and trust in God. We owe a great deal to those who have gone before us, priests, religious and parents and lay educators who worked, sometimes in difficult conditions and often against odds to provide quality Catholic education to successive generations.

Here in the Diocese of Rockhampton our Catholic kindergartens, schools and colleges strive not just to be different but to make a difference in the lives of the young people entrusted to our care. CEDR extends beyond our Catholic schools to encompass the areas of Adult Education and Faith Formation, and Religious Instruction in State schools.

### Our Mission

Inspired by the person and teaching of Jesus Christ, we serve the communities of the Catholic Diocese of Rockhampton.

#### *We provide*

- Life-long faith education,
- Religious education,
- Relevant, holistic, quality education,

assisting all in their search for meaning for life.

### Our Vision

#### *Our Catholic Kindergartens, Schools and Colleges*

- Have a clear Catholic identity
- Are open and accessible to all who seek our values
- Are communities of care and safety
- Offer a relevant and holistic curriculum of quality teaching and learning
- Give witness to the message of Jesus and the mission of the Church
- Are characterised by inclusive partnerships within a community of faith

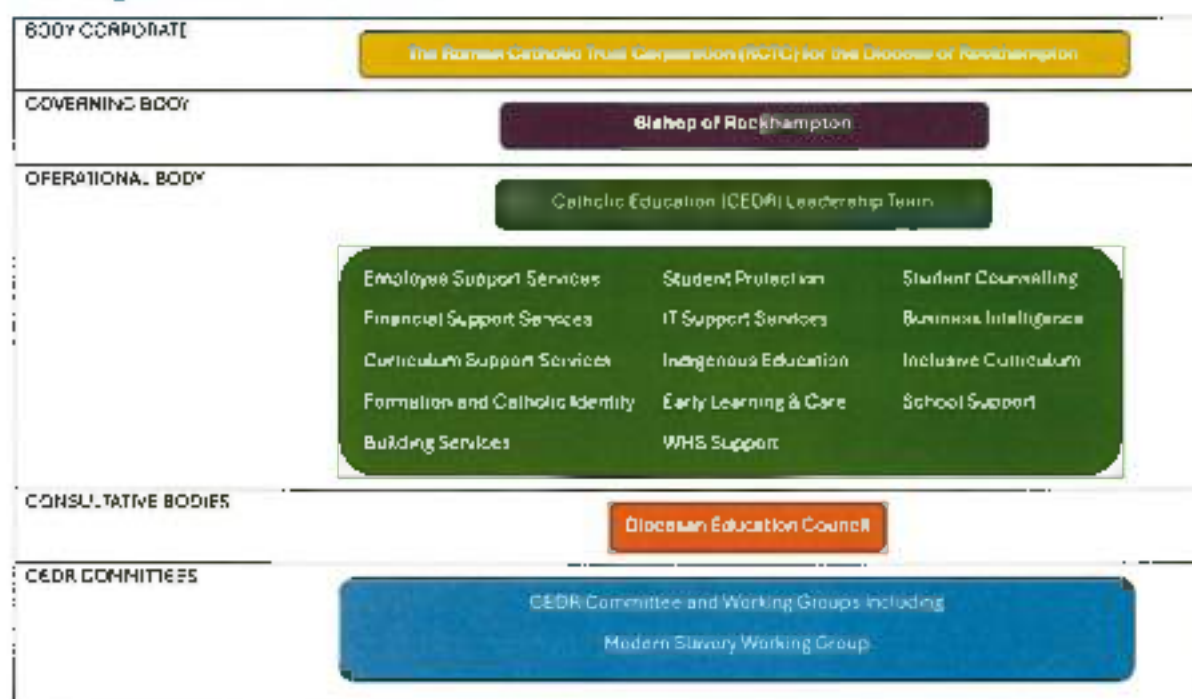




## Our Commitment

- We recognise each person's inherent dignity, as created in God's image
- We are committed to ensuring First Nations children and young people are empowered to achieve their full learning potential
- We engage all in reconciliation in education
- We are committed to safeguarding and student protection, ensuring safe learning environments for all in our communities
- We are committed to sustainability practices

## Our Organisational Structure



The Roman Catholic Trust Corporation for the Diocese of Rockhampton is the legal entity of the Diocese of Rockhampton which delegates the administration and management of Catholic education to Catholic Education - Diocese of Rockhampton (CEDR).

The Sole Trustee of the Governing Body is Most Reverend Michael McCarthy DD - Bishop of Rockhampton. A Charter guides the operations of CEDR. It sets out the responsibilities the Bishop delegates to CEDR for the operation of Catholic kindergartens, schools and colleges in the Diocese of Rockhampton.

The Bishop appoints a Diocesan Education Council (DEC) to provide advice on all matters pertaining to Catholic education and its delivery. The DEC assists the Bishop in determining the educational policies and priorities for the Diocese.

Authority for leadership, administration and management of CEDR has been delegated to the Diocesan Director Catholic Education. This includes implementation of policies and the development, implementation and review of all other governance instruments, including procedures and guidelines as required to meet civil, canonical and specific agency accountabilities. The Diocesan Director Catholic Education is the Executive Officer for the DEC and is an ex-officio member of the DEC.

### Modern Slavery Working Group

In 2024, CEDR was part of a Modern Slavery Working Group that was led by the Catholic Diocese of Rockhampton and included all entities of The Roman Catholic Trust Corporation for the Diocese of Rockhampton. The group met twice in 2024 to continue its work in the implementation of modern slavery initiatives across the Diocese. On an annual basis, the working group provides an annual report to the DEC, Diocesan Finance Council and Diocesan Pastoral Council. CEDR's representation on the group is through the Assistant Director Business and Strategy and the Compliance and Risk Coordinator. Matters requiring the consideration of the CEDR Leadership Team are escalated and discussed as required.

### Our Operations

CEDR's Office is at 143 West Street, Rockhampton QLD 4700, and employs approximately 3,000 people. It operates kindergartens, schools and colleges 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 10,000 students in its:

- 31 primary schools (including 19 outside school hours care services)
- 8 colleges, and
- 10 kindergartens





All schools administered by CEDR are operated on a not for profit basis and in accordance with the governance and management standards set out in the *Education (Accreditation of non-State Schools) Act 2018* and *Queensland Catholic Schools Not-for-Profit Guidelines (2019)*

CEDR is reliant on Commonwealth and State Government funding for the continued delivery of quality Catholic education to the community. CEDR's gross revenue in 2024 was \$420M.

### Our Supply Chain

Where possible, CEDR supports local businesses and supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Furniture and office supplies
- Facility management and property maintenance
- Building and construction
- Food and catering services
- Cleaning and security services
- Medical devices and supplies
- ICT Hardware
- Uniforms and PPE
- Events and event management
- Waste management services
- Finance and investment
- Travel and accommodation
- ICT Software and network services
- Fleet management, consumable and maintenance
- Advertising and marketing
- Print/mail provider
- Utilities
- Professional services
- Licence/membership fees
- Government and agency fees

## Reporting Criteria 3: Modern slavery risks in operations and supply chains

CEDR is a member organisation of the Australian Catholic Anti-Slavery Network (ACAN). As part of ACAN, CEDR'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

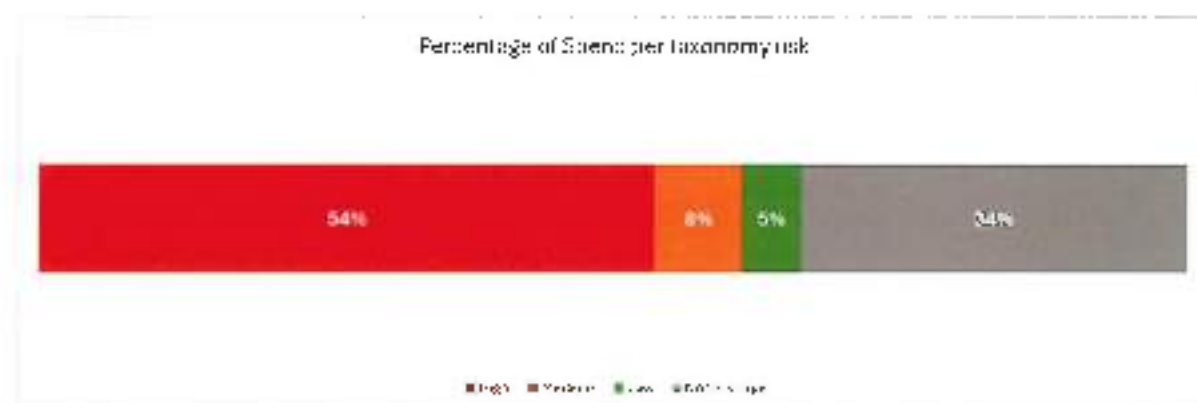
CEDR employs approximately 3,000 people. The Diocesan Director Catholic Education is responsible for ensuring compliance with labour, employment, immigration and whistleblower laws to the extent that they are applicable. CEDR also employs professionally qualified people to manage human resource matters to ensure compliance with relevant industrial instruments and legislation.

Only a very small percentage of CEDR 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.

### Supply Chain Risks

Across all kindergartens, schools and colleges, CEDR has approximately 3,583 suppliers with a total spend of approximately \$171M (2024).

Modern slavery risks associated with CEDR have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. Analysis of spend data shows 54% of spend was in high-risk categories with 2,866 suppliers totalling \$91M spend.

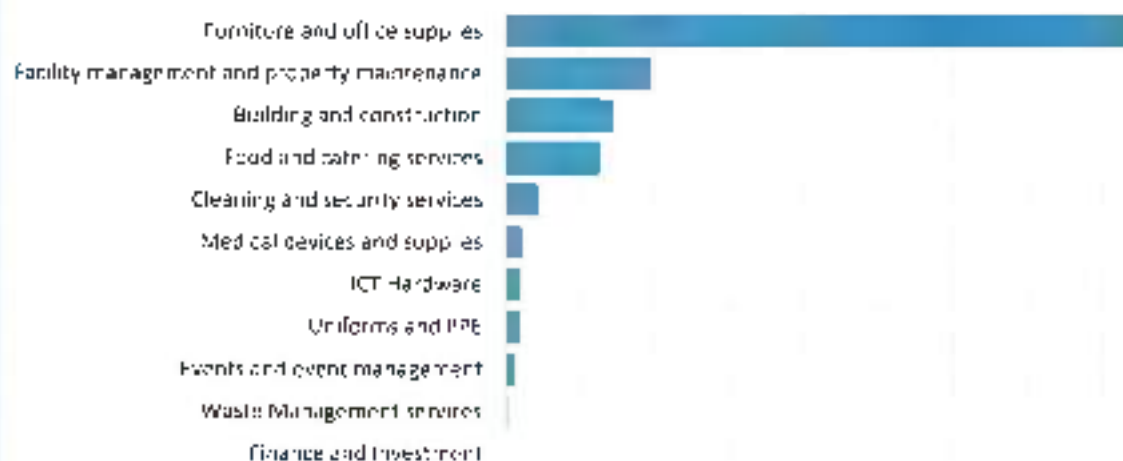




#### Number of suppliers in high-risk categories:

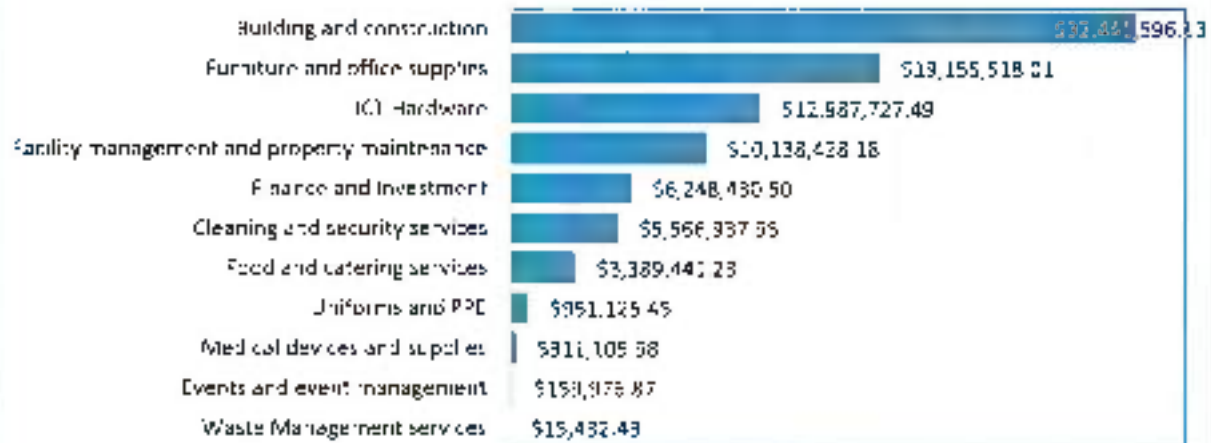
Finance and Investment	4
Waste Management services	9
Events and event management	25
Uniforms and PPE	37
ICT Hardware	40
Medical devices and supplies	44
Cleaning and security services	87
Food and catering services	251
Building and construction	290
Facility management and property maintenance	391
Furniture and office supplies	1,688

#### Number of suppliers in high risk Taxonomy categories





### Procurement Spend in high risk Taxonomy categories



CEDR's procurement procedure includes 'non-price' criteria that are considered when selecting suppliers. Social and economic benefits is one of the considerations that are assessed when undertaking procurement and include:

- Adherence to Modern Slavery requirements
- Engagement with local contractors / sub-contractors (i.e. local content)
- Engagement with indigenous businesses in accordance with the CEDR Reconciliation Action Plan.

## Reporting Criteria 4: Steps taken to address modern slavery risk

### Supplier Engagement

ACAN continue to support CEDR and the broader Diocese with supplier engagement considerations and activities. A Diocesan Supplier Code of Conduct was developed and approved in 2023.

With support through the ACAN supplier engagement process, 53 contractors engaged with the supplier survey process in 2024, with over half of those joining Sedex. Further engagement strategies will continue with other high-risk suppliers utilising the ACAN survey process.

CEDR 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, but mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.



## Our Organisation

CEDR complies with the Fair Work Act employment awards and collective agreements with the directly employed workforce, through a variety of policies and procedures, including:

- Employment Contracts
- Code of Conduct
- Student Protection and Safeguarding Policies and Procedures
- Grievance and Resolution Procedures
- Whistleblower Policy
- WHS Policies and Procedures

## Modern Slavery Working Group

In 2024, CEDR was part of a Modern Slavery Working Group that was led by the Catholic Diocese of Rockhampton and included all entities of The Roman Catholic Trust Corporation for the Diocese of Rockhampton. The group met twice in 2024 to continue its work in the implementation of modern slavery initiatives across the Diocese.

Representatives from ACAN joined the working group meetings to provide support on various matters including reporting requirements and supplier engagement. The working group will continue to consider how ACAN tools can best be adapted for deployment including initiatives to engage with suppliers. The group will continue to provide advice on the management of modern slavery risks and building awareness of modern slavery throughout the organisation.

## Modern Slavery Policy

The Diocese's Modern Slavery Policy was endorsed and published in 2023. The purpose of the Policy is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains. CEDR commits and contributes to the overarching policy framework.

## Australian Catholic Anti-Slavery Network ('ACAN')

In 2024, CEDR continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. CEDR actively participates in the ACAN Modern Slavery Risk Management Program including participation in monthly webinars hosted by ACAN that provide updates about the latest modern slavery resources available to members and suppliers. The support and resources provided by ACAN enable CEDR to strengthen its approach to embedding modern slavery risk management in systems and processes.

## Staff Awareness and Training

CEDR is committed to supporting its staff to raise their awareness and understanding of modern slavery, including recognising the causes and mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

All CEDR staff complete mandatory modern slavery training at the commencement of the school year.

## 2024 Modern Slavery Statement

## 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 CEDR places on eradicating modern slavery from supply chains.

## Remediation

CEDR 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 CEDR 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 Catholic Diocese of Rockhampton 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*, the Catholic Diocese of Rockhampton can help people impacted by modern slavery to achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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.



## Modern Slavery Action Plan progress

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
<b>Commitment</b>		
Engage top-level management and set direction	<ul style="list-style-type: none"> <li>• Deliver modern slavery awareness presentation to CEDR Leadership Team and DEC</li> </ul>	<ul style="list-style-type: none"> <li>• Modern slavery awareness presentation delivered</li> </ul>
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> <li>• Develop and promulgate Modern Slavery Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Modern Slavery Policy approved</li> </ul>
Establish a Modern Slavery Working Group	<ul style="list-style-type: none"> <li>• Develop Terms of Reference for Working Group</li> <li>• Formally appoint members to Working Group</li> </ul>	<ul style="list-style-type: none"> <li>• Working Group Terms of Reference approved</li> <li>• Working Group members formally appointed</li> </ul>
Modern slavery responsibilities defined	<ul style="list-style-type: none"> <li>• Allocate modern slavery responsibilities to staff where applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Modern slavery responsibilities allocated</li> </ul>
<b>Action Plan &amp; Monitoring</b>		
Prepare and implement a modern slavery action plan or strategy to address gaps	<ul style="list-style-type: none"> <li>• Develop Action Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Working Group meets regularly to develop and monitor strategies captured in Action Plan. Supported by ACAN</li> </ul>
Monitor progress and ensure continual improvement	<ul style="list-style-type: none"> <li>• Hold regular Working Group meetings to monitor progress and propose improvements</li> <li>• Complete entity profile annually</li> </ul>	<ul style="list-style-type: none"> <li>• Working Group discusses progress and opportunities for improvement</li> <li>• Entity profile performed annually to produce risk scores for management controls</li> </ul>
<b>Supplier Risk</b>		
Prioritise suppliers based on spend and potential risk	<ul style="list-style-type: none"> <li>• Analyse supplier data at least annually to determine highest risk</li> </ul>	<ul style="list-style-type: none"> <li>• Data is gathered and analysed annually to determine highest risk suppliers</li> </ul>
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> <li>• Email high-risk suppliers inviting them to complete ACAN survey and attend ACAN webinar</li> <li>• Develop and promulgate Supplier Code of Conduct</li> <li>• Embed modern slavery clause(s) in supplier contracts</li> </ul>	<ul style="list-style-type: none"> <li>• Letters to be sent to high-risk suppliers, outlining the importance CEDR places on the eradication of Modern Slavery</li> <li>• Supplier Code of Conduct developed</li> </ul>

OBJECTIVE	PROPOSED ACTION	CURRENT STATUS
<b>Engage, Educate &amp; Respond</b>		
Engage and train management, employees and contractors	<ul style="list-style-type: none"> <li>• Roll out awareness presentation and e-learning modules to staff involved in procurement</li> <li>• Raise awareness of modern slavery through social media</li> </ul>	<ul style="list-style-type: none"> <li>• Diocesan Councils and all CEDR staff have received awareness presentation</li> <li>• Modern Slavery Policy shared on Diocesan Facebook page and LinkedIn</li> </ul>
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> <li>• Offer educational resources to high-risk suppliers (e.g., supplier webinars)</li> </ul>	<ul style="list-style-type: none"> <li>• 34 suppliers completed surveys providing insight into actual risk; 46 suppliers attended capacity building webinars and 78 were invited to join Sedex.</li> </ul>
Establish remedy pathway to respond when slavery practices identified in operations or supply chain	<ul style="list-style-type: none"> <li>• Refer to <i>Reporting Criteria 4</i> section above</li> <li>• Develop and implement Whistleblower Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to <i>Reporting Criteria 4</i> section above</li> <li>• CEDR Whistleblower Policy developed and approved</li> </ul>
<b>Modern Slavery Statement</b>		
Prepare and submit annual Modern Slavery Statements	<ul style="list-style-type: none"> <li>• Submit annual Modern Slavery Statements</li> </ul>	<ul style="list-style-type: none"> <li>• This is CEDR's fourth annual Modern Slavery Statement</li> </ul>
Collaborate with ACAN participants	<ul style="list-style-type: none"> <li>• Regularly participate in ACAN meetings</li> </ul>	<ul style="list-style-type: none"> <li>• MSLO participates in regular ACAN meetings</li> <li>• ACAN reps join Working Group and other meetings as requested</li> </ul>
Publish Modern Slavery Statement on website	<ul style="list-style-type: none"> <li>• Publish Modern Slavery Statements on Diocesan website annually</li> </ul>	<ul style="list-style-type: none"> <li>• 2023 Modern Slavery Statement published on CEDR website</li> </ul>



## Reporting Criteria 5: Effectiveness of steps taken under Criterion 4

CEUR also uses the following performance indicators to measure its progress in the eradication of modern slavery:

	ACTIVITY	2023	2024
INTERNAL / STAFF	Hours spent on modern slavery activities	1,814	965
	Individual staff completed eLearning	3,629	2,972*
	ACAN eLearning modules completed	42	0
	MSWG meetings held	3	2
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	9,543	3,585
	Number of suppliers with visible contact information and ABN		3,104
	Number of suppliers across high-risk categories	645	2,866
	Number of ACAN Supplier Surveys completed	34	413
	Supplier staff attending capacity building webinars (suppliers engaged on MS)	24	46
	Invited to join Sedex	21	78
	Joined Sedex	0	64
	Sedex SAQ completed	2	81
	Sedex Members Ethical Trade Audit (SMETA) Social audits	1	17
	Corrective actions	0	75
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

\*School uniform video



## Reporting Criteria 6: Internal Consultation

In 2024, CEDR approached the task of addressing its modern slavery risks in collaboration with the broader Catholic Diocese of Rockhampton. The Modern Slavery Working Group comprised of representatives from CEDR, CatholicCareCQ and the Diocesan Officers (on behalf of parishes).

Staff awareness and capacity building is provided to all CEDR staff through the mandatory modern slavery staff training program.

Modern slavery risk management activities will continue to be delivered to CEDR personnel at every opportunity to promote and develop organisational awareness.

## Reporting Criteria 7: Any other relevant information

There is no other relevant information to report.





DIOCESE OF  
**LISMORE**  
CATHOLIC SCHOOLS LIMITED

# Modern Slavery Statement

1 January – 31 December 2024



**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 2024 Approval

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The DLC SL 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 read 'Frank Hannigan', with a long, sweeping horizontal line extending to the right.

Mr Frank Hannigan  
*DLC SL 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.

DLC SL'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 read 'A. Spencer', with a long, sweeping horizontal line extending to the right.

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 26 May 2025. 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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# Criteria 1 & 2:

## *About Diocese of Lismore Catholic Schools*

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### About us

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In July 2020, Diocese of Lismore Catholic Schools Limited (DLCSL) was established. This signalled the largest organisational change in Catholic education in the Diocese of Lismore since the establishment of the systemic model in the 1970s. The DLCSL assists 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 three (3) year period (2025-2027). 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 provides a range of services to support approximately 2,680 staff in 45 vibrant and dynamic school communities that serve more than 18,200 students (August 2024).

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 Mission of the Diocese of Lismore is to enable “our students to achieve the fullness of life”. Our vision is 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.”

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.

DLCSL 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](mailto:admin@dlcsl.catholic.edu.au)

## 2024 Modern Slavery Risk Management Initiatives

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To support an awareness of Modern Slavery Risk throughout our organisation the following initiatives and/or actions were identified and carried out during 2024.

- Sharing of supplier spend data.
- Identification of suppliers who joined Sedex and completed Self-Assessment Questionnaires.
- Provision of quarterly reports to the DLCSL Board Audit and Risk Committee on Modern Slavery.
- Staff participation in ACAN webinars.
- Utilised Technology One to report on our supplier data across the 45 schools within the diocese.

## Our Plans for 2025

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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 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 process of engaging new suppliers; and
- 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 2024 spend of unregistered suppliers, informing them of the mutual benefit of registering with this platform.

## Our Organisational Structure

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The 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. DLCSL became the registered proprietor of the 45 schools 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). By 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 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. This has further enhanced 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 three (3) Committees to ensure that the Board has effective mechanisms to deal with specific issues that require specialised areas of expertise.

1. Mission and Education Committee
2. Finance, Audit and Risk Committee
3. Governance and Nominations Committee

## Our Operations

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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 provides a range of services to support approximately 2,680 staff in 45 vibrant and dynamic school communities that serve approximately 18,200 students. Annual revenue is approximately \$418M with employee related expenses of \$339M.

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 Mary's Catholic College Casino
St Francis Xavier Primary School Ballina	St Augustine's Primary School Coffs Harbour
Xavier Catholic College Ballina	St John Paul College Coffs Harbour
St James' Primary School Banora Point	St Joseph's Primary School Coraki
St Joseph's College Banora Point	Mount St John Primary School Dorrigo
St Mary's Primary School Bellingen	St Mary's Primary School Grafton
St Mary's Primary School Bowraville	McAuley Catholic College Grafton
St Finbarr's Primary School Byron Bay	St Joseph's Primary School South Grafton
St Mary's Primary School Casino	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 within a large range of demographics, and 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 in 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 modern slavery risk for DLCSL. Mitigating this risk is an evolving process as we better understand our suppliers and supply chain in respect to modern slavery. Further, as 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 DLCSL to deliver quality education to students. In 2024, Financial Services completed the complex task of mapping and analysing our supplier spend for suppliers where the total yearly spend exceeded \$100,000. Using our finance system we will be able to 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.

## Criteria 3:

### *Modern Slavery Risks*

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#### Operational Risks

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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 five (5) year period to 2025. A three (3) year Strategic Plan has been developed and a dedicated Transformation Team is 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

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DLCSL employs approximately 2,680 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.

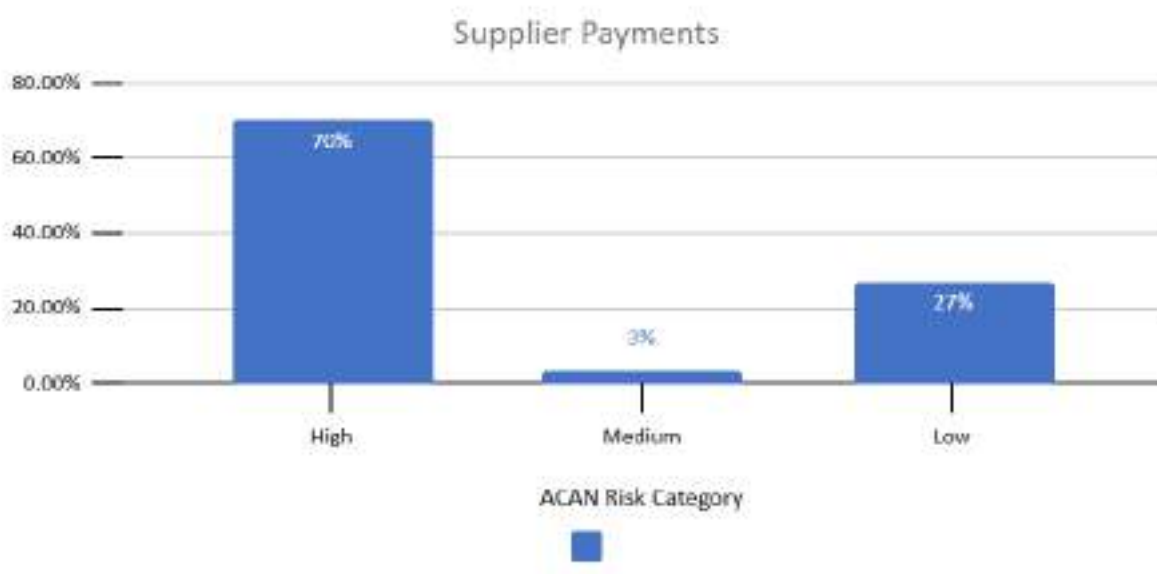
Our workforce has a gender balance of 73% female and 27% male.

DLCSL has a range of policies and procedures in place to cover industrial and whistle-blower 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 2024 (over \$100k/supplier only):

Category	Count of Suppliers	Sum of Total
<b>High</b>	<b>99</b>	<b>\$375,523,584.24</b>
Building and Construction	22	\$23,667,815.22
Cleaning and Security Services	8	\$2,453,785.85
Events and Event Management	15	\$2,911,740.88
Facility Management and Property Maintenance	20	\$5,808,083.28
Finance, Investment & Insurance	3	\$331,099,472.19
Food, Beverage and Catering Services	9	\$1,770,840.72
Furniture, Office & Educational Supplies	12	\$2,765,220.88
ICT Hardware	6	\$4,539,091.60
Labour Hire		\$0
Linen, Carpet, Laundry and Textile Products	1	\$118,324.99
Medical Consumables, Devices and Supplies		\$0
Uniforms and PPE	1	\$105,504.55
Waste Management & Recycling Services	2	\$283,704.08



## Criteria 4:

### *Actions taken to assess and address risk*

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The focus for 2024 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, 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; and
- Continued participation in the ACAN risk management program.

Our Modern Slavery Action Plan initiatives during 2024 have seen some improvement at the completion of 2024.



# Modern slavery action plan and road map

## High Risk Procurement Categories

Category	Planned Actions	Progress
<b>Management systems</b>	ARC reports Quarterly Dashboard report from Functional Risk Register	Audit and Risk Committee quarterly reporting regime established
	Develop Modern Slavery Risk Register Progressing	Progressing
	Dashboard Risk Reports	Progressing
	Leader article	Ongoing
	Integration with Risk Registers and control improvement plans	Ongoing
	Risk Management Framework	Framework developed Implementation underway
<b>Risk Management</b>	Functional Risk Register development	Progressing
<b>Human Resources and Recruitment</b>	Introduce Modern Slavery Risk into Induction Program	ACAN training being reviewed to determine fitness for purpose
<b>Procurement and Supply Chain</b>	Review procurement policy	Progressing

The following table shows DLCSL engagement with high-risk suppliers via ACAN services:

Entity	Diocese of Lismore Catholic Schools Office
Number of suppliers	4003
Number of suppliers with visible contact information and ABN	1
Number of suppliers across high-risk categories	717
Number of ACAN Supplier Surveys completed (cumulative)	439
Number of Supplier staff attending capacity building webinars	56
Number of suppliers invited to join Sedex (cumulative)	73
Number of suppliers that Joined Sedex (cumulative)	67
Number of Sites with Sedex SAQ completed (cumulative)	86
Number of social audits completed in 2024	17
Number of non-conformances in 2024	75

# Criteria 5:

## *Effectiveness Assessment*

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### Effectiveness

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#### ***An analysis of our Sedex Supplier engagement by High Risk Categories for 2024:***

	ACTIVITY	2024 Diocese of Lismore Catholic Schools Office
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	4003
	Number of suppliers with visible contact information and ABN	1
	Number of suppliers across high-risk categories	717
	Number of ACAN Supplier Surveys completed	439
	Supplier staff attending capacity building webinars	56
	Invited to join Sedex	73
	Joined Sedex	67
	Sedex SAQ completed	86
	Social audits	17
	Corrective actions	75
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

Baseline data was from 2023, the first year that the DLCSL actively participated in Sedex and Supplier Self Assessments with our suppliers. In 2024 DLCSL reduced its number of suppliers in high-risk categories from 861 to 717. There was an increase in Sedex SAQ completions from 21 suppliers to 86 suppliers. Suppliers joining Sedex was also positive news with the number of suppliers rising from 62 suppliers to 67 suppliers. The number of supplier staff attending capacity building webinars rose from 7 to 56. The number of ACAN supplier surveys completed increased from 289 to 439. These are all positive steps in the progress of eradication of modern slavery in our supplier chains.

As our organisation matures in its approach to a centralised management of our Supply Chain, we will focus on continuing to increase our engagement in this area.

## Our Plans Beyond 2025

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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 suppliers;
- 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, facility management and property maintenance, cleaning and security services 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***

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No entities owned or controlled by DLCSL.

## **Criteria 7:**

### ***Any Other Relevant Information***

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Nil.







# Modern Slavery



1. Implementation date	11/06/2025
2. Review Date	2027
3. Approved by	ACS Leadership Team & ACSB
4. Author	ACS Finance
5. Related documents	
6. Appendices	
7. Ratified	

## **Disclosure Note**

This statement has been made on behalf of Armidale Catholic Schools. Covering the reporting period 1 January 2024 to 31 December 2024, this statement focuses solely on work performed by Armidale Catholic Schools, ABN 90 702 916 776

The Head Office is at Unit 2/131 Barney Street, Armidale NSW 2350.

Website: <https://www.arm.catholic.edu.au>

Email: [cso@arm.catholic.edu.au](mailto:cso@arm.catholic.edu.au)

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## **Authorisation by Armidale Catholic Schools Chair, Peter Maher**

I am pleased to present the first Modern Slavery Statement for Catholic schools in the Diocese of Armidale.

As one of the largest non-government employers and producers of goods and services in Australia, the Catholic Church holds a pivotal role in ensuring that our workplaces and practices are free from all forms of modern slavery.

Armidale Catholic Schools is committed to upholding human rights and taking meaningful action to identify, address, and mitigate the risks of modern slavery within our operations and supply chains. We closely partner with the Australian Catholic Anti-Slavery Network (ACAN) to leverage our collective influence and drive the urgently needed change.

This Modern Slavery Statement outlines the actions we have taken throughout 2024 to assess and address the risks of modern slavery. We acknowledge this is a continuing journey and reaffirm our commitment to improving this vital area.

On behalf of the Board of Armidale Catholic Schools, I fully support this statement and encourage all Catholic schools within the Diocese of Armidale to deepen their understanding and explore ways to collaborate in creating a world free from modern slavery.

Peter Maher  
Chair, Armidale Catholic Schools  
Date:

## **Approval**

This Modern Slavery Statement was approved by the principal governing body of The Diocese of Armidale as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 10th June 2025. This modern slavery statement is signed by a responsible member of Armidale Catholic Schools as defined by the Act.

# Reporting Criteria 1: About Armidale Catholic Schools

## **About Armidale Catholic Schools**

Armidale Catholic Schools (ACS) provides educational, administrative, ICT, industrial, financial, and employment services support for 24 schools—19 primary, 2 central, and 3 secondary—across a wide rural and remote geographical area in the New England and North West regions of NSW.

Our Catholic school system provides a Catholic education to just under 6,000 students and employs approximately 1,000 staff. It works closely with our Parishes and Parish Priests to further Jesus' mission.

As a Catholic professional learning community, we are committed to improving the faith, learning, and wellbeing outcomes of our young people and communities. We work together to ensure literate and numerate students for a hope-filled future.

Our system is culturally diverse, with 14.1% of students identifying as Aboriginal and Torres Strait Islander.

## Vision & Mission



### Our Vision

A Christ-centered inclusive learning community that supports young people to realise a hope-filled future.

### Our Mission

A Catholic professional learning community committed to improving faith, learning and wellbeing of our students, staff and families.

### Catholic Principles & Values



**PRIMACY  
OF GOD**



**SANCTITY  
OF LIFE**



**FIDELITY IN  
RELATIONSHIPS**



**COMMON  
GOOD**

# Annual Improvement Plan



## ANNUAL IMPROVEMENT PLAN 2025

Literate & Numerate Students for a Hope-Filled Future

### Our Mission

A Catholic Professional Learning Community committed to improving the faith, learning and wellbeing of our students, staff and families.

### Our Vision

A Christ-centred inclusive learning community that supports young people to realise a hope-filled future.

### Our Catholic Principles & Values



### INTENDED FUTURES

#### Christ-centred inclusive learning communities

To sustain a Christ-centred inclusive learning community that strengthens the faith, discipleship, pastoral care and wellbeing of all.

#### Strong teams that enhance learning & teaching

To promote a data-informed strong team culture that improves pedagogy and enhances learning outcomes for all students.

#### Excellence in stewardship and governance

To care for all students, staff and schools through capability, transparency and accountability.

### STRATEGIES

#### Catholic Identity

- Form the faith and Catholic worldview of students, staff and families.
- Strengthen the structures and delivery of the RE Curriculum.
- Enhance parish, school and family relationships.
- Promote wellbeing amongst staff, students and families through a Catholic lens.
- Strategic review and development of Aboriginal and Torres Strait Islander Education Policy 2025 - 2030.

#### Provision of Quality Learning and Teaching

- Embed the 2024-2026 Non-negotiables including:
  - Be data-informed in learning and teaching with precision.
  - Embed evidence-based, pedagogical & assessment practices into the classroom using the 14 Parameters and Clarity Suite.
- Plan, implement and embed new syllabuses per the MESA curriculum reform timeline.
- Understand, value & embed authentic, culturally responsive Aboriginal & Torres Strait Islander perspectives.
- Expand the range of courses offered using LMS.
- Plan and Prepare for the introduction of Stage 6 - Holy Trinity Inverell.

#### Recruitment, Retention and Development of Staff

- Implement TechOne HR-IT.
- Develop and refine Leading Well in ACS and align it to professional growth and development.
- Workforce data is used to inform decisions.
- Embed and extend strategic workforce planning.

#### System Sustainability

- Embed the value-optimisation framework.
- Implement phase 1 of the system-led school fee management.
- Implement system & school enrolment policy, procedures & guidelines utilising Compass.
- Implement clear procurement maintenance, security & enhancement plans for the ICT environment.
- Investigate expansion of schooling pre-K-12 options.
- Plan for the impact of AI for ACS.
- Embed capital & facilities plans in annual & long-term planning.
- Implement additional functionality within the FMS.
- Monitor new branding and marketing for the system of schools.

#### Embedding Governance & Stewardship

- Enhancing a systemic approach to enterprise risk.
- The child safety framework reflects updated Child Safety Standards.
- Strategic review of the WMS framework.

### EVIDENCE OF IMPACT

- Increased uptake of faith formation activities.
- Catholic Principles and Values are tangible, prominent and can be articulated in schools.
- RE Curriculum improvements are explored and planned.
- Clarity Suite is used as PL to drive the ACS Non-negotiables as a framework for teaching and learning in Religious Education.
- Professional learning opportunities concerning RE pedagogy and achieving the curriculum outcomes are accessed.
- Communication channels are evident and inclusive.
- Active creation of opportunities for collaboration and shared understanding including school/parish and school/families.
- Growth and opportunities for students with diverse learning needs are planned for, implemented and evaluated.
- Living Well Learning Well is a viable and articulated framework for student support.
- Promote and strengthen Aboriginal and Torres Strait Islander culture and events through genuine and meaningful relationships, transparency, and prominence.

- Evidence is utilised to ensure all students have improved faith, learning & wellbeing outcomes.
- Curriculum programs are being implemented showing evidence of curriculum reform as per implementation plan.
- A proposal exists for effectively teaching the Aboriginal language syllabus by establishing 'School communities' Language nests.
- Practical framework & data recording for Aboriginal & Torres Strait Islander Plans.
- The flexible learning options have increased, with courses ready for implementation of Stage 6 in Holy Trinity Inverell.

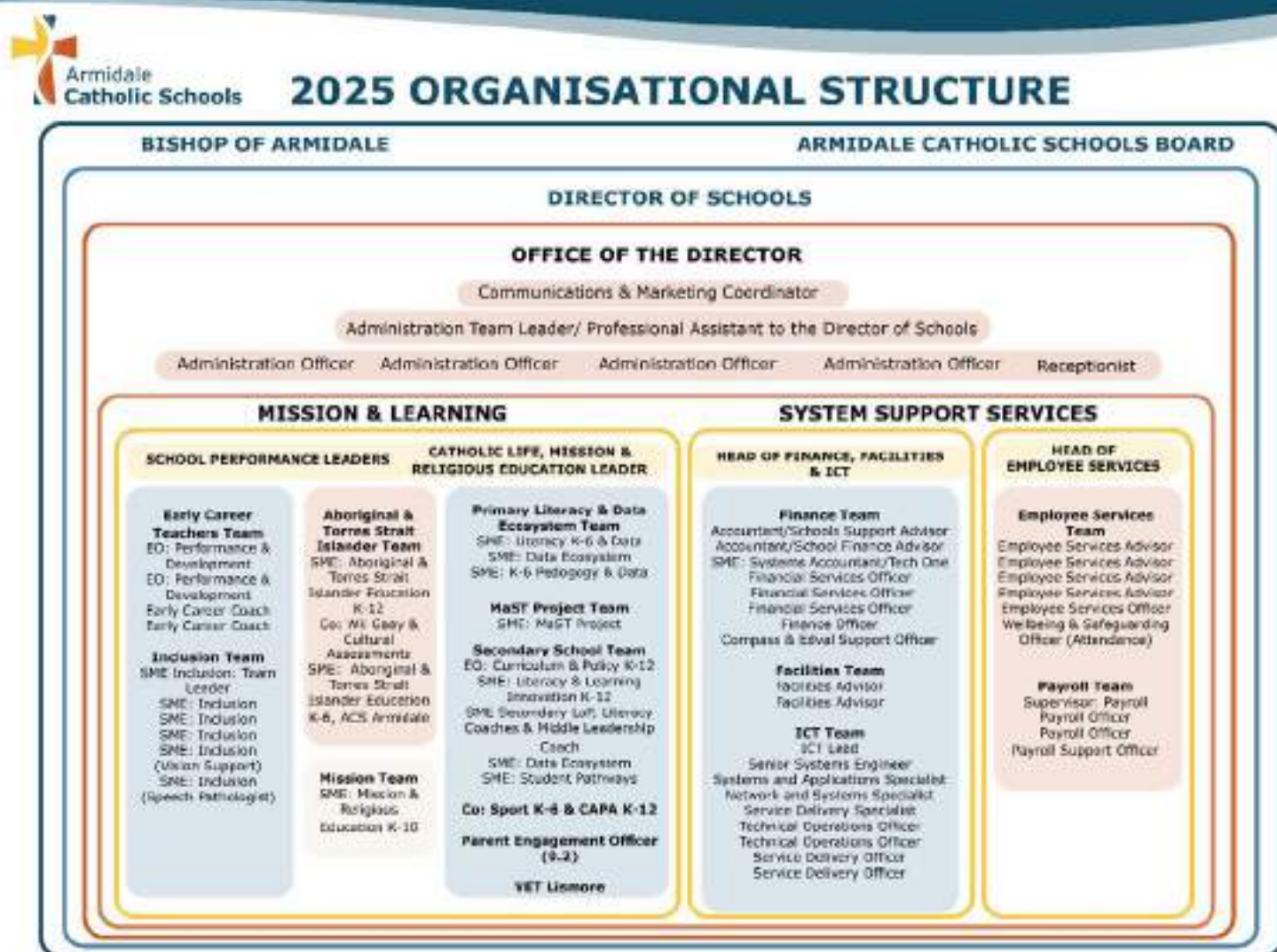
- Processing of payroll occurs with TechOne.
- Recruitment, retention and succession planning strategies are in place to meet workforce needs.
- Visualisation of workforce data.
- Aspiring, middle & experienced school leaders identified & supported to access appropriate PL.
- Increased diversity of applications.

- The value-optimisation framework is implemented.
- A system-led school fee management framework, inclusive of policy, guidelines and roadmap exists.
- Enrolment policies, procedures, guidelines and Compass are used consistently by schools.
- Plans for ICT procurement maintenance, security & enhancement; and a roadmap for implementation & review exist and implementation has commenced.
- A strategic position for pre-K to 12 options has been developed.
- AI policy & guideline exist.
- A prioritised, multi-year FMS extension implementation roadmap has been developed and implementation has commenced.
- New branding implemented and engagement monitored across marketing and communication tools.

- A systematic approach to managing enterprise risks exists. An implementation plan has been developed.
- Child standards are being reviewed.
- WMS implementation framework.

# Reporting Criteria 2: Our Organisational Structure, Operations and Supply Chains

## Our Organisational Structure





## **Governance**

The Trustees of the Roman Catholic Church for the Diocese of Armidale are the sole members of the incorporated entity under the leadership of Bishop Peter Murphy. The Board of Directors are responsible for the organisation's overall governance and strategic direction. 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, Ms Reginz Menz, and the Executive Leadership Team. Armidale Catholic Schools has been acknowledged as a separate entity for taxation purposes, being allocated its own ABN.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. Armidale Catholic Schools provides quality learning and teaching in a faith-centred environment.

Armidale Catholic Schools was established as the agency to deliver Catholic Education in the Armidale Diocese. ACS works hand in hand with the other agencies of the diocese in fulfilling the Church’s mission. ACS, as an agency of the Trustees of the Roman Catholic Church for the Diocese of Armidale, is covered under the auspices of the Roman Catholic Church Property Trust Property Act 1936.

ACS’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 February 2020, the Armidale Catholic Schools Board was established by the Bishop of Armidale as a deliberative body to advise him on education policy for Catholic schools within the Diocese of Armidale.

Armidale Catholic Schools has established a working Modern Slavery working group with a representation from Finance, Facilities & ICT. The Working Group is sponsored by the Head of Finance, Facilities, and ICT.

Overall governance of Modern Slavery lies with Bishop Peter Murphy and the ACS Board. The Leadership Team of ACS is responsible for overseeing Modern Slavery.

The Finance Team is responsible for all Modern Slavery requirements, and the Head of Finance, Facilities & ICT is a member of the Leadership Team.

## **Operations**

In 2024, Armidale Catholic Schools managed 24 Catholic Schools - (19 primary schools, 3 secondary schools and two central schools K-Yr 10, 6,050 students and 1106 staff. The Armidale Catholic Schools Support Teams (central office) in Armidale manages all the activities that can be separated from the schools (i.e. payroll, accounts payable, recruitment, provision of technology, professional learning, facilities, etc) so schools can focus on their core business of teaching and learning.

## ACS Revenue and Expenditure

### Charity details

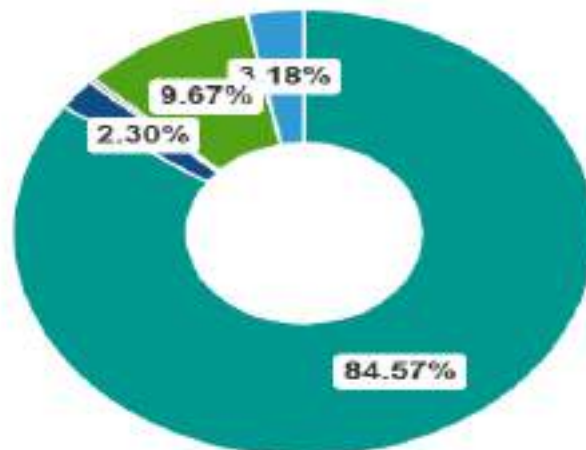
<b>ABN:</b>	90702916776
<b>Address:</b>	131 Barney Sreet Armidale NSW, 2350
<b>Email:</b>	<a href="mailto:cs@arm.catholic.edu.au">cs@arm.catholic.edu.au</a>
<b>Address For Service email:</b>	<a href="mailto:hbentham@arm.catholic.edu.au">hbentham@arm.catholic.edu.au</a>
<b>Website:</b>	<a href="http://arm.catholic.edu.au">arm.catholic.edu.au</a>
<b>Phone:</b>	0267 727388
<b>Charity Size:</b>	Large
<b>Who the charity helps:</b>	Aboriginal and Torres Strait Islander people Children - aged 6 to under 15 Early childhood - aged under 6 Females Males People in rural/regional/remote communities People with disabilities Youth - 15 to under 25
<b>Date established:</b>	31 December 1959
<b>Last reported:</b>	27 June 2024
<b>Next report due:</b>	30 June 2025

## Financial overview

Financial information from the latest AIS.

### Revenue

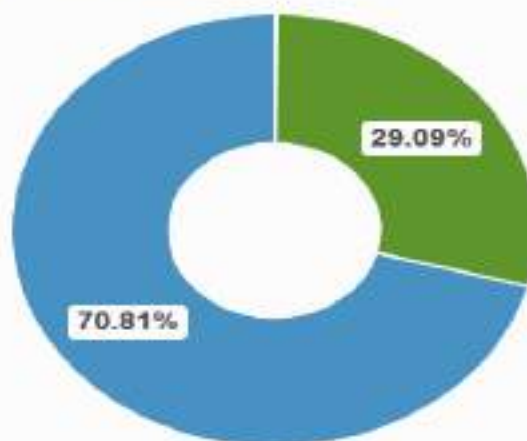
**Total revenue:** \$137,926,021.00



- Revenue from Government
- Other Revenue
- Revenue from Donations and Bequests
- Revenue from Goods or Services
- Revenue from Investments

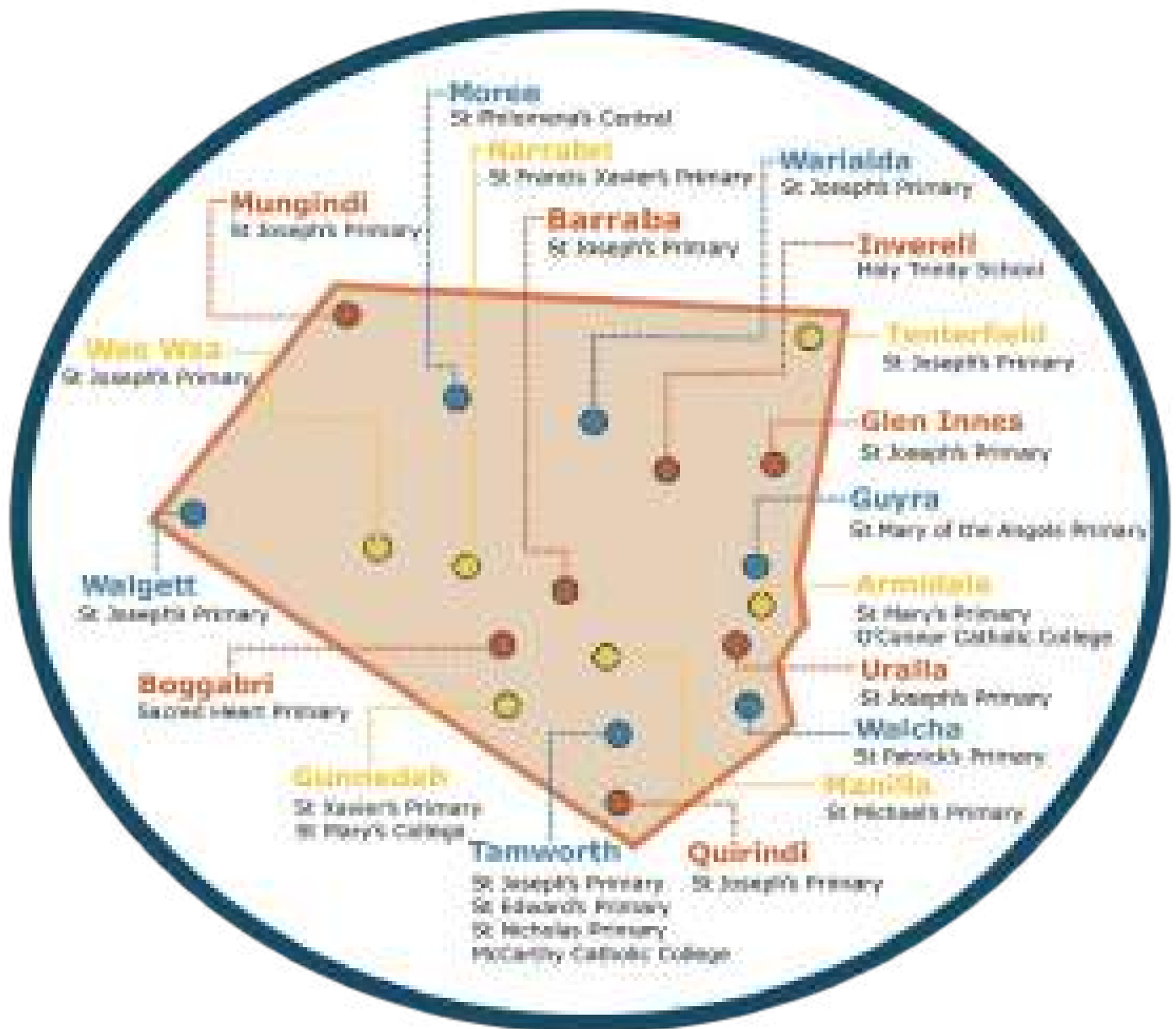
### Expenses

**Total expenses:** \$145,352,104.00



- Grants and donations made for use in Australia
- Grants and donations made for use outside Australia
- Interest expenses
- All other expenses
- Employee expenses

## School locations within the Diocese of Armidale



# Reporting Criteria 3: Modern slavery risks in operations and supply chain

Through the ACAN Program, Armidale Catholic Schools will commence analysis of our 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 lack understanding of their rights.

Armidale Catholic Schools works closely with a select group of Australian-based suppliers to provide cleaning services. Armidale Catholic Schools will ensure 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.

Armidale Catholic Schools 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 & PPE**

The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking.

Armidale Catholic Schools works closely with a select group of Australian-based suppliers to supply Armidale Catholic Schools uniform requirements. Armidale Catholic Schools are working to ensure that these 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. Armidale Catholic Schools 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.

### Armidale Catholic Schools High Risk Spend Categories

Armidale Catholic Schools' High Risk Spend Categories for calendar year 2024 was \$28M with 867 suppliers from a total of 1919 suppliers.

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
<b>Building and construction</b>	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone, etc.), subcontracting 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 Labour, 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.	77	\$12.9M
<b>Cleaning and security services</b>	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 licensing 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 worksites. Equipment and consumables used in these sectors are largely manufactured overseas, predominantly in high-risk countries such as China and Vietnam.	50	\$1.9M
<b>Events and event management</b>	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 the labour force. Venues such as hotels, conference centres, restaurants, and clubs are at 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, and kitchen hands, is endemic in the hospitality and catering	57	\$0.39 M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
		sector. The use of temporary migrants, international students, travellers and other low-skilled or short-term labour is widespread.		
<b>Facility management and property maintenance</b>	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.	255	\$2.8M
<b>Finance &amp; Investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	Investors' exposure to modern slavery risks will continue to grow in an era of increasingly complex global supply chains, the prevalence of imports from countries with poor human rights track records, and the reliance on base-skilled workers across product and service procurement in Australia and overseas. Bankers, investors, insurers, financial partners and financial sector actors have unparalleled influence over global business and entrepreneurialism. They have a unique role to play in investing in and fostering business practices that help to end modern slavery and human trafficking. Finance is a lever by which the entire global economy can be moved.	6	\$3.8M
<b>Food and catering services</b>	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.	121	\$1.2M
<b>Furniture and office supplies</b>	General office suppliers, stationery, paper products, small office	Large quantities of office supplies and furniture are imported into Australia from high-risk countries such as China, Vietnam and Indonesia.	171	\$1.7M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
	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	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.		
<b>ICT Hardware</b>		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.	22	\$2.1M
<b>Labour Hire</b>	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"> <li>● focus on low-skilled, low-paid, seasonal, temporary and or intermittent labour</li> <li>● recruitment of potentially vulnerable people such as new migrants, temporary work visa holders, international students and undocumented workers</li> <li>● deceptive and opaque practices trapping workers into exploitative situations or modern slavery</li> <li>● demanding excessive fees for visas, documentation, travel arrangements, etc creating a debt trap and situations of bonded labour</li> <li>● coercive control, threats, withholding workers' identity documents to limit their freedom of movement and social isolation from community or other supports is common practice</li> </ul>	6	\$0.19 M
<b>Linen, laundry and textile products</b>	Curtains, towels, carpets, flannels, laundry services including plant and equipment, chemicals, maintenance, transport and logistics.	The textiles and apparel industry poses very high risks of 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 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.	21	\$0.14M

Spend category	Sub-categories	Justification	Number of Suppliers	Spend
		People working in linen and laundry services are also at high risk of modern slavery practices due to low pay rates and use of low-skilled labour and subcontracting arrangements. Workers are also at high risk of exposure to toxic chemicals and pathogens.		
<b>Medical devices and supplies</b>	Machines, instruments, beds and health furniture, PPE, uniforms, gowns, gloves, masks, syringes, wound dressings etc	<p>Modern slavery has been linked to all stages of the production of medical devices including:</p> <ul style="list-style-type: none"> <li>• mining, refining and production of raw materials such as steel, tantalum, plastic, latex, cotton, synthetic fibres, chemicals, glass etc;</li> <li>• manufacturing of the product or components;</li> <li>• transport and logistics operations; and</li> <li>• management of waste and toxic waste materials.</li> </ul> <p>Examples of modern slavery practices in medical supply chains include, inadequate pay, forced overtime, excessive recruitment fees, confiscation of passports, anti-union and anti-human rights activities, poor safety, below-standard accommodation, physical and mental abuse, and forced and child labour.</p>	24	\$0.03 M
<b>Uniforms and PPE</b>	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	<p>The textiles industry is high risk for modern slavery, particularly forced labour, child labour and human trafficking.</p> <p>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.</p> <p>Apparel factory workers are also at high risk of forced overtime, often unpaid, particularly in countries such as Vietnam, Bangladesh and Honduras.</p> <p>Use of complex subcontracting in supply chains heightens these and other risk factors.</p>	37	\$0.49M
<b>Waste management services</b>	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	<p>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.</p> <p>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.</p>	18	\$0.35M

# Reporting Criteria 4: Actions taken to assess and address risk

## Actions taken in 2024

During 2024, ACS became a member of the Australian Catholic Anti-Slavery Network (ACAN) to assist ACS in complying with the requirements under the Modern Slavey Act (2018).

ACAN has developed a suite of resources that ACS will utilise 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.

## Supplier Engagement

Armidale Catholic Schools is now a member of Sedex via 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, and vice versa.

Armidale Catholic Schools now 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 Armidale Catholic School, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

Armidale Catholic Schools will use 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 onboarding 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

Armidale Catholic Schools' Modern Slavery Action Plan is detailed in Reporting Criteria 5.

## 2024 Modern Slavery Risk Management Initiatives

In 2024, ACS worked to consolidate its Modern Slavery risk profile and develop governance foundations.

Actions included:

- Formation of the ACS Modern Slavery Working Group along with the ACAN terms of reference, to oversee ACS compliance with legislation and implementation of policies and procedures.
- Review and update of standard ACS supplier and services agreements to include anti-slavery provisions.
- Completion of the ACAN Modern Slavery Entity Profile to assist in identifying areas that require focus or additional attention.



## Our Organisation

Our staff allocation is as follows:

Male 194

Female 912

**Total 1106**

We have 24 schools with a total student population of 6050.

Armidale Catholic Schools 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
- Code of Conduct
- Employee Leave Policy
- Flexible Working Arrangements
- Harassment, Bullying and Discrimination Policy
- Acceptable Use of Electronic Communication Systems and Devices
- Child Protection/Safeguarding Policy
- Complaints Management Framework/Policy
- Performance Management Policy; Privacy and Confidentiality Policy
- WHS Framework/Policies
- Whistle-blower Policy

## Remediation

Armidale Catholic Schools 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 Armidale Catholic Schools is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Armidale Catholic Schools 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 a 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.

Domus 8.7 will:

- partner with organisations in order to refer clients to specialists to provide advice and assistance in relation to legal, social and human rights responses to people impacted or at-risk of modern slavery.
- partner with international organisations with the aim of supply chain remedial action and prevention.

- help build capacity of Catholic social services and parishes to address issues and risks of modern slavery.
- engage in policy advocacy and research.
- engage with businesses and suppliers.

Through Domus 8.7, Armidale Catholic Schools 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 Armidale Catholic Schools to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Armidale Catholic Schools is directly linked to modern slavery by a business relationship, Armidale Catholic Schools is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Armidale Catholic Schools 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.

Armidale Catholic Schools will also develop 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 Armidale Catholic Schools to ensure victim-centred remediation processes are implemented to the satisfaction of Armidale Catholic Schools.

When suspicions of modern slavery practices are identified, Armidale Catholic Schools staff will 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 is the first Modern Slavery Statement for Armidale Catholic Schools. For subsequent years, Armidale Catholic Schools will be aiming 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
4. operations.
5. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
6. **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
7. **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 2024

## Armidale Catholic Schools - Overview & Analysis by Pillar



### Maturity Assessment 2024

#### Armidale Catholic Schools - Overview



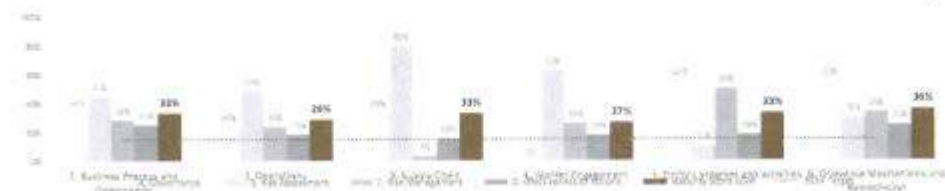
#### Armidale Catholic Schools - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024
1. Business Process and Governance	34%	45%	29%	25%	33%
2. Operations	24%	49%	24%	19%	29%
3. Supply Chain	33%	80%	4%	16%	33%
4. Worker Engagement	0%	63%	26%	18%	27%
5. Entity's program and activities	55%	10%	50%	18%	33%
6. Grievance Mechanisms and Remediation	55%	30%	34%	25%	36%
Average	34%	46%	28%	20%	32%

Maturity Score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score



Maturity Score 2024 comparative to target and maximum scoring, by Pillar



#### Notes:

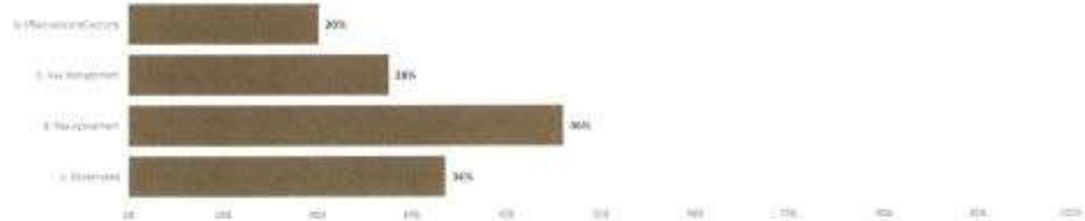
- Participation in Domain 6.7 Remediation Services was incorporated into scoring of pillar 6. Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the Domain 6.7 Remediation Services activities.
- Participation in the ACN Program was incorporated into Supply Chain, increasing the overall score across Risk Assessment (ACN Training and supplier engagement activities) and Effectiveness of Actions (Quality Data). This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the ACN Program activities.

Armidale Catholic Schools- 2024 Assessment by Sub-Pillar

Armidale Catholic Schools - 2024 Assessment by Sub-Pillar



Maturity Score 2024: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description



Maturity Score 2024: Comparative analysis of 2023 performance by sub-pillar.

Notes:  
 - Participation in Dornus B.7 Remediation Services was incorporated into scoring of pillar B. Governance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Dornus B.7 Remediation Services activities.  
 - Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Traceability and supplier engagement activities) and Effectiveness of Actions (Border Data). This will be removed in the 2024 Maturity Assessment for entities not actively participating in the ACAN Program activities.



The table below demonstrates the work performed for 2024.

	<b>ACTIVITY</b>	<b>2024</b>
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	26
	Individual staff completed e-learning	0
	E-learning modules completed	0
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	1919
	Number of suppliers across high-risk categories	867
	Number of ACAN Supplier Surveys completed (identified through ABN & data matching)	259
	Supplier staff attending capacity-building webinars	42
	Invited to join Sedex	40
	Joined Sedex	57
	Sedex SAQ completed	76
	Social audits	17
	Corrective actions	75
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	Contacts made via the 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

From 2025, 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 that 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 Business Unit.
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 the implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area

## Action Plan 2025-26

### Modern Slavery Action Plan 2024-2026

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
<b>Board of Directors</b>	Leadership and effective governance of modern slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	Public commitment approved and published on the website  Board Approves and Board Chair signs annual Modern Slavery Statement at June Board meeting	Board Approves and Board Chair signs annual Modern Slavery Statement at June Board meeting  Review modern slavery progress at the October Board meeting  100% Board members complete modern slavery e-learning course modules: MS101, Business Relevance, Implementing a MS Risk Management Program, Grievance Mechanisms and Remedy 1.5 hours self-paced	Board Approves and Board Chair signs annual Modern Slavery Statement at June Board meeting  Review modern slavery progress at the October Board meeting
<b>Director of Schools</b>	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	Appoint Modern Slavery Working Group (MSWG)*  Present the annual Modern Slavery Statement to the Board for approval and signature	Monitor Modern Slavery Working Group (MSWG)*  1-3 modern slavery communications/year to stakeholders  Present the annual Modern Slavery Statement to the Board for approval and signature  Complete modern slavery e-learning course	Monitor Modern Slavery Working Group (MSWG)*  1-3 modern slavery communications/year to stakeholders  Present the annual Modern Slavery Statement to the Board for approval and signature

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
<b>Head of Finance, Facilities &amp; ICT</b>	<p>Financial/economic impacts of modern slavery risks to people in operations and supply chains are effectively managed</p> <p>Modern slavery risk management program allocated adequate resources</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern Slavery Policy endorsed, communicated and implemented or reviewed and updated</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>
<b>Head of Employee Services</b>	<p>Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of modern slavery in operations and supply chains aligned with modern slavery public commitment</p> <p>The entity has effective processes to provide a remedy is transparent, credible and accountable</p>	<p>Participate in MSWG</p> <p>Conduct workforce profile mapping to better understand indirect workers/labour hire arrangements and worker recruitment</p> <p>Identify and support modern slavery risk management professional development opportunities for staff</p>	<p>Participate in MSWG</p> <p>Strategy for e-learning roll-out developed and implemented</p> <p>Accountabilities for modern slavery are integrated into new and existing position descriptions</p> <p>Modern slavery training and awareness incorporated into recruitment and induction processes</p> <p>Complete workforce profile mapping</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Staff awareness survey</p>	<p>Participate in MSWG</p> <p>An effective grievance mechanism is deployed and monitored in operations so stakeholders can raise modern slavery concerns</p> <p>Continue to monitor and measure e-learning roll-out</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Monitor changes in workforce profile</p> <p>Worker voice and well-being surveys</p>

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
<b>Procurement</b>	Robust systems are in place to effectively identify and mitigate modern slavery risks in the supply chain	Participate in MSWG	Adjust and incorporate 2024 learnings to the risk identification framework	Adjust and incorporate 2025 learnings to the risk identification framework.
	Regular risk assessment	Develop an updated Supplier Risk assessment framework process: - Obtain supplier data	Desktop review of min. 36 high-risk suppliers	Desktop review of min. 72 High risk suppliers through the year 12 randomly selected low and medium risk suppliers
	Policy development and implementation	Apply ACAN Risk Taxonomy - Update Code of Conduct - Apply SAQ - Define spend thresholds - Define risk appetite	Plan for Supplier Audit program (high risk suppliers identified after review)	Engage deeper with 5 select suppliers, to build capacity and demonstrate best practice
	Supplier engagement and training	- Apply risk scoring mechanism	Initiate pilot Audit program (social audit/human rights due diligence) for 5 suppliers identified through risk review activities	Expand Audit program (social audit /human rights due diligence), to 12 suppliers identified through risk review activities
	Monitoring and Auditing	Engage all high-risk suppliers / inform them what is to come and how it will be carried out, including inviting Suppliers to join pre-screening on the chosen platform (as recommended by MS Working Group/ACAN)	Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to trainings and drive high risk suppliers to join pre-screening platform (as agreed/ recommended by Modern Slavery Working group/ACAN in 2024).	Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to trainings and drive high risk suppliers to join pre-screening platform (as agreed/ recommended by Modern Slavery Working group/ACAN in 2024).
	Remediation and support	100% suppliers mapped and ACAN Risk Taxonomy applied	Define required mitigating actions for non-compliances and timelines for completion, in collaboration with the MS Working Group and apply these when issues arise	Monitor that required mitigating actions for non-compliances and timelines for completion are maintained, in collaboration with the MS Working Group
	Reporting and transparency	X% high-risk suppliers engaged and invited to join Sedex	Refine measures and reporting on	
	Continuous improvement	X% high-risk suppliers completed Sedex self-assessment questionnaire (SAQ)		
	Collaboration and partnerships	Measure and report on the actions		

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
			<p>the actions</p> <p>X Suppliers complete modern slavery e-learning</p>	<p>Refine measures and reporting on the actions.</p> <p>Establish supplier due diligence checks and monitor supplier corrective action plans, audits or other reviews</p> <p>X% medium-risk suppliers engaged on modern slavery risk management and/or invited to join Sedex</p> <p>X% medium-risk suppliers completed Sedex self-assessment questionnaire (SAQ)</p>
<b>Risk Manager</b>	Modern slavery risk assessment criteria have been developed and is continuously monitored and reviewed	<p>Participate in MSWG</p> <p>Develop risk criteria and integrate into corporate risk framework and divisional/departmental risk assessment processes (where appropriate)</p> <p>Ensure modern slavery risk management incorporated into operational risk assessment processes</p>	<p>Participate in MSWG</p> <p>Continuous updating of corporate modern slavery risk management profile</p> <p>Undertake ongoing scan and assessment of emerging modern slavery risks</p>	<p>Participate in MSWG</p> <p>Regular monitoring of risk</p>



Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
<b>Employee Services</b>	Modern slavery risk is effectively managed in relation to legal requirements	<p>Participate in MSWG</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p>	<p>Participate in MSWG</p> <p>Ensure legally compliant Modern Slavery Statement, policies and documents</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>	<p>Participate in MSWG</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>
<b>Communications &amp; Engagement</b>	<p>Management of modern slavery risks to people in operations and supply chain are effectively and actively communicated to stakeholders</p> <p>Communications demonstrate respect for rights of people impacted by modern slavery</p>	<p>Participate in MSWG</p> <p>Establish intranet page</p> <p>Establish modern slavery page on website</p> <p>Ethical communications guidelines implemented including for communications regarding children and vulnerable people</p>	<p>Participate in MSWG</p> <p>Complete modern slavery e-learning course</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Expand content on modern slavery</p>	<p>Participate in MSWG</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Update modern slavery web page</p> <p>Support branding, graphic design, of Modern Slavery Statement</p>

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
		Support branding, graphic design, of Modern Slavery Statement	web page e.g. supplier information  Support branding, graphic design, of Modern Slavery Statement  Monitor ACAN communications and share as appropriate	
<b>Finance</b>	The risk of modern slavery in investments is effectively managed, monitored and reported			Participate in X MSWG meetings  Ensure investment staff receive training on responsible investments and modern slavery  Strengthen responsible investment policies by explicitly covering modern slavery  Enhance disclosure on modern slavery and how this risk is managed in investments  Review Investment Management Agreements (IMAs) for exposure to modern slavery risks

Position or Operational Area	Outcomes	2024 Actions	2025 Actions	2026 Actions
<b>Modern Slavery Working Group (MSWG)</b>	Modern slavery risk management is effectively managed by a cross-functional team within the organisation	<p>Develop and implement a modern slavery action plan</p> <p>Set targets/measures that demonstrate effectiveness and continuous improvement</p> <p>Complete an entity profile survey to obtain a maturity assessment</p> <p>Contribute to drafting and finalisation of the annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete an entity profile survey to obtain a maturity assessment</p> <p>Contribute to drafting and finalisation of the annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete an entity profile survey to obtain a maturity assessment</p> <p>Contribute to drafting and finalisation of the annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>
<b>Modern Slavery Liaison Officer (MSLO)</b>	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent the entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney's ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of the annual Modern Slavery Statement by MSWG members.</p> <p>Finalise Modern Slavery Statement for approval and signature by the Board/Bishop</p> <p>Provide the final Modern Slavery Statement to ACAN for inclusion in the ACAN Compendium</p>	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent the entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney's ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of the annual Modern Slavery Statement by MSWG members</p> <p>Finalise Modern Slavery Statement for approval and signature by the Board/Bishop</p> <p>Provide the final Modern Slavery Statement to ACAN for inclusion in the ACAN Compendium</p>	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent the entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney's ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of the annual Modern Slavery Statement by MSWG members</p> <p>Finalise Modern Slavery Statement for approval and signature by Board/Bishop</p> <p>Provide the final Modern Slavery Statement to ACAN for inclusion in the ACAN Compendium</p>

# Reporting Criteria 6: Internal Consultation

Armidale Catholic Schools has established a Modern Slavery Working group that will meet on a regular basis throughout the year to prompt awareness of Modern Slavery and to ensure Armidale Catholic Schools obligations that have been identified and captured in action plans are regularly addressed.

Armidale Catholic Schools does not have any controlled entities.

# Reporting Criteria 7: Any other relevant information

As part of the weekly Prayer program at Armidale Catholic Schools, the Feast of St Josephine Bakhita was recognised in our office. St Josephine Bakhita was a symbol of resilience in the fight against modern slavery and human trafficking.

St Josephine (1869-1947) had been born into a wealthy family in Darfur, in the village of Olgossa, west of Nyala – the fourth largest city in Sudan. Despite these beginnings, she was kidnapped as a young child and sold into brutal and abusive slavery many times.

She eventually gained her freedom and joining the Canossian Sisters, but sadly, she had spent so much time in captivity that she had forgotten her original name. It was her slave owners who gave her the moniker “Bakhita”, which means “fortunate” in Arabic.

St Josephine Bakhita was canonised on 1 October 2000 by Pope St John Paul II, becoming the first female black saint in the modern Catholic era. Her feast day is celebrated each year on 8 February. She is commemorated as the patron saint of South Sudan and Sudan, and of the victims of modern slavery and human trafficking.





## **APPENDIX 1**

Armidale Catholic Schools comprises the following 24 schools:

### **PRIMARY**

St Mary's Primary School, Armidale  
St Joseph's Primary School, Barraba  
Sacred Heart School, Boggabri  
St Joseph's Primary School, Glen Innes  
St Xavier's Primary School, Gunnedah  
St Mary of the Angels, Guyra  
St Michael's, Manilla  
St Joseph's Primary School, Mungindi  
St Francis Xavier's, Narrabri  
St Joseph's Primary School, Quirindi  
St Edward's Primary & Infants School, Tamworth  
St Nicholas Primary School, Tamworth  
St Joseph's Primary School, Tamworth  
St Joseph's Primary School, Tenterfield  
St Joseph's Primary School, Uralla  
St Patrick's Primary School, Walcha  
St Joseph's Primary School, Walgett  
St Joseph's Primary School, Warialda  
St Joseph's Primary School, Wee Waa

### **SECONDARY**

O'Connor Catholic College, Armidale  
St Mary's College, Gunnedah  
McCarthy Catholic College, Tamworth

### **K - Year 10 SCHOOLS**

Holy Trinity School, Inverell  
St Philomena's School, Moree



# Modern Slavery Statement 2024

1 JANUARY 2024 – 31 DECEMBER 2024



## 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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# Statement of **commitment**

## Approval and signature

The Catholic Diocese of Maitland-Newcastle (the Diocese) is pleased to present our fifth Modern Slavery Statement. The 2024 statement represents the Diocese's commitment to modern slavery practices, a commitment that is shared and followed through all our agencies.

As a Catholic entity, we have continued throughout 2024 to acknowledge our role and the impact we have in supporting our wider Catholic community in Australia and abroad to fulfill the mission of the Church. This mission is reflected not only in our journey of proclaiming Jesus Christ and the gospel of God's love and mercy to all, but also in advocating for the human right of all men, women, and children to live with dignity and freedom, free from exploitation, coercion, threats, or deception.

Upholding the Catholic Social Teaching's call for the dignity of work, the rights of workers, and the advancement of the common good, we have incorporated these principles into our Modern Slavery Policy, frameworks, operations, and partnerships. The fight against modern slavery cannot be won alone, and we all have a pivotal role to play. Therefore, it is expected that our employees, contractors, and suppliers model our commitment and comply with all aspects of our Modern Slavery Policy.

In alignment with the messages of His Holiness Pope Francis for the tenth World Day of Prayer and Awareness

Against Human Trafficking: 'Let us pray fervently and work proactively for this cause, the defence of human dignity, whether by prayer and action as individuals and families, or as parish and religious communities, as ecclesial associations and movements, and also in the various spheres of social and political life,' the Diocese of Maitland-Newcastle accepts its responsibility to influence and promote anti-slavery awareness across our diocese and local communities, ensuring that the fight to eradicate slavery continues for future generations.

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 20/06/2025.

This Modern Slavery Statement is signed by me, being the responsible member of the Diocese of Maitland-Newcastle as defined by the Act.

Yours sincerely in Christ,

**Bishop Michael Kennedy,**  
Diocese of Maitland-Newcastle  
June 2025

## 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 Community Fund, CatholicCare Social Services, St Nicholas Early Education and OOSH, and Hunter Community Housing the Diocese provides pastoral, educational, social welfare, housing and community development services. The Diocese of Maitland-Newcastle employs approximately 5,500 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: \$643,097,305.

## Our services

**58** schools with over **21,000** students

**33** St Nicholas OOSH services  
with **3,737+** students enrolled

**12** St Nicholas Early Education centres  
serving more than **2,124** children

Training by the Office of Safeguarding  
provided to over **4,406** staff and **42** Clergy  
and Parish Leaders.

**246+** children and young people in care  
supported through CatholicCare

**16,953+** counselling and assessment sessions  
provided by CatholicCare



# 147,000

Catholics in the region



# 5,500+

Employees in our  
Diocese



# 38

Parishes in our  
Diocese



# 63

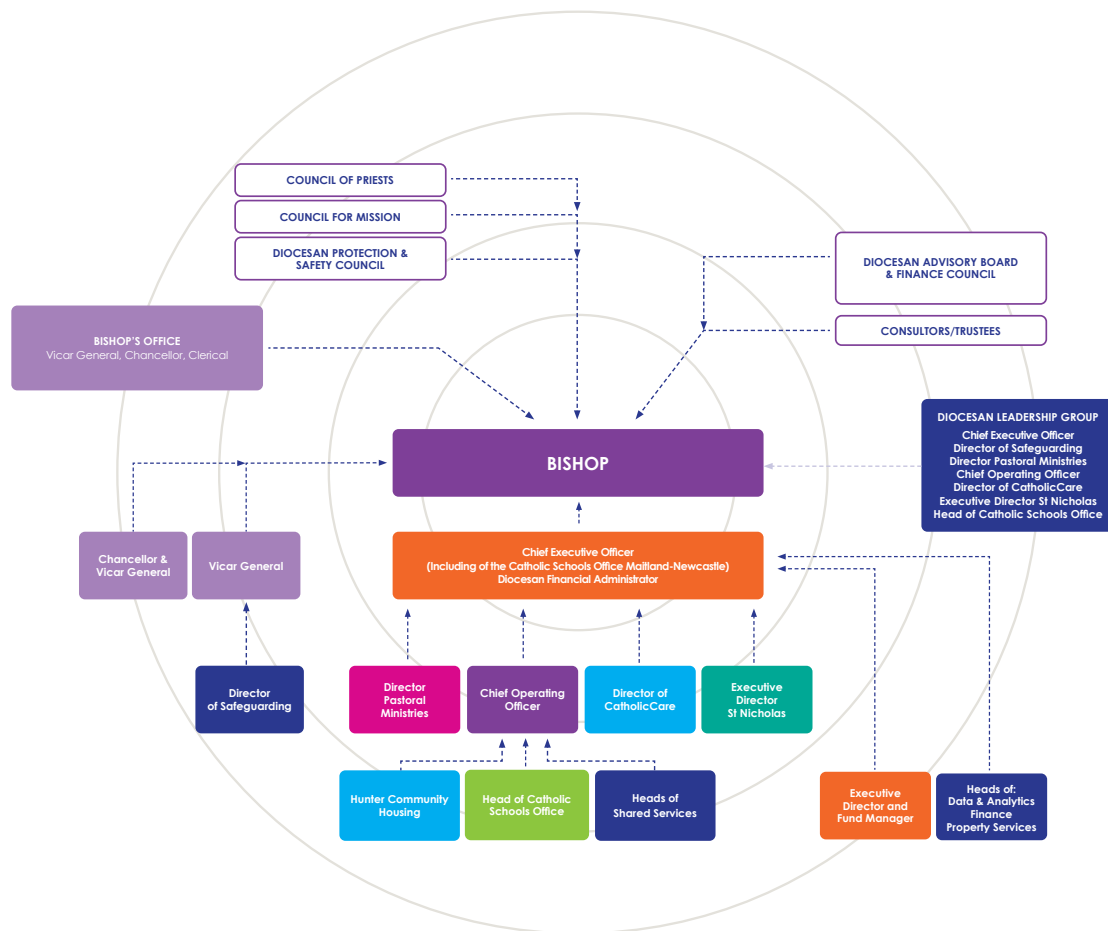
Clergy



# 5,000+

Volunteers

# Organisational overview



## Workforce data:

Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas, CCF and Parishes	354	684	1,105
CatholicCare and Hunter Community Housing	90	65	332
Catholic Schools	1508	2295	3,819
<b>Total</b>	<b>1952</b>	<b>3044</b>	<b>5,256</b>

## Workforce composition (estimated):

Agency	% female	% male	Other
Diocese including St Nicholas, CCF and Parishes	86%	14%	
CatholicCare and Hunter Community Housing	84%	16%	
Catholic Schools	80%	19%	1%
<b>Total</b>	<b>87%</b>	<b>13%</b>	

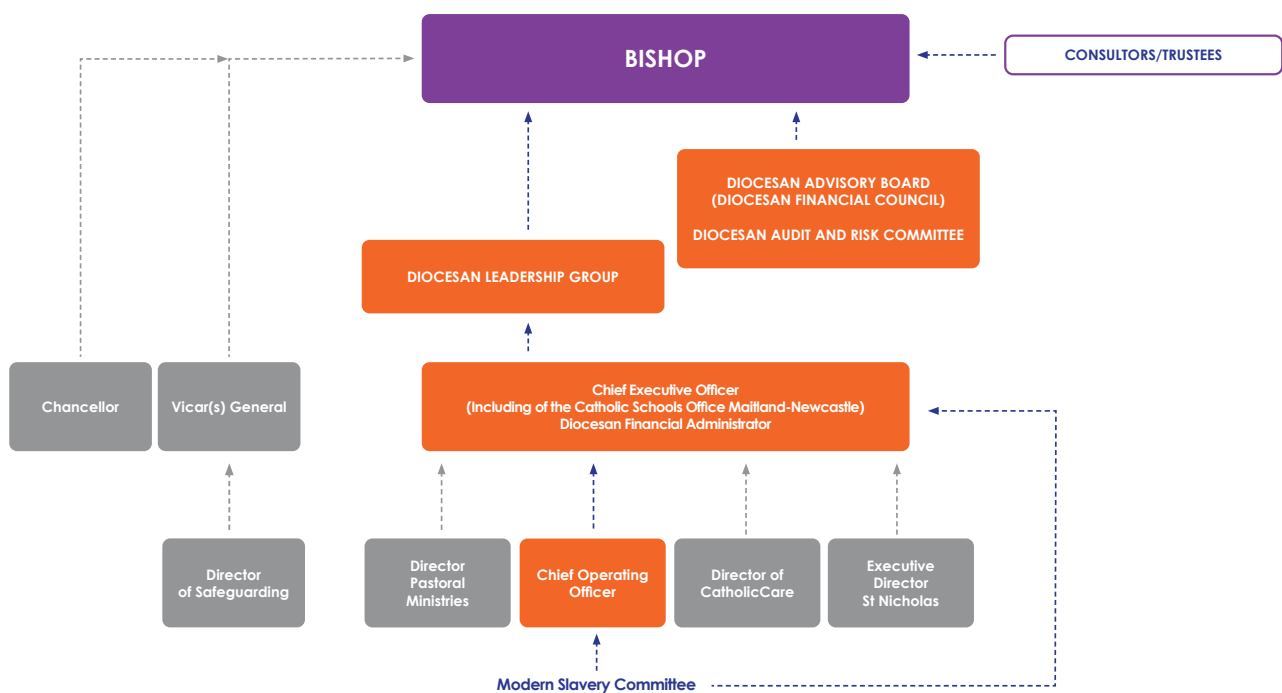
# Governance framework

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 the work of the Governance team and senior stakeholders from across the Diocese.

Managing modern slavery risk is embedded in our operations and reported to the Diocesan Leadership Group.

The Modern Slavery Liaison Committee (MSLC) comprises of representatives from each Diocesan Agency and Curia Department to form a collective responsibility and influence in supporting the Diocese's commitment to anti-slavery. It acts as an advisory committee to the Diocese of Maitland-Newcastle and 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:

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**Catholic Schools**, educating more than 21,000 students in our 58 schools.

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**CatholicCare Social Services Hunter-Manning** provides care, counselling, clinical and support services along with community food programs to support children and vulnerable people.

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**Hunter Community Housing**, a nationally registered Tier 2 Community Housing Provider offering supported independent living for young people transitioning from out of home care, as well as group homes, affordable housing, and a residential market program.

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**Parishes**, the core structure of the Diocese, nourish the lives of the people in our region spiritually, pastorally, educationally and through outreach, social justice and community support initiatives. The Diocese has 38 parishes across 77 locations.

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**St Nicholas**, provides high quality care and education for children aged up to five years across 12 locations, as well as Out of School Hours care in 33 locations. Alongside this care, St Nicholas Pathways program supports study and career options for early education.

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**Catholic Community Fund**, assisting with the management of Diocesan finances and providing retail customers a range of investment products.

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In addition to our agencies, we also have a diverse range of departments that form part of the Diocesan Curia to support our agencies serve the mission of the Diocese:

**Mission & Evangelisation** is an outward-looking team that shares the message of the Gospel with the contemporary world. It provides Diocese-wide leadership in accompaniment and resourcing for Catholic formation, training, and encounter. The three teams are: Mission & Evangelisation Partners, who accompany and support the Diocese and parish communities into the future; the Directorate who supports the Partners with shared leadership, resourcing, project planning, communications and administration; and Chaplains who provide accompaniment, pastoral and spiritual care to those in our unique part of the world.

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The **Office of Safeguarding** promotes the safety and wellbeing of children and vulnerable adults in our Diocese through a range of programs and activities including:

- the provision of specialist advice and support
- conducting administrative inquiries into allegations of abuse against Diocesan workers
- supplying online and face-to-face safeguarding training for Diocesan workers
- supporting our parishes and Diocesan agencies to be compliant with Church and statutory safeguarding standards.

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**Shared Services** brings together multiple specialists with varying backgrounds that offer resources and services to support the agencies and parishes. These Shared Services teams include: Administrative Services; Communications and Marketing; Data and Analytics; Finance; Governance; People and Culture; Property; and Technology Services.

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# 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 integrates AS ISO 31000:2018 as best practice risk management principles, framework and processes into our ministries, activities, and decision-making processes. The Diocese has taken several steps to identify and mitigate 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 and Culture functions, including recruitment, are supported by systems that are compliant with labour, employment, and immigration laws. We have processes in place to make sure that due diligence in our recruitment operations is applied, is fair, and ensures equal opportunities and appropriate remuneration.

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. In 2024, the Diocesan Whistleblower Procedure was introduced to sit under the overarching Whistleblower Policy. The procedure sets out the processes for reporting fraud, corruption, maladministration and misconduct.

Continuing from previous years, our focus on modern slavery action during 2024 included the ongoing implementation and advancements of financial and People & Culture management systems. We also strengthened governance practices, conducted risk assessments, provided training and development for workers, and reviewed the procurement framework and our supplier engagement.

System improvements include a new onboarding and recruitment module, a learning management system for People and Culture, and a new procurement module for managing the end-to-end purchasing process in finance. The procurement module introduces significant improvements in controls for managing purchase approvals and linking procurement expenditure with budget forecasting.

Governance initiatives across the Diocese of Maitland-Newcastle throughout 2024 included streamlining the Complaints and Feedback Framework, the Complaints Management Service, and the Risk Management Framework to align with improvements made to the Enterprise Risk Management System and associated training modules. Additionally, the Policy Management and Delegations Frameworks were revised, which involved implementing a new Diocesan-wide platform for the Policy Library and Delegations Register, as well as initiating the development of a new Compliance Framework.

Through the Australian Catholic Anti-Slavery Network (ACAN) Program, the Diocese of Maitland-Newcastle continues to focus activities with suppliers of labour and the operational risks 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 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 work health and safety risks such as exposure to toxic materials and pathogens, the use of heavy machinery, and dirty work environments. Modern slavery risks in this sector are similar to those faced by cleaners. Subcontracting to small waste management companies is common, as is the use of labor hire. Migrants and low-skilled workers are often employed 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 2,398 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

<b>High</b>	Building & Construction	Furniture & Office Supplies
	Cleaning & Security Services	ICT hardware
	Events & Entertainment	Uniforms & PPE
	Facility Management & Property Management	Waste Management
	Finance & Investments	Labour Hire
	Food & Catering Services	Utilities
<b>Medium</b>	Advertising & Marketing	Print / Mail Provider
	Community & Home Care Services	Travel & Accommodation
	Fleet Management, Consumables and Maintenance	Utilities
	ICT software, network services	
<b>Low</b>	Financial Expenses	Government & Agency Fees
	Professional Services	

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
<b>Building &amp; Construction</b>	Building materials (e.g., concrete, steel, timber, plaster products, glass, plastics, quarried stone etc.) sub-contracting and labour hire services, demolition, painting, and landscaping.	31%
<b>Cleaning &amp; Security Services</b>	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc.) PPE, uniforms, and footwear.	0.13%
<b>Events &amp; Entertainment</b>	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.	0.1%
<b>Facility Management &amp; Property Management</b>	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, heating, ventilation, and air conditioning, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	14.38%
<b>Finance &amp; Investments</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit, and bond rating agencies.	7.6%
<b>Food &amp; Catering Services</b>	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.	2.37%
<b>Furniture &amp; Office Supplies</b>	General office supplies, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc.), workplace supplies (cleaning, first aid, bathroom etc.), packaging, boxes etc.	5.17%
<b>ICT hardware</b>	Software and application development, support services, call centres (off-shore), programming and coding services.	0.70%
<b>Medical devices and supplies</b>	Machines, instruments, beds and health furniture, PPE, uniforms, gowns, gloves, masks, syringes and wound dressings.	0.01%
<b>Uniforms &amp; PPE</b>	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g., gloves, face masks or respirators, glasses / goggles, earmuffs, safety workwear etc.).	0.28%
<b>Waste Management</b>	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing.	0.55%



## Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
<b>Advertising &amp; Marketing</b>	Advertising services, campaigns, branding, media collateral, outsourced business operations.	18%
<b>Community &amp; Home Care Services</b>	Allied health services, home nursing, home care and social support.	3.90%
<b>Fleet Management, Consumables and Maintenance</b>	Vehicle components, consumables, mechanical and crash repairs, servicing, waste disposal (e.g., tyres, oil).	2.74%
<b>ICT software, network services</b>	Software and application development, support services, call centres (off-shore), programming and coding services.	4.52%
<b>Print/ Mail Provider</b>	Printing services, printers, ink, paper, other printing consumables.	0.71%
<b>Travel &amp; Accommodation</b>	Travel booking services, hotels, and accommodation.	2.5%
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, and telecommunications (linked to resources sector risk)	3.79%



## Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
<b>Financial Expenses</b>	Interest	1.96%
<b>Government &amp; Agency Fees</b>	Australian Tax Office, Council rates/fines, and levies etc	1.06%
<b>Professional Services</b>	Consultancy, legal, finance, and auditing.	16.20%
<b>License and Memberships</b>		0.38%





## Actions taken to manage risk

Our effort for 2024 has focused on enhancing the organisation's understanding of potential modern slavery risks in our operations and supply chain, as well as the organisation's commitment to addressing these risks.

The continued roll out of the 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 \(ACAN\)](#). ACAN currently comprises 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 Diocese systems within ACAN. Data relating to common suppliers increased leverage and reduced duplication of supplier engagement from multiple Catholic Diocese systems.

The ACAN webinar series remained an important part of the supplier engagement plan. 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

For the Diocese, 598 suppliers completed the ACAN Supplier Survey, which represents a significant increase from the 2022 figure of 84. It was determined that 89 of the existing suppliers are already on Sedex and 80 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 benefits 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 the 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 the 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 conducted in 2024
4. Download the ACAN supplier PowerPoint presentation and share with staff to raise awareness and ensure an understanding of the Diocese expectations regarding 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 efforts to recognise the potential risk of modern slavery in our supply chains for the 2024 reporting period. We continue to analyse 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 continued to be applied 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 ongoing modern slavery updates. We have rolled out modern slavery training, with training available to all staff via mnpeople, our learning management 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	
<b>Building staff awareness and sharing information</b>	<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 at various staff meetings.</p> <p>The Modern Slavery intranet page and Policy are available to all staff.</p> <p>The ACAN Modern Slavery 101 module is available via mnpeople to all staff, with a total of 15 staff completing the module throughout 2024.</p>
<b>Governance and policy</b>	<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>Updates to the Complaints Framework and complaints management service.</p> <p>Updates to the risk management system for incident and feedback management and reporting.</p>
<b>Analysis and assessment</b>	<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>
<b>Stakeholder and engagement collaboration</b>	<p>ACAN modern slavery module implemented into the new Diocesan learning management system for staff. Available as self-enrolment to staff.</p> <p>Communication campaign to raise awareness of availability of this module.</p>
<b>Capacity building</b>	<p>Modern Slavery Liaison Officer/s:</p> <ul style="list-style-type: none"> <li>• Joined ACAN/ MSLO monthly teleconferences.</li> <li>• Attended ACAN workshops.</li> <li>• Collaborated with ACAN members.</li> </ul>

**Through our new learning management system the Diocese of Maitland-Newcastle staff have access to the ACAN Modern Slavery 101 Course.**

**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.





# 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 challenges have continued to impact our journey during 2024, particularly the pressure of escalating living costs on both our parish communities and the delivery of services—especially in building, construction, and facilities management—as well as the tight labour market and the availability of skilled and qualified staff 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 advancements to management systems that have brought significant improvements to processes and controls for managing risk which include:

- onboarding and recruitment
- improvements and updates to the learning and development management system
- continuous updates and improvements to the enterprise risk management system

- a policy and delegation management system, ensuring that governance practices are centralised and accessible to all staff.
- a centralised Procurement System to support supplier engagement and enhance financial control and monitoring of budget forecasts and expenditure
- a review of the Procurement Framework and supplier engagement in consultation with the Procurement Manager, including the initiation of developing a Procurement Policy.
- The appointment of a Procurement Manager, which will enhance and improve the key risk areas and the associated processes and procedures
- A review of the Modern Slavery Framework and reformation of the Modern Slavery Liaison Committee
- People & Culture, Governance and Senior Leadership commenced a Diocesan wide review into all work-related policies.

In 2025, 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.



# 2025 Priorities

PRIORITIES	ACTIVITIES
<b>Governance and Assurance</b>	<ul style="list-style-type: none"> <li>• Enhancement of reporting capabilities, metrics and development of key performance indicators (KPIs)</li> <li>• Enhance the quality assurance activities to monitor the effectiveness of risk controls in procurement practice</li> <li>• Regular monitoring and reporting from feedback systems</li> <li>• Review of the Diocesan Modern Slavery Policy</li> <li>• Review 5 year Action and Audit Plans</li> <li>• Continue developing a Compliance Framework</li> </ul>
<b>Human Resources Practices</b>	<ul style="list-style-type: none"> <li>• Promote awareness of modern slavery risks</li> <li>• Revise internal training packages for staff</li> <li>• Promote the use of Sedex and preferred contractors.</li> <li>• Regular review of hiring and onboarding processes</li> </ul>
<b>Stakeholder dialogue</b>	<ul style="list-style-type: none"> <li>• Continuing engagement with relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains.</li> <li>• Continuing stakeholder dialogue to include the wider organisation to build awareness of modern slavery risks and legislative requirements.</li> <li>• Continue to work with our partners to build engagement and share knowledge re: modern slavery.</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>• Complete the Sedex self-assessment.</li> </ul>





# 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 Modern Slavery Act
- 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



# Beyond 2025

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 2025:

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 theDiocese’s 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 in 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
<b>Labour Hire and Outsourcing</b>	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.
<b>Procurement and Supply Chain</b>	Detailed procurement policies, guidelines, and processes to eliminate modern slavery in our supply chain are in place and staff are trained in their use.
<b>Contract Management</b>	Performance standards and contract evaluation criteria are in place for at-risk contracts and mechanisms are in place to enforce them.
<b>Screening and Traceability</b>	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.
<b>Supplier Engagement</b>	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.
<b>Monitoring and Corrective Action</b>	<p>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.</p> <p>We work closely with our suppliers to address non-conformance and implement corrective action plans to eliminate modern slavery from their supply chains.</p>
<b>Risk Framework</b>	<p>We include human rights risks as part of reputational risk assessment processes and have the systems in place to address issues as they arise.</p> <p>We regularly assess the effectiveness of risk controls and take action to improve controls, as required.</p>





# 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 598 suppliers. Of those suppliers, 114 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 – 80 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, 84 suppliers also attended ACAN supplier webinars.

INTERNAL / STAFF		2024
Hours MSLC members spent on modern slavery activities		43
Individual staff completed e-learning		15
E-learning modules completed		1
EXTERNAL / SUPPLIER ENGAGEMENT		
Total number of suppliers		3602
Number of suppliers with visible contact information and ABN		3364
Number of suppliers across high-risk categories		862
Number of ACAN Supplier Surveys completed		598
Supplier staff attending capacity building webinars		84
Invited to join Sedex		114
Joined Sedex		89
Sedex SAQ completed		80
Social audits		17
Corrective actions		75
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

# 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 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 module 101 has been embedded into the Diocese's new learning management system and is available to all staff through the self-enrolment menu, with additional modules to be added. Information to promote awareness of and improve practices to manage modern slavery risks across the Diocese has also been implemented.

## Other

2024	ACAN WEBINAR TOPICS
Feb 29	Modern Slavery Updates
Mar 28	Modern Slavery Updates
Apr 24	Modern Slavery Updates
May 23	Modern Slavery Updates – Guest Speaker Måns Carlsson OAM – Modern Slavery -The Investor Perspective
June 27	Modern Slavery Updates – Guest Speaker Laurie Berg, Migrant Justice Institute – Workplace Exploitation Among Migrant Workers
July 25	Modern Slavery Updates
Aug 29	Modern Slavery Updates
Sep 26	Modern Slavery Updates
Oct 31	Modern Slavery Updates
Nov 28	Modern Slavery Updates











**MODERN  
SLAVERY  
STATEMENT  
2024**

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## Disclosure Note

This statement has been made on behalf of Catholic Education Diocese of Bathurst Limited. This statement covers all entities owned or controlled by Catholic Education Diocese of Bathurst Limited.

Covering the reporting period 1 January 2024 to 31 December 2024 this statement focuses solely on work performed by the Catholic Education Diocese of Bathurst Limited ABN 15679 442 089 ©2025.

CEDB Head Office is located at:  
225 Gilmour Street  
Bathurst NSW 2795  
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[cedb@bth.catholic.edu.au](mailto:cedb@bth.catholic.edu.au)

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.



# Approval Statement From Chairperson and the Executive Director of Schools

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.

This Modern Slavery Statement and Endorsement was approved by Mrs Christina Trimble, the Executive Director of Schools, Catholic Education Diocese of Bathurst, and Responsible Person as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on behalf of the governing body - Catholic Education Diocese of Bathurst on 19 June 2024.

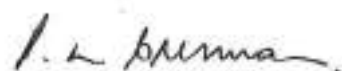
*Action against modern slavery is fundamental to Catholic Social Teaching. As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain our reputation as an ethical organisation which 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  
19 June 2025



**Paul Crennan**  
Chairperson CEDB Board  
19 June 2025

This Modern Slavery Statement is approved by the Board, which is the principal governing body of Catholic Education Diocese of Bathurst Limited as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 19 June 2025.

This Modern Slavery Statement is signed by the Chairperson as the responsible member and the Executive Director of Schools.

# Criteria 1: About Us

Catholic Education 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.

## OUR 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 the collaborative expertise of all teachers to continually improve their practice.

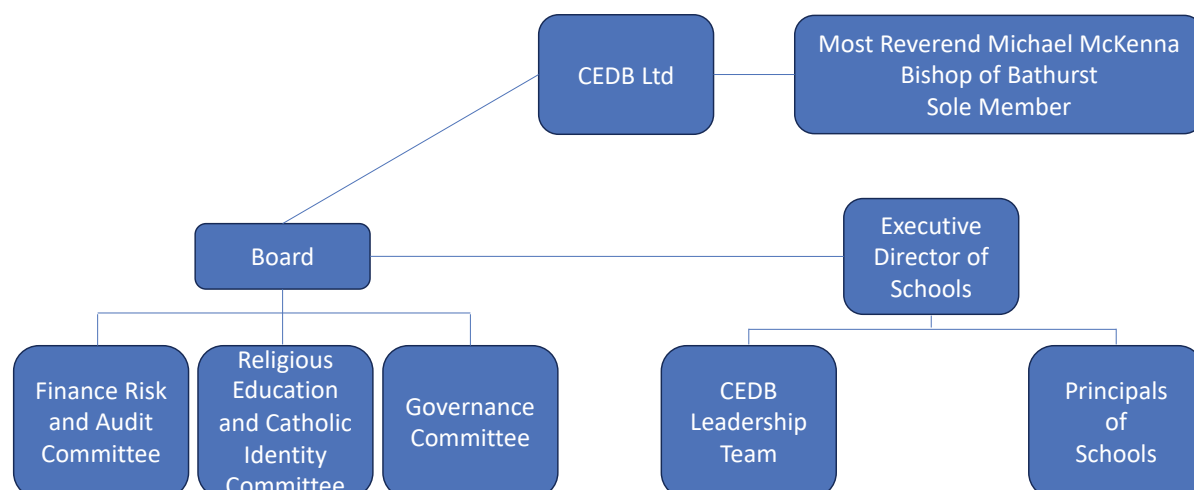
### STEWARDSHIP

- 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.

# Criteria 2: Structure, Operations and Supply Chains

## Our Organisational Structure

### Governance of Catholic Education Diocese of Bathurst Limited



## 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.

Effective 1 January 2025, with the approval of both the Australian Securities and Investments Commission (ASIC) and the Australian Charities and Not-for-profits Commission (ACNC), Catholic Education Diocese of Bathurst (CEDB) was formally incorporated as **Catholic Education Diocese of Bathurst Ltd**. The organisation is now governed by a Board of Directors. The Executive Director of Schools has retained her existing responsibilities and authority and now reports directly to the newly established Board.

The Leadership Team, who oversee the governance and review of activities in the areas of Human Resources, 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 Board and its committees, as required.

The Modern Slavery Working Group operates across a number of teams with members from Human Resources, Risk, WHS, Finance and Facilities teams.

## Our People

The staff employed by 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 permanent, temporary and casual employees.

The staff gender balance is approximately 80% female and 20% male. Staff are also employed who are immigrants, disabled, and/or indigenous.

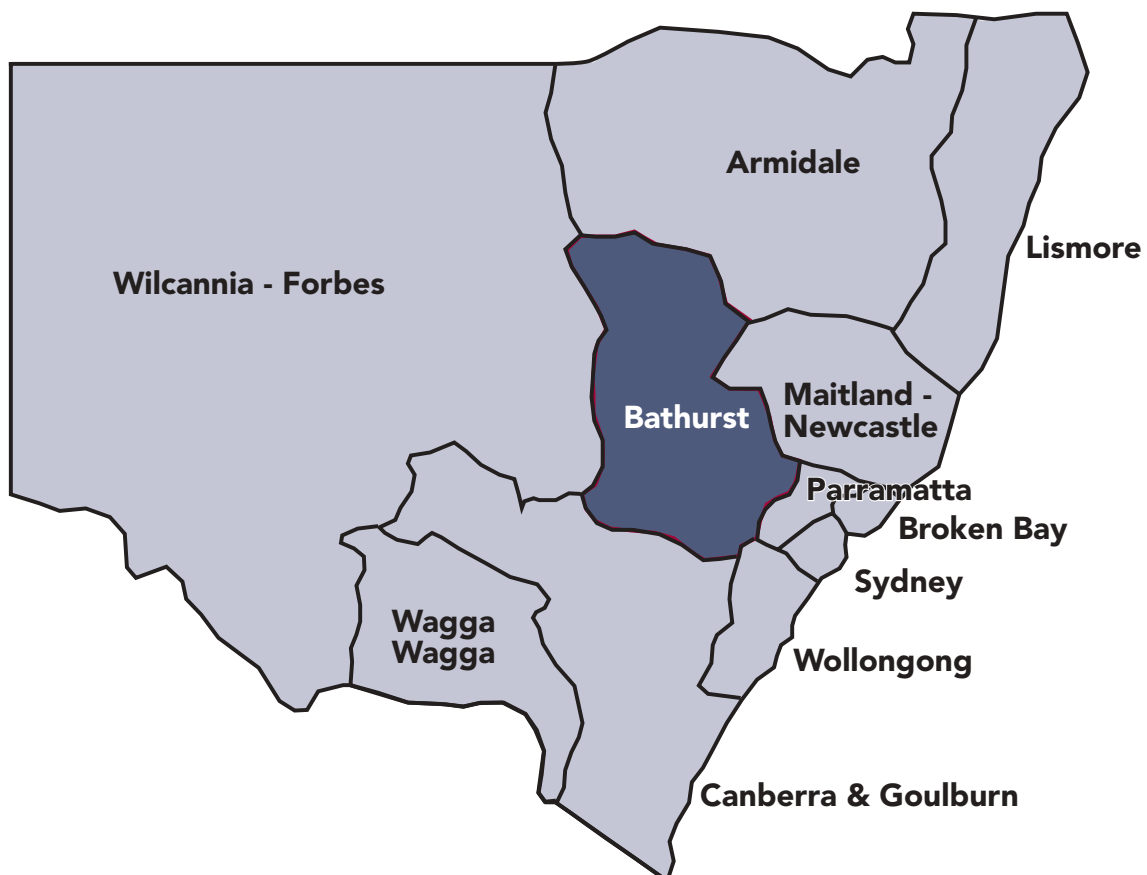
All staff are employed under the current applicable award conditions.

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 Diocese of Bathurst is located in the Central West of New South Wales, Australia, with the head office being in Bathurst. It 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 areas such as Cowra, Wellington, 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 Diocese of Bathurst.

The Diocese has 33 schools which are either Primary schools - Kindergarten to Year Six; Central Schools - Kindergarten to Year Ten, Kindergarten to Year Twelve; or Secondary Schools - Year Seven to Year Twelve.

Catholic Education Diocese of Bathurst permanently employs approximately 2000 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, located in Bathurst and Dubbo. 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. 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 \$219 million and 1965 suppliers.



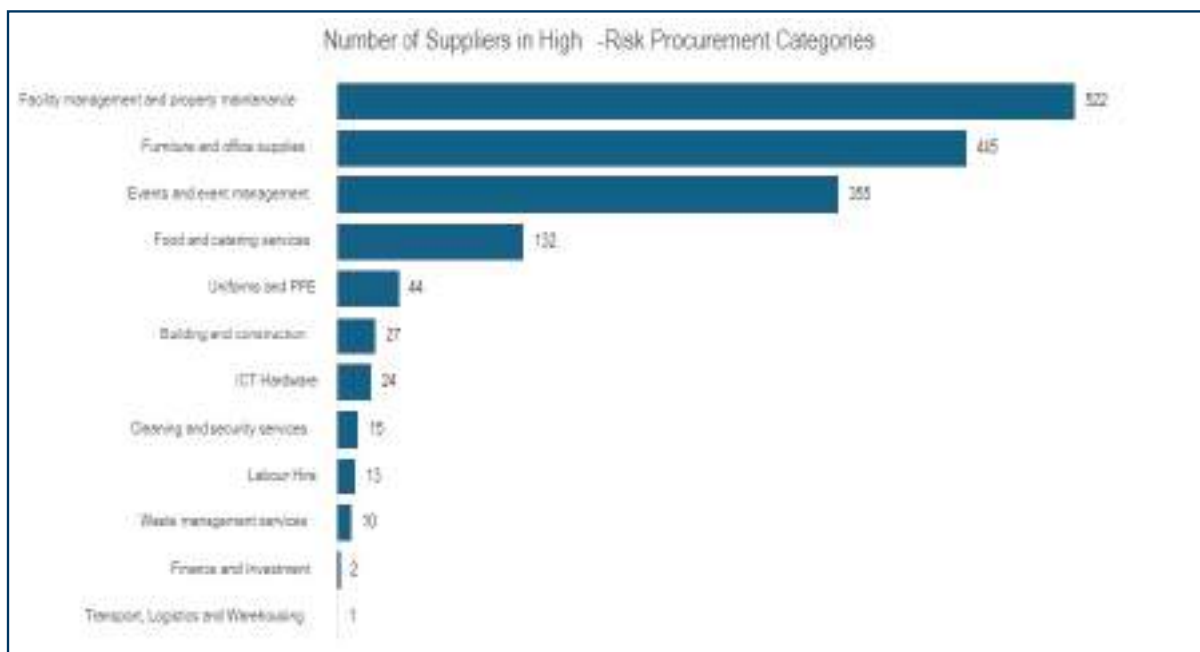


## Criteria 3: Modern Slavery Risks

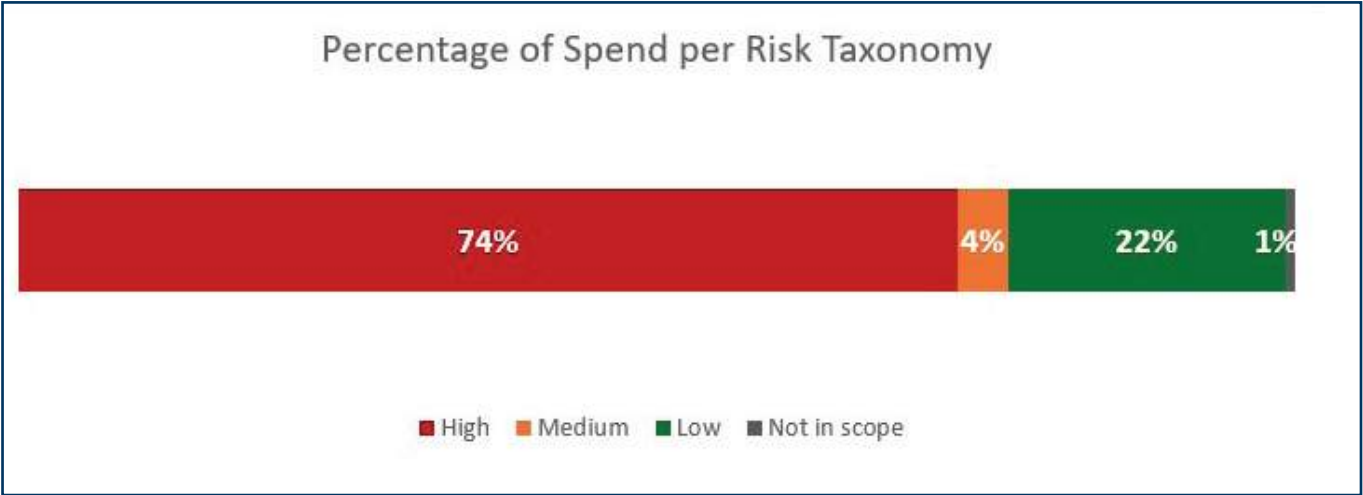
To identify its high-risk providers, CEDB assigns the ACAN risk taxonomy categories to each supplier.

This allocation facilitates the assessment of where the expenditure is going and with whom. The analysis below is based on all 1965 suppliers that CEDB purchased goods and services from during the reporting period. The total spend by the school system was \$38M. This figure excludes any payroll-related payments and related party payments to other Catholic organisations.

As in previous periods, the results indicate the majority of CEDB's expenditure was on goods and services considered at high risk of modern slavery practices, such as: building and construction, ICT hardware, 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.



An analysis of our suppliers has identified 1590 (74%) businesses in the High-Risk Procurement category with a combined spend of \$37 million, an additional 4% in the medium risk procurement category with a spend of \$1.9 million, and a remaining 22% with a spend of \$11 million in the low risk procurement category.



## Criteria 4: 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 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 (on Page 11) 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 338 suppliers to CEDB. Of those suppliers, 44 suppliers were invited to join SEDEX and complete the SEDEX Self-Assessment Questionnaire. There was a 50% increase in suppliers joining SEDEX in 2024 (56 suppliers) compared to 2023 (27 suppliers).

56 suppliers joined SEDEX and connected with the CEDB SEDEX account, providing CEDB with access and insights into both SAQ results and social audit reports.

### 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.

### 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.

## Criteria 5: Assessing Effectiveness

The baseline data tables below contain metrics CEDB 2024 compared with 2023 calendar year. These key metrics provide a quantitative basis to evaluate actions and results, providing an objective measure of achievements.

Data analysis shows an increase of greater than 150% in the number of suppliers completing the ACAN supplier survey and close to double the number of suppliers joining Sedex. Visibility over self-reported information and modern slavery risks associated with individual suppliers improved with an increase in the number of Sedex SAQs completed.

CEDB will link with these suppliers respective Sedex account in 2025, and review the 43 corrective actions.

	ACTIVITY	2023	2024
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	120	120
	Individual staff completed e-learning	0	0
	E-learning modules completed	0	0
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	3251	1965
	Number of suppliers with visible contact information and ABN	**	1725
	Number of suppliers across high-risk categories	1755	1590
	Number of ACAN Supplier Surveys completed	128	338
	Supplier staff attending capacity building webinars	11	38
	Invited to join Sedex	45	44
	Joined Sedex	27	56
	Sedex SAQ completed	8	62
	Social audits	1	9
	Corrective actions	0	43
	Contacts made via worker voice / grievance mechanism	0	0
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	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 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:

- **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 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 2024

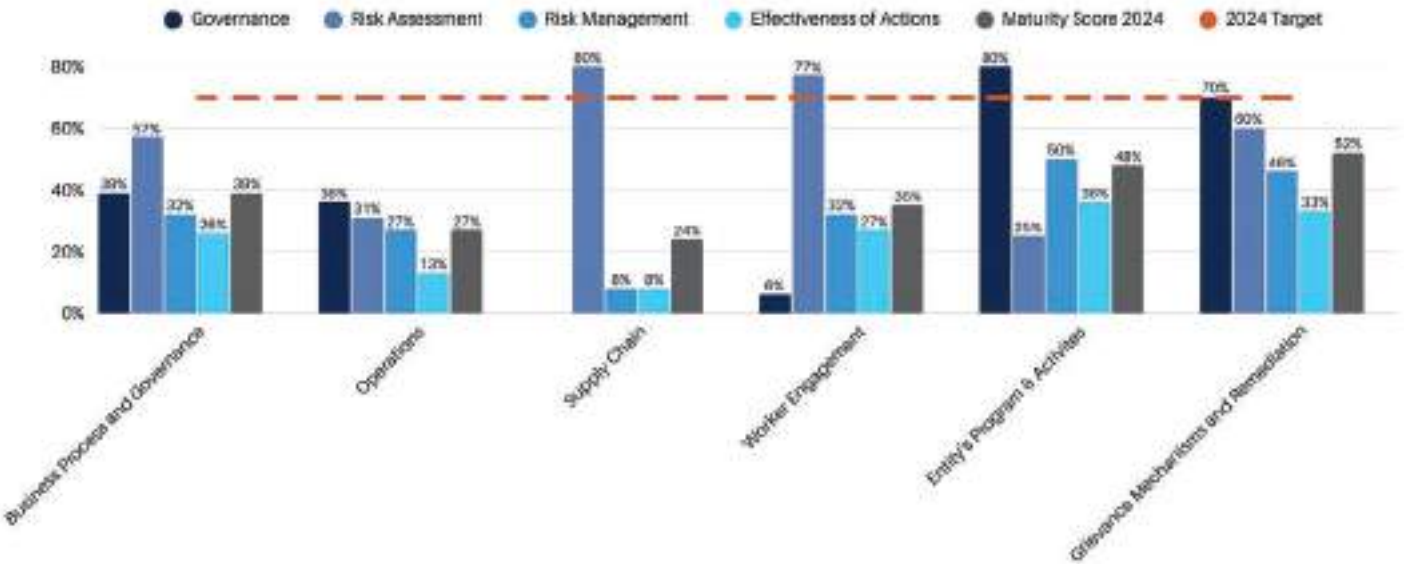
## Catholic Education Diocese of Bathurst - Overview



## Catholic Education Diocese of Bathurst - 2024 Analysis by Pillar

Pillar	Governance	Risk Assessment	Risk Management	Effectiveness of Actions	Maturity Score 2024
1 Business Process and Governance	39%	57%	32%	26%	39%
2 Operations	36%	31%	27%	13%	27%
3 Supply Chain	0%	80%	8%	8%	24%
4 Worker Engagement	6%	77%	32%	27%	36%
5 Entity's Program and Activities	80%	25%	50%	36%	48%
6 Grievance Mechanisms and Remediation	70%	80%	46%	33%	52%

## Catholic Education Diocese of Bathurst - Maturity Score 2024 comparative to target and maximum scoring by Pillar



## Action Planning 2025

In 2025, the CEDB will be reviewing;

- the 43 corrective actions stemming from non conformance action by suppliers in 2024; and
- analysis of the nine (9) completed social audits undertaken in 2024

With the introduction of new modern slavery e-learning modules in 2024, all CEDB Principals, Assistant Principals, School Co-ordinators and general employees with procurement duties will undertake the new modules to strengthen our workforces undertaking of risk mitigation and issues relating to modern slavery in society.

Catholic Education Diocese of Bathurst expects suppliers to share our goals and values in relation to ending modern slavery.

Suppliers are expected to support the CEDB's efforts to assess the levels of risk within their operations and supply chains. Anti-slavery clauses will be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.

Supplier reviews will be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks. This includes any new company seeking to do business with Catholic Education Diocese of Bathurst.

In accordance with the CEDB Modern Slavery Policy, our 1965 suppliers will be requested to complete a supplier self assessment.



## Criteria 6: 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.

### PRIMARY 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  
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 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  
St Patrick's Catholic Primary School, Lithgow  
St Joseph's Catholic Primary School, Manildra  
St Joseph's Catholic Primary School, Molong  
St Joseph's Catholic Primary School, Oberon  
Catherine McAuley Catholic Primary School, Orange  
St Mary's Catholic Primary School, Orange  
St Joseph's Catholic Primary School, Portland  
St Columba's Catholic Primary School, Yeoval

### SECONDARY SCHOOLS

MacKillop College, Bathurst  
St Johns College, Dubbo  
La Salle Academy, Lithgow  
James Sheahan Catholic High School, Orange

### CENTRAL SCHOOLS

St Mary's Catholic School, Wellington

### K-12 SCHOOLS

St Raphael's Catholic School, Cowra  
St Matthews Catholic School, Mudgee





## Criteria 7: Other Relevant Information

No further information.












# MODERN SLAVERY STATEMENT 2024

(1 January - 31 December 2024)



# 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

**Catholic Education Diocese of Wagga Wagga**

**ABN:** 36 345 537 994

**Address:** McAlroy House, 205 Tarcutta Street, Wagga Wagga, NSW 2650

**Website:** <https://www.catholic.edu.au/>

**Contact email for modern slavery:** [cedww-modernslavery@www.catholic.edu.au](mailto:cedww-modernslavery@www.catholic.edu.au)





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## STATEMENT FROM THE BISHOP OF WAGGA WAGGA: MOST REV MARK S. EDWARDS OMI PHD DD

I am proud to stand alongside our dedicated staff who have embraced our commitment to confronting the scourge of modern slavery and, as much as possible, avoid being caught in this web.

This issue, which operates in the shadows in Australia, affects perhaps 16,000 men, women, and children in New South Wales, and it is our moral obligation not to support this evil.

Over the past year, significant strides toward ensuring our Diocese avoids supporting or benefitting from this have been made. We have engaged with suppliers, included provisions in contracts and prepared for a combination of education and awareness-raising in our schools.

The Catholic Church has long upheld the dignity of every human being and, at our best, we refuse to treat any person as a commodity. I am proud of the initiatives that have been put in place to safeguard vulnerable individuals and collaborate with local and national organisations that work tirelessly to combat exploitation.

While we are making great progress, there is still more to do. The journey toward ending modern slavery will require continued effort and dedication. Together, under God and inspired by the Holy Spirit, we work for a future where every person can live in freedom, dignity, and peace.

Yours in Jesus Christ and Mary Immaculate.

A handwritten signature in dark ink that reads "M. Edwards".

*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 19 May 2025.*

*This Modern Slavery Statement is signed by a responsible member of the Catholic Education Diocese of Wagga Wagga as defined by the Act.*







## STATEMENT FROM THE EXECUTIVE DIRECTOR OF CATHOLIC EDUCATION: DR ANDREW WATSON

Catholic Education Diocese of Wagga Wagga (CEDWW) 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 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).

A handwritten signature in dark ink, appearing to read 'Andrew Watson', is placed over a light blue rectangular background.



## 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.

We are guided in our work by our strategic direction which in 2025 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 2024 was “sowing the seeds”, which followed on from the 2023 theme of “preparing the good soil”, drawn from the Parable of the Sower in Matthew’s Gospel.

During 2024 CEDWW gave thanks for all who prepared the soil for the past year and asked

for the strength to continue to sow the seed of Good News of Jesus Christ in our local school community.

To continue sowing the seeds, the Catholic Education Diocese of Wagga Wagga are called to be communities of:

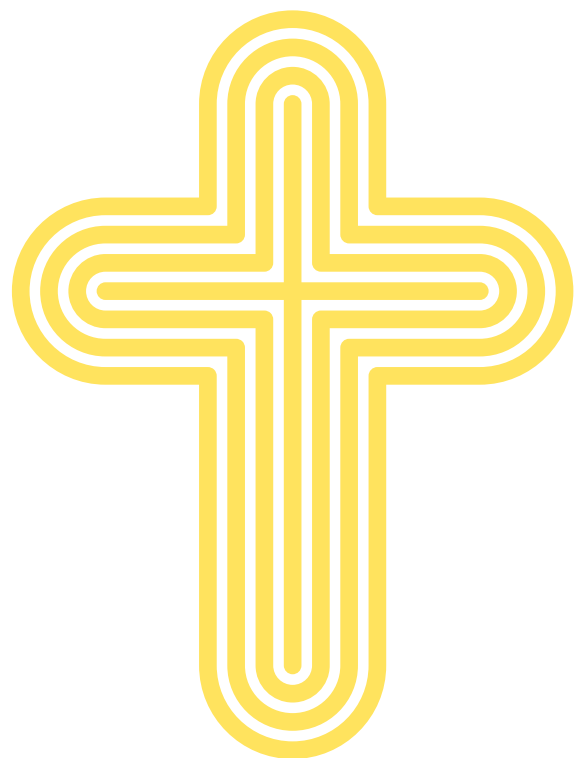
- Welcome
- Faith
- Service
- Learning





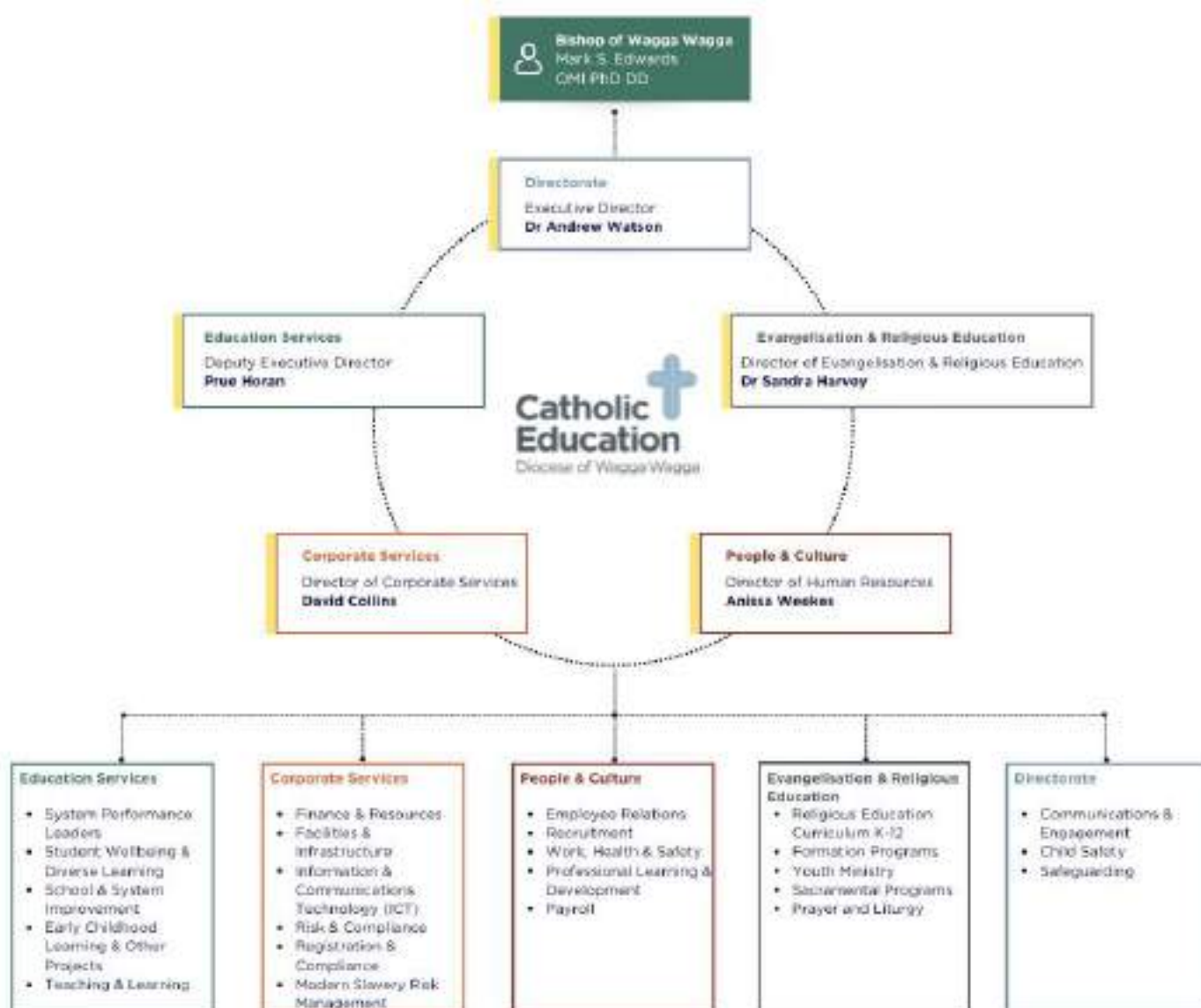
## OUR VISION

*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 Executive 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:

- Executive Director of Catholic Education
- Deputy Executive Director Catholic Education
- Director of Human Resources
- Director of Corporate Services
- Director of Evangelisation and Religious Education

The Executive Director of Catholic Education is assisting 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 2024 CEDWW employed 1,459 people and our schools educated 8,964 students. CEDWW also engaged contractors from 48 cleaning and maintenance businesses.



# MAP OF THE DIOCESE OF WAGGA WAGGA



# CEDWW ANNUAL CONSOLIDATED REVENUE:

CEDWW’s annual consolidated revenue for the 2024 Reporting Period was \$205,658,069.

## OUR SUPPLY CHAIN:

CEDWW engaged the services of some 2,418 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.

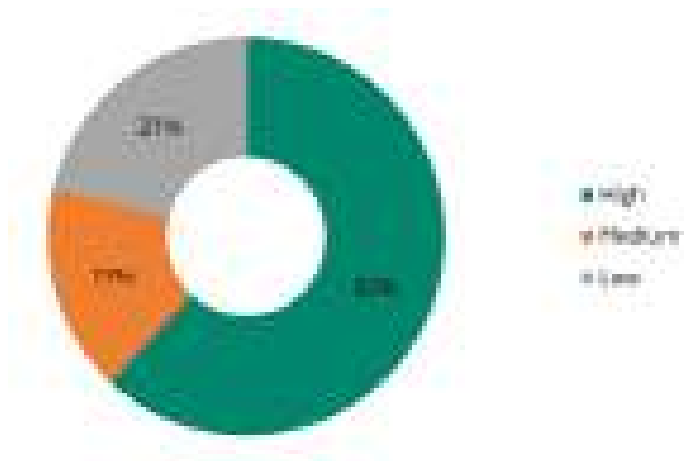
In general terms, CEDWW’s purchasing derives from two sources:

- 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 two), as well as cleaning contracts where clusters of location permit. In 2024, CEDWW entered into procurement contracts with three pest control companies.
- School contracts and purchasing – These are usually single site agreements or acquisitions for an individual School such as for educational supplies and photocopying services.

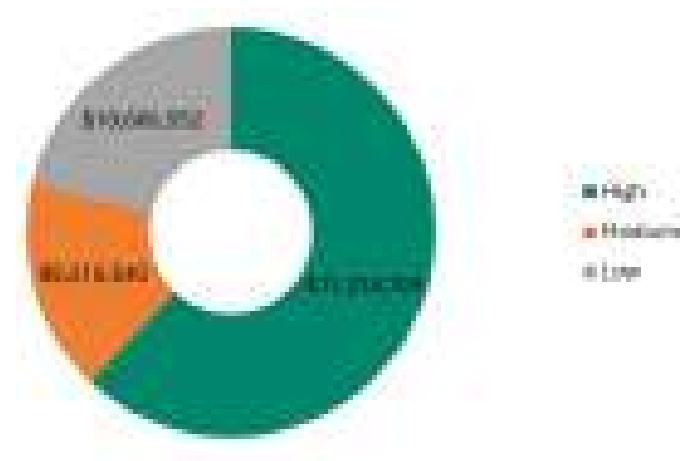
CEDWW is actively seeking opportunities to enter into group purchasing arrangements in other areas such as mechanical services, pest and termite control. In addition to providing a commercial benefit, the consolidation of such services will assist in managing and minimising CEDWW’s risk of exposure to modern slavery activities.

In 2024, CEDWW’s non-employee related expenditure totalled \$50,415,420. A risk assessment of our 2024 expenditure has identified that over 60% was for goods and services in areas classified as high risk, as represented in the below charts:

CEDWW EXPENDITURE % BY RISK



CEDWW EXPENDITURE \$ SPEND BY RISK





The following charts below highlight that 7 out of our 12 highest expenditure areas are in high-risk industries. Suppliers within these high-risk industries, which are amongst our 12 largest providers, will be our focus during 2025 and beyond.

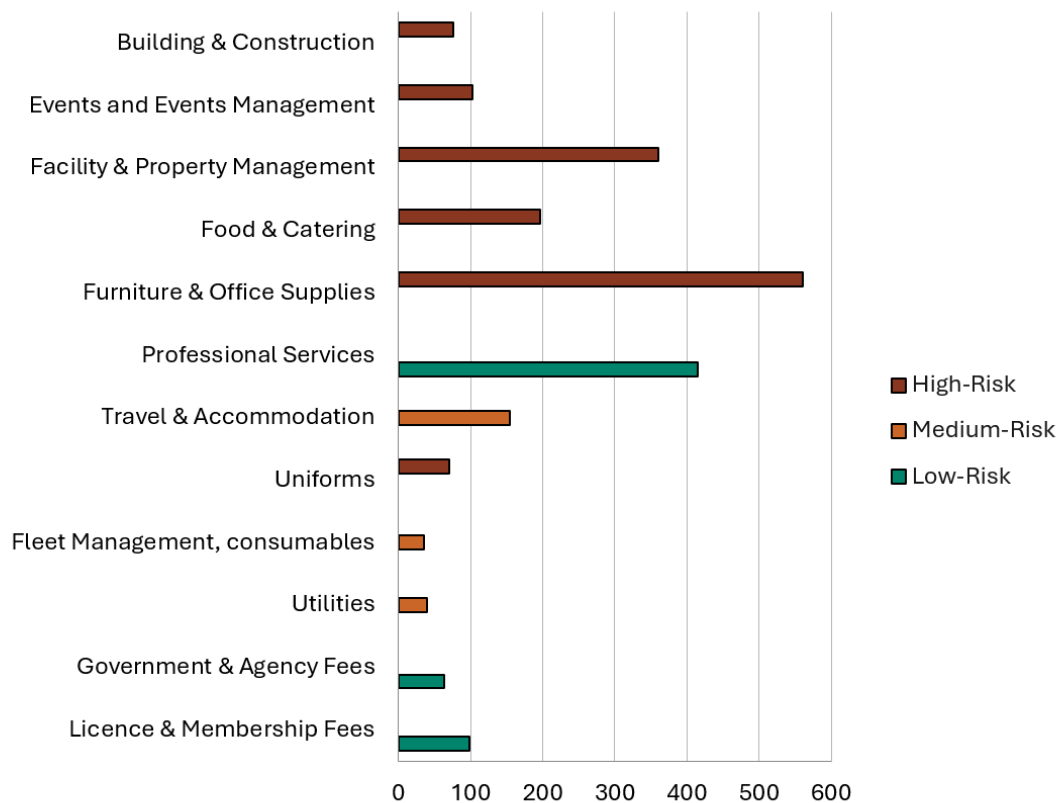
## TOP 12 CATEGORIES OF CEDWW EXPENDITURE







## 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 2024.

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, the following initiatives have been initiated or actioned:

#### Policy and Procedure:

- The continued appointment of a Modern Slavery Liaison Officer and Deputy Modern Slavery Liaison Officer to act as key contacts between CEDWW and ACAN.
- CEDWW's Modern Slavery Policy was published on CEDWW's internal and public websites, outlining CEDWW's expectations on all staff, contractors, and suppliers, with regards to modern slavery practices and compliance with the Modern Slavery Act.
- CEDWW's Modern Slavery Working Group held six meetings, and its sub-committee (CEDWW's Modern Slavery Working Group Chair, Deputy Chair, and Secretary) held an additional fourteen meetings throughout 2024 to continue overseeing CEDWW compliance with legislation and implementation of policy and procedures.
- The continued review and updating of standard CEDWW supplier and services agreements to include anti-slavery provisions.
- The continued review and updating of CEDWW standard construction contracts to ensure compliance with the Modern Slavery Act.
- The continued inclusion of modern slavery clauses in contracts and tenders.
- The continuance of Modern Slavery as a permanent agenda item in Finance, Risk, Audit and Compliance (FRAC) Permanent Committee quarterly meetings, and quarterly reporting.
- CEDWW established a risk management framework to assist CEDWW in managing its modern slavery risks.

#### Awareness Raising:

- CEDWW's Modern Slavery Statement 2023 was launched at the Catholic Education Council Meeting held at one of CEDWW's schools, St Mary's Primary School, Corowa, on 4 June 2024. Bishop of Wagga Wagga, Most Rev. Mark S. Edwards, and CEDWW Director of Education, Dr. Andrew Watson were in attendance at the launch, as well as multiple CEDWW Modern Slavery Working Group Members.
- CEDWW's Modern Slavery Statement 2023 was published online, on both CEDWW's internal and public websites, with printed copies distributed to all 29 schools and 2 boarding houses.
- CEDWW created and published a Modern Slavery page for both its internal and public websites.
- CEDWW's Modern Slavery Supplier Fact Sheet was created and published on both CEDWW's internal and public websites.



- Modern slavery presentations, which provided an update on CEDWW's progress in preventing modern slavery, were provided to: All Catholic Schools Office staff, all CEDWW School Principals, and Finance & Administration Staff
- Completion of ACAN Modern Slavery Entity Profile, to assist with identifying areas that require focus or additional attention.
- The creation of modern slavery email signatures for CEDWW's staff email address to raise awareness about modern slavery.
- The inclusion of modern slavery awareness in CEDWW staff induction training.
- The creation of modern slavery awareness educational resources for CEDWW's primary and secondary schools.

### **Supplier Engagement:**

- CEDWW's continued membership with SEDEX for supplier assessment and supply chain visibility.
- CEDWW provided details of its high-risk suppliers to ACAN. ACAN engaged with the high-risk suppliers on CEDWW's behalf. 448 suppliers have completed the ACAN Supplier Survey to date (66 of those completed it in 2024). Currently, 63 of CEDWW's suppliers are on Sedex, with 65 sites having completed Sedex's Self Assessment Questionnaire (SAQ), as outlined in the graph over the following page.
- CEDWW created a Modern Slavery Supplier Fact Sheet to distribute to its suppliers, to raise awareness of modern slavery and outline its expectations of its suppliers to comply with the Modern Slavery Act.
- CEDWW's ICT team distributed a modern slavery brief at the beginning of its annual technological bulk purchase process to their suppliers, outlining CEDWW's expectations of them to comply with the Modern Slavery Act.
- CEDWW established a modern slavery risk classification tool within its financial management system to apply a modern slavery risk classification to all its suppliers. The tool enables CEDWW to meet their obligations under the Modern Slavery Act, and allows for efficient risk management and financial reporting to ACAN.
- CEDWW continued to undertake procurement risk analysis across key areas of CEDWW.



# Catholic Education Diocese of Wagga Wagga

Suppliers Shared  
with ACAN

2565

Suppliers shared  
with e-mail and  
ABN

2273

Suppliers with risk  
Taxonomy  
assessed

2565

Suppliers in High  
Risk Procurement  
Categories

1503

Total Supplier  
Surveys Completed  
(cummulative)

448

Total High Risk  
Category Supplier  
Surveys 2024

66

Number of suppliers invited to  
join Sedex (cumulative)

55

Number of Supplier  
e-mails in 2024

2060

Total  
Suppliers on  
Sedex

63

Total Sedex  
SAQs Completed  
(Sites)

65

Sedex SAQ  
Completed in 2024  
(Sites)

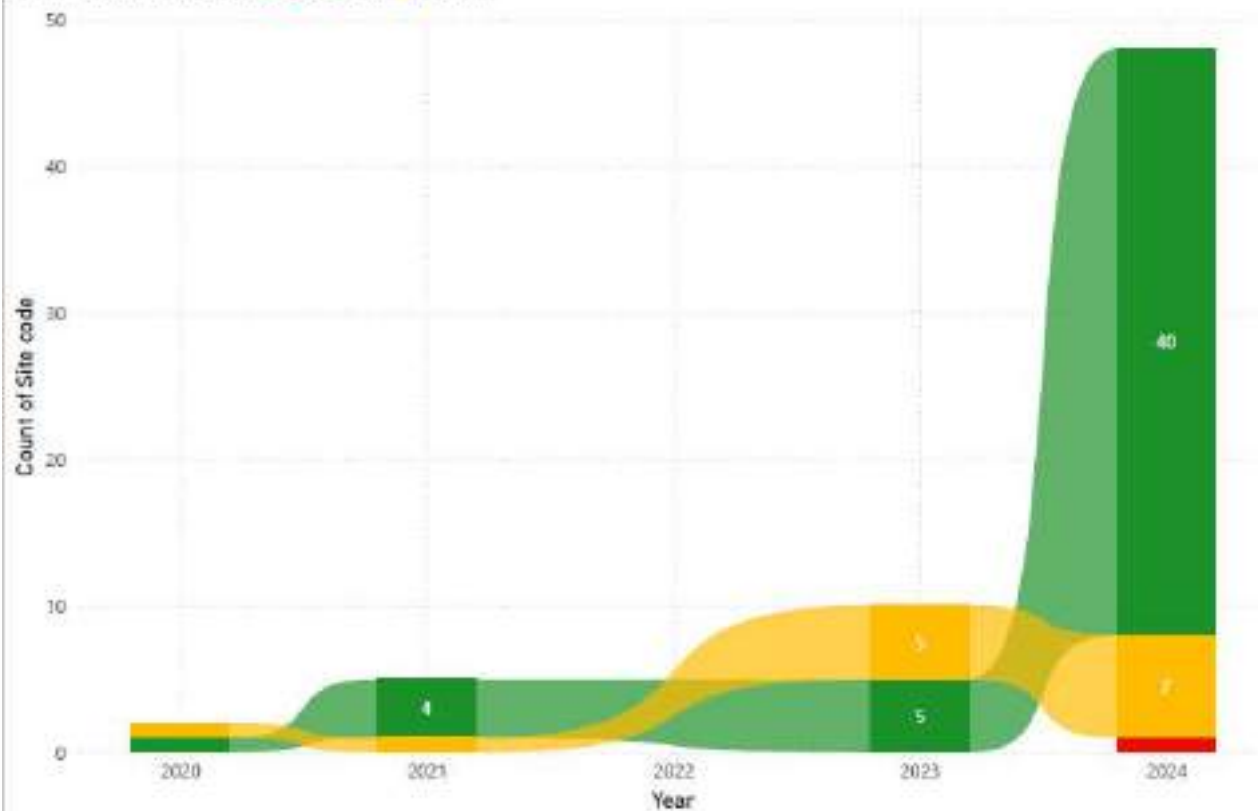
48

Suppliers  
Attending  
Webinars in 2024

26

Count of Site code by Year and Combined risk category

Combined risk category ● High ● Low ● Medium



*CEDWW Supplier Engagement Update as of April 2025 provided by ACAN, these statistics are for the 2024 Reporting Period.*

## CEDWW's 2024 Baseline Data:

The following table provides a summary of CEDWW's 2024 Baseline Data illustrating our efforts to mitigate our modern slavery risk, as well as the progress CEDWW has made since 2023, especially in regards to external/supplier engagement.

	ACTIVITY	2023 Catholic Education Diocese of Wagga Wagga	2024 Catholic Education Diocese of Wagga Wagga
INTERNAL STAFF	Hours spent on modern slavery activities	600	500
	Individual staff completed e-learning	0	0
	E-learning modules completed	0	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	2629	2579
	Number of suppliers with visible contact information and ABN	2177	1109
	Number of suppliers across high-risk categories	1406	1008
	Number of ACAN Supplier Surveys completed (cumulative)	179	319
	Supplier staff attending capacity building webinars (cumulative)	2	22
	Invited to join Sedex (Number of suppliers invited to join Sedex (cumulative)	1	24
	Joined Sedex (Number of suppliers that Joined Sedex (cumulative)	0	63
	Sedex SAQ completed (Number of Sites with Sedex SAQ completed (cumulative)	0	65
	Social audits (number of audits completed in 2024)	0	9
	Corrective actions (Number of non-conformances in 2024)	0	43
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	7
	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

## **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 2025**

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 and our action plan for 2025:

- 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 February 2025, CEDWW completed the ACAN 2024 Entity Profile Survey as part of ACAN’s Modern Slavery Maturity Assessment process. CEDWW’s overall assessment score of 40% is above the benchmark of 30% for a Year 2 reporting entity.

The Assessment has identified areas that will need to be of focus for the year ahead, in particular internal worker engagement, operations, 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 and ongoing focus for the organisation.

CEDWW’s maturity score in programs and activities increased from 48% in 2023 to 52% in 2024.



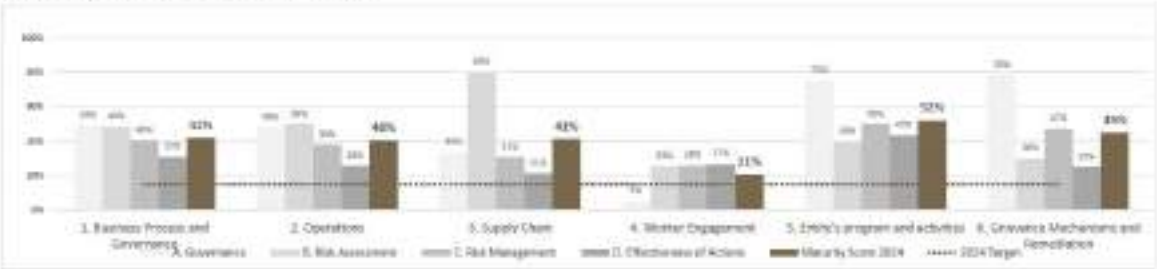
Catholic Education, Diocese of Wagga Wagga - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024
1. Business Process and Governance	49%	48%	40%	31%	42%
2. Operations	48%	50%	38%	26%	40%
3. Supply Chain	33%	80%	31%	21%	41%
4. Worker Engagement	5%	25%	26%	27%	21%
5. Entity's program and activities	75%	40%	50%	43%	52%
6. Grievance Mechanisms and Remediation	78%	30%	47%	25%	45%
Average	48%	46%	39%	29%	40%

Maturity Score 2024 individual scoring for pillar and sub pillar, including averages and total 2024 score



Maturity Score 2024 comparative to target and maximum scoring, by Pillar



## CRITERIA 6 - CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

CEDWW does not control or own other entities and thus does not report on this.

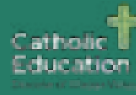
## CRITERIA 7 - ANY OTHER RELEVANT INFORMATION

Part of CEDWW's efforts in continuing to bring awareness to modern slavery included publishing a post on CEDWW's Facebook page inviting their community to join them in their efforts to combat modern slavery, raise awareness, and make a positive impact on this important issue. The post included a link to CEDWW's Modern Slavery Statement for 2023. An image of the Facebook post can be found below.

CEDWW also created, published and distributed a Modern Slavery Supplier Fact Sheet to its suppliers. The Modern Slavery Supplier Fact Sheet can be found over the following pages.



# MODERN SLAVERY SUPPLIER FACTSHEET



The purpose of this Factsheet is to raise awareness amongst suppliers to Catholic Education, Diocese of Wagga Wagga (CEDWW) about modern slavery and what it means for our suppliers.

As a system of 29 schools within the Catholic Diocese of Wagga Wagga, we believe in the inherent worth and dignity of every person, which compels us to act against modern slavery in all its forms.

## What is Modern Slavery?

Modern slavery is a global issue that involves the exploitation and coercion of individuals for economic gain. It encompasses practices such as forced labour, debt bondage, human trafficking, and child labour, among others. These violations of human rights deprive individuals of their freedom, dignity, and well-being, and they are unfortunately prevalent in various industries worldwide, including agriculture, manufacturing, construction, and even within the supply chains of many organisations.

Modern slavery crimes are serious human rights violations, which distort markets, undercut responsible business and pose reputational and legal risks for business.

## The Modern Slavery Act 2018 (Cth)

The modern slavery law applies to entities with an annual consolidated revenue of \$100 million or more, of which there are approximately 3,000 (reporting entity). CEDWW is classified as a reporting entity.

The law requires reporting entities to prepare an annual modern slavery statement describing the steps they are taking to assess and address modern slavery risks in their operations and their supply chains globally.

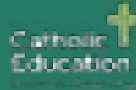
## What does this mean for your business?

Even if the law does not apply to your business, the law may still have some implications for your business. If your business supplies goods or services to CEDWW, your business is considered part of our supply chain.

In response to the law, CEDWW is reviewing the modern slavery risks in our supply chains, to help us prepare our modern slavery statement. Part of this process includes engaging with our suppliers, especially those that provide goods or services that pose higher modern slavery risks.

If you supply to a reporting business there are things your business can do to prepare, even before being asked to provide information. These actions will also give you confidence that your business does not contribute to modern slavery. Taking the time to review your supply chain will help your business provide a timely response if your customers request this information, while preventative actions may even help your business to secure new opportunities. As a small business your approach should be proportionate and you shouldn't worry if you are unable to fully investigate your supply chain.

# MODERN SLAVERY SUPPLIER FACTSHEET



As part of our commitment to human rights, we are taking steps to address modern slavery risks in our supply chains, including by awareness raising with our suppliers and other measures. As one of our suppliers, we may ask you to:

- complete a supplier questionnaire
- provide information on your operations and supply chains, whether there are any risks of modern slavery and what steps your business has taken or plans to take to identify and address any potential modern slavery
- provide your business's Anti-Modern Slavery policy (if you have one) or other relevant policies and procedures implemented in your business
- provide information on the make-up of your workforce (number of employees, part-time, full-time, casual, unionised, non-unionised etc.)
- provide information on grievance processes available for your workers
- provide information on the geographic regions and countries where you source from.

## Where can I get further information?:

- News and resources in relation to the Commonwealth Act can be found at <https://modernslaveryregister.gov.au/resources/>
- View our current Modern Slavery Statement at [www.catholic.edu.au/modern-slavery/](https://www.catholic.edu.au/modern-slavery/)
- Visit the Australian Catholic Anti-Slavery Network (ACAN) website [www.acan.org.au/](https://www.acan.org.au/)
- Visit the NSW Small Business Commissioner website <https://www.smallbusiness.nsw.gov.au/resources/factsheets/modern-slavery-information-small-business>

This information in this factsheet is drawn largely from the Department of Home Affairs, Commonwealth *Modern Slavery Act 2018: Guidance for Reporting Entities* (2019), 16, 44 and 80-81 at <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>, the Department of Home Affairs website, "Modern Slavery" at <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx> and the NSW Small Business Commissioner website at <https://www.smallbusiness.nsw.gov.au/resources/factsheets/modern-slavery-information-small-business>

## APPENDIX:

Catholic Education Diocese of Wagga Wagga comprises of the following 29 schools:



### PRIMARY

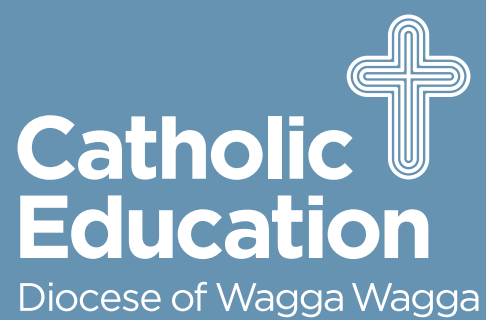
- All Saints' Primary School, Tumbarumba
- Henschke Primary School, Wagga Wagga
- Holy Spirit Primary School, Lavington
- Holy Trinity Primary School, Wagga Wagga
- Mater Dei Primary School, Wagga Wagga
- Sacred Heart Primary School, Koorlingal
- Sacred Heart Primary School, Tocumwal
- St Anne's Primary 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











# Modern Slavery Statement 2024



Catholic Schools  
Parramatta Diocese



## Disclosure note

This statement has been made on behalf of Catholic Schools Parramatta Diocese Ltd. Covering the reporting period 1 January 2024 to 31 December 2024 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.

[parra.catholic.edu.au](https://parra.catholic.edu.au)

[cl@parra.catholic.edu.au](mailto:cl@parra.catholic.edu.au)

## Acknowledgement of Country

We would like to acknowledge the Darug and Gundungurra people who are the Traditional Custodians of this Land, here in Western Sydney - people who have loved and cared for this Land for thousands of years.

We would also like to pay respect to the Elders of the Darug and Gundungurra Nations, past and present and emerging, and extend that respect to other Aboriginal people.

# Authorisation

## by Catholic Schools Parramatta Diocese Ltd Chair Elizabeth Crouch AM

I am pleased to present the fifth Modern Slavery Statement for Catholic schools in the Diocese of Parramatta. This marks our fifth statement overall and is the second submitted under Catholic Schools Parramatta Diocese Limited (CSPDL), with the previous three statements jointly submitted with the Diocese of Parramatta.

As a large non-government employer and provider of education services, CSPDL plays a pivotal role in ensuring that our workplaces and practices are free from all forms of modern slavery.

CSPDL is committed to upholding human rights and taking meaningful action to identify, address, and mitigate the risks of modern slavery within our operations and supply chains. We work in close partnership with the Australian Catholic Anti-Slavery Network (ACAN) to leverage our collective influence and drive the change that is urgently needed.

This Modern Slavery Statement outlines the actions we have taken throughout 2024 to assess and address the risks of modern slavery. We acknowledge that this is a continuing journey and reaffirm our commitment to ongoing improvement in this vital area.

On behalf of the Board of CSPDL, I fully support this statement and encourage all our schools within the Diocese of Parramatta to deepen their understanding and explore ways we can work together to raise awareness and create a world free from modern slavery.



**Elizabeth Crouch AM**  
Catholic Schools Parramatta Diocese Ltd Chair

6 June 2025

## 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 6 June 2025. 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

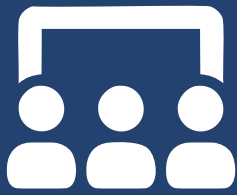
The Diocese of Parramatta has a system of 80 schools, which are managed by a separate entity named Catholic Schools Parramatta Diocese (CSPD). In 2024, CSPD managed 58 primary schools, 22 secondary schools, two trade and inquiry campuses, three high support learning settings and six Catholic early learning centres. CSPD has over 45,600 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 Chief Executive Officer, 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 2024 was \$943,034,000.

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.





**45,600+**  
students



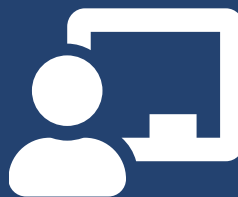
**58**  
primary schools



**22**  
secondary schools



**5,000+**  
total staff



**3,700+**  
teaching staff



**1,300+**  
support staff



**650+**  
system staff



**2** trade and  
inquiry campuses



**3** High Support  
Learning settings



**1** virtual  
School of Now



**6** Catholic  
Early Learning Centres



**52** Before and After  
School Care centres

# Our Strategy

This newly developed strategy will define CSPD's future direction

## Enriching the lives of our students through education

What is our vision?

Our strategic pillars

How will we be distinct?



### MISSION

Catholic by nature, not by name only

Develop faith filled, service-minded students in all cohorts, through an understanding of Catholic social teaching and encouraged by Catholic values to become active contributors to their community



### PEOPLE

High performance culture

Encourage our people to deliver their best, by defining clear goals and targets, and offering active professional development opportunities and access to a supporting system



### QUALITY

Strong academic achievement

Deliver relative learning gains maximising each student's potential, with evidence-based teaching practices, fit-for-purpose learning environment, early identification/intervention and targeted

### Students and families

Who do we want to serve?

- **Provide a Catholic education for all**, that is inclusive and not for Catholic families only
- Attract a student base broadly **representative of the communities we serve, increasing diversity** where we can (including: First Nations, EAL/D and high potential students), offering **special programs** for students **high learning needs**
- Provide a **K-12** education, and deliver greater access to our system through **early childhood partnerships**

What are the key measures?

**Catholic identity**  
(KUL survey)  
**Community service**  
(scale of impact)

**Employee outcomes**  
(employee engagement, turnover, professional learning opportunities)

**Academic performance**  
(NAPLAN, HSC, PAT-R, PAT-M)  
**Wellbeing** (TTFM)



## grounded in excellence, inclusivity and Catholic tradition



### RELEVANCE

Breadth of opportunity

Encourage students to pursue their passions and choose the path aligned to their specific needs through diverse subject offerings, co-curriculars, and progression opportunities, both in higher ed and alternative pathways



### SUSTAINABILITY

Financial stewardship

Establish scalable, unified and optimised systems, practices and processes that enable sustainable growth, effective and equitable resource distribution/contributions in our communities, maximising opportunities for staff and students



### TRUST

Integrity, accountability and transparency

Promote integrity within our organisation, by putting the optimal systems and controls in place to effectively manage our people and financial resources

### Parishes and communities

- Connect with both **local school and parish communities**, whilst also providing students with the opportunity to support the **broader community**
- Provide **schools** with the freedom to **create and drive** community service initiatives whilst **offering system-wide opportunities** organised by the centre

### Staff

- Attract, develop and retain a teacher base of **subject matter leaders** and **experts in teaching** the curriculum, and **support staff** that enable CSPD to deliver the highest quality student outcomes
- **Reflect the diversity** of our communities in our workforce, where possible

### Level of opportunity

(breadth of our offering, tertiary education offers, job positions)

**Market share and financial performance**  
(growth, cost efficiency)

**Compliance**  
(WHS incidents, ACSL standards, regulatory compliance)

# Our organisational structure

Chief Executive Officer

Executive General Manager Learning Outcomes

Executive General Manager Quality & Performance

Executive General Manager Student Support

Executive General Manager Mission

Executive General Manager Communications & Engagement

Executive General Manager Legal, Governance & Risk

Executive General Manager People & Culture

Executive General Manager Finance & Infrastructure

Executive General Manager Information Technology

CSPD has established a Modern Slavery Working Group with representation from each of the directorates listed above. The Working Group is jointly sponsored by the Executive General Manager Mission and the Executive General Manager Finance & Infrastructure.

## Our operations

CSPD manages 80 Catholic Schools - (58 primary schools, 22 secondary schools and two trade pathway campuses, three high support learning settings and six Catholic early learning centres), 45,600 students and more than 5,000 staff. CSPD Support Teams (central office) in Parramatta manage 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.

# Our organisation

Our staff allocation is as follows:

Male	Female	Total
1139	4703	5842

We have 80 schools with a total student population of 45,600.

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



Whistleblower Policy



Acceptable Use of Electronic Communication Systems and Devices



# Reporting criteria 3:

## Modern slavery risks in operations and supply chain

Analysis of CSPD supply chains is based on ACAN risk taxonomy across 23 categories of geographic location, industry or sector, commodity, product category and workforce profile. Through the Australian Catholic Anti-Slavery Network (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

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 employer obligations to meet requirements of the Fair Work Act.

### Facility management and property maintenance, building and construction

CSPD works closely with a select group of Australian based suppliers who are placed on a panel to supply facility management, property management and building and construction services. CSPD ensures that the suppliers are aware of their employer obligations to meet requirements of the Fair Work Act.

### Uniforms and PPE

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 employer obligations to meet requirements of the Fair Work Act with their local workforce.

## Supply chain risk

The bar graph below illustrates supplier spend breakdown across procurement categories based on high, medium and low risk of modern slavery. CSPD has active suppliers in 14 high risk procurement categories and is focused on working with these suppliers to more effectively manage and mitigate modern slavery risks.

### CSPD High Risk Spend Categories

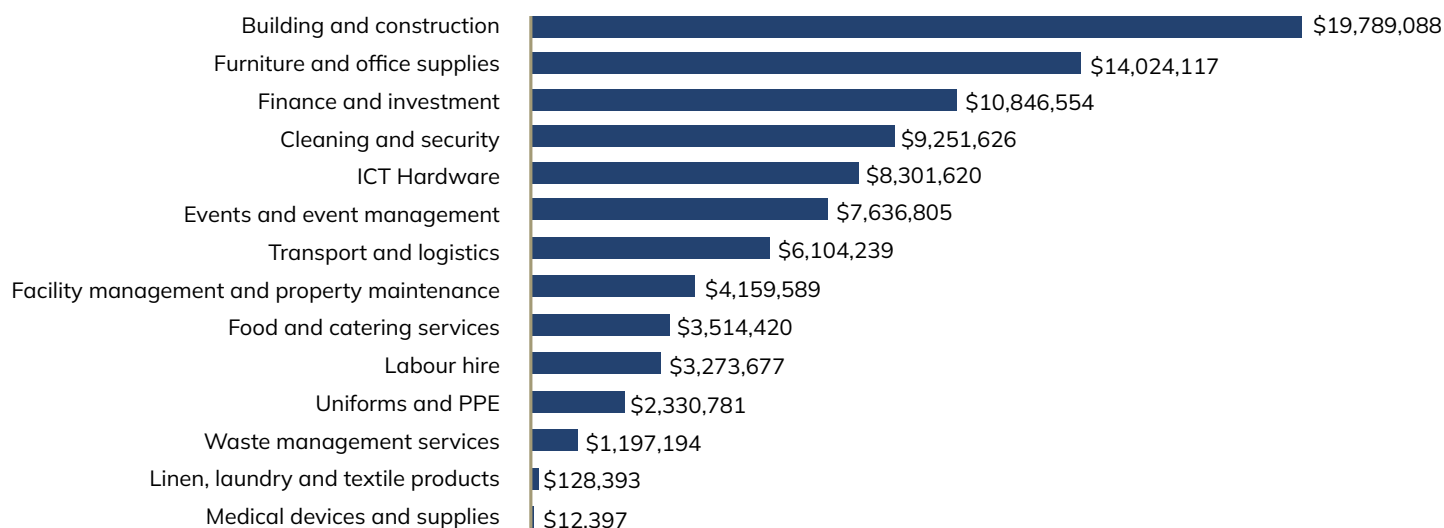
CSPD annual spend in High-Risk Categories for calendar year 2024 was \$90.5M representing 68% of total spend with 2497 suppliers from a total of 3792 suppliers.

High	\$90,570,499	68%
Medium	\$10,044,353	8%
Low	\$29,001,556	22%
Not in Scope	\$3,384,759	3%
Grand Total	\$133,001,166	100%

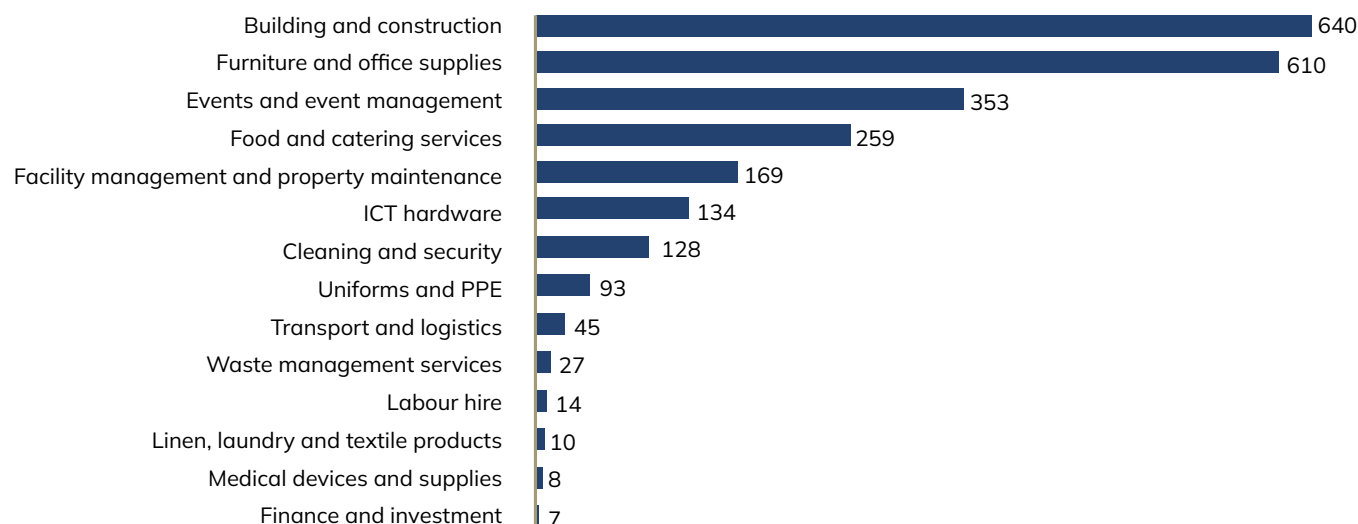
### % of Spend per Risk Taxonomy Category



## \$ Spend in High-Risk Taxonomy Categories



## Number of Suppliers in High-Risk Taxonomy Categories







# Reporting criteria 4:

## Actions taken to assess and address risk

### Actions taken in 2024

CSPD followed 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 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 2024, CSPD made inroads with supplier engagement and participation in risk management activities, summarised:

- 606 suppliers completed the ACAN Supplier Survey
- 97 suppliers joined Sedex
- 53 suppliers completed the SEDEX Supplier Assessment Questionnaire (SAQ)
- 73 supplier staff participated in 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 onboarding 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 onboarding processes
4. Gain visibility further upstream in the supply chains
5. Monitor and report on progress in the profile of suppliers

## Modern Slavery Working Group

The current Modern Slavery Working Group draws representation from Learning Outcomes, Communications, Student Support, Quality & Performance, People & Culture, Mission and Finance & Infrastructure (Procurement). The Working Group has joint executive sponsorship from the Executive General Manager Mission and Executive General Manager Finance & Infrastructure. The Modern Slavery Liaison Officer is the Manager Procurement and Contracts who reports into the Executive General Manager Finance & Infrastructure.

## Modern Slavery Policy, Procedures and Guidelines

CSPD is 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 Orders, have embedded clauses that address Modern Slavery obligations. These clauses are included in all new contracts and renewals.



## Remediation

The Diocese of Parramatta is a founding member of Domus 8.7 remediation service.

Domus 8.7 prioritises crisis support, referrals and case management that seeks to address the harms experienced by people impacted by modern slavery and provides guidance to Catholic entities when concerns arise about indicators of forced labour or modern slavery.

Domus 8.7 staff make an assessment to determine if people are eligible for remediation services or require a referral to other social and community services.

Domus 8.7 offers the necessary expertise, training courses and resources to assist Catholic entities to address the challenges and responsibilities outlined by the Act. A thorough analysis is essential to determine the appropriate remedial actions and measures necessary to prevent future harm.

Domus 8.7 has a multidisciplinary team skilled in social and legal services, business and human rights, supply chain management, stakeholder engagement and community outreach.

Through Domus 8.7, CSPD 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 CSPD to have any future 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 whistleblower 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

The baseline data table below contains key metrics for CSPD to evaluate actions and results, providing an objective measure of achievements.

Data analysis shows an increase in the number of suppliers completing the ACAN supplier survey. Visibility over self-reported information and modern slavery risks associated with individual suppliers improved with an increase in the number of Sedex SAQs completed.

	ACTIVITY	2023 CATHOLIC SCHOOLS PARRAMATTA DIOCESE	2024 CATHOLIC SCHOOLS PARRAMATTA DIOCESE
INTERNAL/ STAFF	Hours spent on modern slavery activities	80	100
	Individual staff completed e-learning	0	0
	e-learning modules completed	0	0
EXTERNAL/ SUPPLIER ENGAGEMENT	Total number of suppliers	3960	3792
	Number of suppliers across high-risk categories	1142	2498
	Number of ACAN Supplier Surveys completed	174	606
	Supplier staff attending capacity building webinars	12	73
	Invited to join Sedex	7	96
	Joined Sedex	7	97
	Sedex SAQ completed	4	53
	Social audits	1	18
	Corrective actions	0	75
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice/grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

# Modern Slavery Maturity Assessment

CSPD completed the annual Maturity Assessment and can report improvements on the previous year in management controls across the following 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.

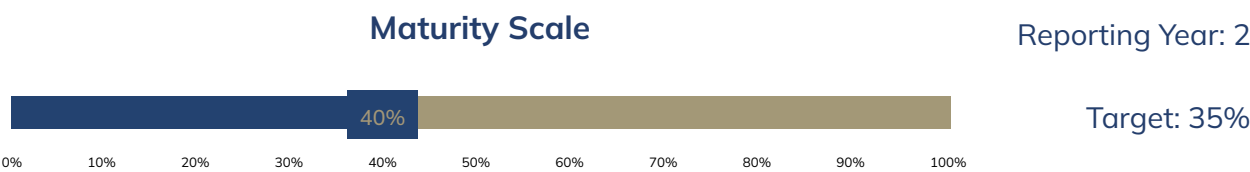
In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

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 allows 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 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 2024

## Catholic Schools Parramatta Diocese - overview



## Catholic Schools Parramatta Diocese - 2023 analysis by pillar

Pillar	A. Governance	B. Risk assessment	C. Risk management	D. Effectiveness of actions	Maturity score 2024
1. Business process and governance	48%	55%	35%	26%	41%
2. Operations	37%	38%	29%	14%	30%
3. Supply chain	8%	80%	37%	10%	34%
4. Worker engagement	11%	72%	13%	23%	30%
5. Entity's program and activities	100%	40%	50%	43%	58%
6. Grievance mechanisms and remediation	78%	30%	49%	25%	46%
Average	47%	52%	36%	24%	40%

As in the last 2 years, the effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

<b>Processes to review actions</b>	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units that will complete the statement
<b>Risk assessment</b>	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
<b>Engagement and feedback</b>	The Modern Slavery Working Group will engage each Business Unit to complete the Statement and provide appropriate feedback regarding review of actions and risk to each
<b>Internal audit</b>	Governance, Risk & Strategy will undertake the normal internal audit of the organisation
<b>Tracking implementation</b>	Regular feedback from the Modern Slavery Working Group will track the implementation of the action plan
<b>Supplier tracking</b>	Procurement will continue to work with suppliers in this area





# Action plan 2025-26

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Board of Directors</b>	Leadership and effective governance of modern slavery risks to people in supply chains and operations are effectively demonstrated, managed and reported	<p>Board approves and Board Chair signs annual Modern Slavery Statement at June Board meeting</p> <p>Review modern slavery progress at October Board meeting</p> <p>100% Board members complete modern slavery e-learning course modules: MS101, Business Relevance, Implementing a MS Risk Management Program and Grievance Mechanisms and Remedy 1.5 hours self-pace</p>	<p>Board approves and Board Chair signs annual Modern Slavery Statement at June Board meeting</p> <p>Review modern slavery progress at October Board meeting</p>
<b>Chief Executive Officer</b>	Modern slavery risks to people in supply chains and operations are addressed through effective management systems	<p>Monitor Modern Slavery Working Group (MSWG)*</p> <p>1-3 modern slavery communications per year to stakeholders</p> <p>Present annual Modern Slavery Statement to Board for approval and signature</p> <p>Complete modern slavery e-learning course</p>	<p>Monitor Modern Slavery Working Group (MSWG)*</p> <p>1-3 modern slavery communications per year to stakeholders</p> <p>Present annual Modern Slavery Statement to Board for approval and signature</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Executive General Manager Finance &amp; Infrastructure</b>	<p>Financial/economic impacts of modern slavery risks to people in operations and supply chains are effectively managed</p> <p>Modern slavery risk management program allocated adequate resources</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>	<p>Participate in MSWG</p> <p>Review and establish internal modern slavery reporting and budget requirements</p> <p>Modern slavery risk review of investments</p>
<b>Executive General Manager People &amp; Culture</b>	<p>Direct workforce can evidence the skills, knowledge and attitude to effectively address risks of modern slavery in operations and supply chains aligned with modern slavery public commitment</p> <p>Entity has effective processes to provide remedy, is transparent, credible and accountable</p>	<p>Participate in MSWG</p> <p>Strategy for e-learning roll-out developed and implemented</p> <p>Accountabilities for modern slavery are integrated into new and existing position descriptions</p> <p>Modern slavery training and awareness incorporated into recruitment and induction processes</p> <p>Complete workforce profile mapping</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Staff awareness survey</p>	<p>Participate in MSWG</p> <p>An effective grievance mechanism is deployed and monitored in operations so stakeholders can raise modern slavery concerns</p> <p>Continue to monitor and measure e-learning roll-out</p> <p>Provide performance reviews/management of modern slavery accountabilities</p> <p>Monitor changes in workforce profile</p> <p>Worker voice and wellbeing surveys</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
Procurement	Robust systems are in place to effectively identify and mitigate modern slavery risks in the supply chain	Adjust and incorporate 2024 learnings to the risk identification framework	Adjust and incorporate 2025 learnings to the risk identification framework
	Regular risk assessment	Desktop review of min. 36 high-risk suppliers	Desktop review of min. 72 high-risk suppliers through the year and 12 randomly selected low and medium risk suppliers
	Policy development and implementation	Plan for Supplier Audit program (high-risk suppliers identified after review)	Engage deeper with 5 select suppliers, to build capacity and demonstrate best practice
	Supplier engagement and training	Initiate pilot Audit program (social audit/human rights due diligence) for 5 suppliers identified through risk review activities	Expand Audit program (social audit/human rights due diligence) to 12 suppliers identified through risk review activities. Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high-risk suppliers to join the pre-screening platform (as agreed/recommended by Modern Slavery Working Group/ACAN in 2024).
	Monitoring and auditing	Communicate with suppliers regularly about values, expectations, and outcomes. Include invitations to training and drive high-risk suppliers to join the pre-screening platform (as agreed/recommended by Modern Slavery Working Group/ACAN in 2024).	Monitor that required mitigating actions for non-compliance and timelines for completion are maintained, in collaboration with the MS Working Group
	Remediation and support	Define required mitigating actions for non-compliance and timelines for completion, in collaboration with the MS Working Group and apply these when issues arise	Refine measures and reporting on the actions
	Reporting and transparency	Refine measures and reporting on the actions	Establish supplier due diligence checks and monitor supplier corrective action plans, audits or other reviews
	Continuous improvement	100 suppliers complete modern slavery e-learning	
Risk Manager	Collaboration and partnerships		
	Modern slavery risk assessment criteria have been developed and are continuously monitored and reviewed	Participate in MSWG	Participate in MSWG
		Continuous updating of corporate modern slavery risk management profile	Regular monitoring of risk
		Undertake ongoing scan and assessment of emerging modern slavery risks	

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Legal Team</b>	Modern slavery risk is effectively managed in relation to legal requirements	<p>Participate in MSWG</p> <p>Ensure legally compliant Modern Slavery Statement, policies and documents</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>	<p>Participate in MSWG</p> <p>Provide advice to Modern Slavery Working Group where relevant</p> <p>Review and monitor usage of modern slavery clauses in contracts</p> <p>Monitor and advise on legislative requirements relating to modern slavery</p> <p>Conduct legal and governance review of policies and documents regarding modern slavery</p>
<b>Executive General Manager Communications &amp; Engagement</b>	<p>Management of modern slavery risks to people in operations and supply chain are effectively and actively communicated to stakeholders</p> <p>Communications demonstrate respect for rights of people impacted by modern slavery</p>	<p>Participate in MSWG</p> <p>Complete modern slavery e-learning course</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Expand content on modern slavery web page e.g. supplier information</p> <p>Support branding and graphic design of Modern Slavery Statement</p> <p>Monitor ACAN communications and share as appropriate</p>	<p>Participate in MSWG</p> <p>Annual modern slavery communications strategy developed and implemented*</p> <p>Update and monitor intranet page</p> <p>Update modern slavery web page</p> <p>Support branding and graphic design of Modern Slavery Statement</p>

Position or Operational Area	Outcomes	2025 Actions	2026 Actions
<b>Quarterly Investment Review</b>	The risk of modern slavery in investments is effectively managed, monitored and reported		<p>Participate in MSWG</p> <p>Ensure investment staff receive training on responsible investments and modern slavery</p> <p>Strengthen responsible investment policies by explicitly covering modern slavery</p> <p>Enhance disclosure on modern slavery and how this risk is managed in investments</p>
<b>Modern Slavery Working Group (MSWG)</b>	Modern slavery risk management is effectively managed by a cross-functional team within the organisation	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete entity profile survey to obtain Maturity Assessment</p> <p>Contribute to drafting and finalisation of annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>	<p>Review and Monitor Terms of Reference</p> <p>Action plan monitoring and review</p> <p>Complete entity profile survey to obtain Maturity Assessment</p> <p>Contribute to drafting and finalisation of annual Modern Slavery Statement</p> <p>Provide progress reports to Board</p>
<b>Modern Slavery Liaison Officer (MSLO)</b>	Modern Slavery Risk Management is embedded across the entity's operations and supply chains	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of annual Modern Slavery Statement by MSWG members</p>	<p>Administer, coordinate and monitor MSWG Terms of Reference</p> <p>Represent entity to the Australian Catholic Anti-Slavery Network (ACAN) according to the Catholic Archdiocese of Sydney ACAN Terms of Reference</p> <p>Complete ACAN Entity Profile survey</p> <p>Coordinate drafting of annual Modern Slavery Statement by MSWG members</p>







# Reporting criteria 6:

## Internal consultation

CSPD has established a Modern Slavery Working group that meets on a regular basis throughout the year to raise 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

This year's annual Mass for the Feast of St Josephine Bakhita united Australia's largest Sudanese and South Sudanese communities to honour their patron saint – a symbol of resilience in the fight against modern slavery and human trafficking.

The Mass was celebrated by Bishop of Parramatta, Bishop Vincent Long OFM Conv on Sunday 16 February 2025 at Mary, Queen of the Family Parish, St Patrick's Catholic Church, Blacktown.

St Josephine (1869-1947) was born into a wealthy family in Darfur, in the village of Olgossa, west of Nyala – the fourth largest city in Sudan. Despite these beginnings, she was kidnapped as a young child and sold into brutal and abusive slavery many times.

She eventually gained her freedom and joined the Canossian Sisters, but sadly, she had spent so much time in captivity that she had forgotten her original name. It was her slave owners who gave her the moniker "Bakhita", which means "fortunate" in Arabic.

St Josephine Bakhita was canonised on 1 October 2000 by Pope St John Paul II, becoming the first female black saint in the modern Catholic era. Her feast day is celebrated each year on 8 February. She is commemorated as the patron saint of South Sudan and Sudan, and of the victims of modern slavery and human trafficking.

After communion, Christian Koelbach gave a short reflection on behalf of International Justice Mission (IJM) Australia. He emphasised that St Josephine Bakhita's journey reminds us that slavery still exists in many parts of the world today.

Also attending this year's Mass and community celebration was NSW Parliamentary Secretary to the Attorney General and NSW Member for Prospect, Dr Hugh McDermott MP.













Catholic Schools  
Parramatta Diocese

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# Modern Slavery Statement 2024



**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).

CEDoW is a pastoral work of the Trustees of the Roman Catholic Church for the Diocese of Wollongong and is registered as a charity with the Australian Charities and Not-for-profits Commission.

This Modern Slavery Statement is signed by a responsible member of CEDoW as defined by the Act.

*+ Brian Mascord*

Most Rev. Brian Mascord DD  
Bishop of the Diocese of Wollongong  
24 April 2025

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## Disclosure Note

This Statement has been made on behalf of CEDoW and covers all entities owned or controlled by CEDoW for the reporting period 1 January 2024 to 31 December 2024.

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 four regions: 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 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

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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  
25 March 2025



## Criteria 1 and 2: About Catholic Education Diocese of Wollongong

### Our Organisational Structure

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CEDoW is a not-for-profit unincorporated organisation operating as a pastoral work of the Diocese of Wollongong. It is the only pastoral work 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 2024 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 Pastoral Works 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:

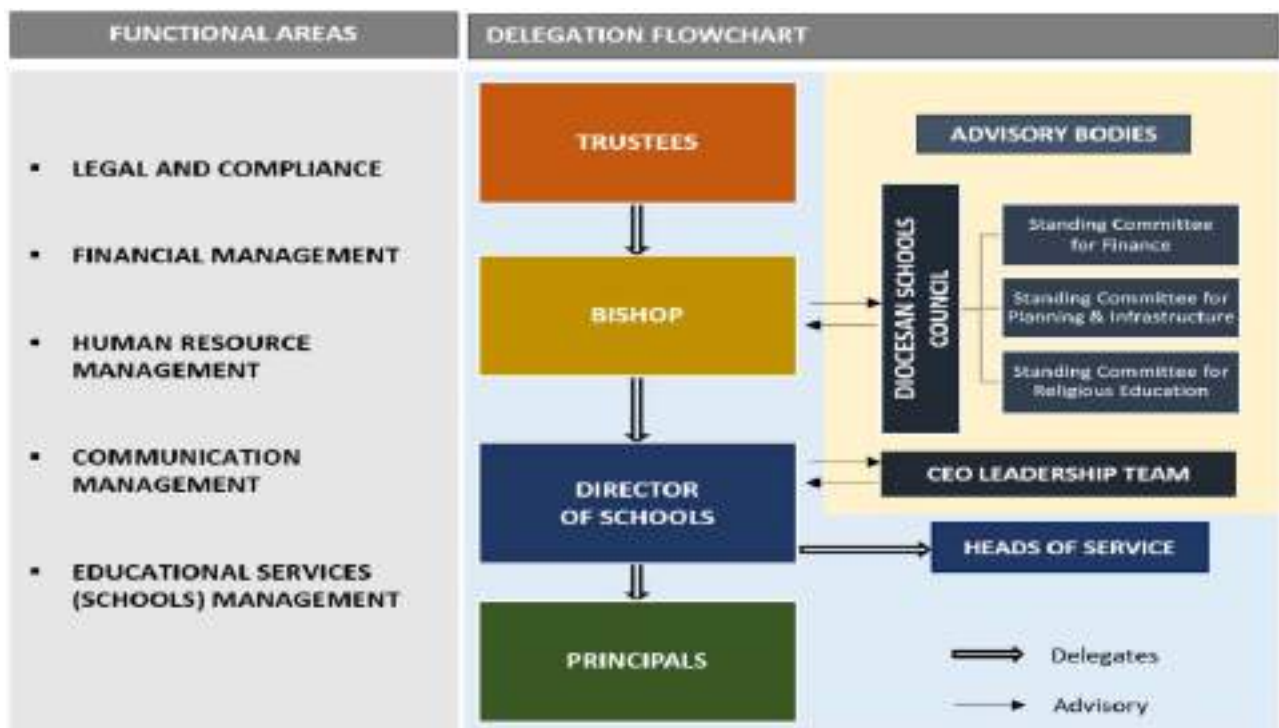
- Clergy and Senior Members from the Office of the Bishop.
- Senior Members from the Catholic Education Office.
- School Principals.
- Parents of children attending Catholic systemic schools.
- Education sector representatives.
- Local community representatives.



The council is assisted by three advisory bodies:

- 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
- Finance, Facilities and Planning
- Governance, Assurance and Risk
- Improvement, Learning and Wellbeing
- Information, Communication & Learning Technology
- People and Culture
- Strategy and Communications

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 2024 school Census, the Diocese educated some 20,393 students and employed 2,525 teaching and non-teaching 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 \$430M. The main sources 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

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At the August 2024 Census, CEDoW employed some 2,525 staff of whom 64 identified themselves as Indigenous. A snapshot of this workforce reveals this total comprised 1,523 teaching staff and 1,002 non-teaching. Of these, 259 employees are engaged across the 3 CEO sites. The gender split of these staff members was 80% female and 20% male employees. Overall, the numbers equated to an FTE of 2,009 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 2,527 third party suppliers during the reporting period, of which only a handful classified as related parties. There were 108 suppliers whose purchases exceeded \$100k ex GST for the year and these accounted for some 77% of total expenditure. The services these suppliers provided ranged from minor consumables to multi-million-dollar school construction projects.

Whilst some contracts are managed by the CEO, the school system essentially operates under a de-centralised procurement model with most 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 a preferred option 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-related purchases conducted by the Properties and ICLT departments respectively. Finance also manages utility service agreements, cleaning contracts and key uniform service agreements.
- School contracts and direct purchasing - These are usually single site agreements or individual school acquisitions. This would include educational supplies and consumables and services such as grounds and general maintenance, waste disposal, photocopying, security and canteens.

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, as occurs in other Catholic Dioceses, for both commercial reasons and to rationalise the number of suppliers being used. Goods and services that lend themselves to this centralisation include areas such as waste services, furniture, educational resources, photocopying 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.

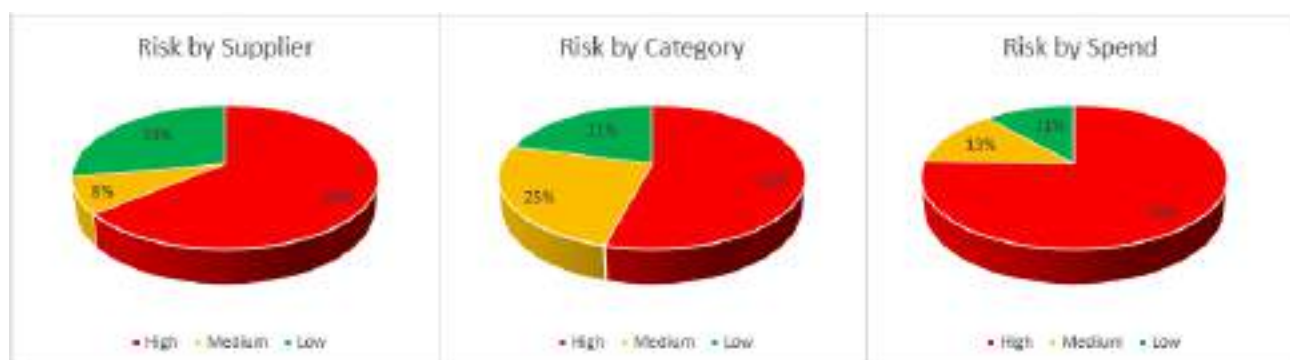
### Supply Chain Risks

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 2,527 third party suppliers that CEDoW purchased goods and services from during the reporting period. The total spend by the school system was some \$98M ex GST. This figure excludes any payroll-related payments, most related party payments to other Catholic organisations, payments to other educational institutions and donations.

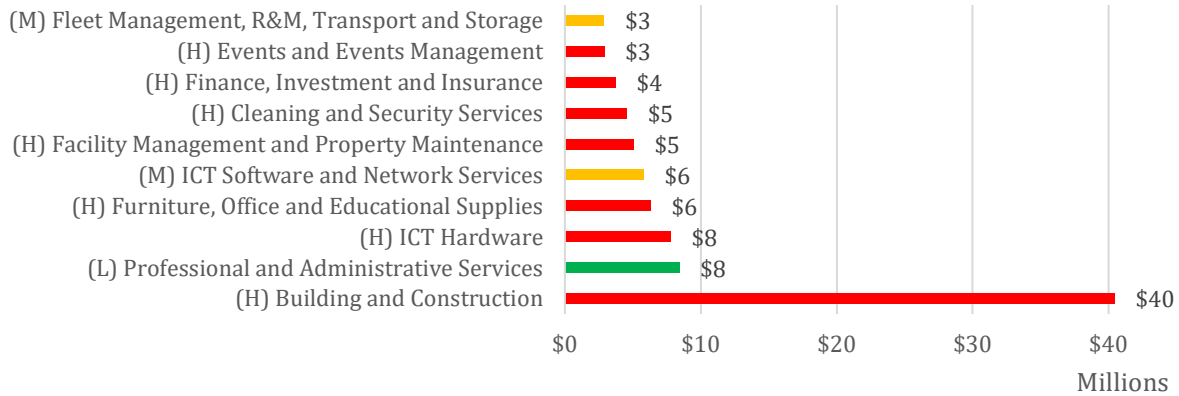
As in previous periods, the results indicate the majority of CEDoW's expenditure was on goods and services considered at high risk of modern slavery practices such as: building and construction; ICT hardware; insurance; office supplies; event management; and furniture. Equipment and consumables used in a number of these sectors are largely manufactured overseas, predominantly in high-risk countries such as China, India 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:

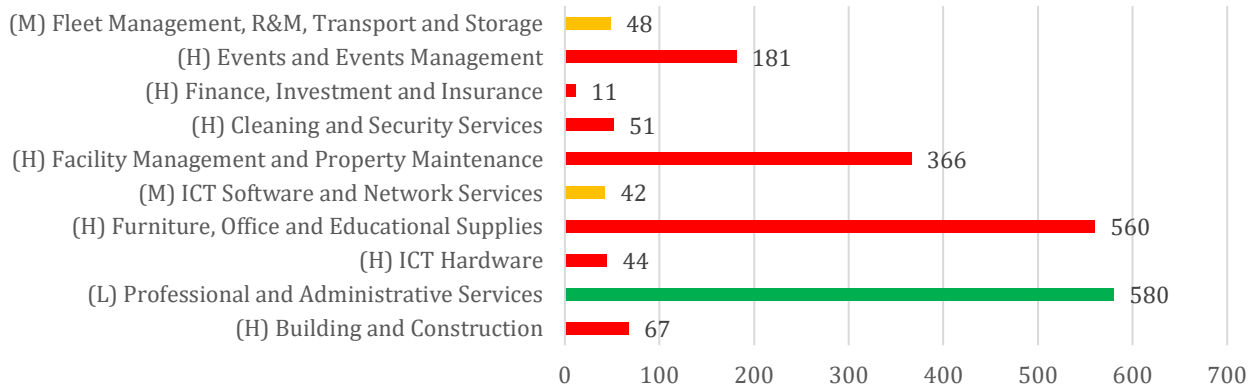




### Spend by Key Risk Category



### Suppliers by Key Risk Category







## Criteria 4: Actions taken to assess and address risk

### Actions Taken to Mitigate Risk

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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 as well as those of the School Properties Office. ICLT were passed a document with these key clauses to include as an Addendum in their supplier-generated agreements. For general school purchases, a notice is also 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 *Contractor Induction Handbook* agreement templates issued to maintenance contractors who attend the schools. This document includes a link to the ACAN Building Links training video.

- 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 to help companies manage and improve working conditions in their supply chains by providing tools such as a self-assessment questionnaire and Audits.

To determine which suppliers CEDoW identifies to register with *Sedex*, it provides ACAN with an updated listing of its top 60 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 passes ACAN its full supplier spend report for the year to assist them in compiling 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 3 ACAN supplier webinars conducted during the period. The purpose of these webinars was to assist suppliers gain a better understanding of modern slavery issues around:
  - Contracting Labour;
  - Cleaning and Security Services; and
  - Grievance Mechanisms and Remediation.
- All CEDoW Staff were invited once again to undertake the 4 ACAN modern slavery eLearning modules located in *People and Culture's* Learning Management System across the year. This was



advertised in the school systems' internal *Gateway* newsletter several times across the period. In addition, the MSLO directly invited the school financial and administrative officers to access these modules as they are actively involved in purchasing for their schools. From 2024, the *Modern Slavery 101* eLearning module is a mandatory part of People and Culture's new staff induction day program.

- 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 when compiling the annual Statement and identifies those candidates to be targeted for *Sedex* membership.
- The ACAN Prequalified Supplier List was downloaded and broadcast to all schools. This exercise will be performed annually.
- 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 [2023 Modern Slavery Statement](#) was published on CEDoW's website in July.

## Our Plans for 2025 and Beyond

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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 each year.

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.
- Encourage all staff to undertake the four ACAN modern slavery eLearning modules to increase their awareness of the modern slavery issue.
- Ensure schools use CEDoW's standard tender and contract templates as they include a suite of ACAN modern slavery contract clauses that highlight the supplier's responsibilities around their supply chains. This is preferred as suppliers' agreement documents are often silent on the issue of modern slavery.
- Continue to allocate the ACAN risk categories to all new suppliers in the accounts payable system to ensure reports can be generated that identify the high-risk, high-spend suppliers as needed.



## 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.

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 Survey 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 some progress was made against the prior period using the Base Line data captured by ACAN around actions taken by staff and suppliers:

<b>Catholic Education Diocese of Wollongong</b>	<b>ACTIVITY</b>	<b>2023</b>	<b>2024</b>
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	100	100
	Individual staff completed e-learning	29	16
	E-learning modules completed	135	40
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	2700	2527
	Number of suppliers with visible contact information and ABN	161	62
	Number of suppliers across high-risk categories	1631	1607
	Number of ACAN Supplier Surveys completed	299	81
	Supplier staff attending capacity building webinars	66	20
	Invited to join Sedex	30	27
	Joined Sedex	5	36
	Sedex SAQ completed	3	14
	Social audits	1	1
	Corrective actions	0	3
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	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 on page 18 provides a score card of 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 2024 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.

## Maturity Assessment 2024

### Catholic Education Diocese of Wollongong - Overview



### Catholic Education Diocese of Wollongong - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	Change
1. Business Process and Governance	44%	50%	34%	17%	41%	+ 4%
2. Operations	31%	38%	31%	35%	33%	+ 1%
3. Supply Chain	0%	80%	17%	14%	23%	0%
4. Worker Engagement	8%	77%	20%	20%	31%	+ 3%
5. Entity's program and activities	100%	35%	50%	41%	58%	+ 2%
6. Grievance Mechanisms and Remediation	72%	30%	40%	15%	44%	0%
Average	32%	52%	32%	23%	39%	+ 3%

### Catholic Education Diocese of Wollongong - 2024 Assessment by Sub-Pillar





## 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:

- Use the CEO tender and contract templates that include the ACAN modern slavery clauses.
- Consider using the companies from ACAN's *Prequalified Supplier List*. This list is distributed by the MSLO annually.
- Encourage key staff in the CEO and schools to undertake the 4 ACAN modern slavery eLearning modules to increase their awareness of the issue.
- Advise the MSWG where they become aware of a supplier's potential breach of CEDoW's [\*Modern Slavery Policy\*](#).

## Criteria 7: Other

- In April, members of the MSWG attended the *Illawarra Business Forum for Suppliers* hosted by ACAN at the Bluescope Visitors Centre in Wollongong. Speakers included Dr James Cockayne, the NSW Anti-slavery Commissioner, Bishop Brian Mascord of the Wollongong Diocese and Alison Rahill from ACAN. Some 50 Supplier representatives attended the forum.





- Members of the MSWG are invited to attend the monthly ACAN webinars 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, around her feast day of 8<sup>th</sup> February. A notice is also placed in the *Gateway* newsletter each year informing the schools of this day and includes prayer resources provided by ACAN.
- The MSLO registered with the *Office of the NSW Anti-Slavery Commissioner* to obtain updates and notices from the Commissioner and attended an on-line forum on modern slavery during the reporting period.
- In May each year, the MSLO places a notice in the *Gateway* newsletter highlighting World Fair Trade Day that encourages schools to consider sourcing recognised Fair Trade products.











Catholic  
Cemeteries +  
Crematoria

# Modern Slavery Statement

1 January 2024 - 31 December 2024

## Disclosure Note

This statement has been made on behalf of Catholic Cemeteries & Crematoria Limited as Trustee of the Catholic Cemeteries & Crematoria Trust trading as Catholic Cemeteries + Crematoria. This Statement covers all entities owned or controlled by Catholic Cemeteries & Crematoria Limited.

### Head Office:

Catholic Cemeteries + Crematoria  
Level 2, 11 Murray Rose Ave  
Sydney Olympic Park NSW 2127  
Website: [www.catholiccemeteries.com.au](http://www.catholiccemeteries.com.au)  
Contact for Modern Slavery: Andy CAO  
**Email:** [andyc@catholiccemeteries.com.au](mailto:andyc@catholiccemeteries.com.au)

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# Leadership message, Approval and Signature

At Catholic Cemeteries + Crematoria (CCC), our values of faith, respect, compassion, collaboration, and integrity guide every aspect of our work. At the core of our mission lies a profound respect for the dignity of every individual, recognising each person as a unique and invaluable creation reflecting the image of God. This belief forms the foundation of our commitment to social responsibility, community engagement, and ethical conduct throughout our organisation.

Our unwavering dedication to upholding human dignity compels us to advocate for the marginalised and people at-risk ensuring that our practices promote fairness and contribute positively to society. With this conviction, we take decisive actions to address modern slavery in all its forms within our sphere of influence. In line with our values, CCC has voluntarily complied with the Modern Slavery Act 2018 and are proud to submit our fifth modern slavery statement to the Australian Government through the Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements.

This statement reflects our steadfast commitment to ethical business practices and our resolve to embody the compassion, respect, and love that lie at the heart of our Catholic faith.

CCC remains dedicated to working collaboratively with our board, staff, suppliers, the Australian Catholic Antislavery Network (ACAN), and our broader stakeholders. Together, we will continue to assess, strengthen, and enhance our anti-slavery efforts. Through our shared commitment, we aspire to create a future where freedom and dignity are upheld for all.



Lauren Hardgrove,  
Chief Executive Officer



Danny Casey  
Chair

This Modern Slavery Statement was approved by the principal governing body of Catholic Cemeteries & Crematoria Trust as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 29th February 2025.

This Modern Slavery Statement is signed by a responsible member of Catholic Cemeteries & Crematoria Trust as defined by the Act.

A handwritten signature in black ink, appearing to read 'Danny Casey'.

**Danny Casey**  
Chair

A handwritten signature in black ink, appearing to read 'Lauren Hardgrove'.

**Lauren Hardgrove**  
Chief Executive Officer

# Criteria 1: About us

## 1



This statement pertains to the Catholic Cemeteries & Crematoria Trust (ABN 54 281 755 117), operating as Catholic Cemeteries + Crematoria (CCC). The Trust was established under the Catholic Cemeteries and Crematoria Trust Act 2024 (NSW).

Effective 30 June 2024, and in accordance with the Catholic Cemeteries and Crematoria Trust Act 2024 (NSW), all assets, rights, and liabilities of Catholic Metropolitan Cemeteries Trust (CMCT) ABN 85 744 325 709 were automatically transferred to Catholic Cemeteries & Crematoria Trust ABN 54 281 755 11.

The Trust is registered as a charity with the Australian Charities and Not for Profits Commission, serving the Sydney community with dedication and purpose.

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 antislavery education and engagement initiatives.

CMCT's last audited financial statements, prior to transfer to CCC Trust, highlighted \$30.7m operating revenue and \$15.3m investing income generating \$15.1m 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.



## Our Purpose

Our purpose is the heartbeat of our organisation – it is about why we do what we do, the impact we have on people's lives and why we insist on excellence.



We honour every life through our own Catholic rituals, those of other faiths, and those of none.



We will accompany and comfort those who mourn, as we have done for nearly 160 years.



We are living out the Corporal and Spiritual Works of Mercy from Jesus' teachings in the Gospels.



# Our Values

Values have been at the heart of CCC's identity from its inception. CCC strives to live its values in its work, decision making and engagement. As it faces the future, CCC remains committed to these values, which have been part of its fabric for decades.



## Criteria 2: Our Structure, Operations and Supply Chains

# 2

### Our Organisational Structure

CCC is an independent not for profit organisation and one of the largest cemetery trusts in New South Wales. CCC provides high quality cemetery services to support the diverse needs of communities and families throughout 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, Risk & Governance
- › Community Advisory

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)
- › Catholic Cemeteries and Crematoria Trust Act 2024 (NSW)

### Our Governance Framework

In February 2020, the CMCT Board approved the Procurement Strategy Plan, incorporating ACAN's Modern Slavery Risk Management Program tools and resources. The Chief Financial Officer leads the procurement function. In 2022, the Modern Slavery Working Group (MSWG) was established, bringing together representatives from the Finance, Human Resources, and Marketing departments to strengthen CCC's corporate response to modern slavery. CCC's MSWG is responsible for advising on issues related to Modern Slavery and supporting the development and implementation of CCC's Modern Slavery Action Plan. In 2024, the MSWG met twice.

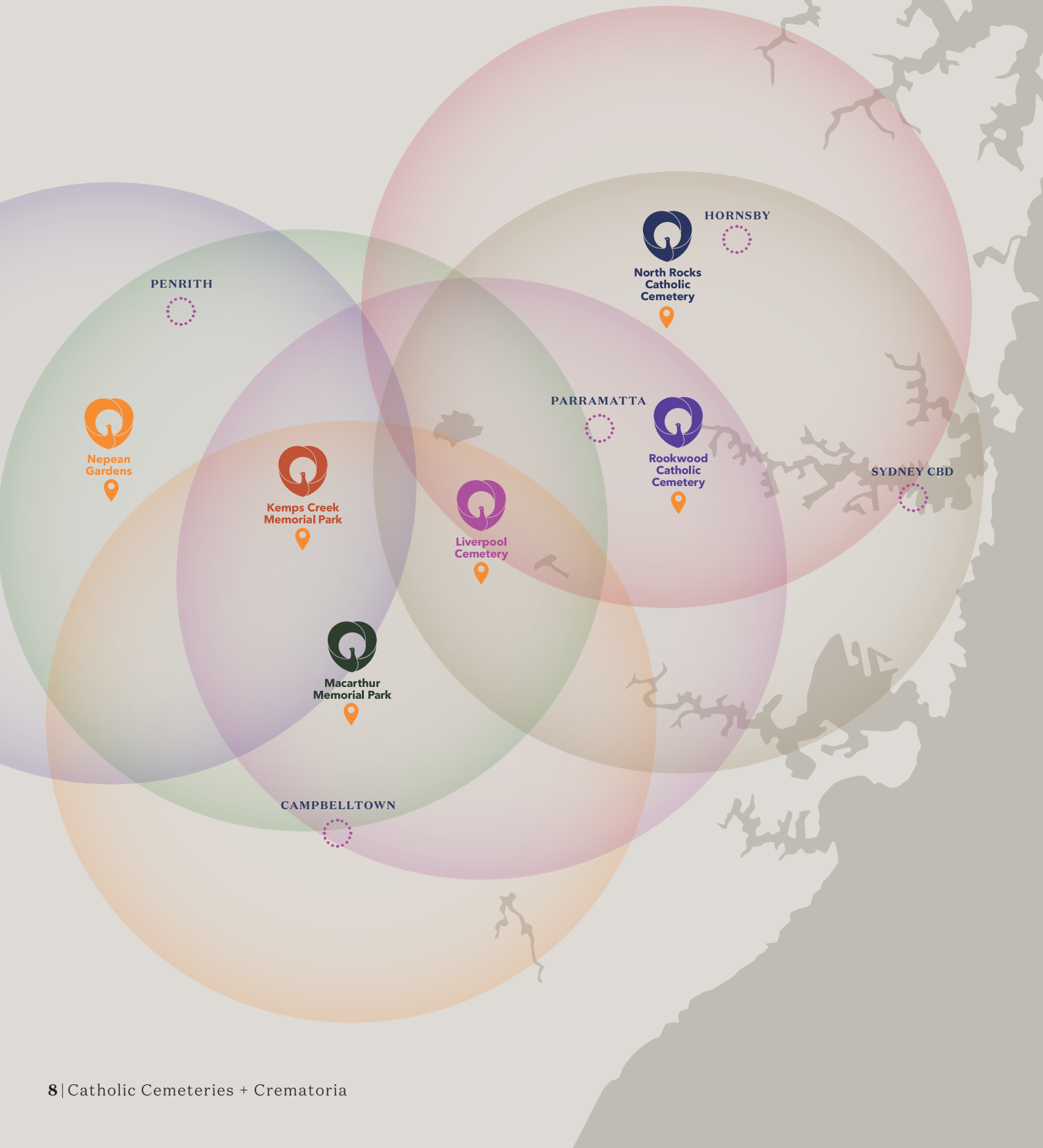
CCC's Modern Slavery risk management activities have the following governance framework in CCC:

- a. Board,
- b. Audit, Risk Management & Corporate Governance Committee (ARMCGC)
- c. CEO
- d. Modern Slavery Working Group
- e. CFO

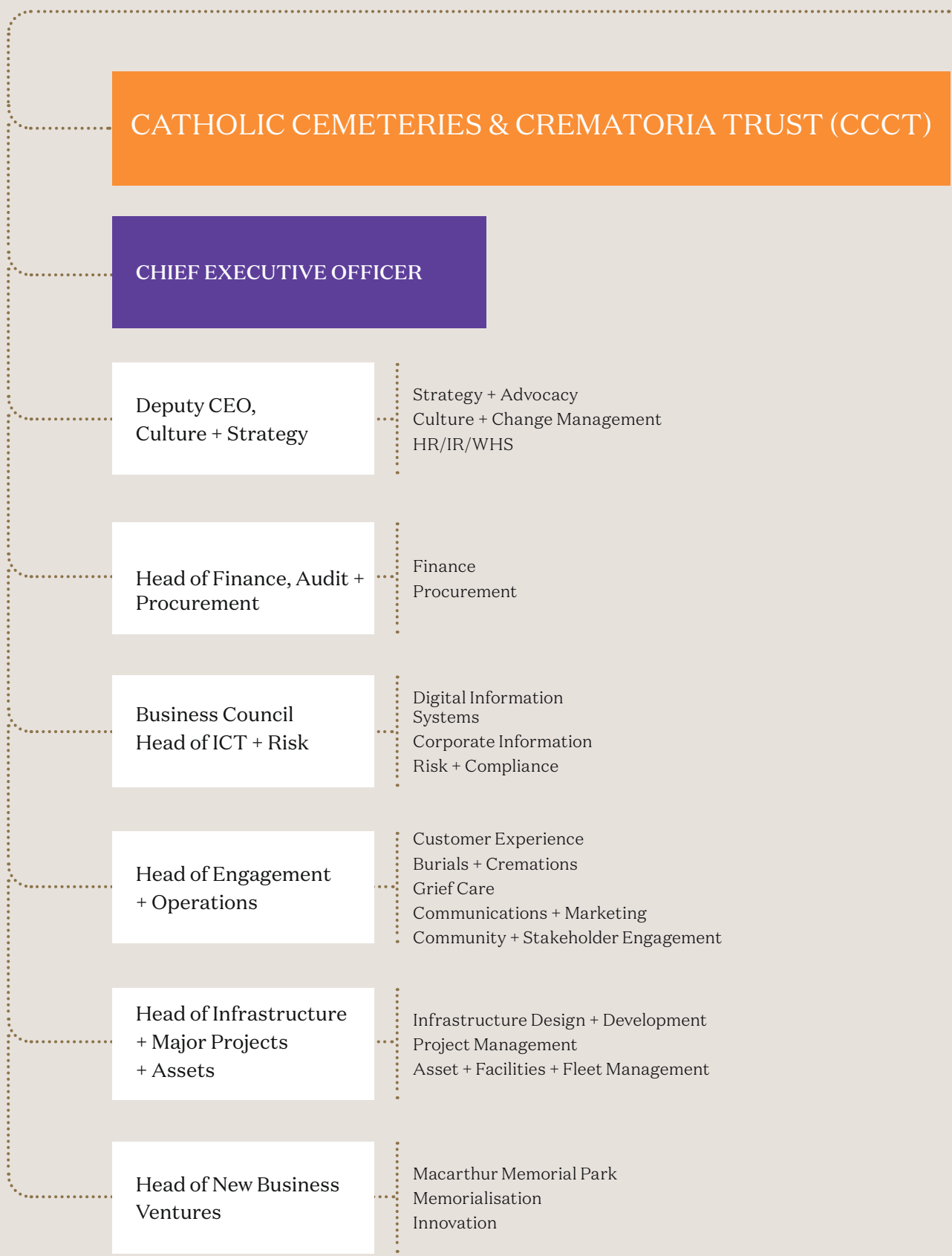
### Our Operations

CCC currently manages three cemeteries in Western Sydney, located in Rookwood, Kemps Creek, and Liverpool. Additionally, construction is underway for Macarthur Memorial Park, scheduled to open in early 2025. CCC also oversees the operations of North Rocks Catholic Cemetery.

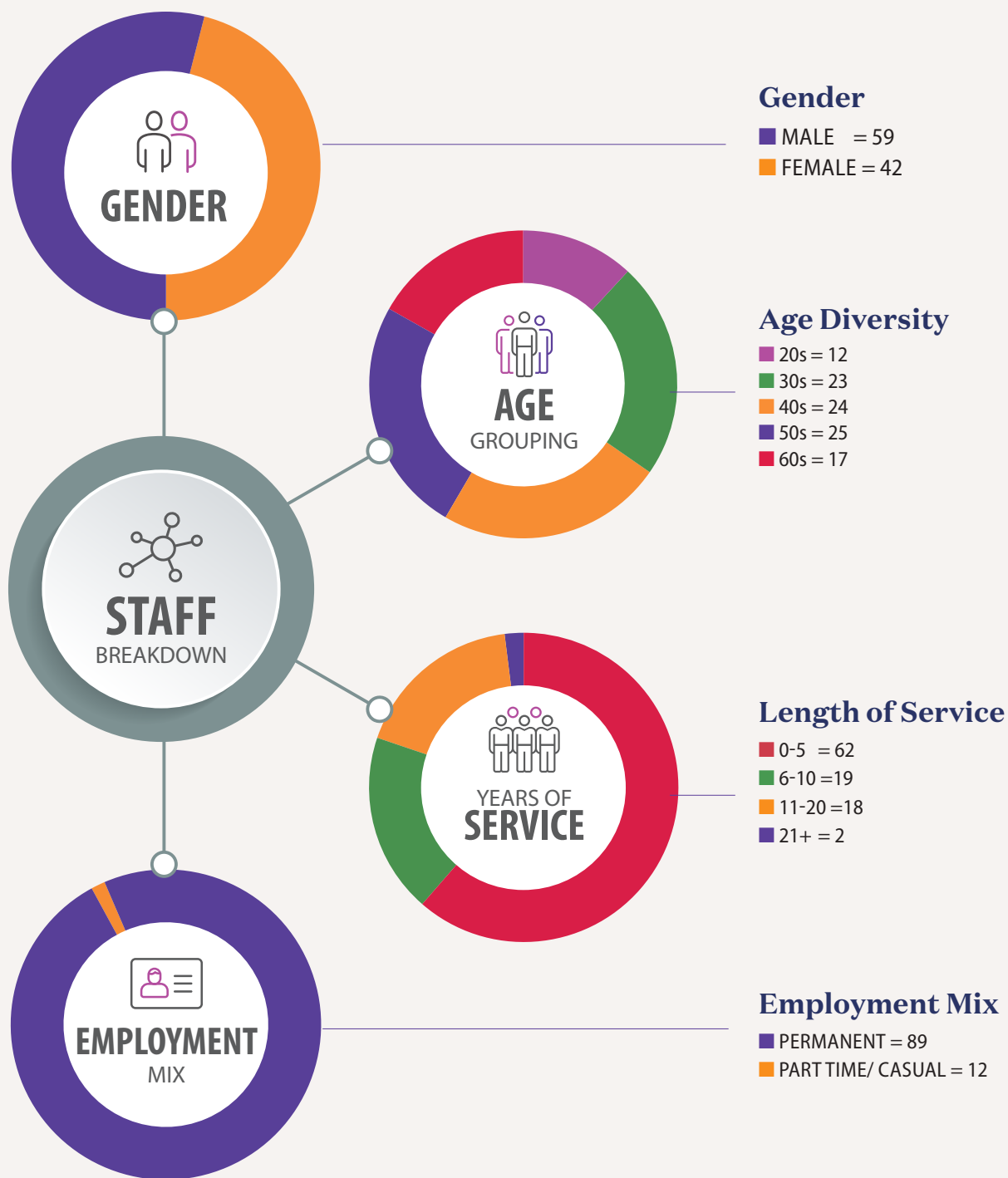
# Our Reach



# Our Organisation



# Our Team





## Workforce profile

CCC's supplier relationships consist of a mix of short and long term engagements. For goods procurement, the suppliers typically set contractual terms, whereas service agreements involve a negotiation process. Beyond suppliers, CCC's primary business relationships include partnerships with Community Groups and Funeral Directors. The organisation does not participate in any joint ventures.

The Procurement Strategy was fully implemented on 1 April 2022, with the establishment of a 'centre led' procurement function and the launch of a 'one-stop-shop' procurement portal. A key outcome of this function is the management of "common use" contracts, which cover a significant portion of both operating and capital expenditures. This approach helps mitigate the risk of CCC being inadvertently linked to modern slavery. CCC is focused on building long term partnerships with suppliers while continually exploring alternative sources of supply. Only those suppliers who meet our rigorous standards are appointed.

## Our Supply Chains

In the reporting period, CCC purchased over \$62.2 million worth of goods and services, primarily from 241 direct suppliers. Our supplier base includes businesses across various sectors, such as construction, stone masonry, cleaning, security, legal services, landscaping, labour hire, IT consulting, and waste management. The majority of our procurement was sourced from Australian suppliers.

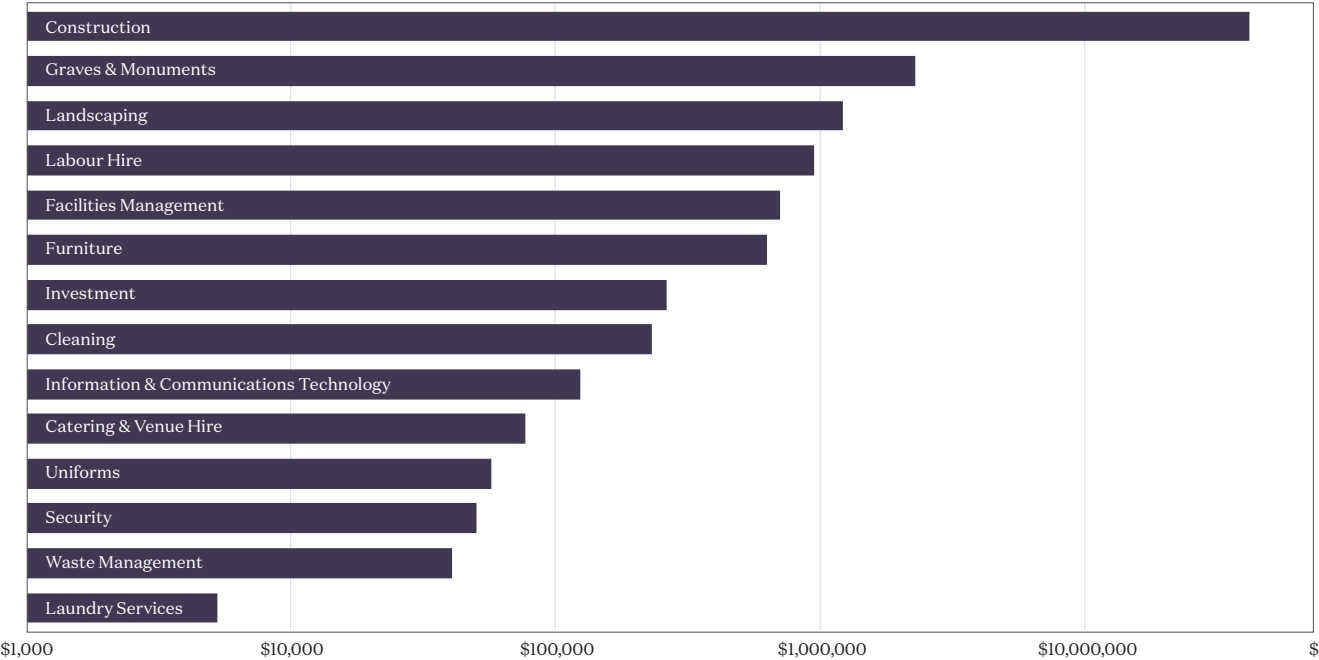
# Criteria 3: Modern Slavery risks



During the reporting period, CCC identified the suppliers with the highest potential risk based on the ACAN Category Risk Taxonomy. This analysis served as the foundation for the supplier dashboard below, which offers an overview of the potential modern slavery risks within CCC’s supply chain. It marks the first step in building strong risk management systems.

Construction	\$41,746,199
Graves & Monuments	\$2,292,600
Landscaping	\$1,219,112
Labour Hire	\$946,758
Facilities Management	\$704,365
Furniture	\$630,225
Investment	\$262,784
Cleaning	\$231,640
Information and Communications Technology	\$124,745
Catering & Venue Hire	\$76,820
Uniforms	\$57,204
Security	\$50,592
Waste Management	\$40,748
Laundry Services	\$5,307

# Spend on High Risk categories

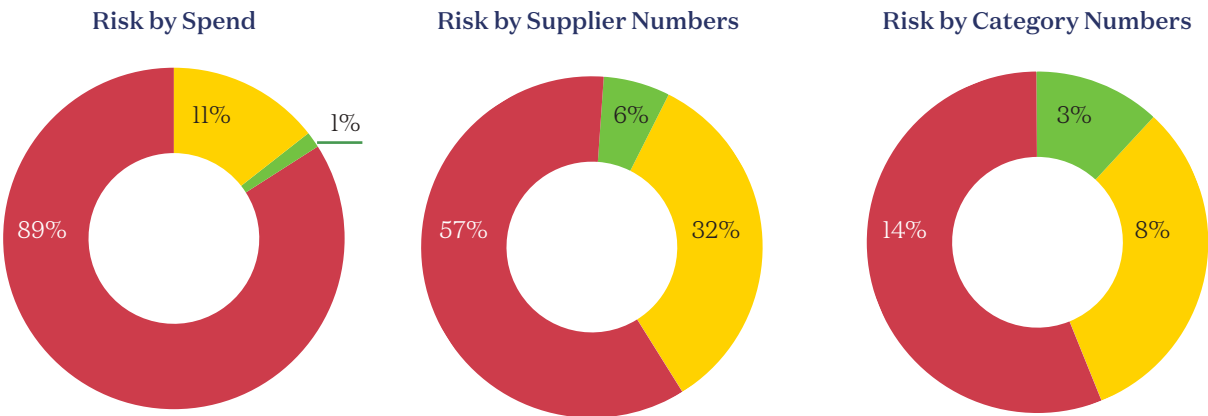


The Dashboard does not attempt to determine the actual risk to the organisation, or the modern slavery risk presented by individual suppliers. Determining actual risk requires detailed information, analysis and investigation from multiple sources and stakeholders.

For example, “Graves & Monuments” may have a risk with materials imported from overseas. “Construction” and “Facilities Management” may represent a risk due to migrant workers from overseas countries.

After reviewing our top 100 suppliers, the graph below highlights 14 potential high risk categories out of 57 suppliers, representing 89% of the top 100 spend.

Risk				
Spend risk (\$)	\$48,389,099	\$503,710	\$5,757,141	<b>\$54,649,950</b>
Supplier risk (No.)	57	6	32	<b>95</b>
Category risk (No.)	14	3	8	<b>25</b>



The 14 potential high risk categories include Construction, Grave & Monuments, Landscaping, Facilities Management, Cleaning, Security, Information and Communications Technology, Investment, Uniforms, Catering & Venue Hire, Waste Management, Labour Hire, Laundry Services, and Furniture.

The primary areas of potential risk are in Construction, Grave & Monuments, Landscaping, Labour Hire, and Facilities Management, which together accounts for the majority of the \$46.9 million spent.

The next largest category of potential risk are Cleaning and Furniture, totaling \$861,000.

CCC is confident that the risk of modern slavery within our internal workforce is low, thanks to a range of policies, systems, and practices in place. These include Human Resource policies designed to ensure that all staff are compensated above award rates based on their role and qualifications. Employment information is securely recorded and managed through our HR Information System and Payroll System, ensuring accurate tracking of staff and their respective employment and pay details.

The key points are:

- Employment - In line with our Recruitment and Selection procedure, hiring decisions are made based on merit, equal employment opportunity, and compliance with relevant Federal and State legislation.
- Pay rates are reviewed annually to ensure they comply with minimum standards.
- Labour hire agencies, including those providing apprentices, are also subject to legislation that ensures compliance with minimum award pay rates for all employees. All agencies are engaged on the understanding that their pay rates align with the relevant CCC instruments, and they provide us with the pay rates for the labour hire personnel they supply.
- Anti-Discrimination is addressed in our Code of Conduct. We value the diversity of our workforce, and as a result, we employ individuals from a wide range of backgrounds.
- The protection of individuals who report illegal or improper conduct within CCC is outlined in our Whistleblower Policy.

# Criteria 4:

## Actions taken to assess and address risk

# 4

In 2024, the focus was on continually raising awareness among employees and the community, monitoring risks, and taking ongoing procurement actions to address modern slavery.

## Category Summary

### Management Systems

CCC has established policies, processes, and an action plan to address modern slavery.

Our Board recognises the risks associated with modern slavery, and the Leadership team ensures due diligence is exercised while overseeing the effective implementation, review, and improvement of our risk management system. We have actions and controls in place to identify, manage, and report on modern slavery risks, incidents, and corrective actions. Our governance framework is well defined, and we have a dedicated team focused on driving efforts to mitigate modern slavery.

### Risk Management

The CCC risk management framework is actively utilised and includes a dynamic feedback loop to integrate new insights. We use Risk Wizard software to capture incidents, assess their severity, map out actions, and track progress in mitigating risks. We regularly engage with our operational staff to identify additional concerns beyond wage compliance. The system is designed to monitor risks, allowing us to proactively manage and prioritise areas where our resources are most needed.

### Procurement and Supply Chain

Our procurement framework is actively utilised and includes a dynamic feedback loop that integrates learnings to enhance decision-

making and risk management. Modern slavery considerations are incorporated into our contract management and tender process, influencing decisions when awarding tenders. We investigate any instances or suppliers associated with adverse information. However, performance is only regularly monitored in terms of quality and delivery issues.

We have advanced our supplier engagement strategy by communicating our stance on modern slavery to all suppliers and conduct surveys with potentially high-risk suppliers to assess their awareness and actions regarding modern slavery.

Additionally, we utilise Supplier Ethical Data Exchange (SEDEX) to identify risks within the supply chains of these potentially high-risk suppliers.

### Stakeholders

CCC has communicated our commitments and values to stakeholders, establishing accountability for driving improvements on this issue. Through our whistleblower policy (for staff and labour hire contractors) and complaints policy (for customers), we provide an active, anonymous, and efficient grievance mechanism. However, this mechanism does not currently extend to workers within our supply chains.



## Grievance Mechanism

CCC has developed a Whistleblower Policy and Grievance Procedure to foster a culture of honesty and ethical behavior by encouraging stakeholders to report any actual or suspected unethical, illegal, corrupt, or fraudulent practices within CCC's operations. CCC is enhancing the ability of its direct employees and stakeholders to identify and respond to signs of poor labour practices, unsafe working conditions, and modern slavery in its operations and supply chains, and to raise these concerns with management. In 2024, 91 staff completed Respect at work training, which includes the Grievance policy.

## Remediation

CCC is committed to ensuring appropriate and timely remedies for individuals impacted by modern slavery, in line with the United Nations Guiding Principles on Business and Human Rights, the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities, relevant Australian laws, and best practice guidelines on informed consent for those affected. This commitment also involves taking actions or cooperating to address harm and the root causes of modern slavery, with the goal of mitigating future risks if CCC is found to have caused or contributed to modern slavery.

If CCC is directly linked to modern slavery through a business relationship, we are dedicated to working with the responsible entity to ensure remediation and prevent recurrence.

## Our Investments

CCC aims to invest responsibly as a committed community member, ensuring that its investments align with its specific mission, the values of the Catholic Church, and the broader context in which the Trust operates.

The Ethical Statement in the CCC Investment Policy requires investment managers of managed funds to monitor the portfolio in accordance with globally accepted standards on corporate sustainability, specifically in the areas of Human Rights, Labour, Environment, and Corruption.

Additionally, on a quarterly basis, we receive a proxy voting report from our Investment Advisor, currently Russell Investments, along with a report identifying companies with primary business activities that engage in unethical or undesirable practices.

Russell Investments is a member of Investors Against Slavery and Trafficking ([www.iastapac.org](http://www.iastapac.org))

# Modern Slavery Action Plan

Achieved in 2020-2024	Plan for 2025
<p>Achieved in 2020-2024</p> <ul style="list-style-type: none"> <li>› Established the Modern Slavery Policy.</li> <li>› 2020 - 2023 Annual Statements are published on CCC website &amp; Procurement Portal.</li> <li>› Incorporated Modern Slavery risk into CCC's operations and supply chain.</li> <li>› Established a Modern Slavery Working Group (MSWG).</li> <li>› Promoted employees' MS awareness via Newsletters.</li> <li>› Implemented anti-slavery clauses in Purchase Orders.</li> <li>› Included Modern Slavery requirements in tendering processes.</li> <li>› Surveyed 60 high-risk suppliers to understand their awareness and approach.</li> <li>› CCC continued to participate in the Australian Catholic Anti-Slavery Network (ACAN)</li> <li>› MS awareness Presentation to all staff in Townhall meeting.</li> </ul>	<ul style="list-style-type: none"> <li>› Prepare 2024 Modern Slavery Statement.</li> <li>› Review Modern Slavery Risk annually.</li> <li>› Resurvey of potential high-risk suppliers to note progress via ACAN.</li> <li>› Incorporate Modern slavery training and awareness into recruitment and induction processes.</li> <li>› Continuously promotes employees' MS awareness.</li> <li>› Utilise social media to promote MS awareness among communities.</li> <li>› Renew ACAN participation</li> </ul>

# Criteria 5:

## Assessing Effectiveness



CCC effective measures are outlined in the below table and demonstrate improvement since the previous reporting period. These measures include, but are not limited to:

- › Five Modern Slavery newsletters were distributed to all Staff.
- › A Modern Slavery awareness presentation was delivered to all staff during the Townhall meeting.
- › 466 Purchase Orders were issued, each incorporating an anti-slavery clause in terms and conditions.
- › Details of 928 suppliers were shared with ACAN & Sedex to assess their awareness and approach to Modern Slavery.
- › CCC utilised Sedex to foster more socially and environmentally sustainable businesses and supply chains.

Catholic Cemeteries and Crematoria Trust	ACTIVITY	2023	2024
INTERNAL / STAFF	Hours spent on modern slavery activities	120	210
	Individual staff completed e-learning	-	0
	E-learning modules completed	25	0
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	622	928
	Number of suppliers across high-risk categories	35	39
	Purchase orders include modern slavery clause	582	466
	Number of ACAN Supplier Surveys completed	75	128
	Supplier staff attending capacity building webinars	26	12
	Invited to join Sedex	12	30
	Joined Sedex	4	38
	Sedex SAQ completed	2	7
	Social audits	1	0
	Corrective actions	0	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

## Criteria 6: Consultation with Owned or Controlled Entities



Catholic Cemeteries & Crematoria Limited (CCC Ltd) is the Trustee of the Catholic Cemeteries & Crematoria Trust (CCCT).

Regular consultation on Modern Slavery occurs with the Board of CCC Ltd in their capacity as trustees of the trust.

## Criteria 7: Consultation with Owned or Controlled Entities



No other relevant information to report.



**Catholic  
Cemeteries +  
Crematoria**

## Contact Us

**Rookwood Catholic Cemetery**  
Barnet Avenue, Rookwood, NSW 2134  
Phone: 1300 114 997  
[enquiries@catholiccemeteries.com.au](mailto:enquiries@catholiccemeteries.com.au)  
[www.catholiccemeteries.com.au](http://www.catholiccemeteries.com.au)

**North Rocks Catholic Cemetery**  
North Rocks Road, North Rocks, NSW 2151  
Phone: 1300 114 997  
[enquiries@catholiccemeteries.com.au](mailto:enquiries@catholiccemeteries.com.au)  
[www.catholiccemeteries.com.au](http://www.catholiccemeteries.com.au)

**Liverpool Cemetery**  
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Phone: 02 9602 0344  
[info@liverpoolcemetery.com.au](mailto:info@liverpoolcemetery.com.au)  
[www.liverpoolcemetery.com.au](http://www.liverpoolcemetery.com.au)

**Kemps Creek Memorial Park**  
230-260 Western Rd, Kemps Creek, NSW 2178  
Phone: 02 9826 2273  
[admin@kempscreekcemetery.com.au](mailto:admin@kempscreekcemetery.com.au)  
[www.kempscreekmemorialpark.com.au](http://www.kempscreekmemorialpark.com.au)

**Macarthur Memorial Park**  
Phone: 1300 086 689  
Email: [info@mmpark.com.au](mailto:info@mmpark.com.au)  
[www.mmpark.com.au](http://www.mmpark.com.au)

**Head Office**  
Level 2, Murray Rose Avenue  
Sydney Olympic Park, NSW 2127  
[enquiries@catholiccemeteries.com.au](mailto:enquiries@catholiccemeteries.com.au)







# MODERN SLAVERY STATEMENT

2024

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

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## DISCLOSURE NOTE

This statement has been made on behalf of Catholic Education Sandhurst Limited (CESL) ABN 94 643 894 384 and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd) ABN 98 643 978 205. This statement is prepared pursuant to Section 134 of the Modern Slavery Act 2018 (Cth) and covers CESL as a single reporting entity.

## ENTITY DETAILS

### Catholic Education Sandhurst Limited (CESL)

ABN 94 643 894 384  
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PO Box 477, Bendigo Vic 3550  
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W: [www.ceosand.catholic.edu.au](http://www.ceosand.catholic.edu.au)



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

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W: [www.scecec.org.au](http://www.scecec.org.au)





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

### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Catholic Education Sandhurst Limited as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on Tuesday 20 May 2025.



**Ms Pam Betts**

*Chair - Catholic Education Sandhurst Limited Board (CESL 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 20 May 2025.








**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 (CESL) and ELCs 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.

# FROM THE BISHOP

Most Reverend  
Shane Mackinlay DD

and

CESL  
BOARD CHAIR  
Ms Pam Betts



The Christian tradition upholds the inherent dignity of every person: created in God's image, endowed with unique gifts and talents, interconnected with all of creation, enriched by relationships of friendship and love, capable of remarkable creativity, insight, and accomplishment, and called into communion with the Triune God as revealed by Jesus. This foundational Christian view of the human person is at the heart of the mission of Catholic Education Sandhurst Ltd.

While the most immediate expression of this principle is evident in placing students at the centre of Catholic education, it also shapes the relationship between Catholic schools, parents, staff, and the wider community. Pope Francis has encouraged us to embrace this community in the broadest sense, and we are increasingly recognising that our actions can have far-reaching impacts beyond our local community.

Modern slavery can affect the operations, business partnerships, and supply chains of our schools in many ways, often in ways that are not immediately visible. Practices such as human trafficking, child labour, and the exploitation of workers for little or no wages are egregious violations of human dignity and are contrary to the fundamental respect that Christians strive to uphold for each individual. Catholic Education Sandhurst Ltd and Sandhurst Catholic Early Childhood Education and Care Ltd are deeply committed to avoiding any involvement with these practices and to assisting with their elimination.

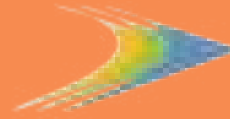
This is the fourth Modern Slavery Statement of Catholic Education Sandhurst Ltd since its new corporate structure was established in January 2021. We are pleased to report that, over the past year, the Company has made significant progress in raising awareness of modern slavery within its operations and identifying ways in which it might unintentionally support such practices.

The Company's plans for 2025 focus particularly on communication and training across its schools, kindergartens, and offices. These efforts will help raise awareness among staff and students, while also identifying potential risks and opportunities for addressing them. We are confident that these strategies will help all involved in Catholic education in the Sandhurst Diocese become more attuned to the risks of modern slavery and take actions that promote the dignity, freedom, and well-being of every person.

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

**Ms Pam Betts**  
*CESL Board Chair*

# REPORTING CRITERION 2



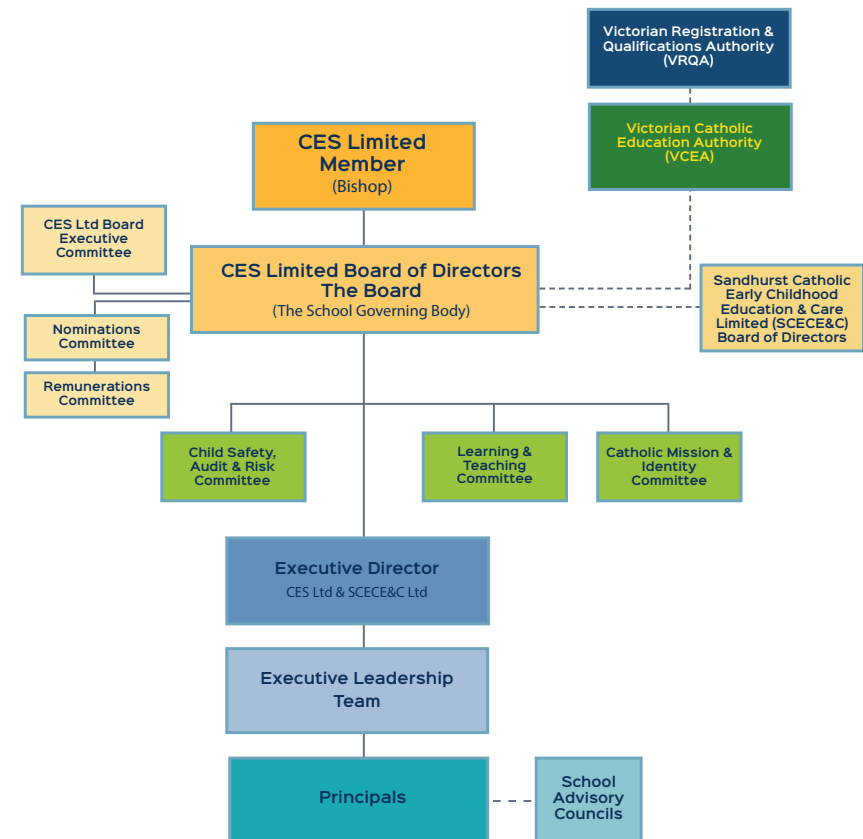
## Catholic Education Sandhurst Limited (CESL) - Governance Framework

In 2021 the Bishop (Bishop Shane Mackinlay) established the Company, Catholic Education Sandhurst Limited (CESL), 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 three Early Learning Centres operating as a subsidiary entity Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd).

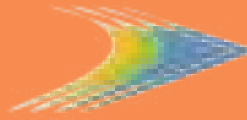
The CESL Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CESL spans primary schools, secondary schools, and specialist settings. It is the responsibility of 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 CESL schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).

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.



# REPORTING CRITERION 2



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:

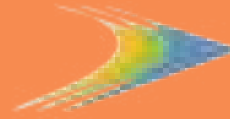
- Reviewing and ensuring the reliability and effectiveness of CESL's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy.
- Finance and audit management.
- Capital development.

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 (CSA&R Committee)**

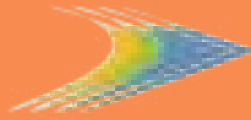
Supporting the responsibilities of CESL and SCECE&C Ltd Boards are their respective CSA&R Committees. The Committee's Terms of Reference state that they are to provide strategic advice and high-level thinking on matters pertaining to child safety, auditing, risk mitigation, financial and investment management, 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. 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, Assisi Kindergarten Strathfieldsaye and most recently in 2024 with the opening of the MacKillop Early Learning Centre Nagambie. 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 CESL, 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.



# REPORTING CRITERION 2



## Educational and Office Services

### Key Objective of CESL

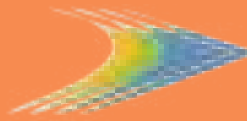
*“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a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

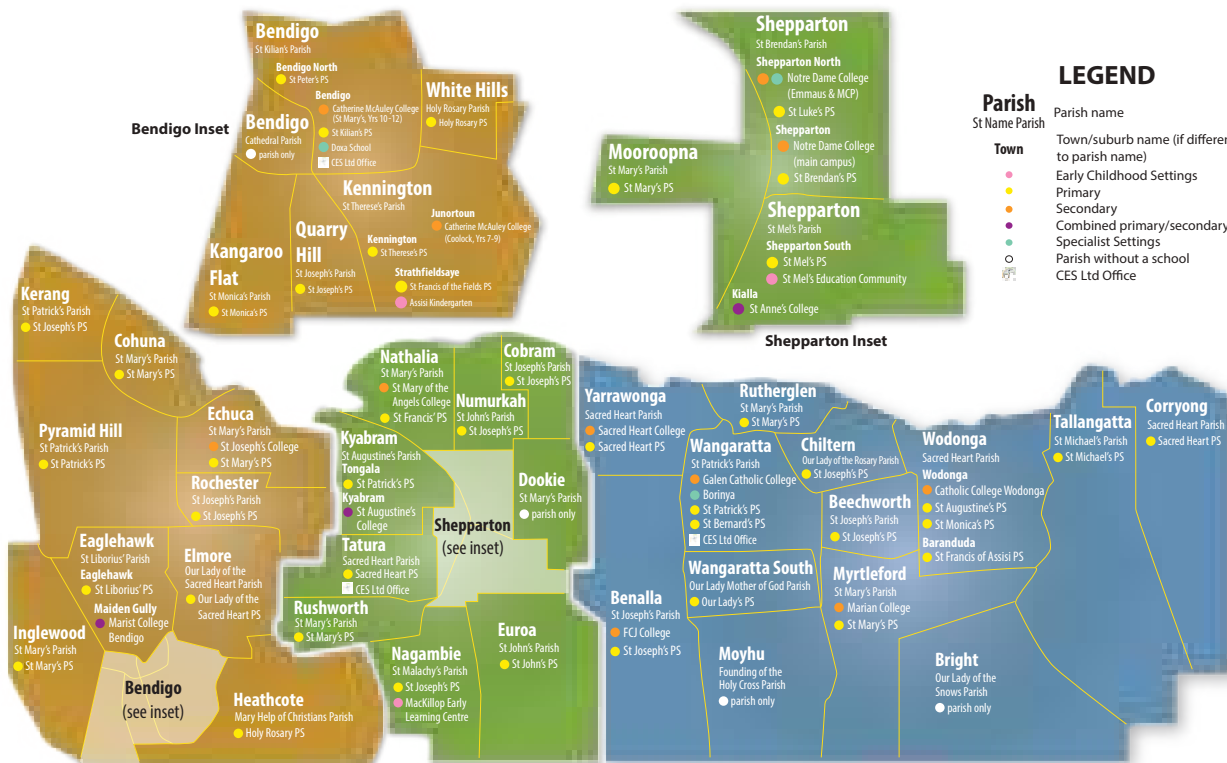
For 171 years, Catholic schools have been an integral part of the Diocese of Sandhurst, with the first school opening on the Bendigo Goldfields in 1853. Since then, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region. 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, CESL 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, CESL 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.

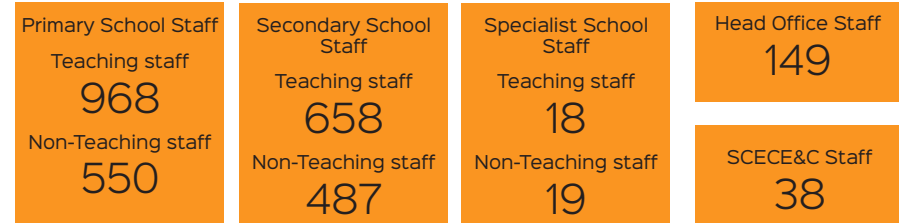
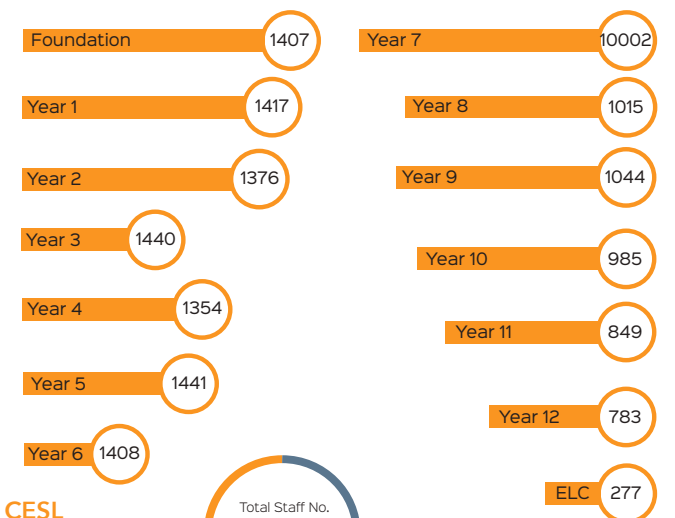
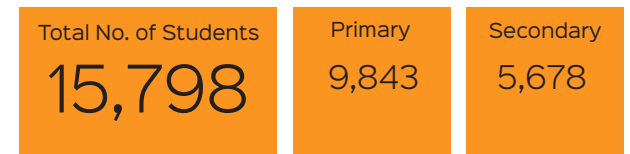
# REPORTING CRITERION 2



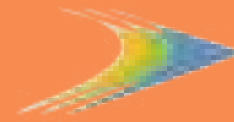
## Workforce Profile



### CESL Student Population



# REPORTING CRITERION 2



## The CESL Head Office Structure

The CESL Head Office provides support for the management of all CESL schools as well as SCECE&C Ltd. The CESL Executive Director, together with the CESL 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 CESL schools and the CESL Head Office. Their goal is to foster a culture of excellence and innovation while upholding the values of the Catholic education community.

The Strategy, Risk and Governance team's purpose is to ensure that CESL are operating within Victorian Catholic Education Authority (VCEA)<sup>1</sup>, The Victorian Registration and Qualifications Authority (VRQA)<sup>2</sup> and legislative requirements.

The two entities collectively employ a team of 149 staff members located across three regional locations: Bendigo (Head Office), Tatura, and Wangaratta. The CESL 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.

# REPORTING CRITERION 2

## 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 2024 CESL had a total turnover of \$397 million which includes all consolidated entities.

The total workforce profile of CESL includes 2,849 direct employees, while the total number of goods and services, contractors and suppliers is almost 10,000.

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

- Office of the Executive Director
- Early Childhood Education and Care
- Mission and Educational Formation
- Learning and Teaching
- School Improvement and Safeguarding
- Operations
- People and Culture
- 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 CESL Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

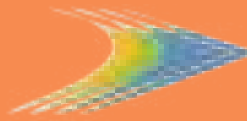
Pope Francis's message is to make a choice for respecting the rights and dignities of every human being by mitigating modern slavery risk in our supply chain and is the strategic goal for Procurement at CESL.

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

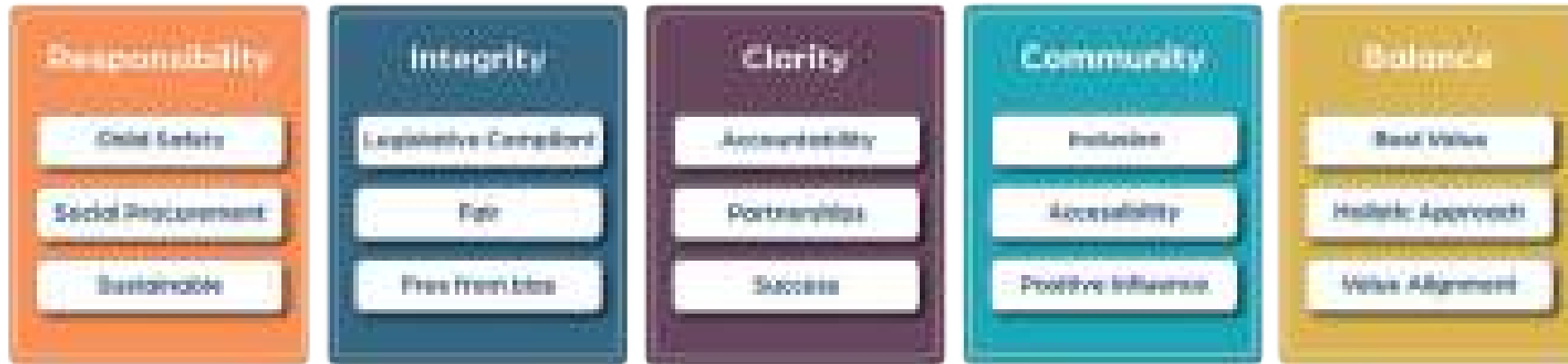
Pope Francis (2014)



# REPORTING CRITERION 2



CESL 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.

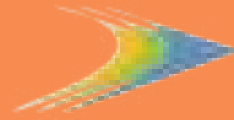
**Integrity** - CESL and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CESL policies. Service Providers will be treated fairly, respectfully and free 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, CESL and our school communities will thrive!

**Community** – CESL greatly values and promotes the viability of our local rural and regional communities and is committed to supporting and fostering the prosperity of businesses within the Sandhurst diocese. In alignment with Catholic Social Teaching, CESL also adopts social procurement practices that actively promote accessibility and inclusion across our supply chain, seeking to create positive influence and opportunity, with particular attention towards First Nations peoples, Victorians with disabilities, and other marginalised groups.

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

# REPORTING CRITERION 3



## Operational Risks

CESL 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. CESL has continued its partnership with the Australian Catholic Anti-Slavery Network (ACAN), allowing CESL 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 CESL 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 CESL. 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.

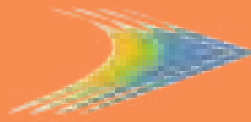
By engaging with Service Providers and Suppliers and ensuring that they adhere to ethical standards, CESL can reduce the exposure to modern slavery risks. CESL will also continue to encourage and support our schools with their Supply Chain in taking steps to mitigate modern slavery risks within their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

Supply chain 'Category Mapping' is another critical aspect of modern slavery risk management that CESL 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 CESL 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 CESL will continue to focus on educating and supporting our staff, schools and ELCs 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 CESL Board and the Child Safety, Audit and Risk Committee, CESL 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

CESL takes the responsibility towards our staff, students and community very seriously. CESL is committed to providing a safe and inclusive work environment where all employees and workers are treated fairly and with respect. CESL 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.

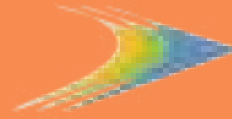
To mitigate the risk of modern slavery within our operations, CESL have implemented several measures. These include:

- **Robust recruitment practices:** CESL 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:** CESL 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:** CESL 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:** CESL has 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.

CESL, 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, CESL is not only fulfilling our responsibilities as a responsible organisation, but also contributing to a fairer and more just society.

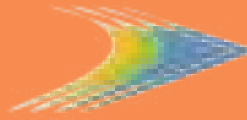
# REPORTING CRITERION 3



Through the ACAN Program, CESL 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**
- **Facility Management and Property Maintenance**
- **Waste Management Services**
- **Labour Hire**

# REPORTING CRITERION 3



## Supply Chain Risks

CESL'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 CESL entities capturing invoice history valuing \$71m 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:

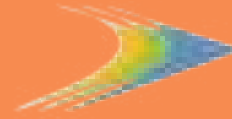
1. Building and Construction
2. ICT Hardware
3. Furniture and Office Supplies
4. Cleaning and Security
5. Events and Event Management
6. Facility Management and Property Maintenance
7. Labour Hire

## Key Expenditure Categories





# REPORTING CRITERION 3



## Spend Data Analysis

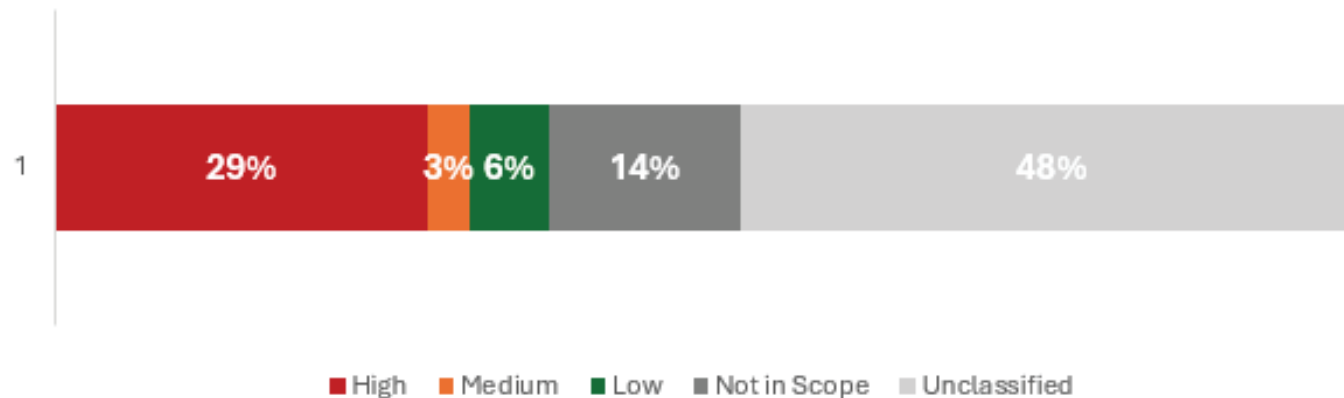
### CESL High Risk Spend Categories

CESL High Risk Spend for the calendar year 2024 was \$75m from a total of 1,763 suppliers. The split between high and low risk for spend was 29% and 6% respectively and the number of suppliers was 18% high risk and 4% low risk.

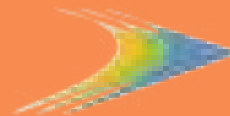
Building & Construction related spending (\$41.8m) presents the greatest spend risk for CESL at 56% of total high risk spend, although the lower number of suppliers (152) helps mitigate this risk.

The Furniture and Office Supplies category accounts for the highest number of high-risk suppliers (657) and the third highest spend (\$9.3m). These two spending categories account for 72% of CESL high risk spend.

Risk Taxonomy of Procurement Spend



# REPORTING CRITERION 3



## Spend in high risk procurement categories



## Number of suppliers in high risk procurement categories



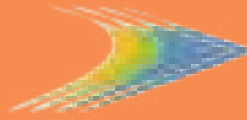
# REPORTING CRITERION 4

## CESL Modern Slavery achievements in 2024

CESL's Modern Slavery eradication efforts began with initiatives in 2021, when the organisation was founded. These initiatives were further developed and embedded throughout 2024. Achievements in 2024 included:

- Developed a Procurement Policy to ensure ethical sourcing and compliance with modern slavery requirements.
- Created a Procurement Procedure to guide consistent and responsible procurement practices.
- Developed a Modern Slavery Action Plan, promoting awareness among current and potential suppliers on the CESL website.
- A total score of 44% in the ACAN Maturity Assessment score in 2024, which was a significant increase of 8%.
- Incorporated Modern Slavery clauses into supplier contract templates to hold suppliers accountable.
- Utilised Vendor Panel for tender processes, aiding in supplier selection and ensuring compliance with Modern Slavery requirements.
- A significant reduction in the total number of suppliers (2,500).
- Attended ACAN and Sedex webinars.
- Delivered a presentation on Procurement and Modern Slavery at the CESL Administration and Finance Conference.
- Re-established the Modern Slavery Working Group to strengthen cross-departmental efforts.
- Reviewed and updated the CESL Modern Slavery Policy to ensure alignment with current best practices.
- Developed a Supplier Code of Conduct to further outline ethical expectations.
- Introduced a Contract Management system (Vendor Panel) to store and monitor contracts for both CESL schools and office, supporting ongoing compliance.
- Launched Modern Slavery introductory training with CESLO staff (including the Board), with 99 participants successfully completing the module.

# REPORTING CRITERION 4



## Actions taken to assess and address risks

In 2024 CESL Procurement Team commenced tendering to mitigate risk in the high-risk area of Cleaning Contractors and Building and Construction 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.

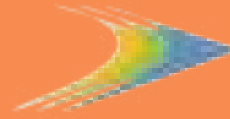
The Procurement Team is continuing to work with Schools and Offices internally to promote and educate staff on the Procurement goal and values. These tools are to support our social value decision making processes in alignment with the CESL Strategic Plan and Catholic Social Teachings and are designed 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.

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

- **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.
- **CESL Modern Slavery Policy** - CESL implemented a Modern Slavery Policy in 2021 and a revision in 2024. 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. CESL will access ACAN guidance for comprehensive clauses for high-risk contracts.

# REPORTING CRITERION 4



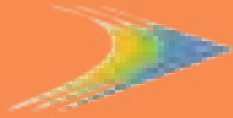
- **Completed Modern Slavery awareness training through ACAN** - The two MSLO have completed modern slavery training-learning modules and are developing training sessions for all of the organisation. E-learning modules cover;
  - » ACAN- Modern Slavery 101
  - » ACAN- Business Relevance
  - » ACAN- Implementing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

## Supplier engagement in 2024

- CESL continued to include modern slavery clauses in the terms of Service Agreements and in tendering Request for Proposal (RFP) templates for offices and schools to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CESL.
- 62 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 CESL 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 2024 CESL conducted tenders for cleaning providers and building and construction (architectural services) and developed a preferred supplier list that included modern slavery requirements.
- Overall reduction of 2,500 suppliers in 2024 from the previous year, this is the result of consolidating suppliers and the introduction of preferred suppliers.



# REPORTING CRITERION 5

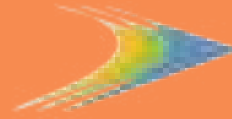


## Our plans for 2025

To strengthen our mitigation practices going forward the following initiatives are in development for 2025:

- Continue implementing the Modern Slavery Communication Action Plan.
- Conduct quarterly awareness campaigns to enhance understanding of Modern Slavery risks within the organisation and Sandhurst schools.
- A modern slavery training program for both CESLO staff and all 51 schools.
- Engage an external organisation to conduct an audit of CESL's procurement practices.
- Implement a due diligence program for key suppliers.
- Invite and increase the number of suppliers to Sedex (20%) to complete the comprehensive self-assessment questionnaire (SAQ).
- Commence project on supply chain 'Category Mapping'.
- Commence a review into CESL suppliers and look to decrease and consolidate.
- Leverage the Sedex (ACAN program) platform to identify and assess risks associated with suppliers that may have red flags related to modern slavery practices.
- Maintain our relationship with ACAN, seeking guidance and support through their webinars and compliance programs.
- CESL's aspirational goal is to identify and eliminate all risks related to Modern Slavery within our operations, business partnerships and supply chain.
- Regular meetings and check-ins with CESL preferred suppliers.
- A contact system for escalation protocol and remedy pathways policy and framework review.

# REPORTING CRITERION 5



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

CESL 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, CESL is utilising the Domus 8.7 program from ACAN - an independent program to provide remedy to people impacted by modern slavery.

CESL 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, CESL can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CESL is directly linked to modern slavery by a business relationship, CESL 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 CESL to ensure victim centred remediation processes are implemented to the satisfaction of CESL.

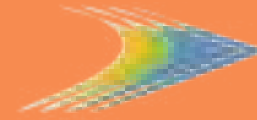
When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact the Modern Slavery Liaison Officers (MSLO) in the first instance. Then the MSLO will contact the relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, 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, CESL agencies have access to the expertise and independent advice available through Domus 8.7. CESL 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



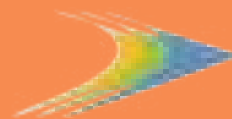
## **Measuring Effectiveness of actions taken**

### **Modern Slavery Baseline**

The Baseline data demonstrates continuous improvement and captures the direct impact of actions, and helps CESL 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 (165%) improved identification of suppliers where the completion of the Sedex SAQ (2023 - 0, 2024 - 44) would support managing modern slavery risk in their own operations and supply chains.

CESL also achieved a 22% reduction in the number of suppliers across high-risk categories, and a further 21% decrease in the total number of CESL suppliers.

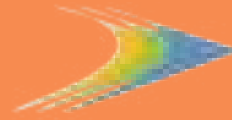
# REPORTING CRITERION 5



Catholic Education Sandhurst	Activity	2024	2023	2022
Internal / Staff	Hours spent on modern slavery activities	45	30	30
	Individual staff completed e-learning	99	0	0
	E-learning modules completed	3	5	0
External / Supplier Engagement	Number of suppliers	9874	12597	n/a
	Number of suppliers with visible contact information and ABN	0		
	Number of suppliers across high-risk categories	1764	2286	n/a
	Number of ACAN Supplier Surveys completed	841	317	0
	Supplier staff attending capacity building webinars	20	1	0
	Invited to join Sedex	44	148	0
	Joined Sedex	62	57	0
	Sedex SAQ completed	44	0	0
	Social audits	17	0	0
	Corrective actions	75	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

CESL Board and People, 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.

# REPORTING CRITERION 6



## 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.

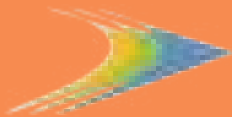
In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

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 2024, CESL achieved a maturity assessment improvement score of 8%, this falls in the 31% - 50% range indicating an Emerging Practice level. The Analysis by Pillar table below demonstrates improvements in all areas of CESL. Strategies introduced at CESL since working towards eradicating modern slavery practices have seen a significant improvement. 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



## Maturity Assessment 2024

### Catholic Education Office Sandhurst - Overview

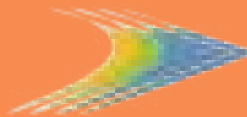


### Catholic Education Office Sandhurst - 2024 Analysis by Pillar

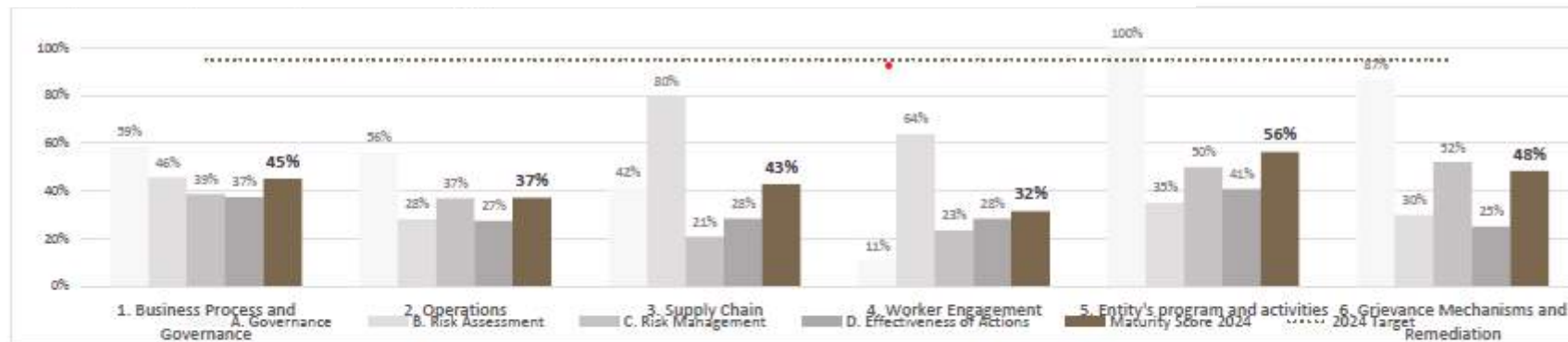
Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	Change
1. Business Process and Governance	59%	46%	39%	37%	45%	↑ 7%
2. Operations	30%	28%	37%	27%	32%	↑ 6%
3. Supply Chain	42%	80%	21%	28%	43%	↑ 20%
4. Worker Engagement	11%	64%	23%	28%	32%	↑ 1%
5. Entity's program and activities	100%	35%	50%	41%	50%	↑ 12%
6. Grievance Mechanisms and Remediation	87%	30%	52%	25%	48%	0%
Average	59%	47%	37%	31%	44%	
	↑ 17%	↑ 8%	↑ 4%	↑ 3%	↑ 8%	

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

# REPORTING CRITERION 6



**Maturity Score 2024: comparative to target and maximum scoring, by Pillar**

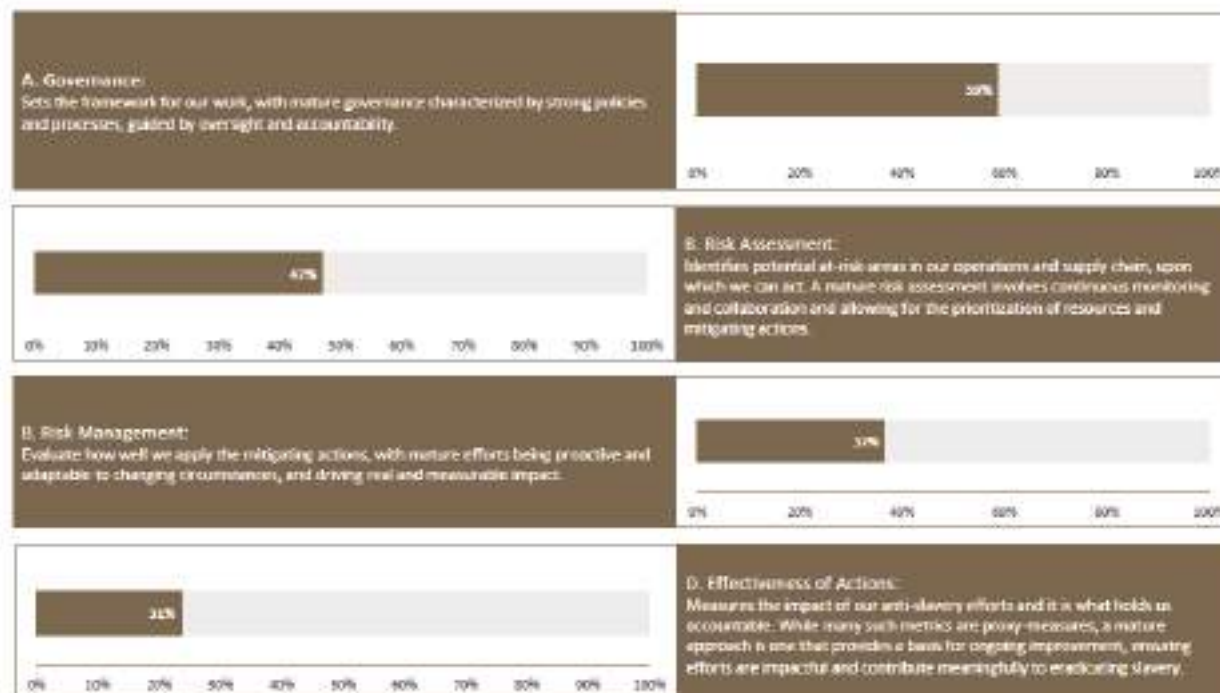
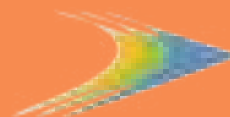


**Maturity Score 2024: comparative individual scoring, by Pillar and Sub Pillar**

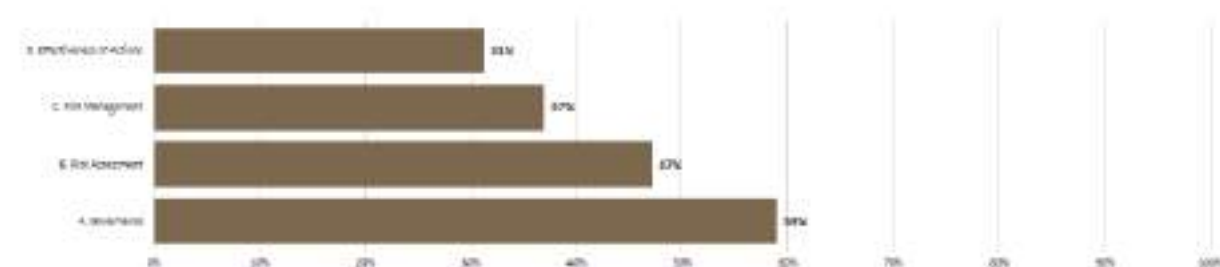
## Notes:

- 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 2025 (extended from 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 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the ACAN Program activities.

# REPORTING CRITERION 6



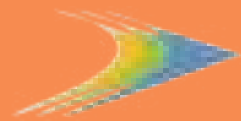
Maturity Score 2023: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description



Maturity Score 2023: Comparative analysis of 2023 performance by sub-pillar

## Notes:

- Participation in Genus 3.7 Remediation Services was incorporated into scoring of pillar B: Effective Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Genus 3.7 Remediation Services activities.
- Participation in the AGRI Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (AGRI 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 AGRI Program activities.



## Action Planning 2025

### Catholic Education Office Sandhurst - Action Planning 2025

#### Recommended focus Areas for 2024

Pillars:	
4. Worker Engagement	32%
3. Supply Chain	43%

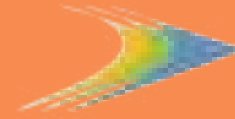
Sub-Pillars:	
D. Effectiveness of Actions	31%
C. Risk Management	37%

### 2025 Commitment of Actions - Entity Profile

The Entity has committed to the following actions on their 2024 Entity Profile:

Action 1	A modern slavery training program for both CESL office staff and all 51 schools
Action 2	Regular meetings and check-ins with CESL preferred suppliers
Action 3	A contact system for escalation protocol and remedy pathways policy and framework review
Action 4	Commence a review into CESL suppliers and look to decrease and consolidate
Action 5	Invite and increase the number of suppliers to SEDEX (20%) to complete the comprehensive self-assessment questionnaire (SAQ)
Action 6	Commence a project on Supply Chain 'Category Mapping'

# REPORTING CRITERION 6



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

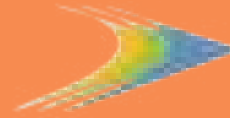
This statement is provided as a single reporting entity, pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and incorporates the activities and operations of the 52 Sandhurst diocesan schools and also includes subsidiary entity SCECE&C Ltd's three early learning centres.

For the preparation of this statement the CESL Chief Operating Officer consulted with different functional departments across CESL 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.



# REPORTING CRITERION 7

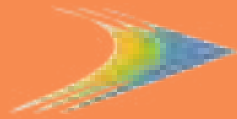


**CESL Modern Slavery Liaison Officers participated in the following ACAN webinars:**

<b>2024</b>	<b>ACAN Webinar topics</b>
<b>27 June</b>	Working Group Updates
<b>25 July</b>	Working Group Updates
<b>29 August</b>	Working Group Updates
<b>26 September</b>	Working Group Updates
<b>31 October</b>	Working Group Updates
<b>28 November</b>	Working Group Updates

<b>2024</b>	<b>ACAN Supplier and Capacity Building</b>
<b>13 June</b>	Introduction and Modern Slavery
<b>14 August</b>	Contracting Labour
<b>9 October</b>	Cleaning and Security Services
<b>11 December</b>	Grievance Mechanisms and Remediation

<b>2024</b>	<b>CESL Modern Slavery Working Group</b>
<b>3 September</b>	Working Group Meeting
<b>26 November</b>	Working Group Meeting



## 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.

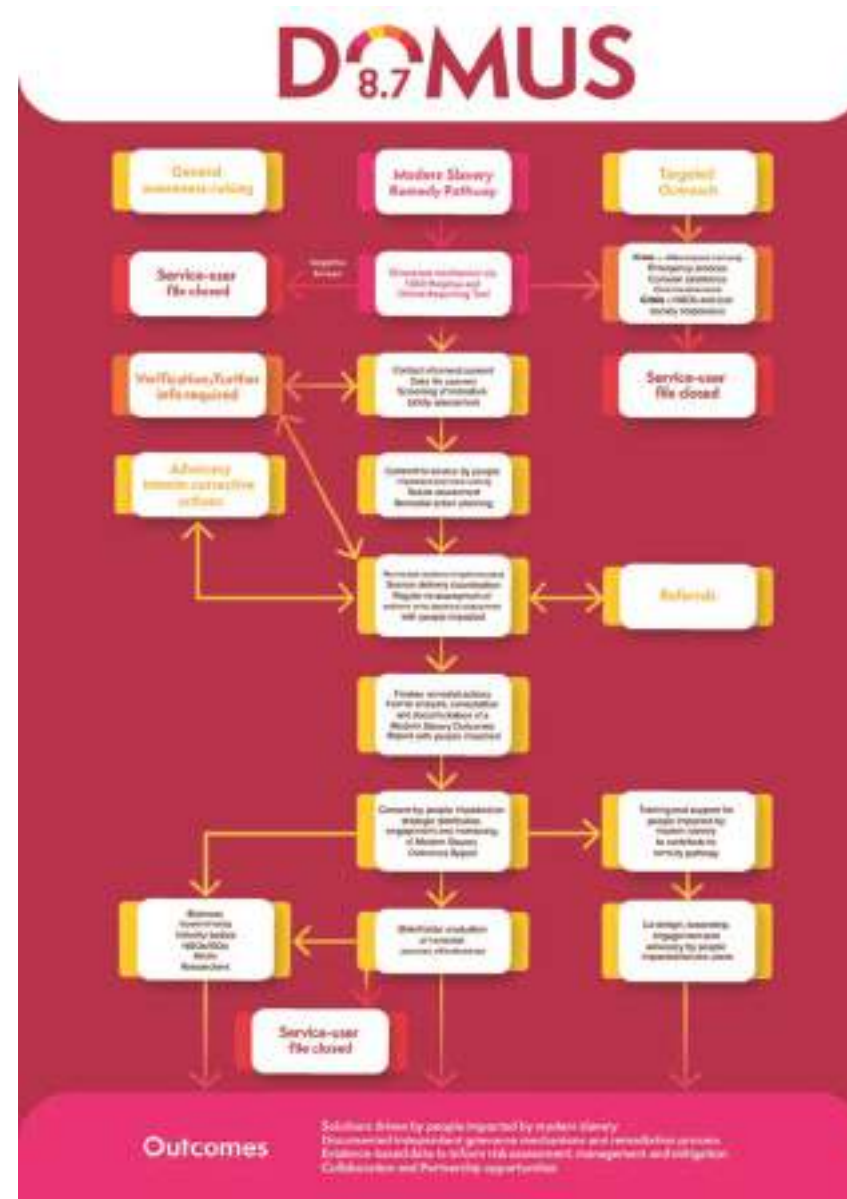
Catholic schools, hospitals, aged care facilities, universities, community services, investment and finance are just some of the Catholic institutions that touch the lives of millions of Australians. 1 in 5 Australian children are educated in Catholic schools (approximately 800,000) and 1 in 10 hospital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



CESL 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.











DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



CATHOLIC EDUCATION BALLARAT

Diocese of Ballarat Catholic Education Limited  
(DOBCEL)

# Modern Slavery Statement

1 January to  
31 December 2024

# Acknowledgement of Country

We respectfully acknowledge the First Nations people of Australia,  
the Traditional Custodians of the lands, seas, skies, and waterways  
where our diocesan education community is situated,  
from the Murray to the Sea.

We recognise and celebrate the diversity of Aboriginal peoples across Western Victoria  
and acknowledge their deep spiritual connection to the land, waterways, and skies,  
which is reflected in their enduring culture.

We pay our respects to First Nations Elders, past and present,  
and support the Uluru Statement From the Heart.  
We acknowledge that the land, waterways, and skies of Australia  
were, are, and will always be the heritage of the First Nations peoples.

This acknowledgment reaffirms our commitment to the ongoing journey of reconciliation  
and highlights the importance of healing between Indigenous and non-Indigenous peoples.  
We recognise our responsibility to ensure that young people in our schools  
can reach their full potential, are empowered to shape their own futures,  
and are supported in embracing 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.

Founded in Christ and sustained by faith, Catholic schools seek to fulfil their mission of enabling each student to come into the fullness of their own humanity. This includes paying attention to the inherent dignity of children and young people, and their fundamental right to be respected, nurtured, and safeguarded by all.

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# 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 fourth Modern Slavery Statement and sets out the progress that DOBCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2024 Calendar Year Reporting Period, from 1 January 2024 to 31 December 2024.


## 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

 **Email:** [enquiries@dobcel.catholic.edu.au](mailto:enquiries@dobcel.catholic.edu.au)

 **Website:** [www.dobcel.catholic.edu.au](http://www.dobcel.catholic.edu.au)

DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



#### MODERN SLAVERY LIAISON OFFICER:

**Name:** Sarah Page

**Role:** Social Justice Education Officer

**Team:** Catholic Identity & Mission Team

 **Email:** [spage@dobcel.catholic.edu.au](mailto:spage@dobcel.catholic.edu.au)



# Declaration

## Modern Slavery Act 2018 (CTH) - Statement Annexure

### Principal Governing Body Approval

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 Tuesday 10 June 2025.



*Terry Harney*

**Mr Terrence Harney**

Board Director and Chair

Diocese of Ballarat Catholic Education Limited Board

### Signature of Responsible Member

This Modern Slavery Statement was signed by a responsible member of the Diocese of Ballarat Catholic Education Limited (DOBCEL) in accordance with section 13 of the Modern Slavery Act 2018 (Cth) 1 ("The Act") on Tuesday 10 June 2025.



*+ Paul Bird*

**Bishop Paul Bird**

Bishop of Ballarat and Company Member

Diocese of Ballarat Catholic Education Limited Board

Signature of Responsible Member





# Reporting Criteria 1

## 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

## About Us

Our schools operate in a diverse and geographically extensive diocese which covers the west of Victoria, extending from the Murray River in the North, to the Southern Ocean in the South. The Diocese of Ballarat is a place of natural, communal and economic diversity.

Catholic education in the Diocese of Ballarat occurs in interwoven communities of learners gathered in Jesus' name. It has its foundation in communities of believers who have made their education system a place of welcome to reach out to nurture all God's people. Generations of diocesan clergy, religious congregations and lay people have endeavoured to establish the flourishing educational communities that exist today, with each school an expression of our foundational belief that we are all created in the image and likeness of a loving God.

The Diocese of Ballarat has a total of 63 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 57 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 51 Primary Schools (Foundation to 6), one Foundation to Year 8 School and 11 Secondary Schools (years 7-12).

# 150th Anniversary of the Diocese of Ballarat

The Diocese of Ballarat turned 150 on March 30, 2024.

2024 was a significant year, as it saw DOBCEL and the wider Diocese of Ballarat community celebrate 150 years of the Catholic Diocese of Ballarat.

It was on March 30, 1874, that Pope Pius the Ninth issued a decree that marked the beginning of the Ballarat Diocese. Every community across our diocese had the chance to commemorate our 150th anniversary by remembering those who came before us, who established the framework for our parish and school communities, as well as the social services and medical care that are currently offered in our diocese.

The anniversary served as a chance for the diocese to reflect on the past, identifying its successes and shortcomings, applauding its accomplishments and admitting its shortcomings. It also provided the diocese of Ballarat the opportunity to assess its current situation and consider how it might live as an authentic Catholic Christian community in the years ahead.

The Catholic Education Week 2024 theme, "Be joyful in hope, patient in affliction, faithful in prayer" (Romans 12:12), encourages a positive outlook and perseverance in the face of challenges. It calls for rejoicing in God's hope, demonstrating patience through difficulties, and maintaining consistent prayer. This theme aims to inspire a community to trust in God's plan, remain steadfast during times of hardship, and seek His guidance through prayer.

It was with great honour that we also acknowledged and celebrated our oldest schools in the Diocese, All Saints Primary School, Portland and St Patrick's School, Port Fairy, who both celebrated their 175th Anniversary in October 2024.



Figure 1: DOBCEL Catholic Education Week Theme 2024

# A Message from the Bishop

This year the world has said farewell to Pope Francis and hello to Pope Leo XIV. The new Pope will have his own style but he has already indicated that he will continue key messages of Pope Francis and earlier Popes. One of those messages is the call to respect human rights, including the rights of workers.



Just two days after being elected, Pope Leo XIV recalled the writings of his predecessor, Pope Leo XIII, who had emphasised the dignity of workers in the nineteenth century in the midst of the industrial revolution of those times. The new Pope Leo referred to another industrial revolution in our twenty-first century, the revolution involved in the development of artificial intelligence. He highlighted the need to defend human dignity in the face of the challenges that this new industrial revolution could bring. "In our own day, the Church offers to everyone the treasury of her social teaching in response to another industrial revolution and to developments in the field of artificial intelligence that pose new challenges for the defence of human dignity, justice and labour."

One of the ongoing challenges is that of modern slavery. In various forms, modern slavery continues to trample on people's right to choose their work and have their personal freedom respected.

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 fourth Modern Slavery Statement and sets out the progress that DOBCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2024 Calendar Year.

As we publish this Statement, we pray for those who suffer under the yoke of slavery and we commit ourselves anew 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 Director

Dear Colleagues and Partners,

It gives me great pleasure to introduce the Diocese of Ballarat Catholic Education Limited Modern Slavery Statement 2024 regarding modern slavery.

DOBCEL, is informed, formed and constantly challenged to transform the world in which we serve. The document Gaudium et Spes, from Vatican II reminds us "The Church has always had the duty of scrutinising the signs of the times and of interpreting them in the light of the Gospel". This means we authentically seek ways to understand the current world, its aspirations, and its challenges, and respond to them with the teachings of the Gospel.

All of humanity is created in the image of God. Therefore, we take very seriously the obligation to uphold the inherent value, dignity and freedom of all humanity, particularly those who are most vulnerable and often

It should not be a procurement decision to combat modern slavery who are directly affected

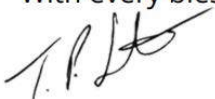
The eradication of modern slavery is a core Mission, Identity and person. This Statement Network (ACAN) Catholic Statement as part of

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.

I take this opportunity to fully commit the Diocese of Ballarat Catholic Education to eradicate all risks associated with modern slavery from our supply chain, business partnerships and operations.

In the words of Pope Francis "First, it is essential to listen to those who are suffering..... especially women and children, who are exploited sexually or in the workplace. May we listen to their cry for help and feel challenged by the stories they tell. Together with the victims and the young, let us once more dream of a world where all people can live with freedom and dignity."

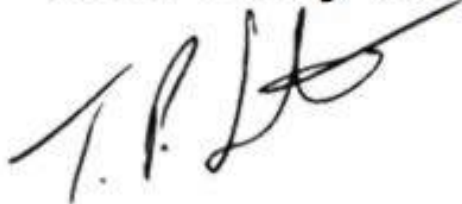
With every blessing,



**Mr Tom Sexton**  
**Executive Director**



With every blessing,



**Mr Tom Sexton**  
**Executive Director**

every operations and s. Thus solutions to ble, involving those

an extension of our uman dignity of the itholic Anti Slavery ore, I endorse this endium of Catholic

# Reporting Criteria 2

## DOBCEL - Governance Framework

### School Governance & Policy

Bishop Paul Bird established a company limited by guarantee, Diocese of Ballarat Catholic Education Limited (DOBCEL), and appointed a board of directors to govern schools.

The Board of the company collaborates closely with to Bishop Paul Bird, as the Bishop of the diocese, and as a member of the company. It also approves education policies in consultation with and for the whole diocesan education community.

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

### Governance Chart

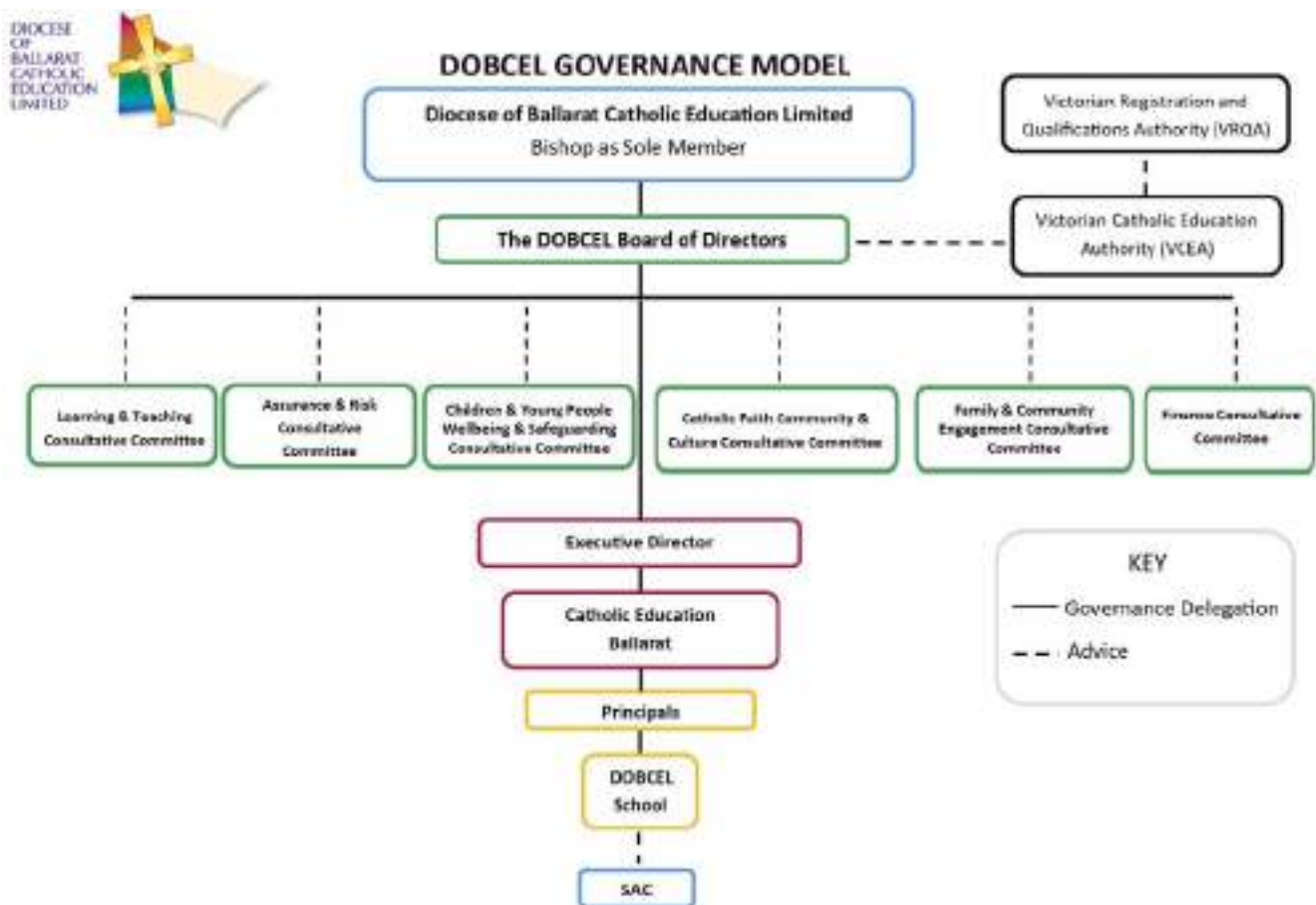


Figure 2: DOBCEL Governance Chart



# The Role of the DOBCEL Board

The Board's role is to govern DOBCEL and it is therefore not involved in day-to-day operational management functions. The Board delegates its authority and the role of managing DOBCEL to the Executive Director who is supported by a management infrastructure (Catholic Education Ballarat and DOBCEL School principals), in accordance with the strategic goals set by the Board and under its direction. The Board is responsible for directing the management of the business of DOBCEL and may exercise all powers of DOBCEL that are not required by the law or by the Constitution to be exercised by the Bishop.

The principal functions and responsibilities of the Board include, but are not limited to, the following:

- Overseeing the development and implementation of a strategic direction for DOBCEL
- Reviewing the progress and performance of DOBCEL in meeting the strategic direction and corporate objectives
- Approving annually CEB and DOBCEL school budgets
- Ensuring accountability to the Bishop in accordance with the DOBCEL Constitution
- Ensuring that robust and effective risk management, compliance and control systems (including legal compliance) are in place and are operating effectively
- Being responsible for DOBCEL's senior management and personnel including:
  - appointing, reappointing or, where appropriate, removing the Executive Director subject to the approval of the Bishop
  - annually determining the remuneration of the Executive Director subject to the approval of the Bishop
  - providing advice and counsel to the Executive Director including formal reviews and feedback on the Executive Director's performance
  - overseeing the professional development of the Executive Director
  - ratifying the appointment, the terms, and conditions of the appointment and, where appropriate, the removal of the Company Secretary
  - ensuring that an appropriate succession plan is in place for the Executive Director, the Company Secretary and other senior managers
  - ensuring appropriate human resource systems, including those relating to workplace health and safety, are in place to ensure the well-being and effective contribution of all employees
- Delegating appropriate powers in accordance with the Instrument of Delegations and the Policy Development document and maintaining a record of delegations
- Ensuring all policies governing the operations of DOBCEL and DOBCEL Schools are consistent with the Constitution and ensuring these comply with all DOBCEL's legal and regulatory obligations
- Fostering relationships with key stakeholders including clergy, families, and parish communities.

# DOBCEL Strategic Intent 2020 - 2024

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.

The Board commits to regular review processes to evaluate its performance against the DOBCEL Board's Strategic Priorities.

## DOBCEL Management Strategic Priorities 2020 - 2024:

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

Throughout 2024, DOBCEL began the initial stages of development for a new strategy that became "DOBCEL Strategy 2035: Pursuing Fullness of Life for All." This strategy aims to establish a bold and courageous, yet responsible approach to enhancing high performance across our network of schools over the next decade and beyond. The focus during 2024 was preparation of the strategy to initiate "sense-making" in 2025.



# Catholic Education Ballarat Organisational Chart

The role of Catholic Education Ballarat (CEB) is to provide support, service and leadership to Catholic Primary and Secondary schools in the Diocese of Ballarat. CEB seeks to engage with and influence the people who make a difference in schools. Its central purpose is to build capacity in Principals, Leaders, Teachers and Students to ensure the continuing development and growth of individuals.

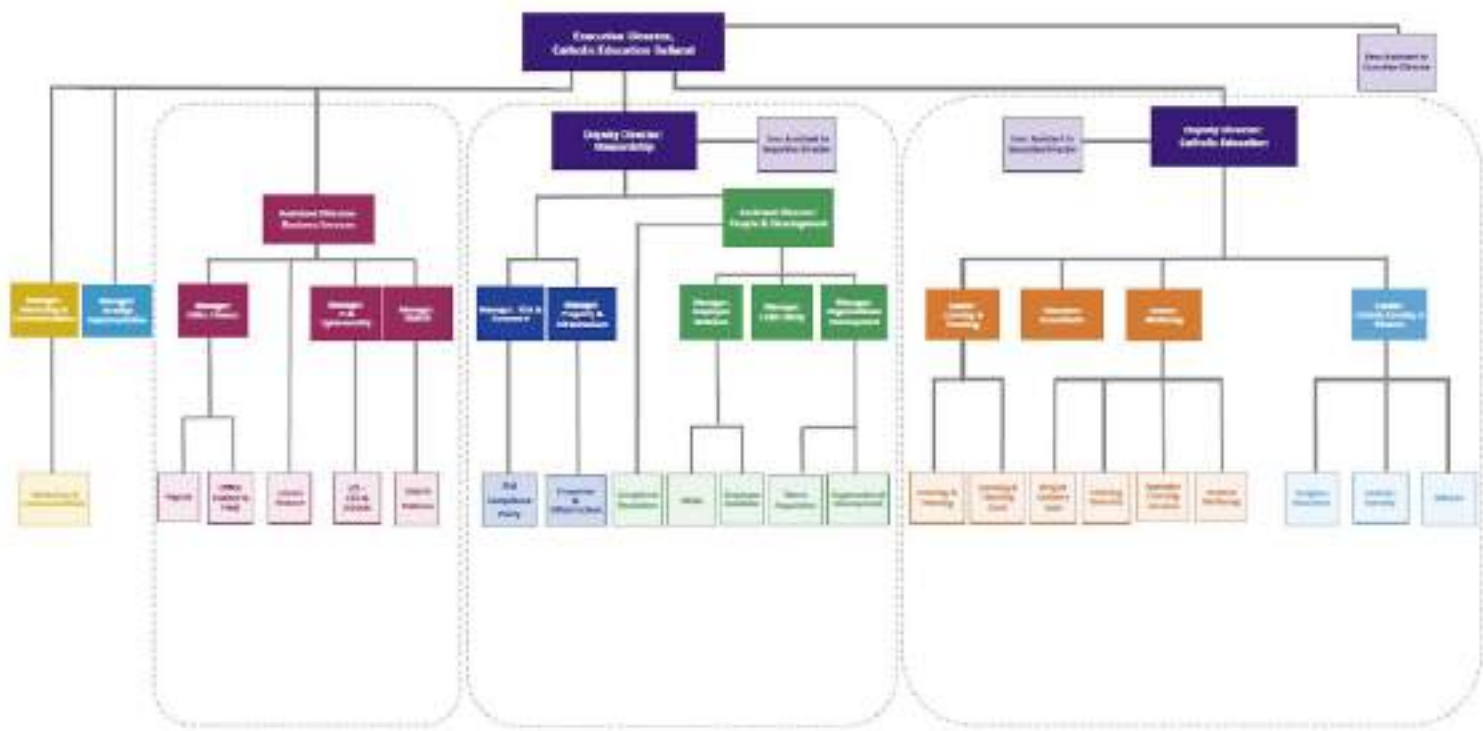


Figure 3: DOBCEL Organisational Chart



“Let us thank all those who teach in Catholic schools.  
Educating is an act of love; it is like giving life.”  
- Pope Francis, Pontifex: 1 March 2014

# Educational and Office Services

Diocese of Ballarat Catholic Education Limited (DOBCEL) is the company established by Bishop Paul Bird to become the governing body for schools in the Ballarat 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 (that parish priests are not the employers of principals and teachers in Catholic schools)
- 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.

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.

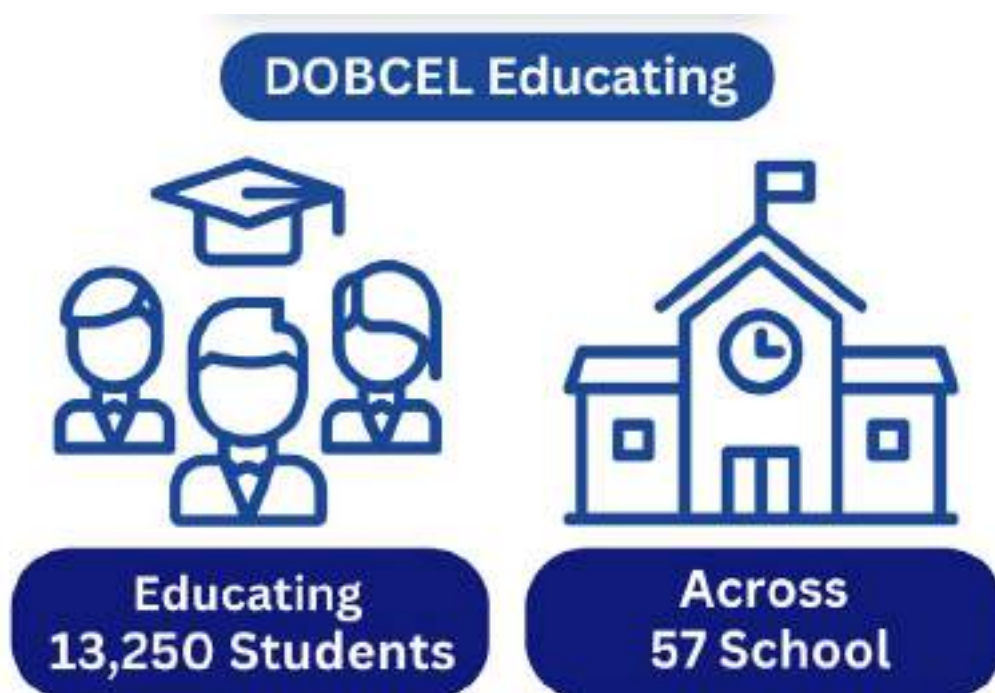


Figure 4: DOBCEL - Students & Schools







# Workforce Profile

From the Murray to the Sea, DOBCEL aims to realise a vision of the 'fullness of life for all' for more than 18,500 students across a community of 63 Catholic primary and secondary schools.

## DOBCEL - CEB Head Office Structure

### DOBCEL's Structural Operations

DOBCEL governs 51 Primary Schools, one Foundation to Year 8 School and five Secondary Schools across the Ballarat Diocese. Appendix 1 shows the complete list of entities owned and operated by DOBCEL.

In the calendar year from 1 January 2024 to 31 December 2024, DOBCEL's annual consolidated revenue reached \$320.574 million AUD, with employee-related expenses totalling \$215.202 million AUD. During this period DOBCEL schools educated 13,250 students, 10,310 of those across the 51 Primary Schools and 2,940 across the 5 Secondary Schools, and employed more than 1,800 teachers and staff, from Mildura in the north, Portland in the south, and west to Edenhope and Nhill. Additionally DOBCEL employed a workforce of 140 staff across its five offices.

DOBCEL and its operational arm, Catholic Education Ballarat (CEB) work together to support leadership of Catholic Primary and Secondary schools, to promote Catholic identity, to deliver quality learning, provide effective stewardship and nurture respectful and trusting relationships with the community. DOBCEL'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. CEB is responsible for the implementation of DOBCEL strategies, policies and procedures, and overseeing the day to day running of the schools.

The DOBCEL Executive Director, together with the DOBCEL Directorate, including Deputy Director Catholic Education, Deputy Director Stewardship, Assistant Director of People and Development and Assistant Director of Business Services, are responsible for providing leadership and direction across all areas of the company's operations. They collaborate closely with the DOBCEL Leadership Team, which is made up of team leaders and management across relevant portfolios.



Figure 6: DOBCEL - Population Numbers

## Office Services & Staff

The role of Catholic Education Ballarat (CEB) is to provide support, service and leadership to Catholic Primary and Secondary schools in the Diocese of Ballarat. It seeks to engage with and influence the people who make a difference in schools. Its central purpose is to build capacity in Principals, Leaders, Teachers and Students to ensure the continuing development and growth of individuals.

DOBCEL employs a team of 140 staff members located across its four zones: Central, Mid North, Northern and Southern Zones. It has offices located across five locations, including Ballarat (Head Office), Horsham, Mildura, Swan Hill and Warrnambool, servicing the schools in those areas.

DOBCEL has standards and codes of conduct for employees and volunteers to maintain a safe and healthy environment. Its commitment to these standards requires that it conducts 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.

# DOBCEL's Modern Slavery Governance Framework

To facilitate our anti-slavery efforts, a new role was established by DOBCEL in October 2023, a Social Justice Education Officer, whose portfolio includes Modern Slavery. The Social Justice Education Officer serves as the Modern Slavery Liaison Officer ('MSLO') with ACAN. The MSLO works within the Catholic Identity and Mission Team, and alongside the Business Services: Office Finance, and School Finance Teams, as well as the Stewardship: Assurance and Risk, and Planning and Infrastructure Teams, and the People and Development: Human Resources, Child Safety and Organisational Development Teams.

In partnership with the teams listed above, the MSLO implements the ACAN Risk Management Program across DOBCEL operations and supply chains, with a focus on achieving the DOBCEL Modern Slavery Framework and risk mitigation activities. The Deputy Director of Catholic Education, as the MSLO's direct Deputy Director, presents the annual DOBCEL Modern Slavery Statement to the Directorate for approval. After it has been endorsed by the Directorate, the Director of Catholic Education then presents the Statement to the DOBCEL Board for final approval declaration.

## DOBCEL's Supply Chain

In order to identify and prioritise the most significant risks in the supply chain, DOBCEL have been able to gather information from its leading suppliers around the diocese and analyse this data using a standardised template thanks to its participation in the ACAN Modern Slavery Risk Management Program. This initiative aligns with its commitment to combating modern slavery and improving transparency within its supply chain.

During the 2024 calendar year reporting period, DOBCEL's total consolidated revenue was \$320.5 million AUD. The main expenditure being \$215.2 million AUD on salaries and employee related expenses. Other expenses totaled approximately \$87.453 million AUD with external suppliers.

DOBCEL maintains a decentralised procurement approach, except for banking services, audit and compliance contracts, fleet procurement, and substantial capital projects. Throughout the reporting period, more than 519 suppliers were engaged, with some schools sharing suppliers.

DOBCEL's decentralised procurement system, while posing challenges in data collection, has been the focus for continuing improvement. DOBCEL continues to scope consistent procurement and purchasing approaches across its schools. In addition to this, the Business Services team has begun developing a new DOBCEL Finance, Payroll and HR Systems, the NEXUS Enterprise Management System, to be launched in 2025. The NEXUS Project will standardise the collection of all financial, payroll and HR data of the 57 schools. This system has been designed to cater for the identification and mitigation of supplier and supply chain risks, while also enhancing reporting, supporting the efforts for a more streamlined way to track its Modern Slavery related data into the future.

In the absence of a unified system for contracts or procurement, the responsibility for overseeing short-term and medium-term contracts is distributed across various levels of the organisation, including schools and the DOBCEL Office. More complex and higher-value contracts are managed by the DOBCEL Office through the Business Services and Stewardship Teams. This includes contracts related to construction, design, consulting, and system-wide programs and initiatives.

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.

Throughout the diocese, schools currently have a considerable level of autonomy in collaborating with local vendors, thereby supporting and providing jobs for the surrounding communities.

Given the nature of expenditures within the diocese, DOBCEL have identified several high-risk areas, including Building and Construction, Furniture and Office Supplies, and Cleaning and Security.

The highest risk areas identified for Educational Institutions are:

1. Building and Construction
2. Labour Hire
3. Furniture & Office Supplies
4. Fleet Management, Consumables and Maintenance
5. Utilities
6. Cleaning Services
7. Professional Services

Throughout 2024, with over 16 capital building projects underway across the diocese, the largest procurement categories have shifted slightly compared to previous years. These categories now include Building and Construction (which encompasses architectural services), Furniture and Office Supplies, and Labour Hire. Labour Hire continues to pose a challenge across the state, primarily due to difficulties in sourcing relief teachers.

As DOBCEL continues to assess risks, it may identify additional sectors for consideration in future evaluations.

# Risk Management

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

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

DOBCEL's employees and volunteers adhere to various codes, policies, and procedures that support the governance and operation of its schools, ensuring the delivery of high-quality education and a nurturing environment for all students. These include the Anti-Slavery Policy, Anti Slavery Procedure, Child Safety and Wellbeing Policy, Child Safety Code of Conduct, Safeguarding Children and Young People Code of Conduct, Recruitment Policy, PROTECT – Reportable Conduct Scheme Policy, Whistleblower Policy, Responsible Persons Policy, School Advisory Council Terms of Reference, Duty of Care Policy, School Complaints Handling Policy and Procedures, Internal Audit Policy, Employee Grievance Policy, Recruitment Policy, Employee Grievance Policy, Procurement and Purchasing Policy and Procedures, Staff Employment, Screening and Supervision Policy, Diversity and Equity Policy, and Relationships and Sexuality Policy.

In 2024, DOBCEL employed 2,407 people, with a significant majority (95%) working in DOBCEL schools. Of the employees, approximately 99% are Australian citizens or permanent residents, all of whom are employed in Australia. Fewer than 50 staff members hold temporary visas. DOBCEL adheres to the Australian Government's Employment and Sponsorship of Visa Holders and Overseas Workers Policy, ensuring compliance with immigration and right-to-work requirements under Australian law when hiring visa holders or sponsoring overseas employees.

The conditions of employment for most staff members are determined under a multi-enterprise bargaining agreement that offers a wide array of benefits and flexibility. DOBCEL regularly engages in discussions with trade unions representing its employees across all schools and offices to advocate for their interests and help develop the multi-enterprise agreement.

DOBCEL policies are underpinned by core values that emphasise respect, integrity, justice, and accountability. These values, along with engagement, belonging, and freedom, guide DOBCEL's commitment to creating safe, supportive, and thriving school environments for all.



# Reporting Criteria 3

## Modern Slavery Risks in our Operations and Supply Chains

DOBCEL faces a range of operational risks that could seriously impact the organisation's reputation and functionality. One of the most significant threats to operations is modern slavery, which constitutes a grave violation of human rights affecting millions globally. As a Catholic organisation, DOBCEL believes that every person has inherent dignity and that each life is precious. The fundamental dignity of every individual is the foundation and driving force of DOBCEL's vision. It views any violation of human dignity in its operations and supply chains as its responsibility. DOBCEL continues to collaborate with the Australian Catholic Anti-Slavery Network (ACAN), which helps them build robust connections that support DOBCEL in recognising and assessing risks in its operations, thus reducing the chances of modern slavery practices occurring in its supply chains.

The operational risks associated with modern slavery highlight three main areas that DOBCEL should focus on to assist in recognising and confronting modern slavery risks within the organisation. These areas include supplier engagement, supply chain mapping, and due diligence. DOBCEL is working towards improving and establishing these practices.

DOBCEL finance systems are currently decentralised, utilising a robust financial and accounting framework that includes a separate accounting system for each school, along with specific procedures for budgeting, reporting, and compliance. Across its organisation DOBCEL also relies on annual financial statement (AFS) codes and a system for approving purchase orders. This is opposed to a complete Supply Chain Purchase to Pay management system. As previously mentioned, in 2024 DOBCEL invested in the development of NEXUS Enterprise Management System, in an effort to centralise data and consistent data entry across the diocese. This new platform, expected to roll out early 2025, represents the best technology, people, and ethical standards that align with DOBCEL's current and future needs and vision.

The variety of products and service providers, along with the evaluation of risks, is reviewed from a broad perspective using information from schools and the central office. By utilising the data available from across DOBCEL, which includes invoice records amounting to \$87.453 million AUD, DOBCEL were able to identify the top 50 suppliers from this dataset based on spending, as well as those providing essential high-risk goods and services. In 2024 DOBCEL spent \$39.25 million AUD in high-risk procurement categories.

In the 2024 reporting period, DOBCEL recorded a high 92% spent in the high-risk procurement category.

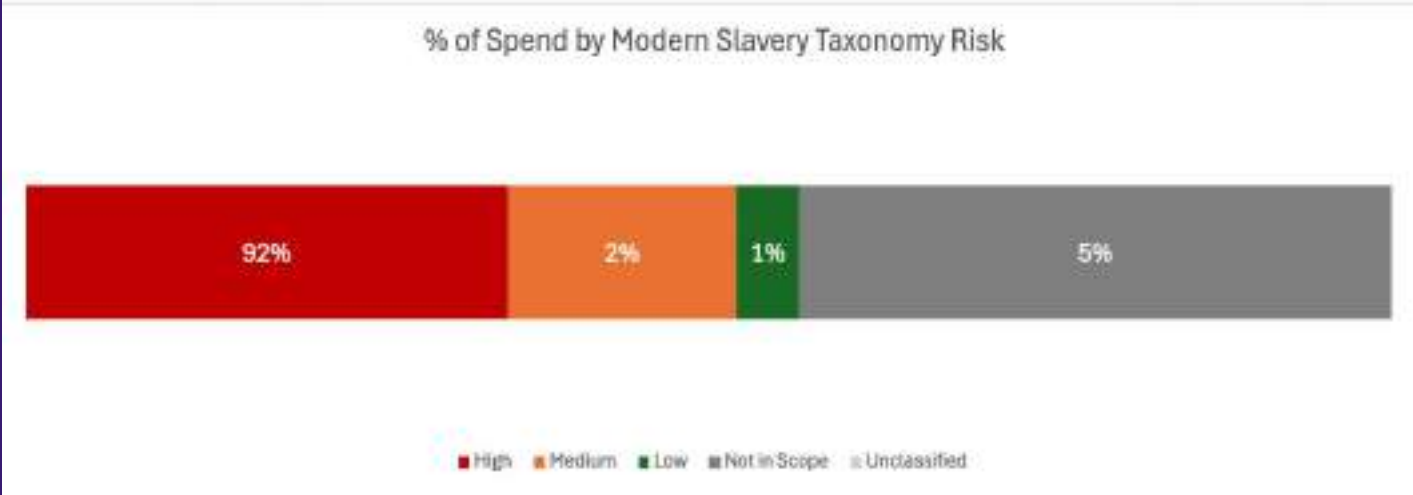


Figure 7: DOBCEL % of Spend by Modern Slavery Taxonomy Risk

DOBCEL allocated 90.26% of its total spending in the high-risk category to Building and Construction, as shown in the table below. In 2024, DOBCEL made significant investments in new builds and refurbishments for several reasons. Primarily, these investments were aimed at upgrading facilities in schools to create better learning environments for both students and teachers. This initiative was supported by funding from the Victorian Government, addressing the issues of aging facilities in many schools and accommodating population growth in several regional areas.

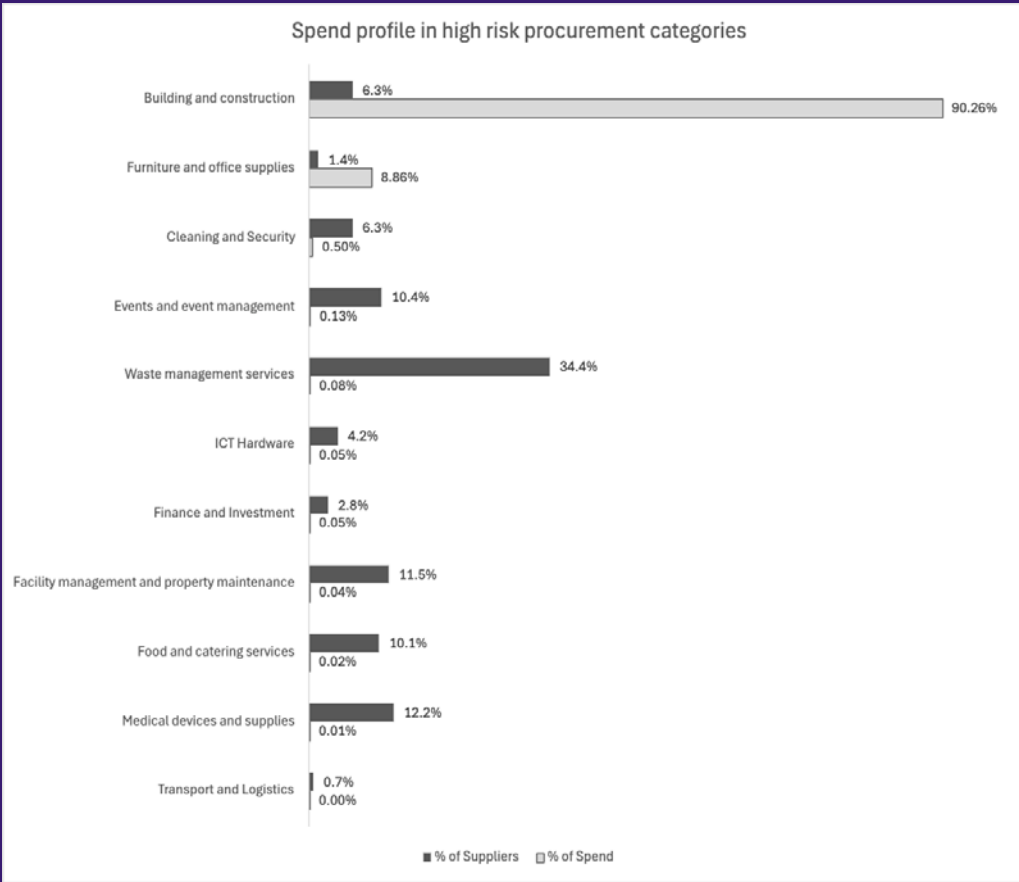


Figure 8: ACAN - DOBCEL Spend Profile in High Risk Procurement Categories



The high spend categories across DOBCEL fell into these categories:



Figure 9: DOBCEL Procurement Risk Level Categories



Figure 10: Sum of Debt by Risk



The graph below reflects the spend categories across DOBCEL in line with the ACAN Taxonomy:

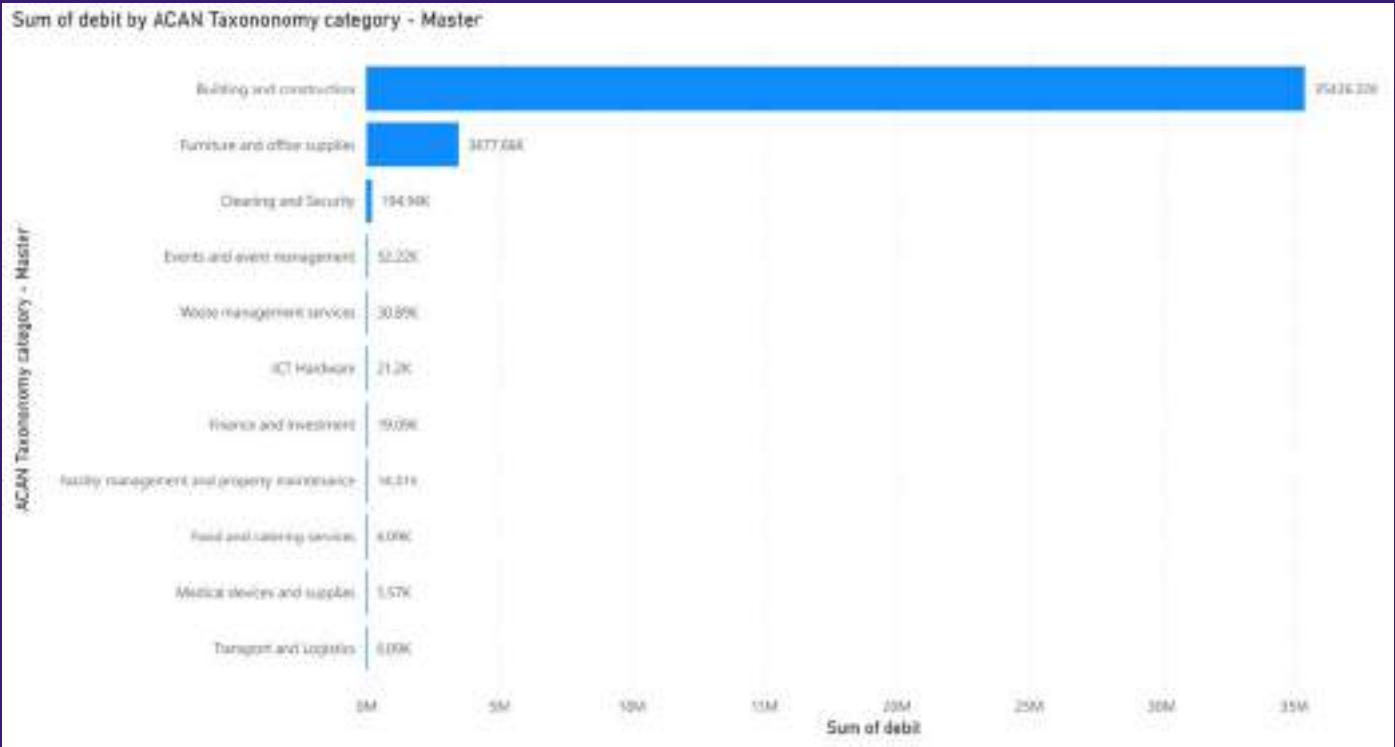


Figure 11: Sum of Debt by Risk Graph



# Operations and Supply Chain Risks

Through the ACAN Program, DOBCEL continues to focus on activities with labour suppliers and the associated operational risks in the following high-risk labour supply chain areas. The descriptions of these supply chains address Criteria 2 and highlight the common risk factors for modern slavery linked to its identified high-risk, high-spend procurement categories.



## Building and Construction

The construction projects are designed to create high-quality educational environments, which include general learning spaces, outdoor areas, and specialised instructional facilities. In 2024, DOBCEL schools undertook a significant number of capital building projects, which included refurbishments and upgrades funded by both state and federal government support. Many of these initiatives aimed to enhance learning environments, improve accessibility, and provide more modern facilities.

DOBCEL recognises that it is in the process of enhancing its ethical procurement practices within the construction sector, and it is dedicated to continuous improvement in this aspect. DOBCEL's objective is to consistently upgrade its practices to ensure they meet ethical standards and encourage responsible sourcing.

**Risks:** The construction sector is marked by a transient workforce and high employee turnover, leading to significant risks associated with modern slavery, such as:

- Pressure to reduce costs and adhere to tight timelines
- A significant presence of migrant workers
- Heavy dependence on agency and subcontracted labour
- Difficulties in monitoring intricate supply chains.



## Furniture and Office Supplies

DOBCEL is dedicated to providing its schools with the furniture and office supplies required to improve learning and working conditions, all while adhering to OHS standards. DOBCEL promotes inclusive educational spaces, where everyone can feel safe, participate actively, and thrive. DOBCEL schools are choosing to use high-quality furniture made in Australia whenever they can.

**Risks:** Modern slavery threats are present in the furniture and office services sectors due to intricate supply chains, subcontracting methods, and the procurement of raw materials from areas with high risk. These threats encompass forced labour, debt bondage, and child labour, especially in nations with lower standards and less stringent labour regulations.







## Fleet Management, Consumables and Maintenance

For CEB and schools, effective fleet management, including consumable and maintenance strategies, ensures efficient operations, minimises downtime, and extends the lifespan of vehicles, particularly school buses. This involves tracking vehicle performance, managing repairs, and maintaining detailed service records, contributing to increased safety, reliability, and reduced operational costs.

DOBCEL's fleet vehicles consist of those provided for the use of Office Staff and Principals. In addition, some of its small rural schools and Secondary colleges have their own buses.

**Risks:** Modern slavery risks in fleet management, consumables, and maintenance can arise from various sources within the supply chain, potentially including forced labour, human trafficking, and exploitative working conditions. Vulnerable populations, high-risk business models, high-risk categories and high-risk geographies can elevate these risks.



## Utilities

Utilities companies in Australia face modern slavery risks due to reliance on migrant workers, global supply chains, and the nature of their operations. These risks include forced labour, debt bondage, and human trafficking. Specific sectors like renewable energy and construction within the utilities sector are also vulnerable.

Each school enters into contracts on an independent basis, which necessitates careful monitoring to ensure that ethical labour standards are upheld.

**Risks:** The utilities sector faces significant risks of modern slavery, particularly in its supply chains and operations. These risks are exacerbated by factors like the increasing demand for renewable energy and the use of migrant workers in construction and infrastructure. The Modern slavery risks in utilities can often involve forced labour, child labour, and other exploitative practices in the sourcing of materials and production of parts offshore.





## Cleaning and Security

The cleaning and security industries generally hire temporary migrant workers through subcontracting agreements, which often result in a significant level of non-compliance with workplace rights and benefits. The tools and supplies utilised in these fields are mostly produced abroad, mainly in high-risk nations like China and Vietnam. Each school enters into contracts on an independent basis, which necessitates careful monitoring to ensure that ethical labour standards are upheld.

**Risks:** Cleaning and maintenance services are identified as high-risk industries, requiring focused efforts to protect the welfare of workers within this supply chain. There is a possibility of modern slavery risks in these types of jobs, as suppliers may sublet work to other individuals, which could elevate the risk of exploitation. Additional indicators of risk include atypically low pricing.



## Professional Services

In the education sector, professional services categories encompass a wide range of roles that support and enable teaching and learning, including administrative, support, and academic roles. Professional services across DOBCEL include a vast range of services, including speech pathologists, occupational therapists, IT staff, facility managers, instructional leadership, psychologists, behavioural specialists, counselors, nursing staff, educational experts and other services. Given that the majority of services offered throughout the diocese in DOBCEL schools and offices are professional in nature, the likelihood of modern slavery occurring in these areas is low, yet still may be present.

**Risks:** In the education sector, modern slavery risks are primarily linked to supply chains and international operations and student/staff engagement. While the sector itself is not inherently high-risk, modern slavery can occur in various areas, which may include, but are not limited to, international operations, supply chains, student employment and placements, staff engagement and research operations.





## Information and Communications Technology

The Information and Communications Technology (ICT) supply chain at DOBCEL covers the complete lifecycle of technology products and services for CEB and schools. It includes the procurement, distribution, installation, maintenance and disposal of hardware, software, and networking elements. DOBCEL's ICT supply chain guarantees effective digital classrooms, administrative systems, cybersecurity, and student interactions, necessitating collaboration among vendors, internal departments, and stakeholders to achieve the best educational and operational results.

**Risks:** Technology companies frequently source materials from areas where modern slavery risks are heightened, particularly in regions with insufficient law enforcement, large populations of migrant workers, and known cases of modern slavery. Some of these countries include China, India, Malaysia, Indonesia and Thailand, where there is evident vulnerability in their migrant labour populations and electronics manufacturing industries. This link is often determined by the financial investment in equipment. Furthermore, ecological hazards arise from the electronics sector's resource-heavy manufacturing methods, including the creation of electronic waste and the utilisation of conflict minerals. Tackling these issues necessitates the implementation of sustainable sourcing strategies.



## Waste Management

Modern slavery risks in the waste management sector include the potential for exploitation of vulnerable populations including migrants and low-skilled workers, particularly in roles such as waste collection and handling. The industry's reliance on subcontracting and temporary workers, coupled with low retention rates, creates opportunities for traffickers to move victims unnoticed by employers. Each school enters into waste management contracts on an independent basis, which necessitates careful monitoring to ensure that ethical labour standards are upheld.

**Risks:** The Waste Management industry is identified as high-risk industries, requiring focused efforts to protect the welfare of workers within this supply chain. Implementing robust risk management plans, including regular supplier assessments and transparency in supply chains, can help mitigate modern slavery risks in the waste management sector.



# Reporting Criteria 4

## Actions Taken to Assess and Address Modern Slavery Risks

### DOBCEL Modern Slavery Achievements in 2024

To begin its journey and mission to eradicate modern slavery, DOBCEL launched various initiatives in 2020, committing to eliminate modern slavery from its business operations. These efforts were further enhanced and integrated into the organisation in 2022 and 2023, achieving the milestones outlined below:

- Develop the position of 'Social Justice Education Officer', within the organisation, a position that will entail responsibility for embedding an understanding, and promote awareness, of the requirements of the Modern Slavery Act 2018 within the organisation
- Develop a Modern Slavery Policy
- Included Modern Slavery clauses in supplier contract templates
- Attendance at ACAN Webinars.

## Actions Taken to Assess and Address Modern Slavery Risks

DOBCEL is dedicated to improving its performance in tackling modern slavery risks within its operations and supply chain in response to the changing environment of modern slavery policy, which has been fuelled by the recent statutory review of the Act in 2023. In order to guarantee ethical procurement procedures, DOBCEL is promoting cooperation, knowledge-sharing, and getting ready for skill-building across the organisation with a renewed commitment.

In developing the Nexus Enterprise Management System, DOBCEL has enabled tools to address the collection and streamlining of entity and procurement data to be built into the program from 2025 onwards.

# Resources dedicated to addressing modern slavery

## Australian Catholic Anti-Slavery Network

As a member of ACAN, DOBCEL is part of a wider Catholic community that shares a strong belief and commitment to eradicating modern slavery. As a participating entity in ACAN, DOBCEL has access to world-class resources for the prevention and mitigation of modern slavery. By collaborating with Catholic entities across Australia from a variety of sectors through ACAN, DOBCEL is better equipped to take action on modern slavery.



DOBCEL attendance at ACAN webinars & Training:

- The MSLO attended ACAN Program Sessions: ACAN Sedex Audit Forum, at ACU Fitzroy Campus on Wednesday 21st February 2024
- The MSLO welcomed ACAN Program Managers Alison Rahill and Laura Giassetti to Ballarat for a day focused on networking and relationship development on Friday, February 23rd, 2024
- The MSLO attended the March, April, May, June, July and August online ACAN Modern Slavery Working Group Webinars
- The MSLO attended the online Sedex training on the Latest Sedex Platform Tools, Tuesday 28th May 2024
- The MSLO joined MSLO from DOSCEL for the National Education Sustainability Summit, Melbourne Convention and Exhibition Centre (MCEC), Friday 14th and Saturday 15th June 2024.



“The Lord has loved me so much:  
we must love everyone...  
we must be compassionate!”  
- Saint Josephine Bakhita

Figure 12: Image Title: St Josephine Bakhita ...  
Image Source: MARCIN MAZUR  
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License: [CC BY-NC-ND 2.0](https://creativecommons.org/licenses/by-nc-nd/2.0/)





DOBCEL has not completed Modern Slavery e-Learning, however Professional Development and Formation Development through the Laudato Si' Action Planning process carried out in 2024 has stimulated awareness of the character of modern slavery's reach into ordinary transactions and the concern for accountability into both professional and personal arenas.

The metrics in Figure 12 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 DOBCEL 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 56 suppliers. Of those suppliers, 15 suppliers were invited to join SEDEX and complete the SEDEX Self Assessment Questionnaire.

	ACTIVITY	2023 Diocese of Ballarat Catholic Education Limited	2024 Diocese of Ballarat Catholic Education Limited
INTERNAL / STAFF	Hours spent on modern slavery activities	160	80
	Individual staff completed e-learning	2	1
	E-learning modules completed	6	1
EXTERNAL / SUPPLIER ENGAGEMENT	Total number of suppliers	519	519
	Number of suppliers with visible contact information and ABN	94	53
	Number of suppliers across high-risk categories	17	117
	Number of ACAN Supplier Surveys completed		56
	Supplier staff attending capacity building webinars	2	10
	Invited to join Sedex	**	15
	Joined Sedex	**	20
	Sedex SAQ completed	**	9
	Social audits	**	
	Corrective actions	**	0
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0	0
	Referrals for advice and assistance	0	0
	Individuals identified or referred for modern slavery assessment	0	0
	Individuals with modern slavery cases remediated	0	0

Figure 13: DOBCEL's Engagement Data 2024

In 2024, the following actions have been undertaken by DOBCEL:

- Commenced assessment of supplier spend and associated risks
- Published a Modern Slavery Statement.

For the 2024 reporting, DOBCEL 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.

**“We want every student to have the opportunity to flourish fully in their learning in schools that are caring, committed to excellence, and live out the Catholic faith, in partnership with families.”**

**- Tom Sexton, Catholic Education Week Dinner 2024**



# Sedex

The ACAN Program has empowered DOBCEL by providing membership to Sedex, the Supplier Ethical Data Exchange. Sedex is a respected global not-for-profit organisation that aids businesses in enhancing



their social and environmental performance across supply chains. By leveraging Sedex's platform, companies can share crucial information and collaborate effectively with suppliers and buyers, fostering a strong commitment to ethical and sustainable practices throughout their supply chains. Joining Sedex displays DOBCEL's dedication to responsible sourcing and improving industry standards.

As a member of Sedex, DOBCEL is opening valuable opportunities to manage supply chain risks, enhance supplier engagement, and elevate ethical and sustainable business practices. With Sedex, DOBCEL gains access to a powerful platform that promotes collaboration, transparency, and relentless improvement across its supply chains. This commitment not only drives superior outcomes but also paves the way for a more sustainable future, benefiting all stakeholders involved.

The ACAN Program assisted suppliers in onboarding to Sedex and participating in assessment surveys, questionnaires, e-Learning modules, and webinars.

DOBCEL intends to further utilise Sedex in 2025 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.



Figure 14: DOBCEL's ACAN & Sedex Activities for 2024

# Remediation

Action against modern slavery is fundamental to Catholic social teaching. DOBCEL is committed to work with CEB and all of its school communities to rid the world of this affront to human dignity and human freedom. Therefore DOBCEL is fully committed to working collaboratively with its suppliers to tackle issues, implement effective remedies, and establish preventive measures. DOBCEL aligns its efforts with UN Guiding Principle 31, which emphasises the importance of providing effective and timely grievance mechanisms for affected stakeholders, including workers within its supply chains.

DOBCEL is committed to taking actions to address harm to individuals and reduce future risks if DOBCEL is found to have caused or contributed to modern slavery.

DOBCEL has previously relied on the Employee Grievances Policy, Whistleblower Protection Policy, the School Complaints Handling Policy, and the Whistleblower Policy for remediation. However, to create a more accessible and anonymous way for individuals to communicate their concerns, specialist resources are required to ensure the best outcomes for people affected by modern slavery. Hence, in 2024 DOBCEL has transitioned to using DOMUS 8.7 as its primary mechanism for handling concerns regarding modern slavery. DOMUS 8.7 offers easier access and quicker responses than our internal policies can provide.

DOMUS 8.7 is a service dedicated to addressing modern slavery through advice, remediation, and prevention, inspired by Pope Francis's call for ending all forms of modern slavery. It's a reference to the Latin word "domus" meaning "home" and the United Nations Sustainable Development Goal Target 8.7, which aims to end forced labour, modern slavery, human trafficking, and child labour by 2030.

DOMUS 8.7 is hosted on the ACAN website and provides a reliable channel for workers, suppliers, and other stakeholders to report concerns related to modern slavery. This service ensures that individuals seeking assistance can easily access it while maintaining their anonymity. When a concern is reported, an assessment and case file are promptly created, and appropriate workflows are implemented based on the severity of the situation. Immediate danger situations are prioritised, but all concerns are addressed based on their specific needs.

Individuals and businesses who identify or suspect modern slavery are encouraged to utilise the DOMUS 8.7 service to report their concerns.





In 2024, DOBCEL did not receive any reports of modern slavery through its internal grievance mechanisms. The table below shows that DOMUS 8.7 received no referrals concerning workers in DOBCEL’s operations and supply chains during the 2024 reporting period. It is important to note that the absence of reports does not mean that modern slavery does not exist in DOBCEL’s operations or supply chains.

2024	Activity	DOBCEL
DOMUS 8.7 External Referrals	Contacts made via worker voice/grievance mechanisms	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Figure 15: DOBCEL’s Referrals to DOMUS 8.7 data

“we are being given the means to walk our talk about human dignity in our agencies day to day... We must be intentional about this, not regarding anti-slavery as a tick-a-box exercise in minimalist compliance but as a defining commitment without which we could not in conscience engage in our many activities; not as something only to trouble the business manager or mission officer, but as everyone’s concern.”  
- Archbishop Fisher, OP, Archbishop of Sydney





# DOBCEL's Plans for 2025

To strengthen its mitigation practices going forward the following initiatives are in development for 2025:

1. Develop and roll out an organisational Modern Slavery Action Plan
2. Plan for Modern Slavery awareness training to be included in DOBCEL training cycle through the SALT e-Learning platform, its organisational development compliance practices
3. Develop a Modern Slavery Working Group, responsible for:
  - Ensuring DOBCEL's compliance with the Modern Slavery Act 2018 through leadership and best practice
  - Fostering open and constructive discussion on modern slavery as DOBCEL's peak stakeholder engagement body on modern slavery
  - Sharing knowledge, expertise, and experience in relation to modern slavery risks
  - Providing input and advice to DOBCEL stakeholders on issues related to modern slavery.
4. Finalise the terms of reference for the DOBCEL Modern Slavery Working Group
5. Enhance the collection of data and tracking of high risk suppliers through its procurement operations.

The aspirational objective of DOBCEL is to recognise and eradicate all risks associated with modern slavery from our supply chain, business partnerships, and operations.



# Reporting Criteria 5

## Assessing the Effectiveness of Actions Taken By DOBCEL

### Measuring Effectiveness

DOBCEL has completed the ACAN 2024 Entity Profile as part of ACAN's Modern Slavery Maturity Assessment procedure. With an overall score of 38%, DOBCEL falls short of the expected 75% by the end of the fourth reporting year. However, there has been growth across the six pillars, with the most significant improvement of 23% in Pillar 1, Business Process and Governance.

The assessment identifies specific areas that need further development and provides resources for progressing into 2025 and beyond. The following figure, figure 11, presents a clear overview of DOBCEL's current maturity level in managing modern slavery risk. The data shows that DOBCEL has experienced slight overall growth; however, it has recognised Pillar 2: Operations, Pillar 3: Supply Chain, and Pillar 4: Worker Engagement as key areas that require immediate attention within the organisation.

#### Diocese of Ballarat Catholic Education Limited - Overview



Figure 16: ACAN - DOBCEL's Overview

#### Diocese of Ballarat Catholic Education Limited - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business Process and Governance	63%	80%	60%	30%	58%	↑ 23%
2. Operations	41%	38%	31%	22%	33%	↑ 8%
3. Supply Chain	8%	80%	16%	12%	29%	0%
4. Worker Engagement	9%	20%	34%	29%	23%	↑ 2%
5. Entity's program and activities	75%	10%	50%	28%	41%	↑ 9%
6. Grievance Mechanisms and Remediation	80%	30%	50%	25%	46%	↑ 6%
Average	46%	43%	40%	24%	38%	
	↑ 15%	↑ 9%	↑ 6%	↑ 1%	↑ 7%	

Maturity Score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score

Figure 17: ACAN - DOBCEL's 2024 Analysis by Pillar

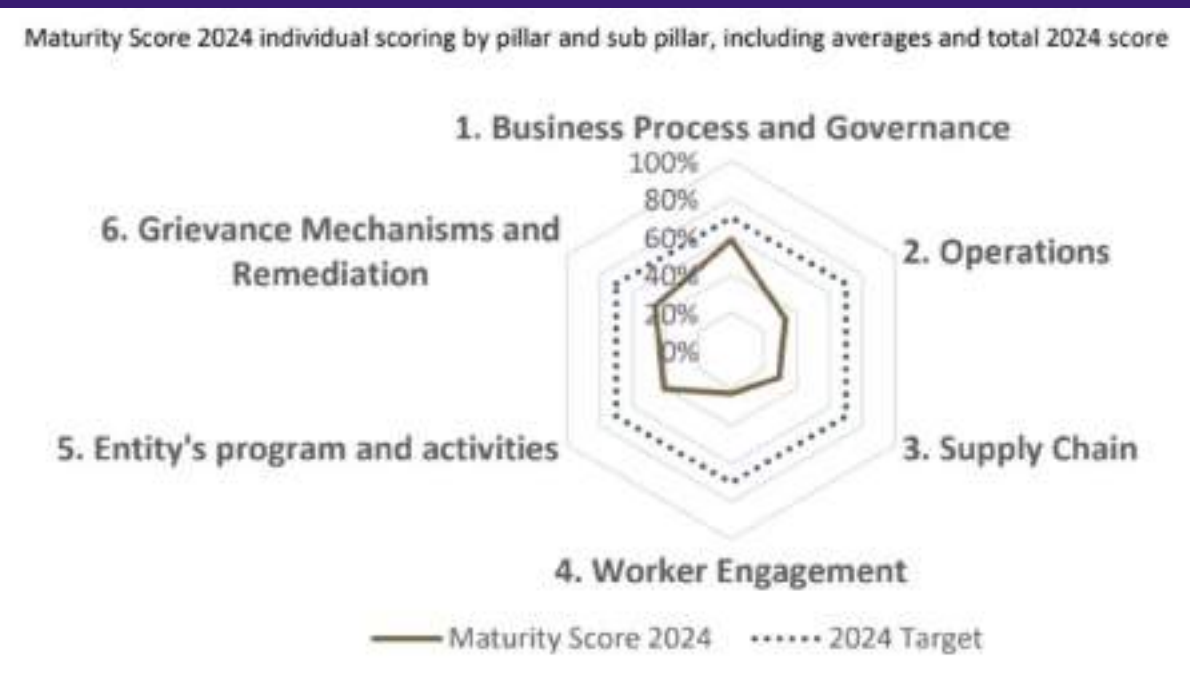


Figure 18: ACAN - DOBCEL's Maturity Score 2024

The table below demonstrates DOBCEL's Maturity Score for the 2024 reporting year. It compares DOBCEL's performance against its 2023 achievements by sub-pillar with sub-pillar description.



Figure 19: Maturity Score 2024: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description.



# DOBCEL's Action Plans

DOBCEL aims to achieve exemplary human rights due diligence for the ethical and sustainable sourcing of products and services for both within the CEB Offices and the schools it manages. It strives to answer the late Pope Francis' call for us to 'Care for Our Common Home' by intentionally living the Laudato Si' Goals, in particular 'Response to the Cry of the Earth', 'Response to the Cry of the Poor', 'Ecological Economics', 'Ecological Education' and 'Adoption of Sustainable Lifestyles'.

As DOBCEL school and CEB staff immerse in formation and professional development focused on Laudato Si', DOBCEL aims to cultivate a deeper awareness of the interconnectedness of all life. It recognises that its consumption choices have significant impacts, and it is committed to addressing these issues as a matter of justice. By thoughtfully selecting purchasing and labour hiring practices, DOBCEL aspires to turn its actions into moral choices that reflect its Catholic identity. Through its daily decisions and consumer behaviours, DOBCEL seeks to exemplify this identity in meaningful ways.

Moving forward, DOBCEL is dedicated to investing in resource allocation and capacity development. It will focus on raising awareness, establishing internal working groups, revising policies, and further strengthening its collaboration with ACAN. DOBCEL hopes these initiatives will expand the scope of its due diligence efforts and introduce new procedures.

“I ask you to ensure that humanity is served by wealth and not ruled by it.”

- Pope Francis, Message to the World Economic Forum Annual Meeting 2014



DOBCEL has identified the following activities for its modern slavery risk management approach in 2025:

## DOBCEL Modern Slavery Actions 2025

Action	Timeframe	Status
<b>Management Systems</b>		
<ul style="list-style-type: none"> <li>Establish a DOBCEL Modern Slavery Working Party including representation from: <ul style="list-style-type: none"> <li>Business Services: School Finance; IT &amp; Cyber Security</li> <li>Stewardship: Assurance &amp; Risk; Improvement &amp; Compliance, Policy &amp; Governance</li> <li>Stewardship: Planning &amp; Infrastructure; Property &amp; Facilities Advisor, Capital Delivery Advisor</li> <li>People &amp; Development: Human Resources; HR Advisor</li> <li>People &amp; Development: Organisation Development; Talent Acquisition Partner.</li> </ul> </li> </ul>	2025	In Progress
<ul style="list-style-type: none"> <li>Develop and implement a DOBCEL Modern Slavery Action Plan</li> </ul>	2025-26	In Progress
<ul style="list-style-type: none"> <li>Finalise the Terms of Reference of the DOBCEL Modern Slavery Working Group</li> </ul>	2025	In Progress
<ul style="list-style-type: none"> <li>Introduction of the DOBCEL Modern Slavery Working Group to SEDEX</li> </ul>	2025-26	In Progress
<ul style="list-style-type: none"> <li>Review DOBCEL Purchasing Policy to develop multifaceted analysis that includes triple bottom line reporting in the areas of finance, human resources and sustainability</li> </ul>	2025-26	In Progress
<ul style="list-style-type: none"> <li>Review DOBCEL Fundraising Policy for alignment with Modern Slavery Legislation</li> </ul>	2025-26	In Progress
<b>Risk Management</b>		
<ul style="list-style-type: none"> <li>Continue working with partners to update the risk management framework and define how to measure and understand risk in operations and supply chains.</li> </ul>	2024	Ongoing
<b>Procurement and Supply Chains</b>		
<ul style="list-style-type: none"> <li>Invite high risk suppliers to complete the ACAN supplier survey</li> </ul>	2025-26	Ongoing
<ul style="list-style-type: none"> <li>Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.</li> </ul>	2025-26	Ongoing
<ul style="list-style-type: none"> <li>Development of a contract clause for suppliers and as part of prospective new tender process</li> </ul>	2024-25	In Progress
<b>Human Resources and Recruiting</b>		
<ul style="list-style-type: none"> <li>Recommendation that DOBCEL employees, where appropriate, complete relevant SALT Modules: <ul style="list-style-type: none"> <li>MS:101 'Introduction to Modern Slavery</li> <li>Business Relevance: 'Why Businesses Must Act'</li> <li>Grievance Mechanisms &amp; Remedy</li> <li>Modern Slavery Risk &amp; Management for Suppliers</li> </ul> </li> </ul>	2025-26	In Progress



# Reporting Criteria 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 57 DOBCEL governed schools.

DOBCEL anticipates that its consultation processes will continue to evolve and improve in future reporting periods, as will its daily operations as it enhances its understanding of modern slavery and implements effective processes.

In preparing this statement, DOBCEL consulted with various subsidiaries within the organisation, including the Catholic Identity and Mission, Business Finance, Assurance and Risk, and People and Development Teams.



# Reporting Criteria 7

## Other

“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 of Luke 4:14–21.

Vatican II reminds people 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 the 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 is diverse. It is based on providing witness to Jesus Christ and the gospels in ways that engage and influence 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
- A Social Justice Education Officer.

The CI&M Team brings to life the 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 of CI&M in all school communities
- To educate and empower all members of the DOBCEL community to connect with the Catholic Story and Vision in its call to bring Fullness of Life for All.

Catholic social teaching is at the heart of the work of the Catholic Identity and Mission Team.

This work 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 the 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 Catholic Mission, 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' Action Planning 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 the DOBCEL 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 school communities and the Catholic Education Office
- 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 Catholic Mission, Caritas, Catholic EarthCare Australia, Ballarat EarthCare Group, ResourceSmart Schools etc.

- DOBCEL promotes ethical Easter egg campaigns through its schools, parishes and communities in the lead up to Easter
- DOBCEL actively promotes the Australian Catholic Bishops Social Justice Statement each year around Social Justice Sunday. In 2024 DOBCEL proudly supported the launch of The Australian Catholic Bishops Social Justice Statement 2024-2025, 'Truth & Peace, A Gospel Word in a Violent World' through a reflection day opened to all across the diocese.

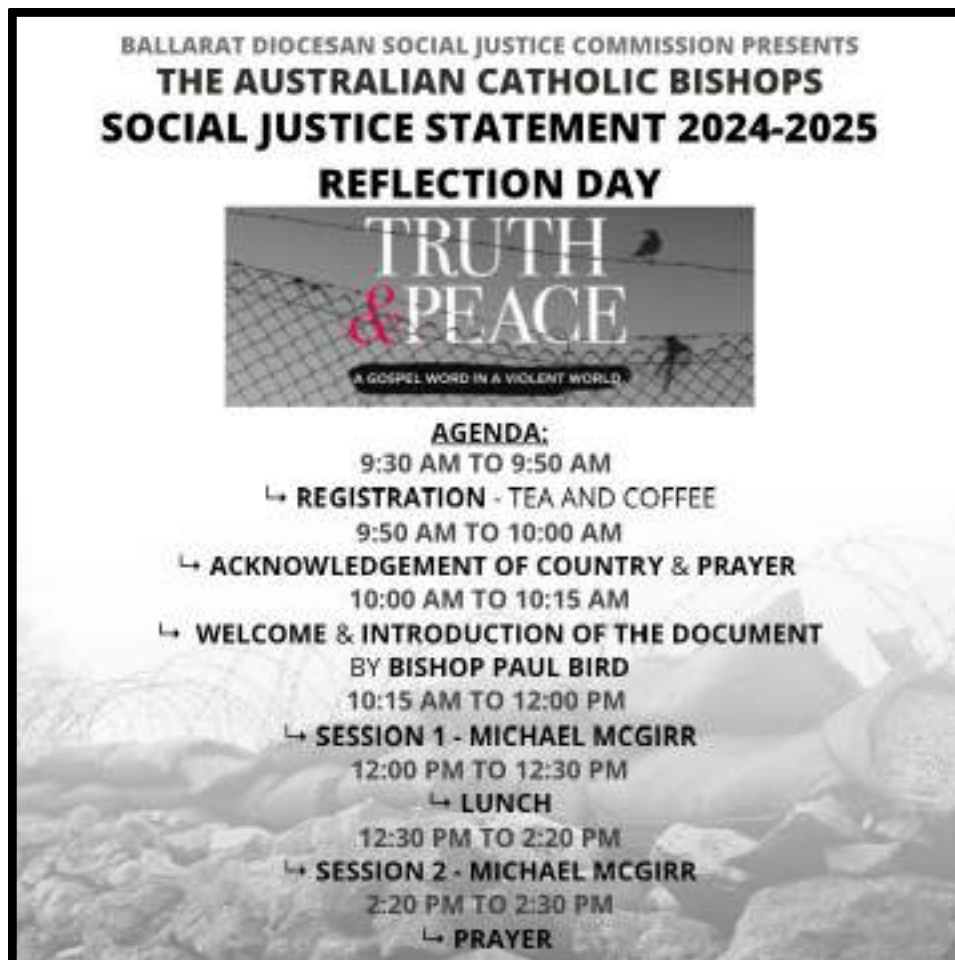


Figure 20: The Australian Catholic Bishops Social Justice Statement 2024-2025, 'Truth & Peace, A Gospel Word in a Violent World' Launch Event



# Appendix 1: Entities Owned and Operated by DOBCEL

## DOBCEL Governed School List 2024

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 Malachy's Primary School**, Edenhope
24. **St Patrick's Primary School**, Gordon
25. **St Mary's Primary School**, Hamilton
26. **St Joseph's Primary School**, Hopetoun
27. **St's Michael and John's Primary School**, Horsham
28. **St Brigid's College**, Horsham
29. **St Patrick's Primary School**, Koroit
30. **Siena Catholic Primary School**, Lucas
31. **St Augustine's Primary School**, Maryborough
32. **Our Lady of the Sacred Heart Primary School**, Merbein
33. **Sacred Heart Primary School**, Mildura
34. **St Paul's Primary School**, Mildura
35. **St Coleman's Primary School**, Mortlake
36. **Damascus College**, Mount Clear
37. **Emmaus Catholic Primary School**, Mount Clear
38. **Our lady Help of Christian's Primary School**, Murtoa
39. **St Patrick's Primary School**, Nhill
40. **St Joseph's Primary School**, Penshurst
41. **St Patrick's Primary School**, Port Fairy
42. **All Saints Primary School**, Portland
43. **St Joseph's Primary School**, Red Cliffs
44. **St Aloysius Primary School**, Redan
45. **St Mary's School**, Robinvale
46. **St Mary's Primary School**, Sea Lake
47. **St James' Primary School**, Sebastopol
48. **St Patrick's Primary School**, St Arnaud
49. **St Patrick's Primary School**, Stowell
50. **St Mary MacKillop College**, Swan Hill
51. **St Mary's Primary School**, Swan Hill
52. **St Thomas' Primary School**, Terang
53. **St Mary's Primary School**, Warracknabeal
54. **St Joseph's Primary School**, Warrnambool
55. **Our Lady Help of Christian's Primary**, Warrnambool East
56. **St Pius X Primary School**, Warrnambool West
57. **Our Lady Help of Christian's Primary School**, Wendouree



DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



# Modern Slavery Statement 2024

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# Diocese of Sale Catholic Education Limited

## Modern Slavery Statement 2024

## 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 fifth Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing and addressing modern slavery risks during the 2024 Calendar Year Reporting Period, from 1 January 2024 to 31 December 2024.

## 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  
13 June 2025



Cathy Jenkins  
Board Deputy Chair  
Diocese of Sale Catholic Education Limited

## Entity Details

The Diocese of Sale Catholic Education Limited  
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ABN 91 621 266 993  
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Dear Sisters and Brothers in Christ,

In this 2024 modern slavery reporting period, I have contemplated the scourge of modern slavery, prayerfully considering the challenges Pope Francis offered to the world to ensure we can work together to eradicate slavery in all forms and orient ourselves to a just and peaceful society where all can flourish.

In a meeting with survivors of modern slavery in Rome in November 2023, Pope Francis called on all leaders to take action to end modern slavery. This call of Francis must drive our work here in the Diocese of Sale, where, in every sphere of Diocesan life, we remain vigilant to ensure our practices are not enabling slavery of any form to occur.

*“The historical effects of slavery are still felt today, with millions of people suffering around the world. Faith and spiritual leaders, along with individuals, must keep fighting the structures creating modern slavery.”* (Francis, 2023)

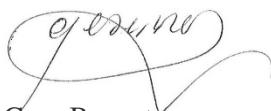
Today, human trafficking is estimated to be a \$150 billion industry that profits off an estimated 49.6 million victims worldwide. On the 10th International Day of Prayer and Awareness against human trafficking established by Francis to coincide with the February 8 Feast Day of St Josephine Bakhita, the patron saint of human trafficking victims, Francis exhorted each of us to ‘... *help one another to be more responsive, to open our lives and hearts to our sisters and brothers who even now are being bought and sold as slaves. It is never too late to take action.*’

In the construction and opening of our most recent school, St Josephine Bakhita Catholic Primary School, all our processes were designed to exemplify a rejection of modern slavery and trafficking. This was in direct response to the Pope’s call to ‘... *pray fervently and work proactively for this cause, the defence of human dignity, whether by prayer and action as individuals and families, or as parish and religious communities, as ecclesial associations and movements, and also in the various spheres of social and political life.*’ (Francis, 8/2/24)

In our ongoing commitment to reject modern slavery and human trafficking in all our endeavours, we continue to examine all our actions through the lens awareness – awareness of the factors that can give rise to human trafficking and slavery, including wars, conflicts, famine and climate change, and ways we can address these factors through our explicit actions. Here, Francis reminded us that is ‘... *only by lifting our eyes to Christ, our hope, that we can find the strength for a renewed commitment.*’ (Francis, 8/2/25)

Together, we can work to ensure that the conditions for trafficking and exploitation are eliminated and that the respect for fundamental human rights prevails, not just in the Diocese of Sale, but across the world.

Yours 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 is 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 fifth Modern Slavery Statement and illustrates our progress towards identifying, assessing, and addressing modern slavery risks during the 2024 Calendar Year Reporting Period, from 1 January 2024 to 31 December 2024.

### 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 fulfilled the Strategic Plan 2020-2024, *"Inspiring Faith, Inspiring Learning."* This Strategic Plan outlined our key priorities and direction and guided our efforts to provide high-quality education that nurtured both faith and academic excellence over the past five years.

We are excited to announce the opening of St Josephine Bakhita Catholic 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. Officially opened in February 2025, St Josephine Bakhita Catholic Primary School now serves as a beacon of faith and learning, shaping the lives of current students and generations to come. Additionally, by naming the school after the patron Saint dedicated to modern slavery victims, we strive to raise awareness and inspire action against modern slavery within our community.

Gratitude is extended to the Victorian and Commonwealth Governments for their ongoing 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 2024 with nine official Blessing and Opening Ceremonies to celebrate completed school projects. 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 39 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 2024, DOSCEL's annual consolidated revenue reached \$426.24 million, with employee-related expenses totalling \$267.28 million. During this period, DOSCEL schools educated 10,706 primary school students and 7,553 secondary students. Additionally, DOSCEL employed a workforce comprising 2,901 school staff and 110 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.

● Primary Schools    ● Secondary Schools    ● Doscel Secretariat



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.

In 2024, the DOSCEL Secretariat Senior Management Team consisted of:

- Chief Executive Officer / Director of Catholic Education
- Chief Operations Officer, Deputy Director – Catholic Identity, Leadership, Learning and Teaching
- Chief Financial Officer
- Chief Compliance Officer, Executive Manager – Industrial Relations/Human Resources (vacant from July 2024)
- General Manager – Learning and Teaching
- General Manager – Infrastructure and Support Services
- General Manager – Information and Technology
- Senior Manager – Catholic Identity and Religious Education.



In 2024, the DOSCEL Board, including the Chair and Deputy Chair, was comprised of eight Directors. The Board oversees corporate governance, regulatory compliance, Church law and risk management, and sets the strategic direction. A Directors' Code of Conduct is in place.

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.

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

Victorian Catholic Education Authority Ltd ('**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.

VCEA, as the VRQA appointed review body for Catholic schools in Victoria, is responsible for assuring the compliance of proprietors and their schools with the minimum standards for school registration. In line with this responsibility, VCEA undertook a governance and not-for-profit minimum standards for school registration review of DOSCEL in 2024.

Figure 2 illustrates the DOSCEL organisational structure in 2024.

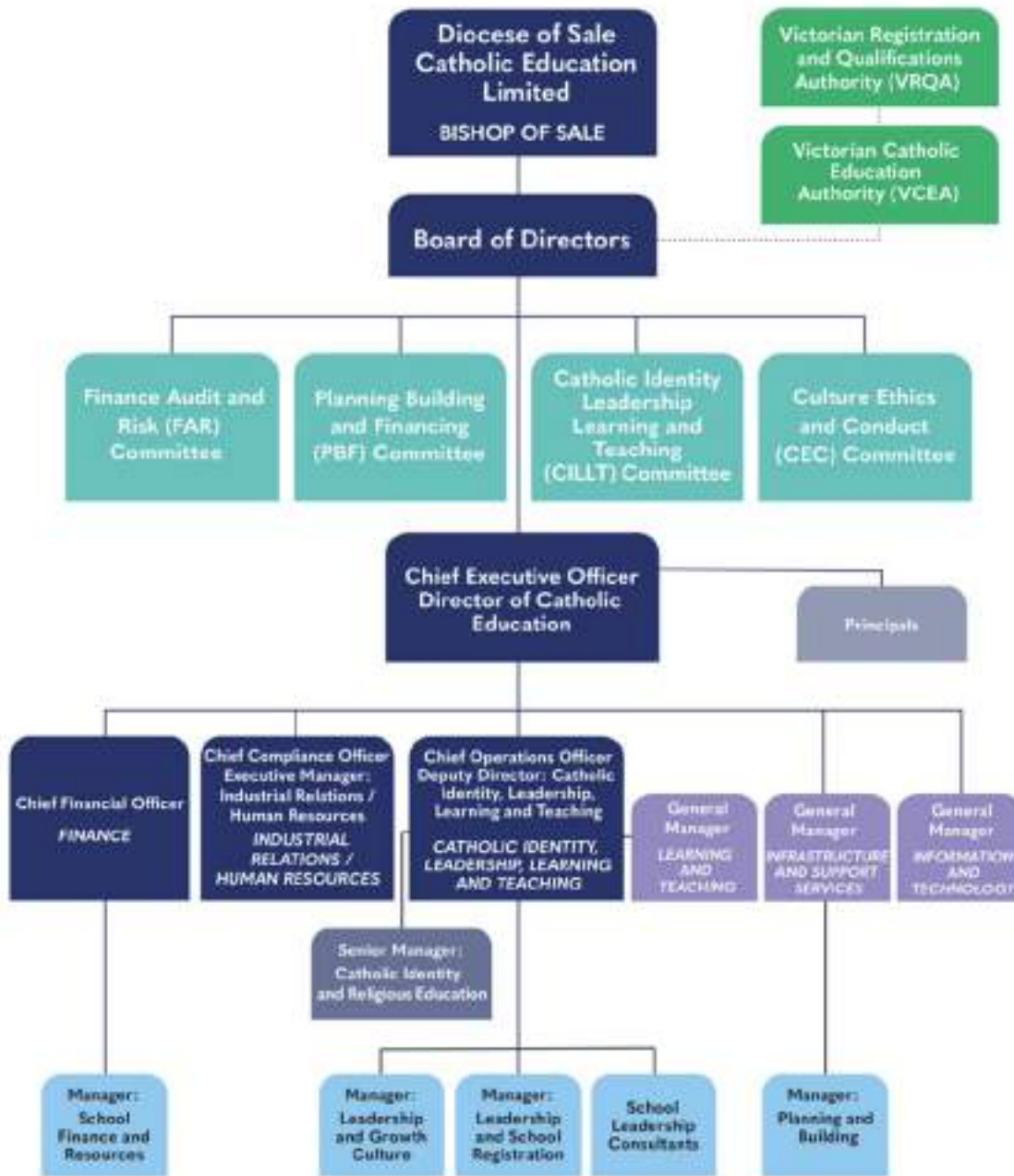


Figure 2: 2024 DOSCEL Organisational Structure

## Our modern slavery governance framework

In September 2023, DOSCEL joined the Australian Catholic Anti-Slavery Network ('**ACAN**') and completed orientation. Over the course of 2024, DOSCEL engaged with ACAN collaboratively to develop a productive working relationship. For the second 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 was established at DOSCEL, a dedicated Strategic Sourcing Adviser ('**SSA**') who served as the Modern Slavery Liaison Officer ('**MSLO**') with ACAN. The MSLO worked 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. Unfortunately, the role of SSA became vacant in August 2024 and was not filled for the remainder of the year.

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.

## Our supply chain

In 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 have been aligned with the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labor Organization definitions of modern slavery.

During the 2024 calendar year, DOSCEL spent approximately \$132.0 million with external suppliers. Our top 50 spend equated to approximately \$77.7 million and comprised 58.9% of our total spend to external suppliers. Our largest procurement categories remain somewhat consistent with 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). With significant capital projects, including the construction of St Josephine Bakhita Catholic Primary School, Finance and Investment, Furniture and Office Supplies and Cleaning and Security also featured in the top procurement categories.

Looking more closely at our top 50 suppliers by spend, approximately 80% have operations solely based in Australia, with the remaining 20% having operations in one or more countries including New Zealand, United Kingdom, South Africa, China, and the Philippines. All of our top 50 suppliers hold an Australian Business Number (ABN).

An internal audit of supplier data for the 2024 calendar year indicated that DOSCEL had 6,789 suppliers for the period, ranging from one-off purchases to longer-term contracts. This is consistent with our estimate of 7,000 suppliers in 2023.

We acknowledge the trend towards sustainable procurement involving supply chain consolidation. DOSCEL is currently in the early 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. Throughout 2024, DOSCEL participated in the VCEA Digital Re-imagination initiative aimed at shaping the digital future of Catholic Education in Victoria. DOSCEL is committed to the strategic priority of establishing enterprise systems which has transformative implications for procurement among other capability areas.

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

As a primary and secondary education provider, DOSCEL has no risk of modern slavery occurring within its directly employed workforce. Employment is overseen by DOSCEL's Industrial Relations / Human Resources Department, ensuring all staff are engaged through fair, transparent, and ethical practices. The vast majority of employees are engaged under the *DOSCEL Schools and Secretariat Agreement 2022*.

DOSCEL takes a proactive stance on identifying and mitigating modern slavery risks, particularly among suppliers in labour-intensive sectors such as school cleaning, facilities management and construction. These industries often employ individuals who may be more vulnerable to exploitation, including migrants, temporary visa holders, international students, and undocumented workers. Subcontracting arrangements in these sectors can sometimes result in noncompliance with workplace rights and entitlements.

To strengthen protections against modern slavery, DOSCEL requires all labour suppliers to hold a valid labour hire license, ensuring they comply with industry regulations and ethical employment standards. This requirement forms part of DOSCEL's broader commitment to responsible supplier management and upholding fair workplace practices.

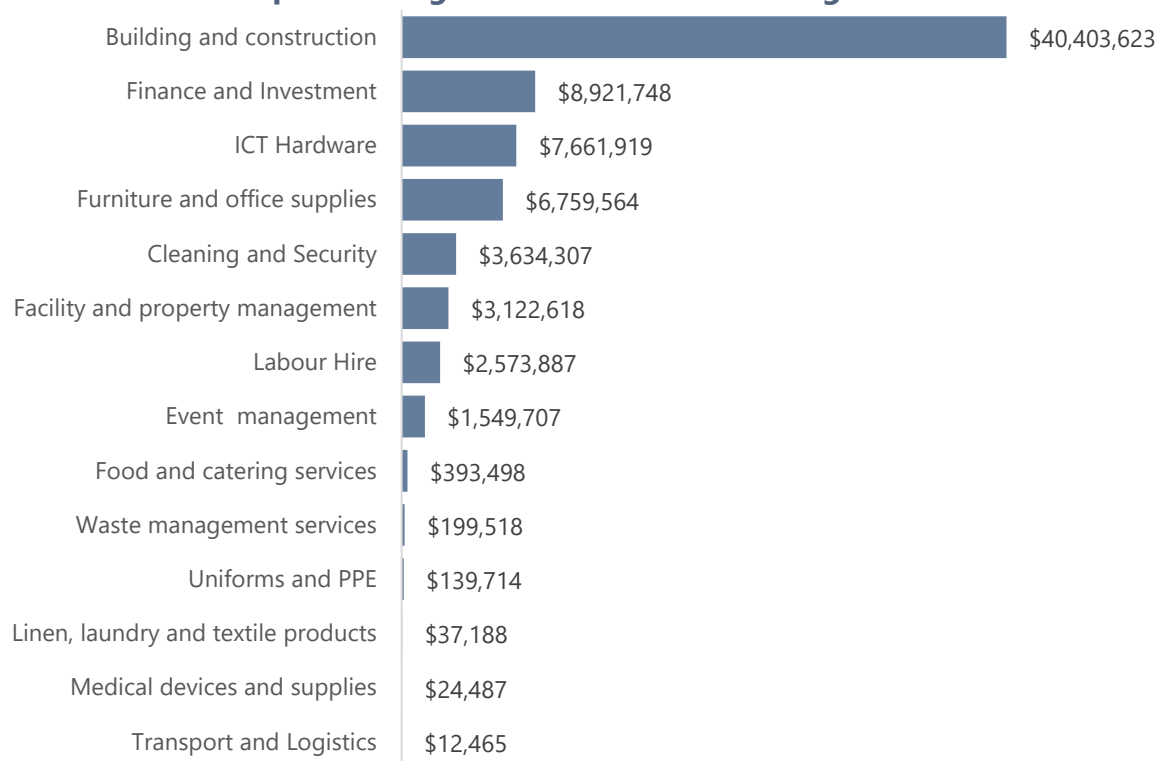
To effectively identify high-risk suppliers, DOSCEL has utilised the ACAN risk taxonomy, categorising each supplier accordingly. This approach enables comprehensive spend analysis by sector, providing insight into where funds are allocated, and which suppliers are involved.

During the 2024 reporting period, DOSCEL engaged with 6,789 third-party suppliers for goods and services, with total expenditure reaching \$132.0 million. This figure does not include payroll-related payments and intra-company transactions.

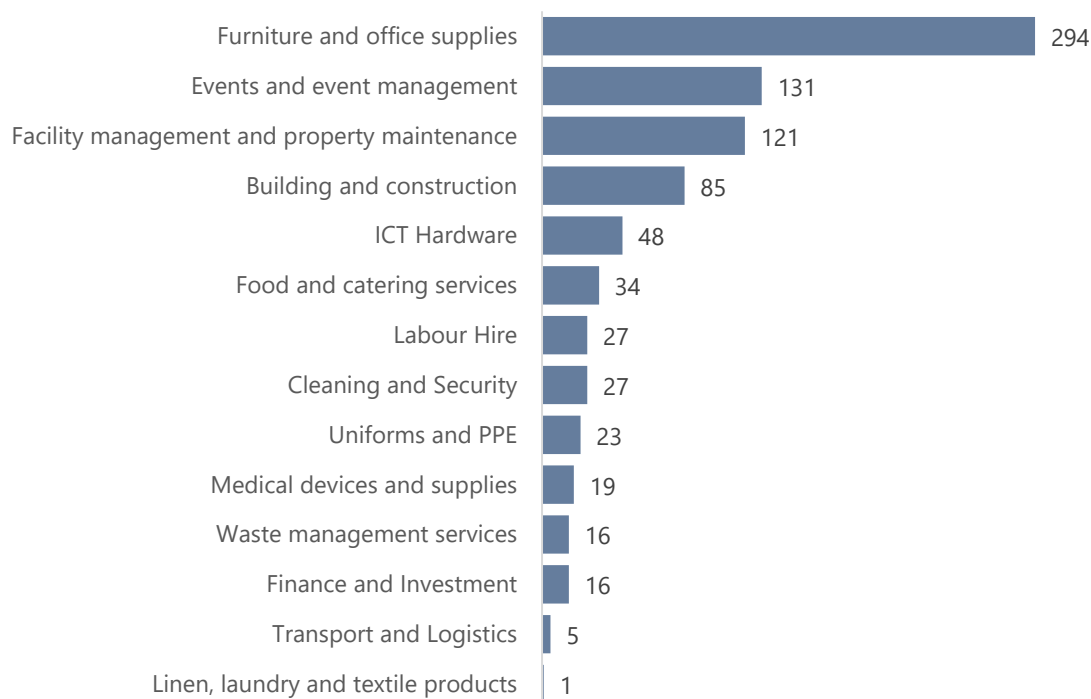
Consistent with previous years, the analysis highlights that a significant portion of DOSCEL's spending is directed toward industries traditionally associated with heightened modern slavery risks. These sectors include building and construction, ICT hardware, furniture and office supplies, cleaning and security. Many of the equipment and consumables used in these industries are manufactured overseas, often in high-risk regions such as China and Vietnam, where labour exploitation is more prevalent.

DOSCEL remains committed to monitoring and mitigating these risks through responsible procurement practices and supplier oversight.

### Spend in High-Risk Procurement Categories



### Number of Suppliers in High-Risk Procurement Categories



*In the above graphs DOSCEL's spend and number of suppliers in high risk categories, as determined by the ACAN risk taxonomy, are shown.*



## 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.

Seeking proactive insights into anticipated changes in reporting criteria, DOSCEL participated in key events such as 'The National Education Summit' program focussed on Sustainability in Schools. This engagement provided valuable insights and best practices, positioning us to confidently navigate the demands of modern slavery reporting, with a focus on sustainable products and services.

Moreover, DOSCEL contributed to Royal Melbourne Institute of Technology (RMIT) University Business and Human Rights Institute and Behavioural Business Lab study on optimising remediation of slavery in supply chains. The purpose of this research was to test what solutions might help to improve remediation of modern slavery incidents, driven by the central concern that victim-survivors of modern slavery in supply chains are not adequately considered or involved when businesses and organisations respond to modern slavery reports and incidents.

DOSCEL also joined the Caritas Australia Earthcare Community which aims to assist Catholic organisations to plan and take action to live *Laudato Si'*, guiding us to prioritise values over profit margins.

DOSCEL's flagship modern slavery project in 2024 was the planning, construction and procurement for St Josephine Bakhita Primary School in Clyde North, named after the patron Saint of modern slavery victims. DOSCEL aspired to exemplary modern slavery practice in all aspects of this project.

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 on how we can best address this concern in our supply chain.

In the following section, we outline the initiatives accomplished during the 2024 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 was better positioned in 2024 to take action, as it contributes to and leverages collective purchasing spend and has a more coordinated response.

### **Strategic Sourcing Adviser (SSA)**

DOSCEL significantly improved its internal resources and capabilities by appointing a SSA in 2023. In 2024, this role was dedicated to ensuring modern slavery compliance, reporting, and our commitment to ethical sourcing practices. Furthermore, it encompassed 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, DOSCEL aimed to not only provide quality education but also to inspire our community to actively participate in efforts against modern slavery.

Construction of the school commenced in 2023 and continued throughout 2024 in readiness for opening in February 2025. The Principal who commenced in July 2024, liaised with the SSA to develop a deep understanding of modern slavery. The Principal actively engages with the local school and parish community to foster a sense of social responsibility, empathy, and commitment to justice. The school's motto of "*Courage Humility Forgiveness*" is reflective of this commitment.

### **School uniforms**

DOSCEL actively worked 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.

As part of our ongoing commitment to ethical sourcing, DOSCEL embedded a 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.

### **Awareness training**

As an ACAN participating entity, DOSCEL has access to comprehensive resources for modern slavery risk prevention, including flexible training modules. During 2024, an invitation to participate in awareness training was extended to all school principals, leadership staff, business managers and administration officers.

### **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.

<b>EOI supplier tender process includes DOSCEL modern slavery questionnaire</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Building and Construction	√	√	√	√
Information and Communications Technology	√	√	√	√
Financial Services	-	-	√	√

## Contracts

Modern slavery clauses are included in 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 statements and will remain an important feature of our modern slavery prevention strategy.

<b>Contractual Controls – Modern Slavery Contract Clauses</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Building and Construction	√	√	√	√
Cleaning Services	√	√	√	√

## Vetting potential suppliers

For high risk spend categories, DOSCEL continues to supplement 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 previous years.

## 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, especially with departments associated with procurement in high-risk

categories of Building and Construction, and Information and Technology industries and more recently Financial Services.

The annual desktop review has been completed over five 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 2024 to 31 December 2024 are 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.

DOSCEL refers to 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.

Below is a table indicating that no referrals to Domus 8.7 were made regarding workers in our operations and supply chain during 2024, consistent with the previous 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.

	ACTIVITY	2023	2024
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	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

## 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 was a member of the St Josephine Bakhita Catholic Primary School Working Party to ensure the topic of modern slavery was maintained at the forefront of procurement activities. This also served as an opportunity for collaboration and awareness raising for staff across the DOSCEL Secretariat, the Principal of St Josephine Bakhita Catholic Primary School and the Parish Priest of St Thomas the Apostle Parish, Clyde North.
- *DOSCEL Responsible Sourcing Guidelines* were developed as a practical resource for staff at St Josephine Bakhita Catholic Primary School.
- A communication was issued to all DOSCEL Principals outlining our ethical sourcing and anti-modern slavery commitments and requesting that they familiarise themselves with DOSCEL's Modern Slavery Statements.
- All School principals, leadership staff, business managers and administration officers were invited to complete ACAN modern slavery awareness e-learning modules: Introduction to Modern Slavery and Modern Slavery Business Relevance.
- Resources were provided to all DOSCEL schools in relation to the *UN World Day Against Trafficking in Persons* on 30 July 2024 for awareness raising.
- Increased modern slavery due diligence was completed with all major new and renewed contracts across a broad range of products and services including architecture and construction, ICT, labour hire, financial services, transport, cleaning and facilities management, energy, furniture and office supplies, school uniforms, legal representatives, insurance, third party education suppliers and playground equipment.
- A Modern Slavery Awareness Campaign was undertaken in the lead up to Easter with a focus on modern slavery free chocolate.
- As of 31 December 2024, DOSCEL had 75 suppliers registered on Sedex, providing transparency and accountability in our supply chain management practices.

### **ACAN Effectiveness Assessment**

Measuring effectiveness is assessed by completing the annual ACAN Entity Profile Survey 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 evidences the significant progress made against the prior period using the Base Line data captured by ACAN around actions taken by DOSCEL staff and suppliers.



DOSCEL's strong focus on encouraging suppliers to complete ACAN surveys and join Sedex have resulted in a significant number of suppliers engaging in these processes. Of highlight was the attendance at ACAN capacity building webinars of architects and construction company employees involved in the building of St Josephine Bakhita Catholic Primary School.

<b>DIOCESE OF SALE CATHOLIC EDUCATION LIMITED</b>	<b>ACTIVITY</b>	<b>2023</b>	<b>2024</b>
<b>INTERNAL / STAFF</b>	Hours spent on modern slavery activities	449	310
	Individual staff completed e-learning	0	2
	E-learning modules completed	0	4
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Total number of suppliers	500	6789
	Number of suppliers with visible contact information and ABN (top 50)	33	50
	Number of suppliers across high-risk categories	0	847
	Number of ACAN Supplier Surveys completed	0	294
	Supplier staff attending capacity building webinars	0	4
	Invited to join Sedex	0	12
	Joined Sedex	0	75
	Sedex SAQ completed	0	34
	Social audits	0	8
	Corrective actions	0	43
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	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 the above table, DOSCEL's ACAN Baseline Data Metrics are shown*

## **Criteria 6: Consultation with entities owned or controlled**

This Statement was developed with input from staff at the DOSCEL Secretariat and schools. 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, directors, executives and senior management 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.

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 governs.

Throughout the reporting period, DOSCEL invested significantly in resourcing and capacity building, focussing on awareness campaigns, internal working group development, and extending our partnership with ACAN.

Looking ahead to 2025, DOSCEL is focussed on commencing operation under the recently launched *DOSCEL Strategic Plan 2025 -2028*. The Strategic Plan outlines DOSCEL's Vision, Mission and Values of:

- *Vision:* Faith-inspired educational excellence for a hope filled future.
- *Mission:* To deliver sustainable and inclusive education that nurtures each student's potential, equips them to thrive in a dynamic world, and is enriched by our flourishing Catholic culture.
- *Values:* Integrity, Excellence and Inclusion.

A Key Program outlined in the Strategic Plan is the development of a new Procurement Framework with the outcome that *"DOSCEL engages in ethical, sustainable and strategic sourcing practices"*. The success measures of this Key Program are:

- DOSCEL operates within the established Procurement Framework supporting and promoting sustainable and ethical supply chains
- DOSCEL Modern Slavery Statements evidence substantial annual improvement in procurement activities.

Through this Key Program we will transition 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 direct suppliers to date, 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



**St Josephine  
Bakhita Catholic  
Primary School**  
CLYDE NORTH  
ABN 12 638 504 514



**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



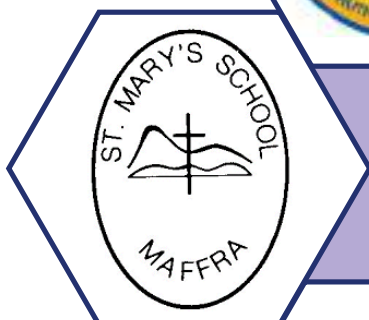
**St Joseph's  
Primary School**  
KORUMBURRA  
ABN 30 588 371 259



**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





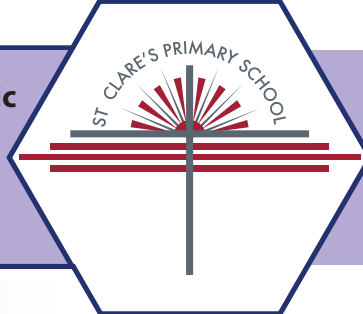
**Trinity Catholic  
Primary School**  
NARRE WARREN  
SOUTH  
ABN 50 374 081 685



**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



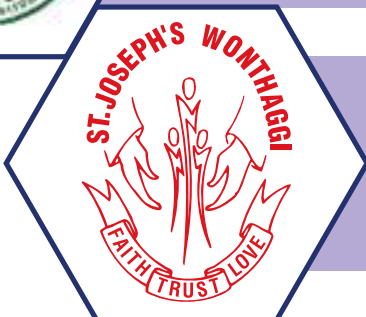
**St Michael's  
School**  
TRARALGON  
ABN 62 095 609 409



**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

1 January to 31 December 2024

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 2024, 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 2024 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, and the Board's Quality Compliance & Risk Committee and approved by VMCH's Board on 28 May 2025.

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 2024.

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. In 2024, VMCH's registered office was 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.



## 12 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 2024 Modern Slavery Risk Management Initiatives

In 2024, we continued our work of increasing awareness through communication, online learning and developing, we also partnered with other Catholic entities within our ACAN network to better tackle supplier engagement. We continued to implement initiatives to further our Modern Slavery awareness and mitigation journey.

These are summarised below.

- Continued membership of ACAN to leverage best practice materials and approaches.
- Modern slavery online training was available for employees to undertake 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 complies with VMCH's Modern Slavery Policy as part of the final agreement.
- We continued to use the Sedex platform to understand the modern slavery risks within our supply chain.
- Continued to bring together the network of modern slavery champions for discussion and presentations regarding modern slavery to improve awareness and engagement on the issue of modern slavery.
- Worked with other ACAN Members in similar industry and try and leverage our collective buying power to engage more suppliers onto Sedex.

- A member of our organization participated in training courses and learned about the auditing and testing of controls to identify possible Modern Slavery practices.
- Training to increase financial literacy of our staff to ensure they are best placed to assert their rights against any overbearing influence which they may have in their lives.
- Took part in the launch of the ACAN compendium highlighting the plight of a survivor of modern slavery in an event which included key stakeholders and suppliers.



## 14 Our plans for 2025

VMCH is steadfast in its commitment to act along the path to identify and mitigate modern slavery risk. Our plan for 2025 is to focus on three key priorities:

### i) We will continue to be an Ethical Employer

VMCH provides a decent, fair, and safe place to work.

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

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

Use our influence and leverage, where possible, 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.

### iii) We will continue to increase transparency and understanding of modern slavery risk 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:

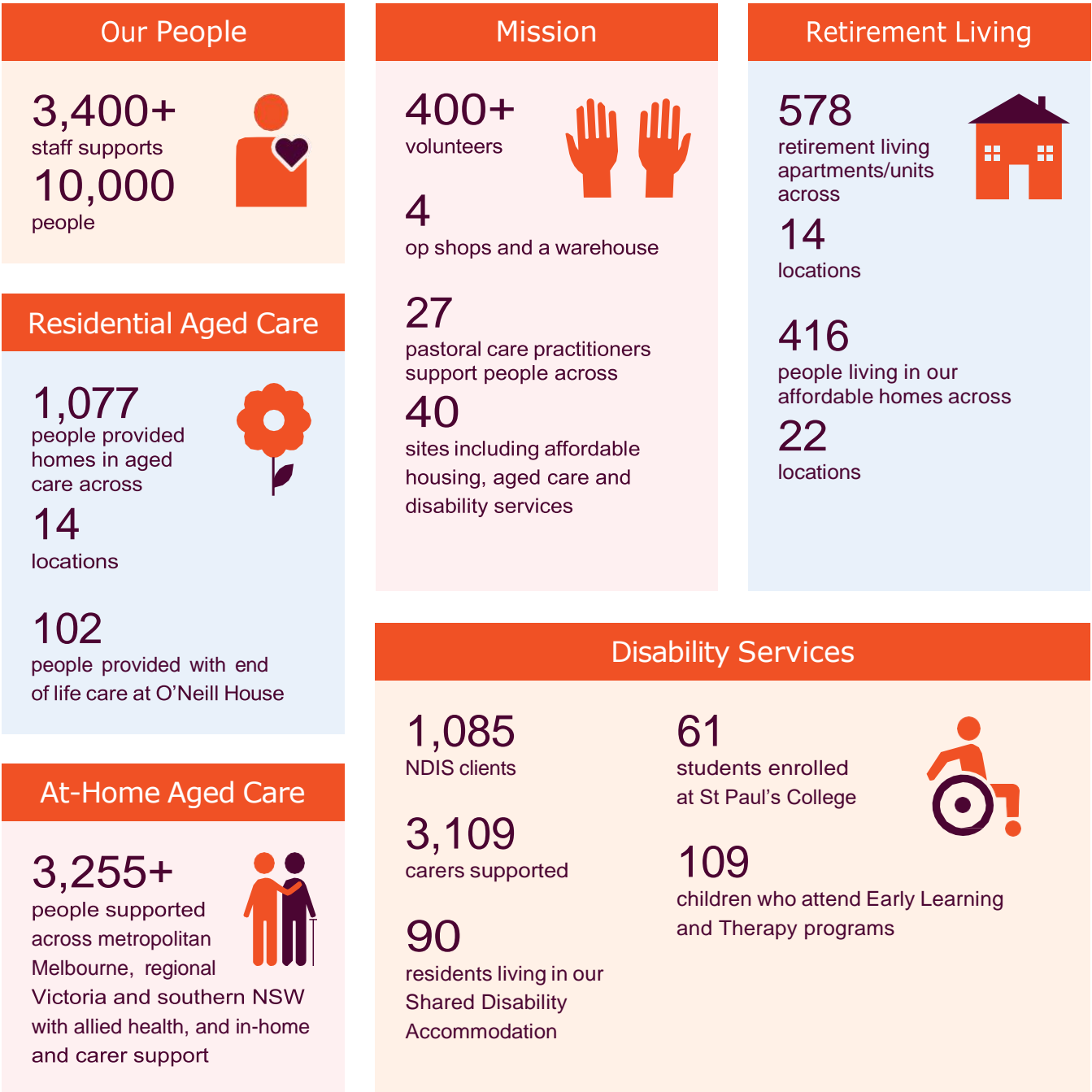
- Governance – continue to develop the governance around our modern slavery programme so it holds the right people to account and drives continuous improvement and the completion of our modern slavery strategy.
- Policies – maintain up-to-date policies which are fit for purpose and follow our Governance Framework.
- Strategic Partnerships – continue to 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 – continue to 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.
- Making a positive impact – VMCH has released our first Social Enterprise Impact Report, tracking our progress in supporting people with disability to find and sustain meaningful award-wage employment. This initiative is a global movement raising awareness of purpose-driven businesses and the positive impact they make on people's lives. VMCH has long been committed to supporting people of all ages and abilities to reach their goals with zero tolerance of modern slavery.

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.

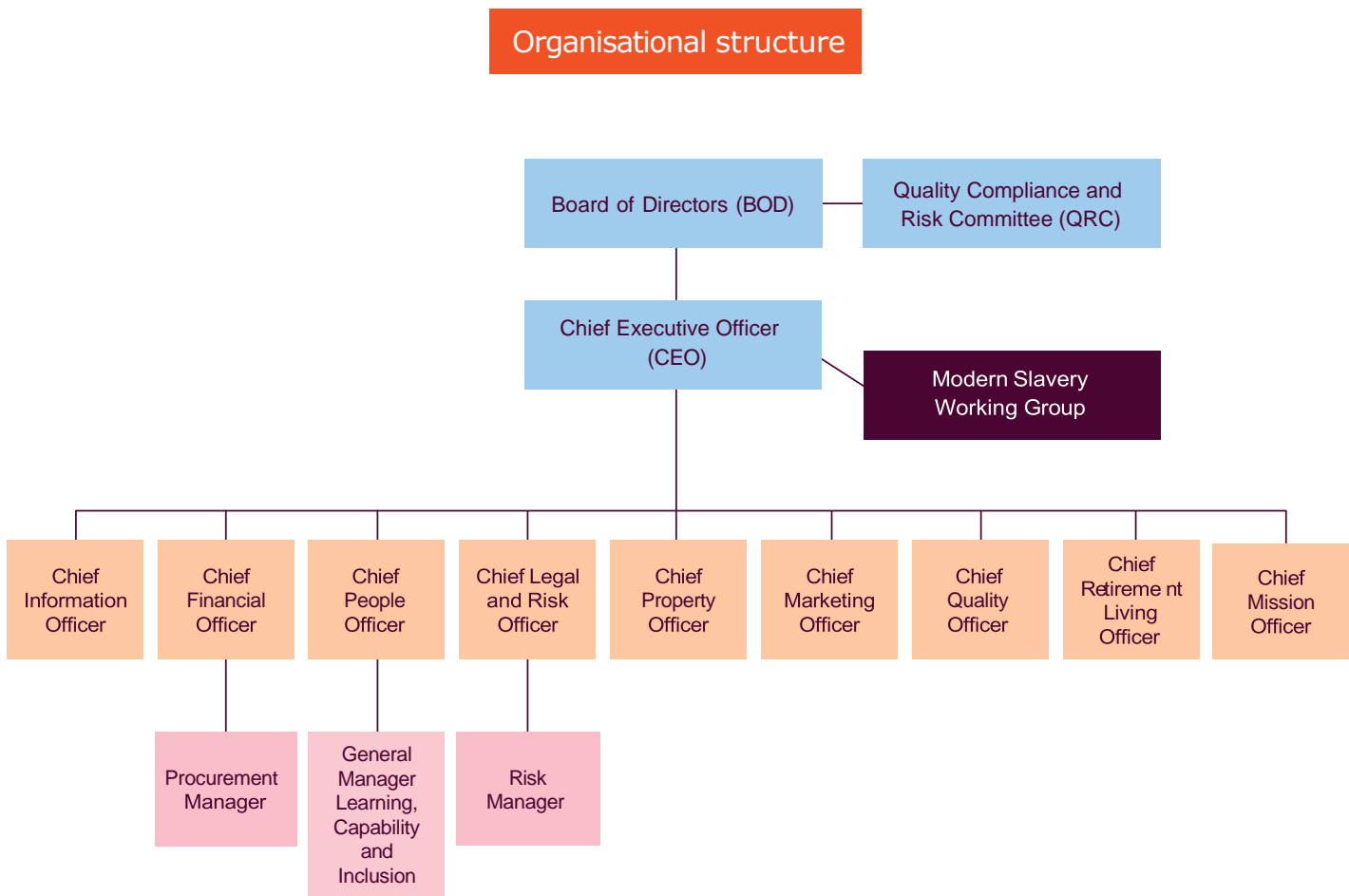
Further Commitments for the future are highlighted in Section 6.

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-plus 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 structure includes a procurement function (reports to the CFO) and risk function (reports to the Chief Legal and Risk Officer) which provides support to the operational areas. We also have a Capability and Inclusion senior manager (reports to the Chief People 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 structure that ensures the highest standards of care and allows for the mitigation of 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. The objectives of this working group 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.

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 2025 VMCH Strategic Plan, under the headings:

### Effectiveness

- Excellent Board governance practice
- 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 2,906 active suppliers, who supply a range of goods and services to enable VMCH to maintain its 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.

Our supply chain is diverse and encompasses small local businesses through to national and global businesses with extensive and international supply chains. We deal mainly with suppliers with an Australian presence, and many have their head office in Australia. Other suppliers' head offices are based around the world in key countries including China, United Kingdom, and the United States. 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.

We make sure we include a modern slavery questionnaire for each tender, ensuring can determine if there are any relevant modern slavery practices by the service providers.

Examples of what we source:



VMCH has a robust tender process in place to review our tenders for potential modern slavery risks.

# 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.
- **Vulnerability of workers risk:** relates to the likelihood that a worker, due to their specific circumstances like social economic aspects could be exploited or forced into labour conditions that constitute modern slavery, often due to factors like lack of legal protections, limited language skills, migrant status, poverty, or reliance on a single employer for their livelihood, making them susceptible to coercion and abuse.

### 2.2 Understanding modern slavery within VMCH's context

In 2024, VMCH continued to develop its corporate understanding of modern slavery risk. We developed key processes to assess elevated modern slavery risk areas within our business supply chain, have 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 2025 work, we will continue to work with our partners to drive supplier engagement to join Sedex, continuing to drive staff to undertake the modern slavery training modules and highlight where applicable Modern Slavery risk.

Also, 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. In 2024, VMCH introduced an anonymous whistleblower line, thereby strengthening the ability for individuals to highlight issues including modern slavery matters. VMCH continues to build knowledge and awareness of human rights issues among employees and volunteers and encourages them to voice any concerns without fear of retribution and with confidentiality.

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 supplier surveys, Sedex membership and supplier's Self-Assessment Questionnaires, Maturity Assessment, training modules and having access to key speakers.

In 2024 VMCH had the privilege to have the presence of Mr. Moe Turaga, a Modern Slavery survivor expert speak to its corporate office staff about his experience and current work in highlighting his lived experience and his work in his plight to eradicate Modern Slavery in Australia.

## 2.3 Modern Slavery Maturity Assessment

In previous modern slavery statements VMCH undertook a gap analysis to assess and analyse our work in the modern slavery area. In 2024, we have commenced a maturity assessment model. This is a more comprehensive model that aims to assesses how VMCH approach's maturity to drive the impact against modern slavery. The maturity assessment will allow tracking over time.

The following is a description of the categories assessed for the maturity assessment:

- **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasizing the importance of oversight and clear responsibilities. VMCH has implemented rigorous governance practices including:
  - Risk assessments, identify high risk areas within the supply chain based on factors like geography, industry, and labour practices.
  - Supplier due diligence, screening potential suppliers for modern slavery risks before engaging with them.
  - Training employees on modern slavery issues. Educate employees at all levels about modern slavery risks, company policies, and reporting mechanisms.
  - Grievance mechanisms, establish clear and accessible grievance mechanisms for workers to report concerns about potential labour abuses.
  - Modern slavery working groups to discuss and track modern slavery workplans.
  - Comply with mandatory modern slavery reporting requirements.
- **Operations (+5% YOY):** Focus on internal practices and how effectively we manage risks within our day-to-day activities. At VMCH these include:
  - Risk assessments of operations and supply chains to potentially identify vulnerabilities.
  - Assess suppliers before doing business with them.

- **Supply Chain:** Examines our external partnerships and then mechanisms in place to assess and mitigate risks beyond our immediate operations, including:
  - Conduct assessments of potential suppliers.
  - Foster open communication with suppliers, establish clear expectations regarding ethical practices.
- **Worker Engagement:** Addresses how we manage worker engagement, and the standards upheld to prevent exploitation. At VMCH these include:
  - Empowering employees to identify potential exploitation within its operations.
  - Establishing clear channels for employees to raise concerns anonymously, including reporting mechanisms to relevant authorities.
  - Report concerns without fear of retaliation and actively participate in creating a workplace culture that values ethical practices.
- **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
- **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the process for addressing them.

The change in VMCH maturity assessment based on the comprehensive model now used has shown a improvement year on year as set out below:

Business Process and Governance	+3%
Operations	+5%
Supply Chain	+4%
Worker Engagement	+1%
Entity's Program and Activities	+3%
Grievance Mechanisms and Remediation	+2%



## 24 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 has analysed 614 suppliers by spend from its 2024 total supplier list, an increase of 564 compared to 50 by spend suppliers analysed in 2023. This is approximately 21 percent of all suppliers.

The suppliers were classified by spend categories and were then categorised with a risk classification. Analysing a higher base of suppliers allows classifying higher-risk suppliers which in term will enable VMCH to focus their efforts on the areas where the potential for forced labour or exploitation is most significant, also enabling VMCH to prioritise due diligence and mitigation strategies in the parts of their supply chain most likely affected, ultimately leading to a more effective fight against modern slavery practices.

Other reasons why classifying higher-risk suppliers is beneficial:

- **Efficient resource allocation:** Focusing on high-risk suppliers allows companies to prioritise their efforts and allocate resources more effectively towards addressing the most critical areas of concern.
- **Improved risk mitigation:** By proactively identifying and mitigating risks associated with high-risk suppliers, companies can reduce the likelihood of being implicated in modern slavery practices within their supply chain.

There will be greater focus on supplies in the high and medium risk categories.

The following is a breakdown of spend (614 suppliers) as a percentage of total spend.

### Breakdown % of spend

High Risk	57%
Building and construction	17%
Cleaning and Security	4%
Events and events management	1%
Facility management and property maintenance	7%
Finance and investment	1%
Food and catering services	9%
Furniture and office supplies	1%
ICT hardware	6%
Labour hire	8%
Medical devices and supplies	4%
Transport and logistics	0%
Uniforms and PPE	0%
Waste management services	0%
Medium Risk	8%
Advertising & Marketing	0%
Fleet management, consumables and maintenance	1%
ICT software and network services	3%
Print / mail provider	0%
Travel and accomodation	1%
Utilities	3%
Low Risk	5%
Government and agency fees	0%
License / member fees	1%
Professional services	4%

Note: Spend categories are classified according to ACAN Taxonomy

Overall, supplier analysis increases a maturity score by enabling a company to identify areas where their supplier relationships can be improved, leading to better quality, cost efficiency, and overall supply chain performance, which are key factors in a maturity model assessment; essentially, by actively evaluating and optimizing supplier capabilities, a company demonstrates a more advanced level of procurement and supply chain management, resulting in a higher maturity score.

# 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 52 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; 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.

### 3.1.1 Supplier Engagement

- The ACAN supplier surveys were also completed by over 200 suppliers and assessed by ACAN.
- The supplier code of conduct was in place for the 2024 reporting period
- Continued work with the SEDEX tool ([www.Sedex.com](http://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. In 2024, 48 of our suppliers' sites have completed the Sedex Self-Assessment Questionnaire, with 4 sites identified as high risk for modern slavery. These 4 sites are in the US and are manufacturing factories of a global company, with ongoing risk mitigation activities taking place as part of ACAN.

### 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 developed with the assistance of ACAN, is part of VMCH's online training portal for employees and volunteers.
- Modern Slavery online training is included in the suite of modules directors are required to complete.
- Webinars and training were made available to suppliers.
- Monthly ACAN Working Webinars are attended by the Chief of Risk and Legal Officer and the Risk 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.

### 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 2024, there was a focused effort on reducing reliance on agency staff through the continuation of the scheduling project. The project focused on reducing the level of agency used at VMCH, 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.
- 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 (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, specialized resources are required to ensure the best outcomes for individuals affected by modern slavery.

VMCH is pleased to report no cases of modern slavery in its operations and supply chains in 2024, based on current processes and supplier interviews.



# 4

## Criteria 5: Effectiveness Assessment

At VMCH we understand that improvements and challenges to eradicate potential Modern Slavery risks will be a continuous process for the organisation. However, we have robust modern slavery policies and processes in place and have clear expectations with our suppliers, contractors and staff. We have continued to strengthen and resource our induction and onboarding processes to assist in monitoring modern slavery risk.

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.
- Regular review and improvement of VMCH's suppliers.
- Workplace engagement survey.



# 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.

# 6

## Criteria 7:

Other – Future Commitment

VMCH has outlined specific actions for 2025 that directly address the identification, management, and mitigation of modern slavery risks.

Specific actions are listed below:

- Ensure our policies are up to date, fit for purpose and follow our Governance Framework.
- Identify and partner with appropriate external organisations to assist in determining the effectiveness of our metrics in developing our engagement with suppliers.
- Ensure all VMCH staff, contractors and volunteers are informed of the risks of Modern Slavery.
- Continue to inform the organisation of countries and sectors that have a higher risk of modern slavery.
- Report annually.

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



Villa Maria Catholic Homes ABN 32 004 364 103







# Modern Slavery Statement 2024

1 January 2024 - 31 December 2024



## Disclosure Notice

This statement has been made on behalf of Catholic Education Northern Territory. This Statement covers all entities owned or controlled under the Catholic Church Diocese of Darwin Education Property Trust  
ABN 58 600 950 933 - <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](mailto:whs.support@nt.catholic.edu.au).

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## Bishop's Address



## CATHOLIC DIOCESE OF DARWIN



On behalf of the Catholic Education Northern Territory, we continue our commitment to helping eradicate modern slavery.

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 a painful part of Australia's history. The impacts of colonisation have deeply affected Aboriginal and Torres Strait Islander peoples, resulting in the loss of land, language, and culture. Many families were separated through government policies, leading to significant intergenerational trauma and a loss of dignity and rights. We acknowledge this history as we continue to listen, learn, and walk alongside our First Nations peoples in a spirit of reconciliation and healing.

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



## Leadership 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 02 May 2025

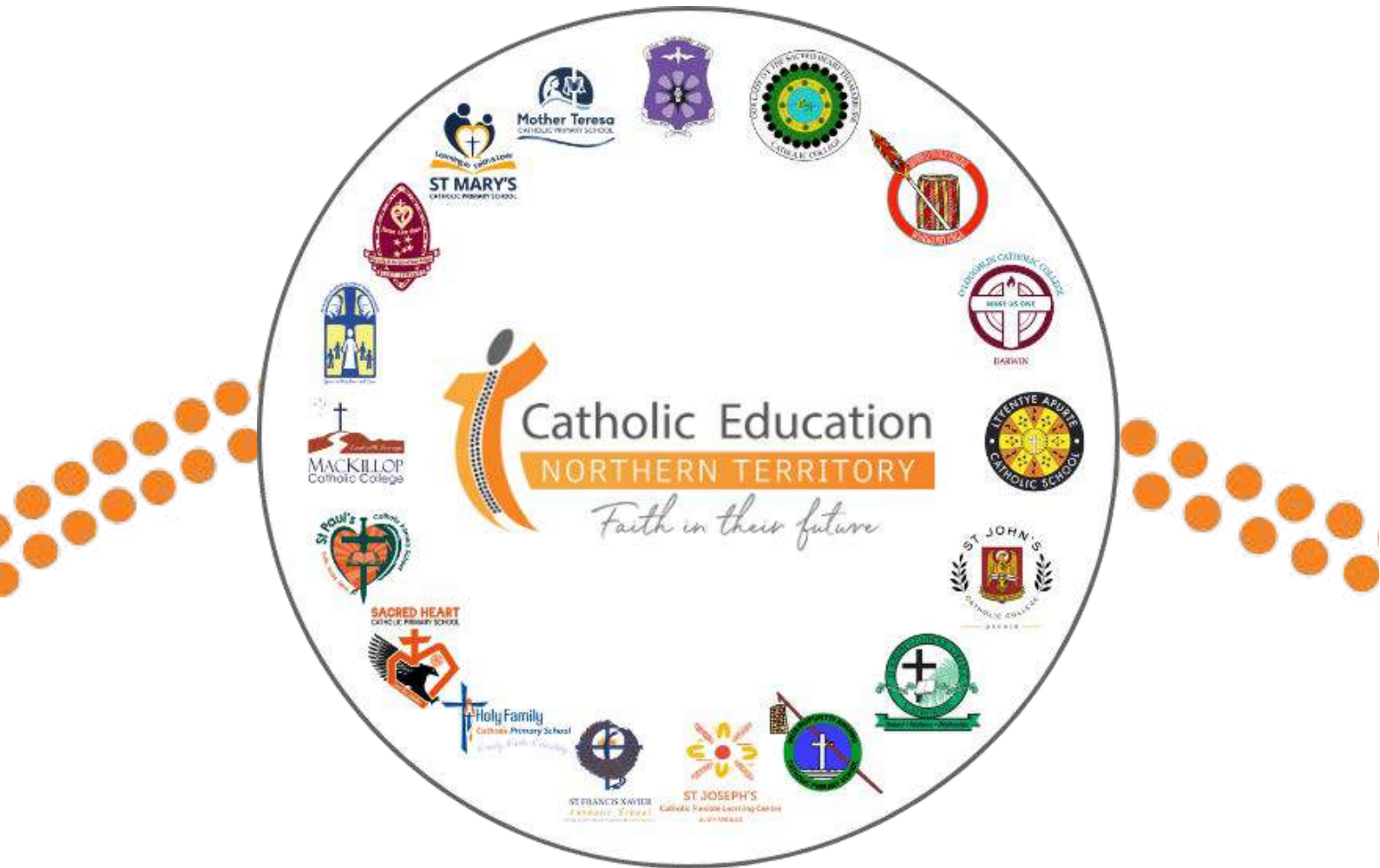
This modern slavery statement is signed by a responsible member of Catholic Education Northern Territory as defined by the Act.



Paul Greaves  
**Director, Diocese of Darwin**

2 May 2025

## Criterion 1 : Catholic Education Northern Territory



### 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, Naiyu, Wurrumyunga and Wadeye. CENT schools also support and manage 9 Early Learning Centres (ELC), 9 Outside School Hours Care (OSHC) Services and 4 Remote Preschools. These schools service early learning, Primary, Middle and Secondary students. CENT also supports St Joseph's Flexi-Learning Centre in partnership with Edmund Rice Education Australia located in Alice Springs. CENT also operates one RTO/VET location to support the communities in Darwin and surrounding regional areas.

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 5345 students including 1893 Indigenous (34%). CENT employs 1494 workers across its operations including 445 Teachers supported by 524 non-teaching and Indigenous Education Workers and 120 Early Childhood Education and Care staff in our ELC and OSHC Services.

CENT education office has 76 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 Marketing.



#### 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









*Our Values:*  
**LOVE** **COMPASSION**  
**WISDOM** **COURAGE**  
**JUSTICE**

## CENT Entities


Entity Name	ABN
Catholic Church Diocese of Darwin Education Property Trust	58 600 950 933
Catholic Education Office	22 616 685 167
Our Lady of the Sacred Heart Catholic College	24 635 994 048
St Francis Xavier Catholic School	51 776 150 284
Holy Family Catholic Primary School	17 624 608 900
Holy Spirit School Catholic Primary School	49 758 636 720
St Joseph's Catholic College	59 349 106 472
Ltyentye Apurte Catholic School	38 684 620 361
Murrupurtiyanuwu Catholic Primary School	83 595 212 973
O'Loughlin Catholic College	22 969 854 283
St Francis of Assisi Catholic Primary School	34 189 459 642
Sacred Heart Catholic Primary School	21 849 524 313
St John's Catholic College	70 855 099 082
St Mary's Catholic Primary School	29 197 914 637
St Paul's Catholic Primary School	75 807 963 110
Our Lady of the Sacred Heart Thamurrurr Catholic College	35 744 622 695
Xavier Catholic College	97 102 844 821
Mother Teresa Catholic Primary School	15 466 737 018
MacKillop Catholic College	80 042 512 230

### DARWIN

**Primary Schools**





- Holy Family Catholic Primary School (Karama)  
- Holy Spirit Catholic Primary School (Wanguri)  
- St Mary's Catholic Primary School (Darwin City)  
- St Paul's Catholic Primary School (Nightcliff)  

**Secondary Schools**

- O'Loughlin Catholic College (Karama)
- St John's Catholic College (Darwin City) 

### PALMERSTON

**Primary Schools**



- Sacred Heart Catholic Primary School  
- Mother Teresa Catholic Primary School  

**Secondary School**

- MacKillop Catholic College



### HUMPTY DOO

**Primary School**

- St Francis of Assisi Catholic Primary School  



### KATHERINE

**Primary & Secondary School**

- St Joseph's Catholic College  

### ALICE SPRINGS

**Primary & Secondary School**


- Our Lady of the Sacred Heart Catholic College  

**Secondary School**

- St Joseph's Catholic Flexible Learning Centre


### DALY RIVER, NAUIYU

**Primary & Secondary School**

- St Francis Xavier Catholic School 


### WADEYE, PORT KEATS

**Primary & Secondary School**

- Our Lady of the Sacred Heart Thamurrurr Catholic College 


### SANTA TERESA

**Primary & Secondary School**

- Ltyentye Apurte Catholic School 





### WURRUMIYANGA, BATHURST ISLAND

**Primary School**

- Murrupurtiyanuwu Catholic Primary School 

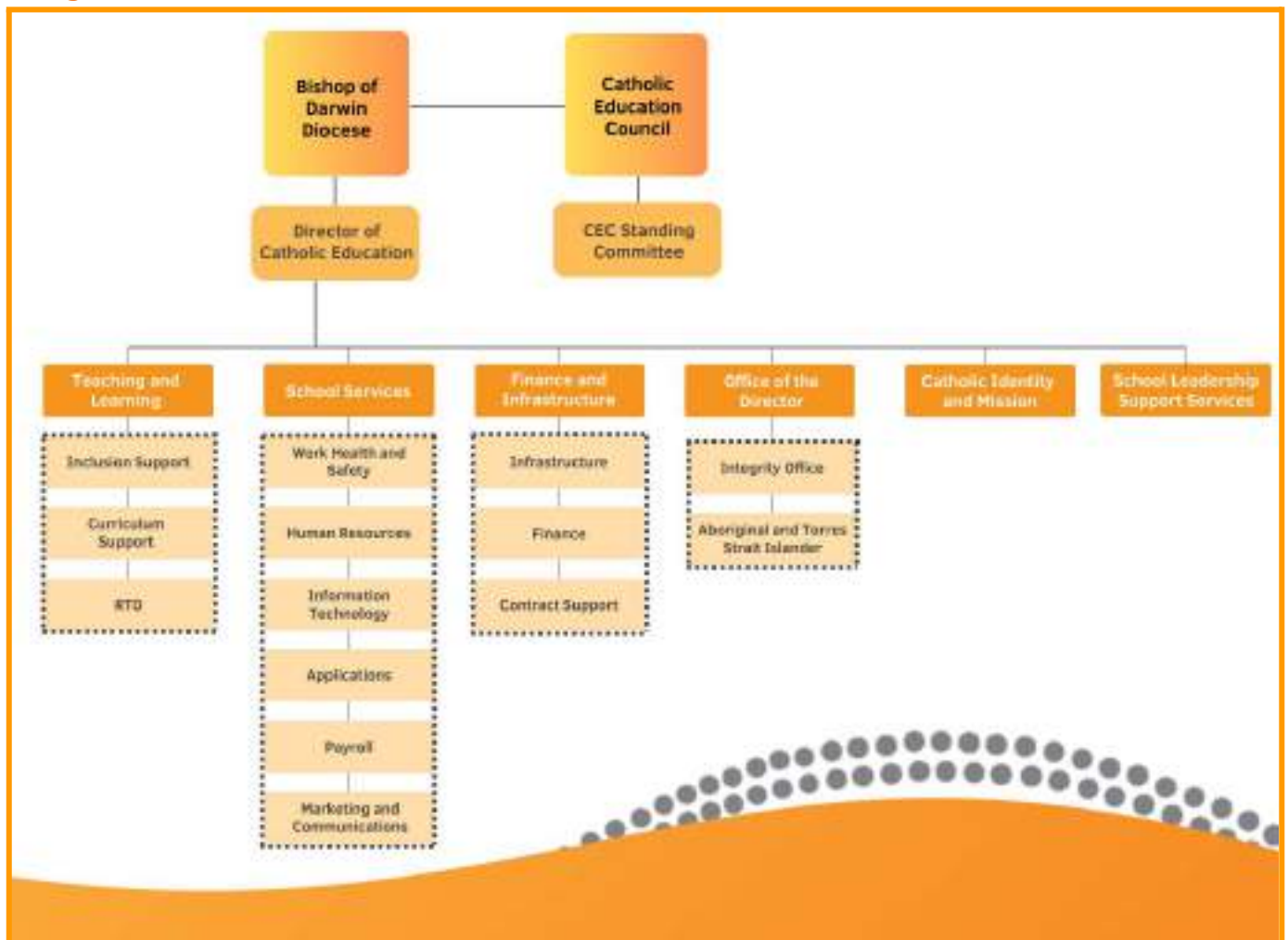
**Secondary School**

- Xavier Catholic College

 Early Learning Centre  
 Outside School Hours Care  
 Pre-School  
 Boarding

## Criterion 2 : Our Structure, Operations and Supply Chains

### Our Organisational Structure



### Governance Framework

The Catholic Church Diocese of Darwin Education Property Trust is the registered approved authority for schools within CENT. The Bishop of the Diocese of Darwin is the trustee of the above Trust and 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. 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.

To support this Governance Framework, the CENT Modern Slavery Working Group (MSWG) was formed to provide Leadership and CENT workers with information on and support Modern Slavery Risk Management within the organisation. Meetings will be held once per term, and meeting minutes will be shared with the CEO Executive Team, who will provide escalations to the CEC as required. The membership of the MSWG

- Modern Slavery Liaison Officer (MSLO)
- Finance Manager
- Contract management
- WHS Manager
- Human Resources Manager
- Infrastructure Manager
- Deputy Director School Services Member of the CEO Executive

## 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 Composite Colleges, 9 Primary Schools, 2 VET Centres and 1 flexible learning centre. Within the system there are also 9 Early Learning Centres, 9 Outside School Hours Care facilities and 4 remote Pre Schools. The Catholic Education Office supports the network of services from its Berrimah Head Office.

CENT Operations Revenue for 2025 was \$208,000,000. This was funded by the collection of school fees and supplemented by the State and Commonwealth Government.

Our Operations include the management and maintenance of housing facilities in remote locations. CENT also operates a Boarding facility in Darwin at St John's Catholic College 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 and Torres Strait Islander 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 in the 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 risks 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. In 2024 CENT engaged the products or services from 1648 Suppliers across our 20 Sites with a total spend of \$60.9 Million.

CENT assessed the risk exposure within CENT's expenditure and identified over 60% of suppliers fall within the high risk category.

High Risk Category	No. Suppliers	\$ Spend	% of CENT Total Spend
Building and Construction	13	10.46 Mil	17.17
Cleaning and Security Services	4	2.243 Mil	3.68
Facility and Property Maintenance	3	\$643,391	1.06%
Food and Catering Services	4	2.451 Mil	4.02
Furniture & Office Supplies	6	3.968 Mil	6.51
ICT Hardware	8	2.575 Mil	4.23

During 2024 the MSLO began to review the gaps within CENT and manage Modern Slavery Risk. This review included

- Current processes
- Current training needs and availability
- Supporting Documentation
- CENT Risk Framework
- Current reporting practices

Following this review gaps were identified in CENT systems and these were discussed in the MSWG meeting to understand what reporting and data points were needed to better understand what needs to be evolved or systems put in place to capture this data.



Sacred Heart Catholic Primary School



St Francis of Assisi Catholic Primary School

## Criterion 4 : Steps Taken To Address Modern Slavery Risk

During 2024, the designated CENT Modern Slavery Liaison Officer (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. This included completing the SEDEX Self Assessment Questionnaire for the first time for CENT.

2024 also saw the implementation of expanded training requirements for all staff to participate in Modern Slavery online training through GRC's Compliance Learning Management System (SALT) using the ACAN sourced Modules. All workers are required to complete Modern Slavery 101. Leadership and Finance workers are required to complete an expanded course including the following modules

- Implementing a Modern Slavery Risk Management Program
- Grievance Mechanisms and Remedy
- Business Relevance
- Modern Slavery Risk Management for Suppliers

E-Learning Module	Total Modules Completed	
	FY 2023	FY 2024
Modern Slavery 101	577	856
Implementing a Modern Slavery Risk Management Program	22	30
Grievance Mechanisms and Remedy	23	30
Business Relevance	22	31
Modern Slavery Risk Management for Suppliers	23	20

Late in 2024 the CENT Modern Slavery Working Group (MSWG) was created. As part of the creation of the CENT MSWG, the following supporting Policies, Frameworks and Guidelines to further support CENT's Modern Slavery Commitments were created.

- CEO.SS.3112.1.1 Modern Slavery Policy
- CEO.SS.3112.3.1 Modern Slavery Guideline
- CEO.SS.3112.2.2 CENT Supplier Code of Conduct

As part of CENT Modern Slavery Actions for 2024 to improve supplier engagement and in collaboration with the Contracts Manager, resulted in the inclusion of Modern Slavery Risk Management being included in all contract and service agreement templates encouraging suppliers to register with ACAN and Sedex. These templates have become the standard documents for all new and existing supplier contracts into the future.

## 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

### CENT Maturity Assessment 2024

In 2025 ACAN provided CENT with a Modern Slavery Maturity Assessment. This was used to review the effectiveness of and the continuous improvement of the modern slavery risk management approach within CENT. CENT achieved a rating of 47% vs a target of 75% for our 4th reporting year. The scores reported reflected what CENT had already identified as areas for improvement and were set as actions in the 2023 Modern Slavery Statement that was released in 2024 and these will continue to be a focus throughout 2025.

#### Catholic Education Northern Territory - Overview



#### Catholic Education Northern Territory - 2024 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business Process and Governance	48%	60%	41%	46%	49%	↑ 14%
2. Operations	56%	41%	46%	44%	47%	↑ 17%
3. Supply Chain	33%	80%	20%	30%	41%	↑ 18%
4. Worker Engagement	9%	70%	35%	36%	37%	↑ 14%
5. Entity's program and activities	75%	40%	50%	43%	52%	↑ 14%
6. Grievance Mechanisms and Remediation	63%	60%	52%	39%	54%	↑ 5%
Average	47%	58%	41%	40%	47%	
	↑ 18%	↑ 15%	↑ 13%	↑ 35%	↑ 18%	

Maturity Score 2024 includes all scoring by pillar and sub pillar, including averages and total 2024 score



## Modern Slavery Engagement Review

	Activity	2022	2023	2024
Staff engagement – internal	E-learning modules completed	2	577	1167
	SEDEX users	1	1	1
	Working Group meetings	0	0	1
Supplier engagement - external	Number of suppliers across high risk categories	n/a	1	1
	E-learning modules completed	0	0	0
	Suppliers invited to join SEDEX	4	4	17
	Invited to join SEDEX sent by ACAN	4	N/A	
	ACAN supplier survey completed	14	N/A	
	Suppliers invited to join SEDEX	4	4	4
	Suppliers attended ACAN webinars	6	8	4

## Change Analysis

CENT is currently reviewing its supplier engagement process so that we have a better ability to capture supplier information to assist in identifying the risk for CENT and to also share this with suppliers. This will see improvements over the coming years in how CENT can monitor and evaluate modern slavery risks for our supply and this coupled with improved training and awareness to workers can help minimise risks and also identify suppliers that do not meet the requirements prior to engaging.

Category	Topic	2023	2024	Change
Management Systems	Governance			Improved
	Commitment			Improved
	Business Systems			Improved
	Action			Improved
	Monitoring & Reporting			Improved
Risk Management	Risk Framework			Improved
	Operational Risk			Improved
	Identifying External Risks			Improved
	Monitoring & Reporting on Risk			Improved
Human Resources and Recruitment	Awareness			Improved
	Policies and Systems			No change

Category	Topic	2023	2024	Change
	Training			Improved
	Labour Hire / Outsourcing			Improved
Customers and Stakeholders	Customer Attitude			No change
	Information Provision			No change
	Feedback Mechanisms			No change
	Worker Voice			Improved
Procurement and Supply Chain	Policies and Procedures			Improved
	Contract Management			No change
	Screening and Traceability			No change
	Supplier Engagement			No change
	Monitoring and Corrective Actions			Improved

Not Started	Started	In Progress	Completed
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## Action Plan

FY 2025

As part of CENT's 2024 review the following actions have been identified for 2025

- Improved Supplier engagement
  - Encourage completing registration with ACAN Modern Slavery Survey
  - Reviewing Procurement Procedures to better reflect CENT's Modern Slavery Commitments
- Strengthen compliance for supplier code of conduct that was launched in Late 2024
- Improved reporting mechanisms for leadership throughout the year and also to include more data recording to assist in minimising Modern Slavery Risks

## CENT Towards 2026 Strategy

As part of our Towards 2026 Strategic Priorities of Intentional Capacity Building and Quality Governance and Sustainability. CENT will look to transition to Preferred Supplier and Contractors operating model by the following actions

- CEO will support the consolidation of vendors and review current contract arrangements
- Conduct Preferred Supplier review with Modern Slavery a Key Criteria in the selection process
- 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, we now have the ability to lean in on Subject Matter Experts with the ability to influence all areas of the organisation to establish processes and practices that align strategies to address Modern Slavery risks. Schools are encouraged to seek assistance from the [whs.support](mailto:whs.support) email in managing their own 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.