



## **Modern Slavery Statement**

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

January 1 2023 – December 31 2023

### **CATHOLIC SCHOOLS BROKEN BAY**

Caroline Chisholm Centre Building 2, 423 Pennant Hills Road, Pennant Hills, NSW 2120

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## 1. Introduction

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

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

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

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

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

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

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

This statement addresses the modern slavery reporting criteria in accordance with the Modern Slavery Act 2018 (Cth) ('the Act') for the financial year 1 January 2023 to 31 December 2023.

## 2. Reporting entity

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

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

## 3. Structure, operations and supply chain

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### *Structure*

The reporting entity has 46 wholly owned and controlled subsidiary entities. These are set out below.

Entity	Location	ABN
Catholic Schools Broken Bay (Central office)	Pennant Hills	19 542 675 092
Corpus Christi Catholic Primary School	St Ives	93 731 206 639
Holy Cross Catholic Primary School	Kincumber	43 227 223 632
Holy Family Catholic Primary School	Lindfield	89 548 339 579
Mackillop Catholic College	Warnervale	69 094 564 017
Maria Regina Catholic Primary School	Avalon	83 509 495 501
Mater Maria Catholic College	Warriewood	63 423 792 086
Mercy Catholic College	Chatswood	31 439 493 889
Our Lady Help of Christians Catholic Primary School	Epping	21 428 536 511
Our Lady of Dolours Catholic Primary School	Chatswood	53 932 362 427
Our Lady of Good Counsel Catholic Primary School	Forestville	30 842 913 699
Our Lady of Perpetual Succour Catholic Primary School	West Pymble	53 987 617 495
Our Lady of the Rosary Catholic Primary School	The Entrance	26 056 443 965
Our Lady of the Rosary Catholic Primary School	Waitara	18 348 120 766
Our Lady of the Rosary Catholic Primary School	Wyoming	40 073 033 827
Our Lady Star of the Sea Catholic Primary School	Terrigal	21 557 574 781

Prouille Catholic Primary School	Wahroonga	22 412 327 740
Sacred Heart Catholic Primary School	Pymble	51 490 837 374
Sacred Heart Catholic Primary School	Mona Vale	49 988 711 561
St Agatha's Catholic Primary School	Pennant Hills	94 348 201 843
St Bernard's Catholic Primary School	Berowra	14 481 048 838
St Brendan's Catholic Primary School	Lake Munmorah	11 504 332 761
St Brigid's Catholic College	Lake Munmorah	32 136 813 910
St Cecilia's Catholic Primary School	Balgowlah	23 521 712 887
St Cecilia's Catholic Primary School	Wyong	64 190 020 653
St Gerard's Catholic Primary School	Carlingford	22 011 765 184
St John Fisher Catholic Primary School	Tumbi Umbi	68 466 829 768
St John the Baptist Catholic Primary School	Freshwater	66 770 014 768
St John the Baptist Catholic Primary School	Woy Woy	49 586 632 836
St John's Catholic Primary School	Narraweena	23 629 383 434
St Joseph's Catholic College	East Gosford	93 041 953 582
St Joseph's Catholic Primary School	Narrabeen	71 921 607 268
St Kevin's Catholic Primary School	Dee Why	56 665 728 002
St Kieran's Catholic Primary School	Manly Vale	60 129 423 973
St Leo's Catholic College	Wahroonga	30 147 067 836
St Martin's Catholic Primary School	Davidson	67 181 592 433
St Mary's Catholic Primary School	Manly	14 161 213 405
St Mary's Catholic Primary School	Toukley	61 558 206 679
St Patrick's Catholic Primary School	Asquith	66 789 035 993
St Patrick's Catholic Primary School	East Gosford	70 308 733 443
St Paul's Catholic College	Manly	31 990 612 609
St Peter's Catholic College	Tuggerah	39 784 133 202
St Philip Neri Catholic Primary School	Northbridge	29 988 792 638
St Rose Catholic Primary School	Collaroy Plateau	22 626 746 064
St Thomas' Catholic Primary School	Willoughby	32 613 802 773

## ***Operations***

CSBB is a not-for-profit system of schools that delivers Catholic education to approximately 18,000 students enrolled in its schools, with 46 locations and approximately 2,000 employees in total. CSBB's school system comprises 44 schools (36 primary schools, 7 high schools, and 1 K-12 schools).

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

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

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

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

## ***Supply chain***

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

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

students and staff.

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

CSBB's 2023 portion of spend and portion of number of suppliers by supplier category is set out in Figures 1 and 2 below.

Figure 1: Spend per category – 2023 spend

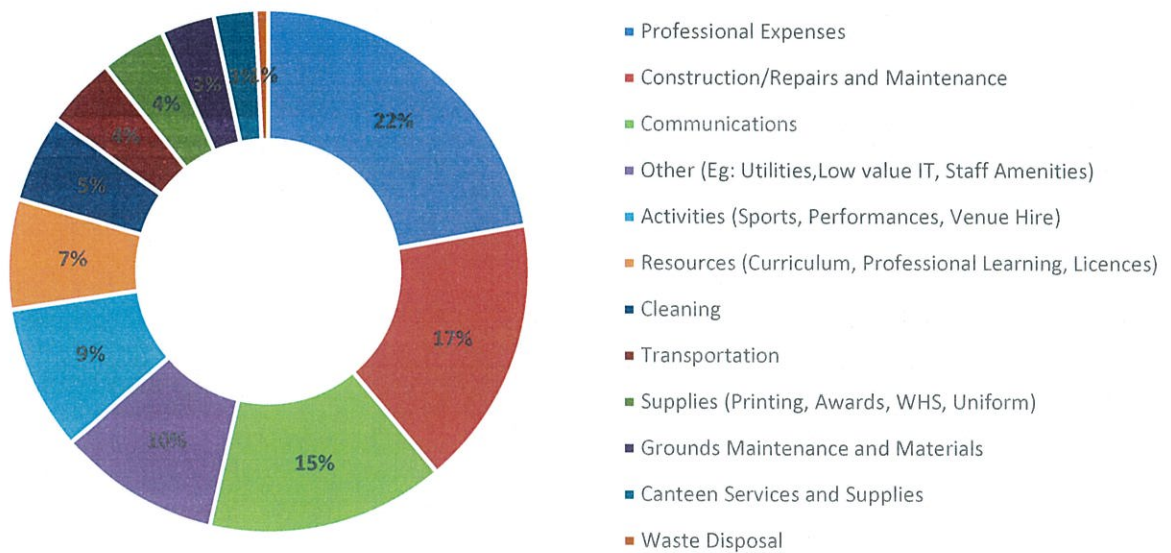
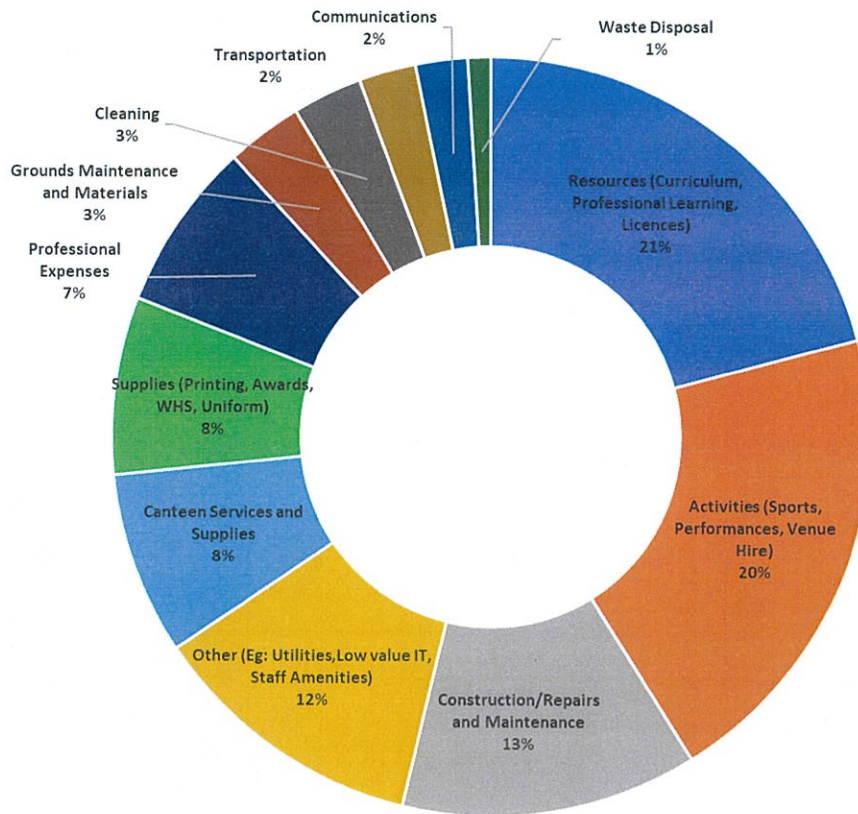


Figure 2: Number of suppliers by category – 2023 spend



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

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

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

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



procurement of all CSBB requirements.

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

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

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

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

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

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

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

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

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

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

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

slavery and the intersecting risks to the rights of humans lies in CSBB's supply chains.

A subsequent risk assessment in respect of CSBB's supply chains was undertaken for the 2023 year. This is set out in this Modern Slavery Statement.

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

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

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

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

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

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

*Communicate:* CSBB is committed to promoting justice and fairness in relationships and service and to promoting proper working conditions characterised as just and fair. CSBB is committed to continually revising its Modern Slavery Statement as new risks and/or trends in this area emerge requiring a CSBB response.

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

*Identify and assess:* In all construction projects, CSBB ensures that a full and detailed

construction program is put together by facilities construction and repairs and maintenance suppliers, with this program subject to thorough due diligence using Subject Matter Experts (SMEs) to ensure that the assumptions embedded in the program do not indicate unreasonable or undeliverable timeframes for sub-tasks in the context of standard industry practice. Equally, a thorough due diligence exercise in relation to quoted costs is used to uncover labour rate assumptions and any indication of hourly rates which are below industry standard and that required by legislation which may indicate the risk that slavery is embedded within supply chains. CSBB has formalised arrangements with some CSBB 'Pre-Qualified Suppliers' in this space, where rate cards agreed with these suppliers are refreshed and subject to due diligence periodically, and all subsequent quotes from these suppliers checked back to these pre-agreed rate cards.

In the case of technology produced overseas, CSBB adopts its vendor due diligence, tender due diligence and contracting measures (see sub-section 3 below) in identifying, assessing and managing risk associated with its vendors in this space, and where deemed appropriate based on risk assessed, will not enter into business relationships with vendors perceived to carry a high risk of modern slavery.

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

*Communicate:* CSBB is committed to continually communicating with its suppliers through appropriate supplier relationship management, seeking responses to risk-related questions to suppliers through vendor and tender due diligence (see sub-section 3 below), and revising its Modern Slavery Statement as new risks and/or trends in these areas emerge requiring a CSBB response.

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

*Identify and assess:* CSBB has taken the key steps below in an assessment of its supply chain risk:

Supplier base and management

- 1 Quantify spend: for the 2023 year total spend with suppliers was approximately \$55 million (CSBB's other spend comprises staff costs).
- 2 The total spend and number of suppliers by supplier category have been categorised by CSBB. This analysis is set out graphically in Section 3 and highlights some weighting in **spend** towards professional expenses (22%), construction and repairs and maintenance (17%), and communications (15%).

**Total suppliers** for 2023 spend show weighting towards curriculum and learning resources (21%), venue hire, sports and performances (20%), and construction and repairs and maintenance (13%).

#### Supplier category risk management

- 1 Understand the risk: risk analysis to identify the level of risk of each product or service in CSBB's supply chains has been completed. This process is to be undertaken for all suppliers at intervals throughout the contract lifecycle. A risk and value matrix on which CSBB spend categories were plotted has been developed for the purpose of a refreshed assessment of primary sourcing strategy by spend category.
- 2 Arrangements have been formalised with a panel of CSBB 'Pre-Qualified Suppliers' including for suppliers in high risk categories such as uniform providers, canteen providers, cleaners, grounds and gardens maintenance and head contractors used for construction and repairs and maintenance projects, incorporating appropriate tender due diligence in doing so. This creates a level of influence over the behaviours of these suppliers through agreed rate cards, ensuring compliance with trade licences and insurances as relevant.
- 3 Additional actions and monitoring have been undertaken in key areas considered to carry relatively higher levels of potential modern slavery risk (in addition to actions previously mentioned for facilities and technology suppliers):
  - In the area of professional services, CSBB leverages the benefit of key providers in this space having their own Modern Slavery Statements and commitments in the area of modern slavery in order to assist in managing its own risk
  - In the case of communications and learning resources, CSBB will adopt its vendor due diligence, tender due diligence and contracting measures (see the remainder of sub-section 3 below) in identifying, assessing and managing risk associated with its vendors in this space, and where deemed appropriate based on risk assessed, will not enter into business relationships with vendors perceived to carry a high risk of modern slavery
  - In the area of canteen services, CSBB monitors provision of services on site and as part of tender processes to refresh supplier panel members and on an ongoing basis can request financial information to support comfort in appropriate payments to supplier employed and subcontracted staff
  - In the area of uniforms, CSBB will ensure that its Pre-Qualified uniform suppliers either have their own Modern Slavery Statement

or policy that they are able to provide, or as a minimum the ability to provide appropriate evidence of their risk management. Their risk management practice may include them being a member of the SEDEX or similar supply chain reporting platforms and/or a member of relevant unions with appropriate employee reporting requirements, and in addition will require that they have any overseas facilities subject to appropriate audits and/or business licensing which have reporting available to CSBB upon request.

- In the area of cleaning services and grounds and garden services providers, hourly rates offered by these providers in their CSBB Pre-Qualified Supplier rate cards have been reconciled with hourly rates embedded in the relevant industry award, and questioned by CSBB where it feels there is insufficient room in the hourly rate charged to schools to cover labour costs plus overheads.

### Supplier diligence and agreements

In 2023 CSBB has undertaken a process of rationalising its supplier base to a lower total number of suppliers, for key reasons being:

- streamlining to create efficiencies in the end to end 'procure to pay' process, in parallel with the rollout of CSBB's **Enterprise Management System (EMS)**;
- further enhancing value for money through CSBB system wide exclusive 'Preferred Supplier' and 'Pre-Qualified Supplier' supplier panel arrangements; and
- further enhancing risk management around supplier compliance, performance and areas including modern slavery.

As part of this large round of supplier rationalisation which is due for completion in the first half of 2024, CSBB's **vendor due diligence** process is being embedded in the EMS and will have the modern slavery component of it split out and treated more specifically. CSBB plans by the end of 2024 to have in development a survey or other mechanism to measure supply chain modern slavery risk. This mechanism will be intended to be run across, as a minimum, nominated high risk suppliers in CSBB's supplier base, and coming out of this, CSBB will be in an improved position to be able to specifically risk assess each individual supplier for modern slavery risks.

CSBB intends to assess the appropriate action if a modern slavery risk is identified, including ending a supplier relationship if the matter cannot be rectified.

In addition to CSBB's vendor due diligence, CSBB's **Market Testing Requirements** ensure that all new purchases and agreements entered into are appropriately market tested in correlation with the size and inherent risk of the purchase or agreement. The purchaser is required to provide proper justification for a chosen provider for a

purchase or agreement, including consideration of non-price factors such as quality, risk and alignment with CSBB values. This process highlights any vendor who is pricing significantly below the market (and in turn perceived to pose a modern slavery practices risk), and has an inherent focus on value for money rather than lowest cost.

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

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

*[Clause X] Anti-Slavery*

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

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

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

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

(iii) *taking all reasonable steps to ensure that any instances of Modern Slavery in its supply chains or any part of its business cease and victim remediation occurs to the reasonable satisfaction of Catholic Schools Broken Bay.*

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

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

- 1 **Public information monitoring** – monitoring information publicly available which refers to modern slavery practices as exposed somewhere in CSBB's supplier base;
- 2 **Panel ('Pre-Qualified') providers** – Ongoing checking of pricing rate cards offered to CSBB by CSBB's Pre-Qualified Suppliers;
- 3 **Registration of onsite contractors and providers** – Any contractor or provider that is required to enter a CSBB school site is required to have proper insurances and Child Protection registrations – by undertaking these checks and monitoring CSBB is reinforcing use of reputable and registered suppliers and contractors;
- 4 **Market testing** – By undertaking an assessment of reasonable market value in alignment with CSBB's Market Testing Requirements, CSBB is ensuring that for all purchases and contracts there is size and risk correlated monitoring to ensure no evidence of underpricing of goods or services which may align with a modern slavery practices risk.

*Communicate:* CSBB is committed to continually communicating with its suppliers through appropriate supplier relationship management, seeking responses to risk-related questions to suppliers through vendor and tender due diligence, and revising its Modern Slavery Statement as new risks and/or trends in these areas emerge requiring a CSBB response.

### **Summary**

CSBB has policies, procedures and guidance in place to ensure that CSBB operates to a certain standard that guides the responsible stewardship of resources, that are ethical, efficient, effective, and value for money.

CSBB having a centralised response to modern slavery mitigates the risks of slavery in its supply chains, no matter what the procurement. In addition to the work on embedding modern slavery due diligence into CSBB's tender and vendor due diligence processes,

legal agreements address human rights issues and in particular, an agreement between CSBB and the supplier to work together to combat modern slavery. CSBB believes that suppliers that have the security of a contract in place are less likely to employ illegal slavery practices.

Over the course of 2020 through to the end of 2023 CSBB has:

1. Completed a high-level assessment of its operational supply chain risk
2. Created a process for vendor and tender due diligence
3. Embedded modern slavery measures into its supplier contracting pro-formas
4. Assessed categorised spend to identify key risk areas
5. Commenced the process of creating awareness both within and outside the organisation
6. Implemented technologies to assist with procurement processes
7. Identified key risk areas/gaps in purchasing for its school system
8. Finalised a rolling list of compliant suppliers
9. Engaged an external consultant to revisit supplier categorisation, sourcing strategy by category, compliance requirements by category and the supplier on-boarding process.

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

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

The elements of vendor due diligence and tender due diligence, and the embedding of modern slavery into supplier contracting pro-formas will be continually refined, reviewed and improved, as will CSBB's supplier base and an understanding of modern slavery risk inherent in it.

The migration of supplier and contract information into the EMS will make this review process even more effective and efficient.

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

Within CSBB, cross workstream collaboration occurs when required to discern matters relating to procurement including but not limited to:

- Continual refinement of the information requested as part of vendor due diligence and tender due diligence;
- Continual refinement of the CSBB Procurement Framework and its related policies and procedures; and
- The management of suppliers and contracts in the EMS.

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

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



programs/materials where deemed relevant and necessary.

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

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

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

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

### ***Partnering***

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

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

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

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

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

As the CSBB Procurement function matures, it will continue to further develop a program in line with the modern slavery legislative requirements that will monitor, analyse and manage modern slavery risks into the future.

## 8. Principal Governing Body Endorsement

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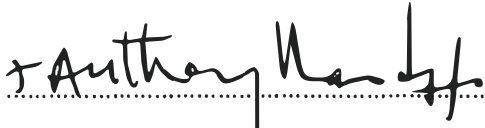
This Statement describes the actions of Catholic Schools Broken Bay in response to the Modern Slavery (Cth) Act 2018.

This statement highlights the steps Catholic Schools Broken Bay have taken to date and the work we are completing to eradicate modern slavery from our supply chains. This statement covers the financial year 1 January 2023 to 31 December 2023.

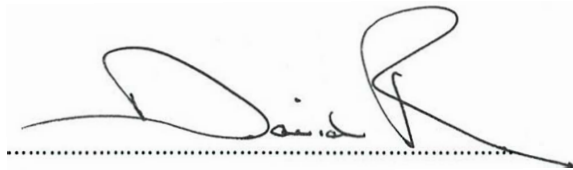
This statement is endorsed by the Trustees of the Roman Catholic Church for the Diocese of Broken Bay. The signed endorsement follows.

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

Signed at Pennant Hills on this .....19..... day of June 2024



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



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



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