



AUSTRALIAN CATHOLIC  
**ANTI-SLAVERY  
NETWORK**

**2021**

**COMPENDIUM  
OF MODERN  
SLAVERY  
STATEMENTS**

ACAN COMPENDIUM  
EXECUTIVE SUMMARY

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*“The Australian Catholic Anti-slavery Network (ACAN) is leading the Catholic response in Australia through its modern slavery risk management program and Domus 8.7.”*

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PRESIDENT, AUSTRALIAN CATHOLIC  
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# 01 About ACAN

## 01.1 Foreword

By John McCarthy QC  
Chair of the Sydney Archdiocesan Anti-Slavery Taskforce

The Australian Catholic Anti-slavery Network (ACAN) Compendium 2021 contains 40 Modern Slavery Statements and is the response of Catholic entities to the reporting requirements of the Modern Slavery Act (Cth) 2018 (MSA). This is the second ACAN Compendium on the Australian Government's Online Register for Modern Slavery Statements.

The ACAN Compendium reflects activities undertaken during the 2021 calendar year. ACAN entities have aligned respective reporting periods to a single reporting period, consistent with the joint reporting requirements of MSA s.14.

The Sydney Archdiocesan Anti-Slavery Taskforce coordinates 50 Catholic entities and provides direct support to staff tasked with the implementation of the ACAN modern slavery risk management program (ACAN Program).

Over the past three years the Taskforce has continued to engage with Catholic entities which would benefit from participation in the ACAN Program but have not as yet joined. As a result, participation in ACAN increased to 50 entities, with the notable inclusion and support from both major peak associations, the National Catholic Education Commission and Catholic Health Australia.

ACAN entities are united in the belief that action against modern slavery and protecting the dignity of workers everywhere, is fundamental Catholic Social Teaching. ACAN strives to demonstrate solidarity, show collective leadership of the Church

and to be at the forefront of efforts to eradicate modern slavery in Australia and throughout the world in our generation.

Another measure of the resolve of ACAN entities to tackle modern slavery are the ten entities that have annual revenue below the MSA reporting threshold. Yet they have joined ACAN in solidarity with Catholic reporting entities, and are working to build strong organisational culture and practice to assess and address the risk of modern slavery in their operations and supply chains.

In 2021, in a message for the International Day of Prayer and Reflection against Trafficking in Persons, Pope Francis called for an economy of care, courage, and the promotion of justice aimed at building a society that puts the human person at the centre. The Holy Father continues to raise his voice against modern slavery and human trafficking:

*“An economy without human trafficking is an economy of care. An economy of care is also one that cares for work, creating employment opportunities that do not exploit workers through degrading working conditions and gruelling hours.”*

- POPE FRANCIS

Australia and 190 other nations pledged to end modern slavery by 2030, by adopting the Pope Francis-inspired UN Sustainable Development

Goal (SDG) 8.7. ACAN aspires to help the Australian Government to meet Australia's international obligations under SDG 8.7.

The extent of the risk of modern slavery in Catholic operations and supply chains is significant in this global battle. Indeed, the major risk of modern slavery of the Church in Australia is related to procurement decisions of Catholic agencies across health and aged care, education, dioceses, social services, finance and investment sectors.

For this reason, the specialist advice, tools and resources of the ACAN Program become more important for Catholic entities, as risk assessment transitions from inherent sector risk, to specific risk and red flags associated with individual suppliers.

The ACAN Program anticipates the evolving needs of Catholic entities as their response matures from policy to embedding practice in procurement processes. Fostering the capability of staff to implement processes to identify and mitigate modern slavery risks is a substantial board and management undertaking. Addressing modern slavery risk, implementing corrective action and reporting obligations are highly complex and will require more resources over coming years.

On behalf of ACAN I wish to thank the Anti-Slavery Taskforce Executive Alison Rahill, Jenny Stanger, Ciantal Bigornia and Carsten Primdal for their modern slavery expertise, vision, capacity and generous endeavours to organise and mobilise the Australian Catholic Anti-slavery Network.

I also acknowledge the support of Michael Digges, Executive Director, Administration & Finance Catholic Archdiocese of Sydney and the leadership of Archbishop Anthony Fisher OP.

May Saint Josephine Bakhita bless the work of all those endeavouring to end modern slavery, human trafficking and forced labour by 2030.



Most Rev Anthony Fisher  
launches the Australian Catholic  
Anti-Slavery Network Annual Report  
2019-2020

## 01.2 ACAN Entities

### OVER \$1B ANNUAL CONSOLIDATED REVENUE

- ✕ Catholic Archdiocese of Brisbane
- ✕ Catholic Education Western Australia
- ✕ Edmund Rice Education Australia
- ✕ Little Company of Mary Health Care (Calvary)
- ✕ Mater Health
- ✕ Melbourne Archdiocese Catholic Schools
- ✕ St John of God Health Care
- ✕ St. Vincent's Health Australia
- ✕ Sydney Catholic Schools

### BETWEEN \$500M - \$1B

- ✕ Australian Catholic University
- ✕ Cabrini Health
- ✕ Catholic Archdiocese of Hobart
- ✕ Catholic Education Diocese of Parramatta
- ✕ Mercy Health

### BETWEEN \$250M - \$500M

- ✕ Australian Catholic Superannuation and Retirement Fund
- ✕ Catholic Church Insurance
- ✕ Catholic Diocese of Maitland-Newcastle
- ✕ Diocese of Rockhampton
- ✕ Catholic Education Archdiocese of Canberra Goulburn
- ✕ Catholic Education Office Diocese of Wollongong
- ✕ Catholic Healthcare
- ✕ Mercy Education
- ✕ Ozcare

### BETWEEN \$100M - \$250M

- ✕ Catholic Education Diocese of Bathurst
- ✕ Catholic Education Northern Territory
- ✕ Catholic Education Sandhurst
- ✕ Catholic Education Diocese of Wagga Wagga
- ✕ Diocese of Ballarat Catholic Education
- ✕ Diocese of Lismore Catholic Schools
- ✕ Dominican Education Australia
- ✕ MacKillop Family Services
- ✕ Mercy Care WA
- ✕ Mercy Community Services SEQ
- ✕ Southern Cross Care (NSW & ACT)
- ✕ Southern Cross Care (Qld)
- ✕ St Vincent de Paul Society NSW
- ✕ St Vincent de Paul Society Qld
- ✕ University of Notre Dame Australia
- ✕ Villa Maria Catholic Homes

### LESS THAN \$100M

- ✕ Catholic Archdiocese of Adelaide
- ✕ Catholic Archdiocese of Perth
- ✕ Catholic Archdiocese of Melbourne
- ✕ Catholic Archdiocese of Sydney
- ✕ Catholic Cemeteries and Crematoria
- ✕ Catholic Education Commission Victoria
- ✕ Catholic Health Australia
- ✕ Catholic Schools NSW
- ✕ CatholicCare Sydney
- ✕ Catholic Education Network (CENet)
- ✕ National Catholic Education Commission

### MESSAGE TO ACAN FROM THE AUSTRALIAN GOVERNMENT

"I'm really encouraged to see the collaboration that's happening across the supply chains of Australia's largest Catholic organisations - in education, health and aged care, dioceses and community services, finance and investment sectors. Collaboration across industry groups and sectors is vital to addressing modern slavery, which is deeply embedded in the global economy and in supply chains across the Asia Pacific region.

I'd like to say a big thank you to the 40-plus Catholic organisations in the Australian Catholic Anti-slavery Network."

Click [here](#) to view the video message from the Assistant Minister for Customs, Community Safety, Multicultural Affairs and Modern Slavery in 2021.



“An economy without human trafficking is an economy of care”

POPE FRANCIS

## 01.3 Endorsement



AUSTRALIAN CATHOLIC BISHOPS CONFERENCE  
THE PRESIDENT

17 June 2022

### Statement of Endorsement and Support

Modern slavery destroys personal freedom and violates the human dignity and inherent worth of every person. Forced and child labour, human trafficking, debt bondage, deceptive recruitment and other forms of modern slavery impact over 40 million people worldwide with the majority in the Asia-Pacific region. Globally, Catholics have been called by Pope Francis to take action to end all forms of modern slavery. In Australia, the Modern Slavery Act (MSA) 2018 has also made engagement with modern slavery by Catholic entities a very concrete and imperative reality. The Australian Catholic Anti-slavery Network (ACAN) is leading the Catholic response in Australia through its modern slavery risk management program and Domus 8.7.

I strongly commend ACAN participating entities for this 2021 Compendium of Catholic Modern Slavery Statements and what they are doing to eliminate modern slavery from our operations, supply chains and the wider world. This Compendium is a demonstration of our faith being put into action across Catholic health and aged-care services, education providers, community services and investments. These efforts by Modern Slavery Liaison Officers (MSLOs), Modern Slavery Working Groups, executives, board members and business partners have strengthened the transparency and sustainability of Catholic organisations and Catholic accountability to people impacted by modern slavery around the world. Yet much remains to be done.

Australians are beginning to emerge from the COVID pandemic. Some communities are recovering and rebuilding from the worst fires and floods in Australia’s history. Poverty, displacement, violence against women, the refugee crisis and a changing climate are some of the factors contributing to modern slavery risks both in Australia and abroad. An integral approach to modern slavery by all stakeholders including the newly elected Australian Government is now more important than ever. It will enable the United Nations Sustainable Development Goal 8.7 to eliminate modern slavery by 2030 and Pope Francis’ *Laudato Si’* goals to heal both the earth and human society.

Saint Josephine Bakhita, patron saint of slavery victims, Pray for us.

✠ Mark Coleridge  
Archbishop of Brisbane  
President

# 02 ACAN Operations and supply chains<sup>1</sup>

ALL AUSTRALIAN STATES  
AND TERRITORIES  
REPRESENTED



**196,501**

STAFF EMPLOYED ACROSS  
139 ENTITIES



**41,471**

VOLUNTEERS



**607,624**

STUDENTS EDUCATED IN  
1,478 SCHOOLS



**46,436**

UNIVERSITY STUDENTS  
ACROSS 13 CAMPUSES



**11,216**

BEDS ACROSS  
66 HOSPITALS



**19,122**

AGED CARE BEDS  
ACROSS 247 FACILITIES



**6820**

COMMUNITY SERVICES  
BEDS



**165,654**

SOCIAL CARE CLIENTS



<sup>1</sup>48 entities provided data

## 03 Modern Slavery Risks

### 03.1 Risk Assessment

In 2021, of the \$8.01B aggregated expenditure on procurement, \$4.7B was spent with 24,929 suppliers across 11 high risk categories.

The first step for each new entity participating in the ACAN Program is to undertake an assessment of modern slavery risk of operations and supply chains. For that purpose, ACAN uses modern slavery risk profiles developed for the supply chains of ACAN entities using a category risk taxonomy.

The ACAN Category Risk Taxonomy identifies inherent or potential modern slavery risks associated with major spend categories using sources such as the 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

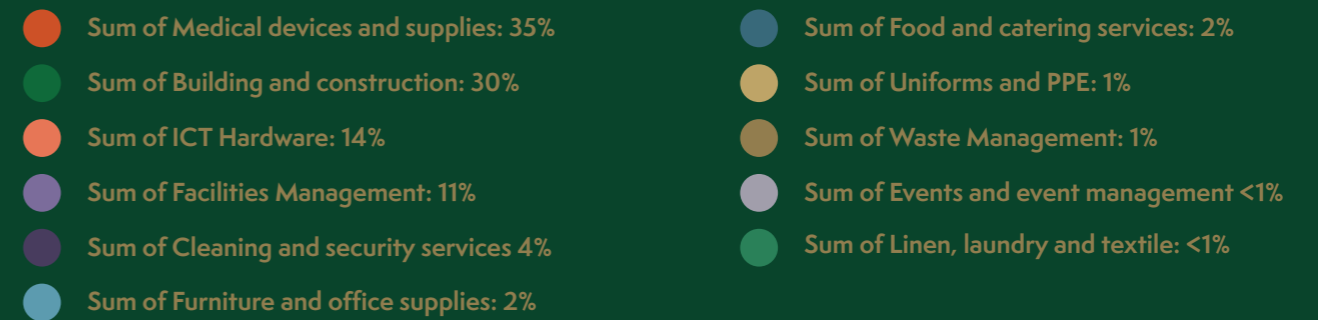
The Category Risk Taxonomy informs and educates procurement teams and other internal stakeholders on potential modern slavery risks within supply chains.



## 03.2 Risk Categories

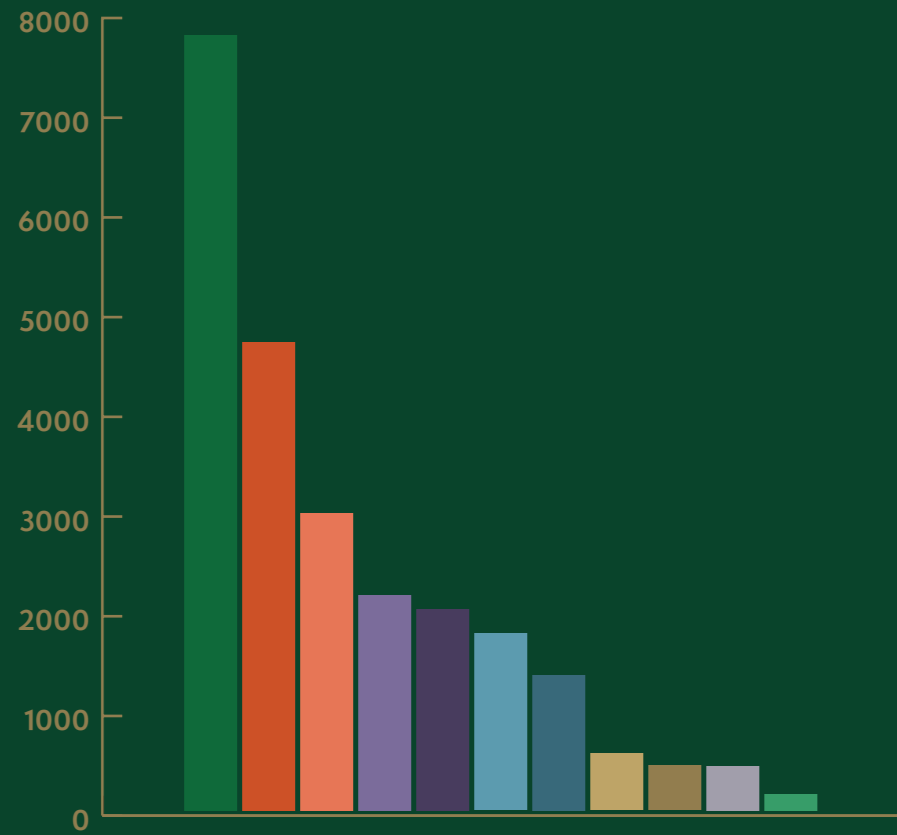
### 03.2.1 OVERALL SPEND IN HIGH RISK CATEGORIES

MEDICAL DEVICES AND SUPPLIES	\$1,658,082,206
BUILDING AND CONSTRUCTION	\$1,435,542,604
ICT HARDWARE	\$655,486,603
FACILITY MANAGEMENT & PROPERTY MAINTENANCE	\$495,459,578
CLEANING AND SECURITY SERVICES	\$186,151,596
FURNITURE AND OFFICE SUPPLIES	\$114,389,281
FOOD AND CATERING SERVICES	\$83,949,403
UNIFORMS AND PPE	\$29,460,022
WASTE MANAGEMENT SERVICES	\$25,825,359
EVENTS AND EVENT MANAGEMENT	\$14,087,284
LINEN, LAUNDRY AND TEXTILE PRODUCTS	\$7,365,844
<b>Total</b>	<b>\$4,705,799,790</b>

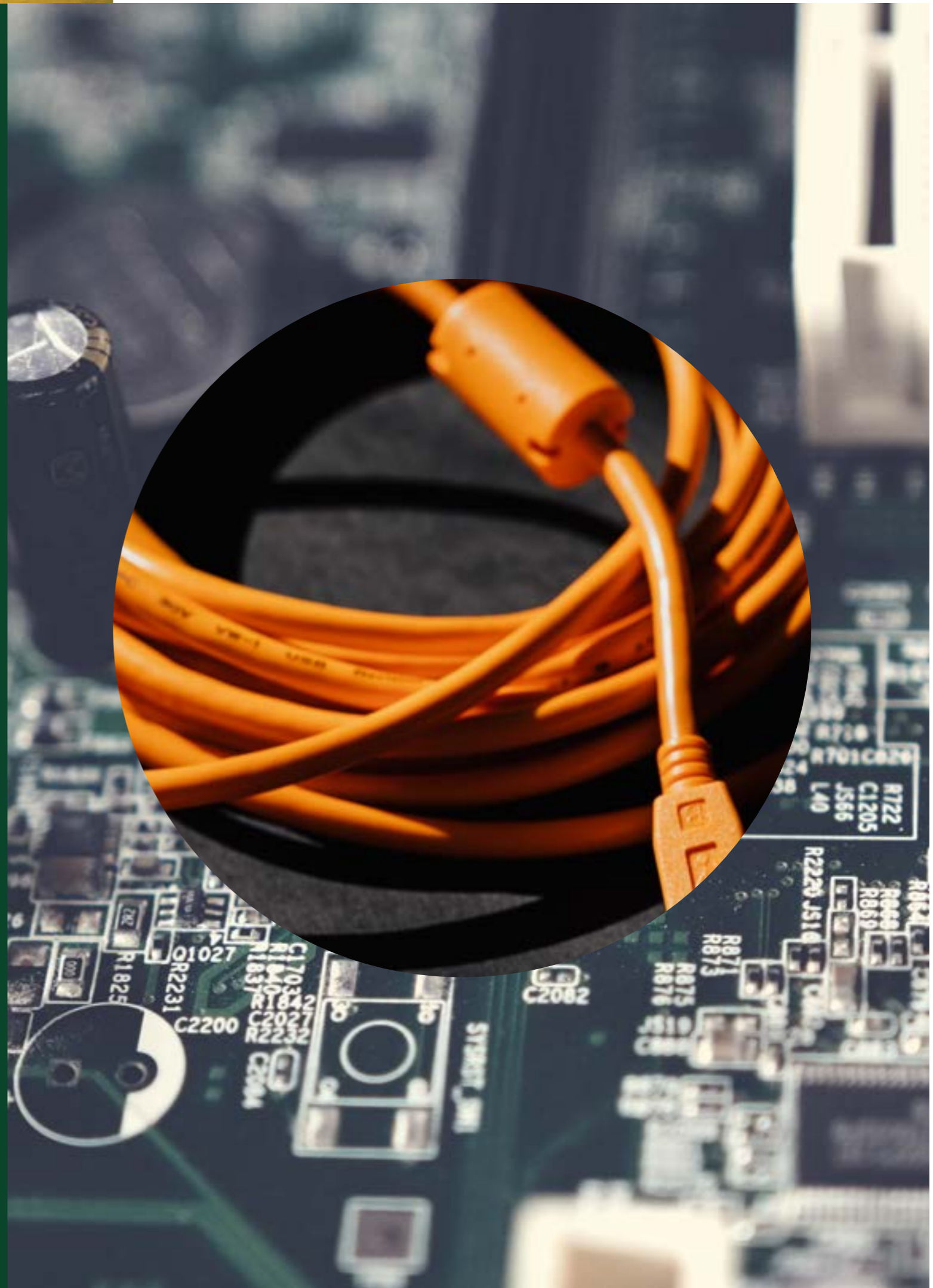




03.2.2 NUMBER OF SUPPLIERS IN THE 11 HIGH RISK CATEGORIES



- Facility management & property maintenance
- Furniture and office supplies
- Food and catering services
- Building and construction
- ICT Hardware
- Medical devices and supplies
- Cleaning and security services
- Events and event management
- Uniforms and PPE
- Waste management services
- Linen, laundry and textile products





## 03.3 Risk profile



**\$8.01B**

**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:**

- ✘ Medical devices and supplies
- ✘ Building and construction
- ✘ ICT Hardware
- ✘ Facility management & property maintenance

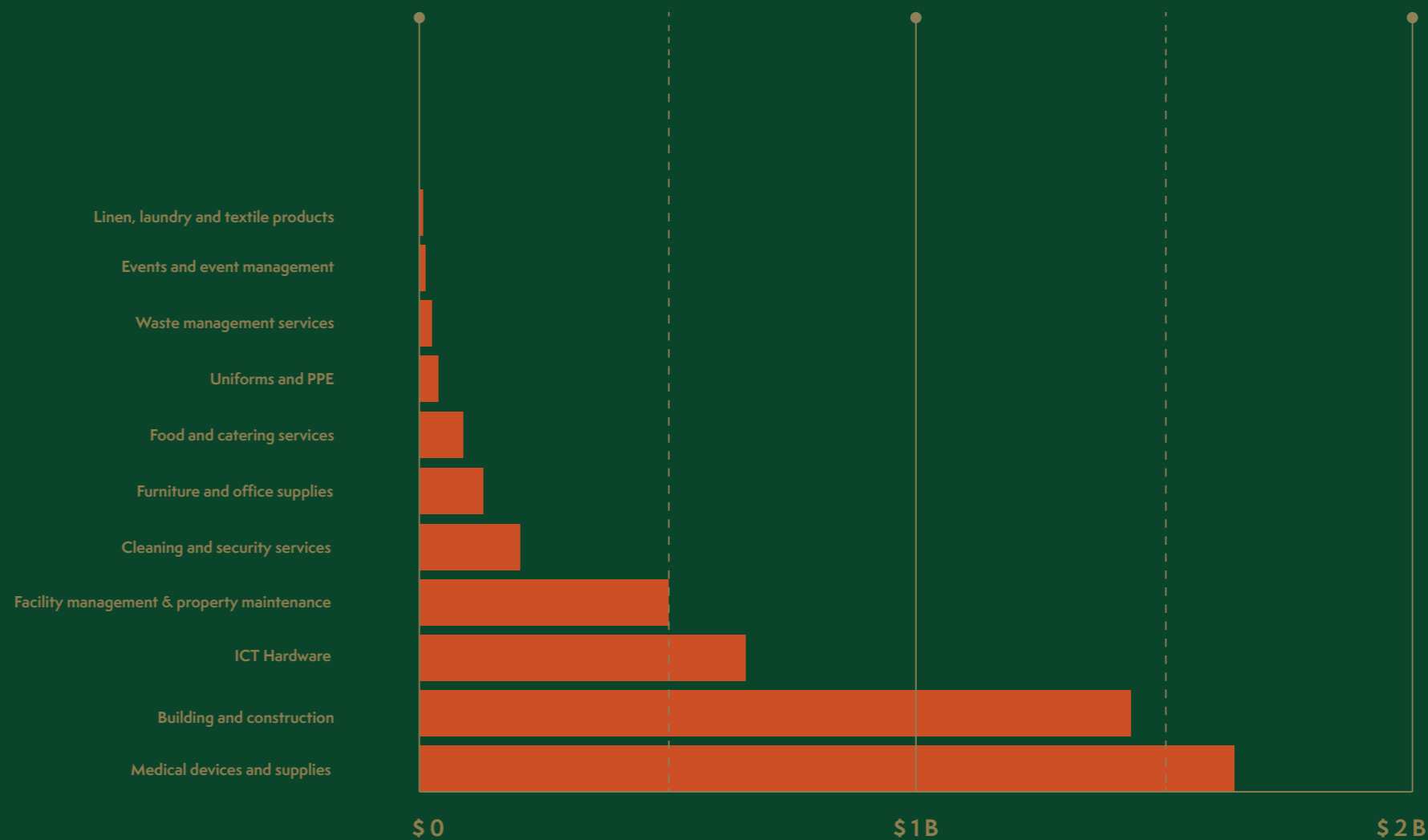
Over half of total spend is in categories with inherent high risk of modern slavery.



**24,929**

**TOTAL NUMBER OF SUPPLIERS IN HIGH RISK SPEND CATEGORIES ACCOUNT FOR \$4.7B EXPENDITURE**

### Overall spend in high risk categories



# 04 Actions taken to address risk

## 04.1 ACAN risk management program

At the centre of the ACAN Program is the Modern Slavery Liaison Officer (MSLO) who is nominated by each ACAN entity. The MSLO's role is to liaise with ACAN, coordinate implementation of the ACAN Program and lead the Modern Slavery Working Group (MSWG). The MSWG is comprised of key internal staff who are integral to the implementation of the ACAN Program. ACAN recommends senior staff from these functions are appointed to a MSWG and meet on a regular basis:

- ✘ Procurement
- ✘ Finance
- ✘ Human Resources
- ✘ Property and facilities managers
- ✘ Legal, risk & governance
- ✘ Communications

Capacity building is a core principle of ACAN, which fosters ownership of the ACAN Program and creates a pathway to embedding modern slavery risk management into policy, process and practice.

In 2021, staff spent an estimated 14,500 hours engaged in work associated with implementation of the ACAN Program. ACAN hosted 11 monthly webinars to share ACAN Program updates and communicate key activities and timelines for MSLOs. Virtual breakout rooms allowed MSLOs to share experiences, progress and challenges.

A monthly newsletter is distributed to over 1000 subscribers providing ACAN Program insights, government updates and links to curated modern slavery resources.



## 04.2 Supplier engagement

The essential components of the ACAN Program are Sedex and e-learning.

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.

ACAN entities commenced onboarding to Sedex with the aim to:

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

ACAN entities use the risk taxonomy to select high risk and high volume suppliers for onboarding to Sedex. Once invited to join the Sedex platform, suppliers are required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

ACAN entities will be engaging with high risk suppliers via Sedex in the course of 2022. This will be an important step for ACAN entities towards complying with the requirement for continuous improvement under the MSA.





In 2021 ACAN commissioned 46 ACAN Entity accounts on the supplier engagement platform Sedex. Across these 46 accounts, 114 users were created. Twenty-two ACAN entities have initiated supplier onboarding to Sedex resulting in 1262 invites to join Sedex being issued to selected suppliers. A total of 247 suppliers accepted the invitation and by the end of the reporting period, 44 suppliers had sufficiently completed enough of the self-assessment questionnaire to generate a risk rating.

The work to onboard the suppliers is ongoing and will continue throughout 2022, and the approach to suppliers who do not comply will be determined.

The expected outcome of ACAN entities' Sedex membership is a comprehensive indication of where the real risk lies and the ability to generate next steps, to mitigate the risk of modern slavery, either through supplier engagement or supplier audits.

A preferred supplier list is under development and will be made available to all ACAN members. Over time this list will be a major tool in sourcing products and services across the ACAN network.

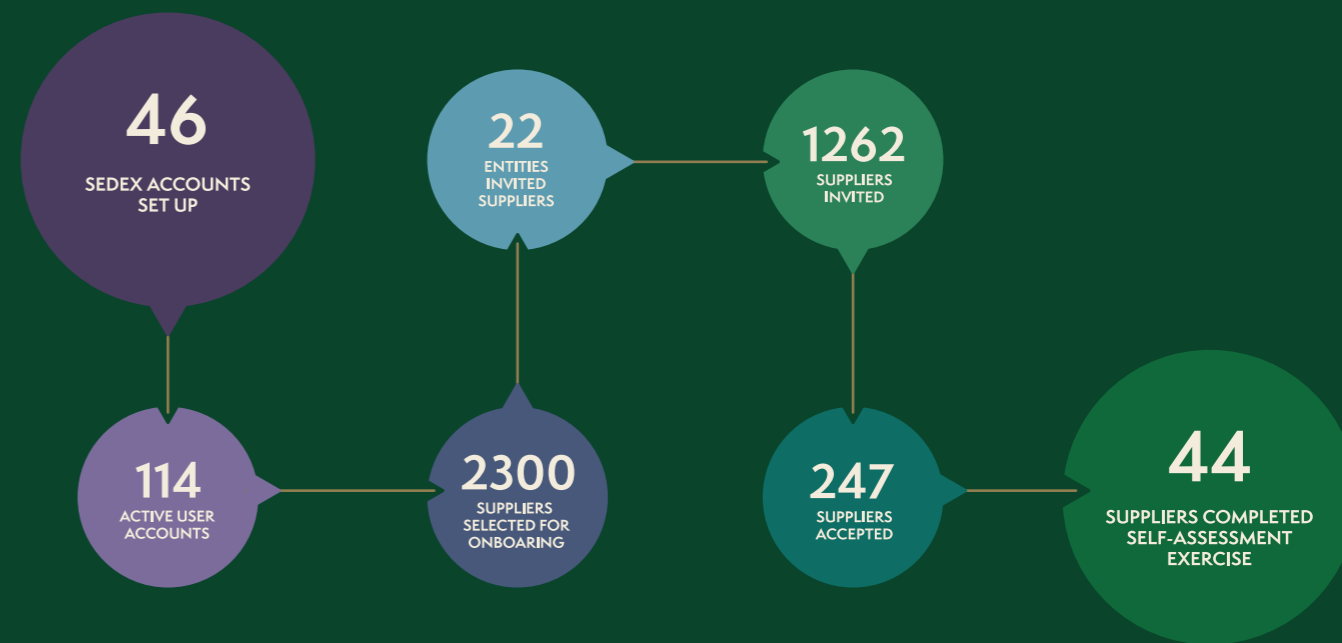
An important part of supplier engagement included a webinar series for suppliers of Catholic health & aged care, education, community services, finance & investment hosted by ACAN. The purpose of the ACAN supplier webinar series was to help businesses gain an understanding of modern slavery in relation to:

- ✘ Business relevance and the Modern Slavery Act
- ✘ Catholic customer/buyer expectations
- ✘ How to access free ACAN e-learning
- ✘ Sedex supplier membership
- ✘ Engagement with ACAN's modern slavery remediation service Domus 8.7

The webinar series focused on medical, construction, information technology and communications, and other suppliers to Catholic entities. Recordings of the webinars were emailed to suppliers via links to the [ACAN supplier resources webpage](#) and online video site.

In order to register for the ACAN webinar series, 260 suppliers provided the following responses to a short survey:

- ✘ 67% annual revenue below \$100M
- ✘ 81% global headquarters located in Australia
- ✘ 35% submitted a Modern Slavery Statement
- ✘ 17% members of Sedex



## What can suppliers do?

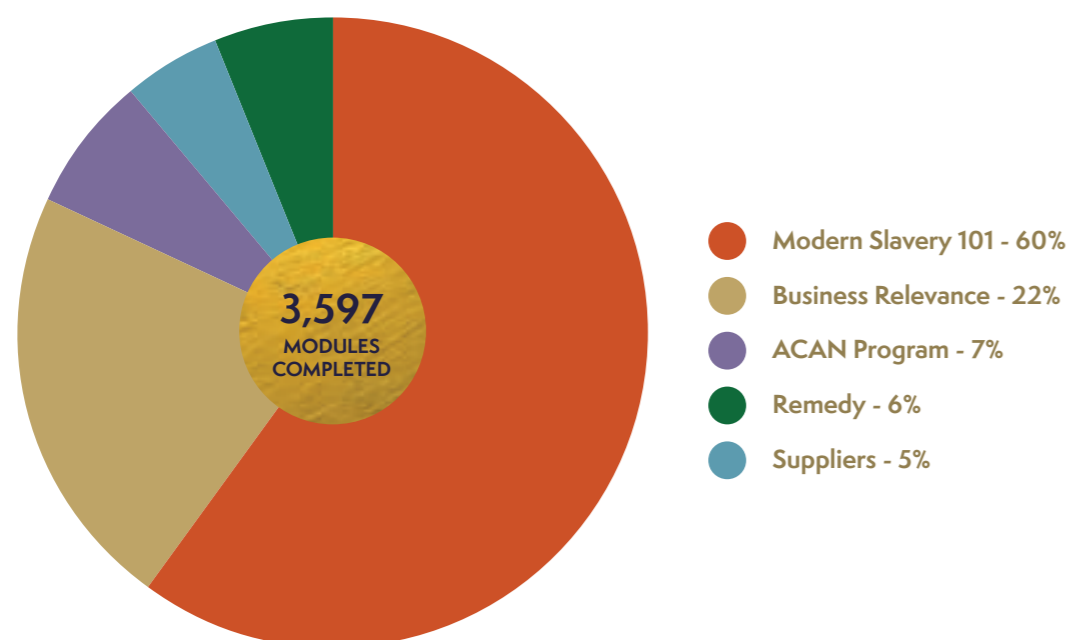
01. Designate a role in your business to drive modern slavery engagement.
02. Watch an [ACAN supplier webinar](#) for construction, medical, ICT and other
03. Download the ACAN [supplier powerpoint presentation](#) and share with your staff to raise awareness and ensure expectations of the ACAN entity your business supplies to are understood.
04. [Join SEDEX](#) as a Supplier Member, complete a Self-Assessment Questionnaire (SAQ) and connect to the ACAN entity you supply to.
05. Building and construction suppliers [download the Building Links toolkit](#) for deployment on-site or contact us to learn more about how to partner.
06. [Contact us](#) to arrange e-learning completion of Modern Slavery 101 and Modern Slavery Risk Management for Suppliers for your staff. Keep e-learning completion certificates as evidence of modern slavery training for ACAN entities and other customers.

## 04.3 ACAN e-learning

E-learning provides an important framework and foundation for the ACAN Program. The five modules are delivered online via the ACAN Learning Management System providing transparency of reporting on staff participation.

In 2021, the ACAN e-learning modules were incorporated into the internal Learning Management Systems of 16 ACAN entities. This provided greater oversight and accountability, equipping entities to track training completion rates, hours of training delivered and learner understanding through the completion of quizzes. This data informs each entity's ongoing modern slavery training and education program and provides valuable information for annual modern slavery reporting.

The e-learning chart shows that in total 3597 modules were completed, Modern Slavery 101 representing 60% of modules completed by 2160 staff.



The ACAN modern slavery modules are summarised as follows:

### MODULE 1: MODERN SLAVERY 101 (MS101)

This module provides a comprehensive overview of modern slavery – who is vulnerable, how and why it occurs. This module shares insights about slavery in all stages of the supply chain relating to the production of goods, from raw materials, to the manufacturing, and various stages of transport and logistics.

Modern slavery risks in the labour services industry, particularly the sectors of cleaning, security and hospitality are also explored.

The module is interactive, using scenarios, quizzes and case studies to engage and educate users about the continuum of workers' rights and the key indicators of modern slavery risk.


### MODULE 2: BUSINESS RELEVANCE

This module provides a business perspective on modern slavery risks. The module explains the responsibilities of businesses to respect human rights through enhanced corporate due diligence, and the key economic, legislative and stakeholder drivers to manage risks.

The final section of the module looks at relevant legislation in Australia, outlining criminal offences in relation to the modern slavery and the key reporting requirements of the Modern Slavery Act 2018 (Cth).

The module is highly interactive and uses scenarios, case studies and quiz questions to engage learners and consolidate learning outcomes.





### Implementing a Modern Slavery Risk Management Program

#### MODULE 3: IMPLEMENTING A MODERN SLAVERY RISK MANAGEMENT PROGRAM

This module provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources. It clearly explains the five steps of ACAN's Modern Slavery Risk Management Implementation Flowchart:

1. **COMMITMENT** – to set direction, gain support, prepare policy documentation and define roles and responsibilities
2. **BUSINESS STATE OF PLAY** – to understand what is being done well and where the gaps are, develop a modern slavery action plan and monitor progress
3. **SUPPLIER RISK** – to prioritise supplier according to risk and spend, present data in an easily understandable way and conduct supplier due diligence.
4. **ENGAGE, EDUCATE, RESPOND** – to ensure staff, contractors and suppliers are trained and educated on modern slavery risks and that documented response mechanisms are in place.
5. **MODERN SLAVERY STATEMENT** – to help entities prepare a compliant Modern Slavery Statement and collaborate with other ACAN entities.

The module is visual and interactive and provides direct access to all available ACAN tools and resources.

All modules are available on the [Domus 8.7 Shopfront](#).

#### MODULE 4: MODERN SLAVERY RISK MANAGEMENT FOR SUPPLIERS

This 20-minute module assists suppliers to gain an understanding of the Modern Slavery Act and how to meet contractual requirements for the supply of ethical goods and services. Three key areas of action are described in the module:

- ✕ Developing modern slavery risk profiles for major suppliers
- ✕ Developing ethical procurement policies and other documentation such as supplier codes of conduct, reporting tools and contract specifications
- ✕ Undertaking action planning to implement a modern slavery risk management program.

The module outlines expectations of suppliers to effectively manage modern slavery risk and the potential implications of enhanced supplier due diligence.

The module provides a highly visual and interactive learning opportunity for suppliers wanting to develop and implement a modern slavery risk management program.

#### MODULE 5: GRIEVANCE MECHANISMS AND 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 Modern Slavery Act 2018 Guidance for Reporting Entities.

The module also includes extracts from the UN Global Compact Network Australia's publication on Implementing Effective Modern Slavery Grievance Mechanisms, and case studies about initiatives, such as the Cleaning Accountability Framework (CAF).



### Modern Slavery Risk Management for Suppliers



### Grievance Mechanisms & Remedy

START

COURSE  
INSTRUCTIONS

Course completion time: 30 minutes

## 04.4 Remediation

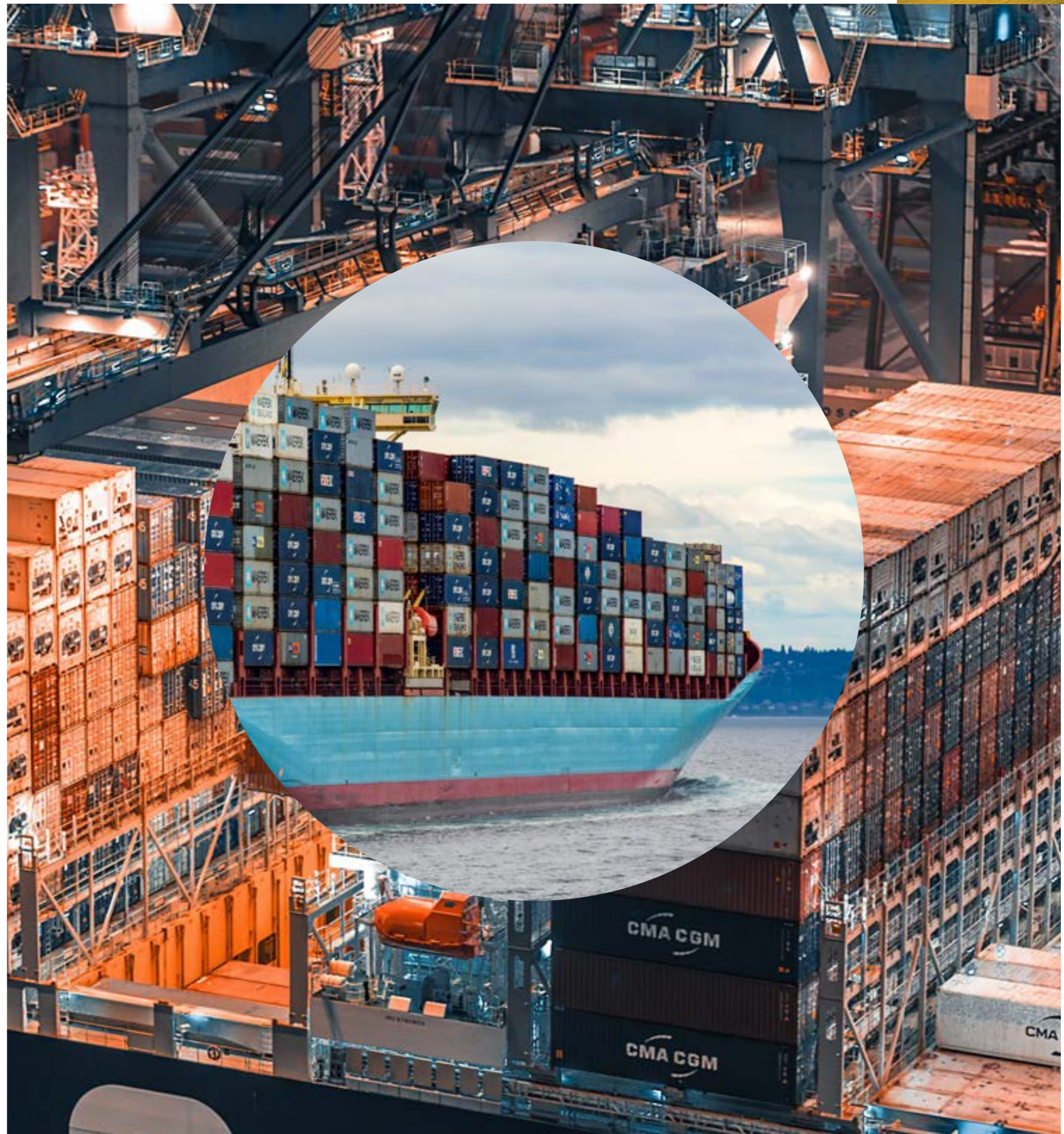
An initiative of the Catholic Archdiocese of Sydney to provide an effective response to modern slavery.

A documented remedy pathway is an important requirement of the Modern Slavery Act. Statements are required to include how entities are assessing and addressing risks of modern slavery in operations and supply chains and the actions taken (including remediation).

**Domus 8.7 is Australia's first 'one-stop-shop' service available to business, workers or people impacted by modern slavery to obtain support, advice and guidance on how to respond to modern slavery concerns.**

### A REMEDY PATHWAY:

- ✘ Enhances the ACAN modern slavery risk management program
- ✘ 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 (potentially) complex humanitarian issues
- ✘ Addresses a key mandatory reporting requirement of the MSA
- ✘ Upholds Catholic Social Teaching
- ✘ Ensures ongoing commitment to protecting the human rights of people in operations and supply chains.







**REMEDIATION PROCESS**

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.

**KEY ELEMENTS:**

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

**DOMUS 8.7 SERVICE PROFILE:**

- ✗ Guidance and advice for entities who identify slavery in their operations or supply chains
- ✗ 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

**GAPS, RELATIVE TO MAJOR AREAS (AVERAGE)**

This ranking of items assessed also assists ACAN entities to prioritise focus areas for 2022. Of particular note are the areas of monitoring and reporting which appear in the lowest tier. This is consistent with the general perception that Key Performance Indicators, data collection and metrics need more development.

# 0.5 Measuring effectiveness

## 05.1 Gap Analysis

A major activity to measure effectiveness and develop action plans is the annual undertaking of entity-based Gap Analysis. This work commenced in 2019. Aggregated results across 30 ACAN entities show progress by entities across five focus areas and highlight organisational maturity, relative to dealing with modern slavery risk.

The five focus areas of Management & Governance, Risk Approach, Human Resources & Operations, Stakeholders, Procurement & Supply Chain, are measured on a scale from 0 to 5. The five levels begin with "0" where work has yet to commence and "5" which represents that appropriate practices are in place.

The outcome of the Gap Analysis across the five areas shows that Risk and Procurement & Supply Chain are the most immature, while Stakeholder engagement is the most mature area.



FOR EACH ITEMS SURVEYED, IN ORDER OF MATURITY, THE RESULTS ARE HIGHLIGHTED BELOW.

**FOCUS AREA**

Risk Management	Monitoring and Reporting on Risk	1.8
Procurement & Supply Chain	Monitoring and Corrective Actions	1.9
Risk Management	Identifying External Risks	1.9
Procurement & Supply Chain	Screening and Traceability	2.1
Management & Governance	Monitoring & Reporting	2.1
Human Resources & Recruitment	Labour Hire / Outsourcing	2.2
Human Resources & Recruitment	Policies and Systems	2.3
Stakeholder Attitude	Customer Attitude	2.5
Procurement & Supply Chain	Contract Management	2.5
Procurement & Supply Chain	Policies and Procedures	2.5
Management	Commitment	2.6
Stakeholder Attitude	Feedback Mechanisms	2.6
Management & Governance	Governance	2.7
Management & Governance	Action	2.7
Human Resources & Recruitment	Awareness	2.7
Risk Management	Operational Risk	2.8
Management & Governance	Business Systems	2.8
Human Resources & Recruitment	Training	2.9
Stakeholder Attitude	Worker Voice	2.9
Procurement & Supply Chain	Supplier Engagement	2.9
Risk Management	Risk Framework	2.9
Stakeholder Attitude	Information Provision	3.4

ACAN successfully applied for Cleaning Accountability Framework (CAF) membership in order to demonstrate a willingness to end exploitation in cleaning services and improve work standards. Through the CAF membership, ACAN seeks to:

- ✘ Support sustainably priced and efficient cleaning services
- ✘ Ensure compliance with workplace laws and regulations
- ✘ Engage and educating workers and all supply chain stakeholders
- ✘ Foster accountability and transparency in cleaning supply chains

## 05.2 Future actions

ACAN entities share common suppliers across building and construction, information and communications technology (ICT), medical devices, equipment and a range of consumables.

Increased engagement with suppliers via regular communications, access to modern slavery e-learning and use of the supplier engagement platform Sedex will increase supplier transparency and accountability in ways that can be measured and reported.

Collectively, ACAN entities are the largest employer in Australia outside the public sector, with many employees working in frontline public-facing roles. Nurses, social workers, community service staff and facilities managers in ACAN entities are the most likely to encounter people in modern slavery. Opportunities to train frontline staff to recognise and respond to modern slavery across ACAN are being identified and planned.

ACAN entities operate and own large sites where subcontracted staff and people at risk of modern slavery may be working. Whilst many entities contract whistle blower services and promote them to staff, there are limited ways for workers in supply chains to raise grievances or share concerns.

A modern slavery grievance mechanism will be deployed across ACAN and managed via Domus 8.7. This will ensure that training and capacity-building efforts are linked to a timely and effective response, and where appropriate, remediation.

### ACAN PROGRAM OBJECTIVES FOR 2021 - 2023:

**PRIORITY 01**

ACCESS TO A PLATFORM TO MANAGE ONGOING SUPPLIER RISK DUE DILIGENCE

**PRIORITY 02**

MONITORING AND REPORTING, PRODUCING MEANINGFUL METRICS

**PRIORITY 03**

TRACKING PROGRESS AND ACCOUNTABILITY FOR ACTIONS

**PRIORITY 04**

KNOWING THAT OUR EFFORTS ARE PRODUCING THE RIGHT OUTCOMES

**PRIORITY 05**

REMEDATION SUPPORT AND ADVICE

## 05.3 Baseline data

To support the development of KPIs, ACAN developed a set of baseline metrics to begin assessing the effectiveness of activities to address the five focus areas of the Gap Analysis. The metrics are represented in table 1:

	ACTIVITY	2020	2021
<b>INTERNAL / STAFF</b>	Modern Slavery Liaison Officers (MSLOs) appointed	35	47
	Modern Slavery Working Groups (MSWGs) constituted	15	22
	Hours spent on modern slavery activities	14,735	14,500
	E-learning modules completed	568	3597
	Sedex Entity Accounts provisioned	0	46
	Sedex Individual user accounts	0	114
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	Number of suppliers across high risk categories	0	24,929
	Suppliers selected for onboarding to Sedex	0	2300
	Entity accounts issuing invites to suppliers to join	0	22
	Invited to join Sedex	0	1262
	Joined Sedex	0	247
	Sedex SAQ completed & Risk score generated	0	44
	E-learning modules completed	0	178
	% of entities with MS contract clauses (41 reporting entities)	0	68.75%
	Common suppliers engaged on Modern Slavery	0	150
	Social audits	0	0
Corrective actions	0	0	
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	Worker voice / grievance mechanism deployed	0	11
	Modern slavery cases identified	0	0
	Modern slavery cases remediated	0	0
	Referrals for advice and assistance	6	3
	Worker's case remediated	0	1

## Modern Slavery Risk Management Program Implementation

01.

### COMMITMENT

Engage top management and set direction  
Adopt the Modern Slavery Policy  
Establish a Modern Slavery Working Group  
Define roles and responsibilities

02.

### BUSINESS STATE OF PLAY

Understand what you are doing well and where your gaps are to manage modern slavery risks  
Prepare and implement a modern slavery action plan or strategy to address your gaps  
Monitor progress and ensure continual improvement

03.

### SUPPLIER RISK

Prioritise suppliers based on potential risk and spend  
Seek responses from suppliers on their modern slavery actions in EOI or tender processes  
Clearly outline expectations to suppliers

04.

### ENGAGE, EDUCATE & RESPOND

Engage and train management, employees and contractors  
Engage and educate highest priority suppliers  
Establish remediation process to respond when slavery practices identified in operations or supply chain

05.

### MODERN SLAVERY STATEMENT

Prepare draft Modern Slavery Statement and submit to leadership for signature  
Collaborate with ACAN participants to develop Modern Slavery Compendium and upload to Commonwealth Modern Slavery Statement Register  
Publish Modern Slavery Statement on entity website

## ACAN Resources

- ✗ Board Awareness Powerpoint presentation
- ✗ Model Modern Slavery Policy
- ✗ Working Group Model Terms of Reference
- ✗ Model Position Descriptions

- ✗ Sector-specific Modern Slavery Action Plans
- ✗ Undertake operational gap analysis across functions: Procurement, Finance, Human Resources, Facilities & Property Management, Legal, Risk & Governance and Communications

- ✗ Supplier Code of Conduct
- ✗ Supplier data spreadsheet
- ✗ Procurement risk taxonomy
- ✗ Supplier questionnaire and expectations matrix
- ✗ Supplier Corrective Action Plan template
- ✗ Supplier model contract clauses

- ✗ Staff Awareness Powerpoint presentation
- ✗ eLearning modules x 5
- ✗ Model stakeholder questionnaire
- ✗ Supplier Awareness Powerpoint presentation
- ✗ Model supplier engagement strategy and communications resources
- ✗ Supplier engagement workshop and 'how to run a supplier forum' video
- ✗ DOMUS 8.7 remediation process

- ✗ 'How to prepare Modern Slavery Statement' workshops
- ✗ Support and advice for ACAN participants
- ✗ ACAN Modern Slavery Statement checklist and survey
- ✗ Feedback on individual entity draft Statement

# 06 Index of Modern Slavery Statements

ENTITY NAME	ABN
<b>SECOND STATEMENT</b>	
1 St John of God Health Care Inc	21930207958
2 Little Company of Mary Health Care Ltd	11079815697
3 Mater Misericordiae Ltd	83096708922
4 Mercy Health Australia Ltd	89614115856
5 Cabrini Australia Ltd	42624828306
6 Catholic Healthcare Ltd	69064946318
7 Southern Cross Care (NSW & ACT) Ltd	76131082374
8 Villa Maria Catholic Homes Ltd	32004364103
9 Ozcare	58072422925
10 The Corp of the Trustees of the Roman Catholic Archdiocese of Brisbane	25328758007
11 Catholic Archdiocese of Sydney	72823907843
12 Catholic Education Western Australia Ltd	47634504135
13 Trustees of Edmund Rice Education Australia	96372268340
14 Catholic Education Office Diocese of Parramatta	86875623906

ENTITY NAME	ABN
<b>SECOND STATEMENT</b>	
15 Australian Catholic University Ltd	15050192660
16 The Roman Catholic Trusts Corporation for the Diocese of Melbourne	52768159282
17 Roman Catholic Church Trust Corporation of The Archdiocese of Hobart	24097986470
18 Trustees of the Roman Catholic Church for the Diocese of Maitland-Newcastle	62089182027
19 The Roman Catholic Trust Corporation for the Diocese of Rockhampton	50979741889
20 Trustees for the Wollongong Diocese Catholic School System	67786923621
21 Trustees for Catholic Education Office Archdiocese of Canberra & Goulburn	47824127996
22 Mercy Education Ltd	69154531870
23 The University of Notre Dame Australia	69330643210
24 Catholic Education Diocese of Bathurst	73470086952
25 Diocese of Lismore Catholic Schools Ltd	93638070836
26 Catholic Education Office Diocese of Darwin	22616685167
27 Catholic Education Commission of Victoria Ltd	92119459853
28 Catholic Church Insurance Ltd	76000005210
29 Catholic Schools NSW Ltd	46619593369
30 The Roman Catholic Archbishop of Perth Corporation Sole	96993674415
31 St Vincent de Paul Society NSW	91161127340
32 MacKillop Family Services Ltd	79078299288
33 St Vincent de Paul Society Queensland	14211506904
34 Catholic Metropolitan Cemeteries Trust	85744325709
<b>FIRST STATEMENT</b>	
35 Melbourne Archdiocese Catholic Schools Ltd	18643442371
36 Diocese of Ballarat Catholic Education Ltd	68629894686
37 Catholic Education Office Diocese of Sandhurst	94493967364
38 Mercy Community Services SEQ Ltd	51166477318
39 Mercycare Ltd	31098197490
<b>FY 2020/21</b>	
40 St. Vincent's Health Australia Ltd	



## St Bakhita Prayer

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 all 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.



AUSTRALIAN CATHOLIC  
**ANTI-SLAVERY**  
**NETWORK**

# Reaching out in solidarity

Modern Slavery Statement  
2021



ST JOHN OF GOD  
Health Care



## Disclosure note

This is a joint modern slavery statement made by St John of God Health Care Inc (ARBN 051 960 911) on behalf of itself and the entities it controls or owns including:

St John of God Hawkesbury District Health Campus Ltd (ACN 608 054 379);

St John of God Outreach Services (ACN 064 831 965);

St John of God Foundation Inc (ARBN 066 805 132);

St John of God Midland Health Campus Ltd (ACN 152 874 845);

Dencross Pty Ltd (ACN 086 647 298);

St John of God Berwick Health Campus Ltd (ACN 606 404 915); and

Marillac (ACN 050 463 717)

(together, for the purposes of this statement "St John of God Health Care")





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# Roadmap

## 2019

### Initial awareness and mobilisation

Engage with Catholic peer and industry groups

Undertake due diligence activities

## 2020

### Approach

Conduct 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

Develop policies and processes

Engage with high priority tier 1 suppliers

Establish working group

Launch awareness and communication campaign

## 2021

### Extend and involve

Updated agreement and RFX templates to include modern slavery clauses

Added modern slavery clauses in new agreements (top tier supplier, ICT and PPE categories)

Reviewed ACAN *Modern Slavery 101* training program and added all available modules to St John of God Health Care learning and development platform

Reviewed and updated business maturity assessment

Review approach/framework

Reviewed change impact assessment

Add top 25 suppliers to the SEDEX platform

Reviewed policies and procedures

Extended risk assessment beyond tier 1 suppliers

Reviewed goals, targets and KPIs

Partner with ACRATH to communicate the impact of modern slavery

## 2022

### Effectiveness review and monitoring

Launch campaign to improve communication and awareness

Refine our supplier engagement and communication approach

Rollout modern slavery training to broader group of caregivers at St John of God Health Care



## About us

St John of God Health Care is a leading provider of high-quality health and community services across Australia, and New Zealand.

We were established more than 30 years ago by the Sisters of St John of God, who first arrived in Western Australia and commenced caring for the community in 1895.

We are one of Australia's largest Catholic health care providers, employing more than 15,500 people.

As a not for profit group, we return all surpluses to the communities we serve by updating and expanding our facilities and technology, developing new services, investing in people and providing our social outreach services to those experiencing disadvantage.

## Vision

*We are recognised for care that provides healing, hope and a greater sense of dignity, especially to those most in need.*

## Mission

*To continue the healing mission of Jesus.*

## Values

Our core Values reflect our heritage and guide our behaviours:

### *Hospitality*

A welcoming openness, providing material and spiritual comfort to all.

### *Compassion*

Feeling with others and striving to understand their lives, experiences, discomfort and suffering, with a willingness to reach out in solidarity.

### *Respect*

Treasuring the unique dignity of every person and recognising the sacredness of all creation.

### *Justice*

A balanced and fair relationship with self, neighbour, all of creation and with God.

### *Excellence*

Striving for excellence in the care and services we provide.

# Our initiatives in 2021

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## Modern slavery working group

We have established a cross-functional working group from supply and procurement, workforce, legal and policy, international health, mission and corporate affairs.

## Partnership with other Catholic health care providers

We joined the Australian Catholic Anti-Slavery Network (ACAN) for a further two years to leverage their strength and expertise across Australia's largest network of Catholic hospitals and aged care service providers. We have also partnered with Australian Catholic Religious Against Trafficking in Humans (ACRATH) for a series of Formation events to improve awareness of modern slavery.

We continued as a member of the Catholic Network Alliance (CNA) Joint Procurement Network (JPN) to engage with suppliers collaboratively.

## Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 25 suppliers to the top 50 to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management.

## Contract management

We progressed with executing variations to contracts, including the new anti-slavery clauses for the top 50 of our suppliers. In addition, we commenced including the new anti-slavery provisions in new contracts with the 15 suppliers.

We included modern slavery provisions in the templates of high-risk procurement categories for consideration in new contracts. In addition, we extended this action to the personal

protective equipment (PPE) and the information communication and technology (ICT) category suppliers to ensure that we manage the supply chain risk in more detail

## Risk assessment and framework

As in 2020, independently of ACAN, we reviewed our supply chain risks to use as basis for discussion with our vendors and have put in place actions across the management cycle.

We expanded the work done identifying and conducting a taxonomy risk assessment of our top 50 suppliers to 565 suppliers. We are in the process of inviting our leading tier suppliers to join the SEDEX platform to work together to understand modern slavery risk in the supply chain. In addition, we are varying the contract terms to include clauses addressing modern slavery risks across our top tier information communication and technology (ICT) with an annual spend of \$15 million and personal protective equipment (PPE) with a yearly spend of \$9 million.

## Ethical sourcing guidelines

We revisited the ethical sourcing guidelines and the *Social Responsible and Ethical Business Practice Statement*. We translated the statement from English to Tetun to be used by our International Health Division in Timor-Leste as a Statement of Commitments by suppliers. We have not extended the use of the ethical sourcing guideline beyond the top 50 St John of God Health Care suppliers while we are conducting a review of our *Environmental Sustainability Strategy*. Once the overarching strategy is approved, we plan to incorporate the guidelines into our environment and sustainability policy under the sustainable procurement and supply chain section.

---

### Supplier Code of Conduct

We have completed the *Suppliers Code of Conduct*, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

### Modern Slavery Policy

The *Modern Slavery Policy* was approved by the Board in March 2021. To align to this policy the *Social Responsible and Ethical Business Policy* was also reviewed and amended in October 2021 to include statements relating to the support of eradication of modern slavery by managing and mitigating modern slavery risk within St John of God Health Care operations and supply chains.

### Education and training

All members of the working group undertook *Modern Slavery 101*, *Business Readiness* and *Grievance Mechanisms and Remedy training*, developed by ACAN, to build organisational understanding and knowledge. We have also included the five training modules *Modern Slavery 101*, *Business Relevance*, *Implementing a Modern Slavery Risk Management Program*, *Grievance Mechanism and Remedy*, and *Modern Slavery Risk Management for Suppliers* training in our learning and development platform.

### Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board and Audit and Risk Committee (ARC) to ensure scrutiny and oversight.

### Change impact assessment

We completed a re-assessment of changes needed across St John of God Health Care. As a result, we identified additional areas impacted by modern slavery practices and have taken steps to implement internal changes to identify and address modern slavery.

### Communication

We developed an awareness program as part of our Formation framework to help employees better understand modern slavery, the risks and flags they may encounter, and our organisational position, including St John of God Health Care's actions to reduce the risk of modern slavery within the procurement and supply chain environment.

We also rolled out a range of mass communication via our electronic channels both internally and externally to promote understanding and awareness of modern slavery, leveraging the International Day for the Abolition of Slavery.

### Action plan

We have refined and extended our action plan, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance, and communication, which forms part of a broader four-year roadmap.

# Our plans for 2022 and beyond

## Risk assessment

Following the extension of our risk assessment to include the top 565 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We have engaged our top 50 suppliers with a detailed review of the risks in their supply chain and will extend this to the top 75.

## Education and training

We will develop job-specific training in the high risk areas for facilities managers, supervisors and coordinators.

We will roll out *Modern Slavery 101 Business Relevance, Implementing a Modern Slavery Risk Management Program, Grievance Mechanism and Remedy, and Modern Slavery Risk Management for Suppliers* training through our learning and development platform for inclusion in mandatory training for key caregivers in the procurement and supply chain division during 2022.

## Contract management

We will continue to complete and execute variations to contracts, to include the modern slavery provisions for our top 50 suppliers, and across the leading tier suppliers in the information communication and technology (ICT) and personal protective equipment (PPE) categories.

We will continue to work with our top 75 suppliers to ensure that the contracts are reviewed and amended to include the relevant modern slavery clauses.

## Supplier compliance framework

We have included modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the onboarding process.

We will continue to develop and implement supplier compliance frameworks, such as screening, ongoing evaluation, and auditing.

We will include the ethical sourcing declaration in our supplier onboarding system and explore other opportunities to improve supplier practices through collaboration, relationship management and training for suppliers.

## Change management

We will confirm changes to policy and procedures with all facilities managers and undertake other change management activities to embed anti-modern slavery practices and initiatives within our organisation.

## Governance and reporting

We will continue to develop KPIs to monitor effectiveness and oversight to the St John of God Health Care executive team and Board.

We will evaluate mechanisms, such as whistleblowing.

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

St John of God Health Care was established more than 30 years ago by the Sisters of St John of God, who had been providing health care and community services since the late 19th Century in Australia and beyond. As a Catholic Ministry, we believe in the intrinsic and unique dignity of every person.

We have zero tolerance for modern slavery and the exploitation of people in any form.

We recognise that this can be insidious and difficult to detect, particularly within supply chain management, and we apply principles of good corporate governance and foster an ethical and responsible organisational culture to reduce the risk.

The eradication of modern slavery requires a team approach and we work in close partnership with our suppliers and contractors to meet our human rights obligations and adopt fair and transparent practices when choosing and working with suppliers.

We are making steady progress and remain deeply committed to working with government and other organisations to help eradicate the practice and existence of modern slavery.

We are pleased to present our second modern slavery statement.

This statement has been reviewed and approved by the St John of God Health Care Board.



Hon Kerry Sanderson AC CVO

Dr Shane Kelly





# Reporting criteria 1 & 2

## About St John of God Health Care

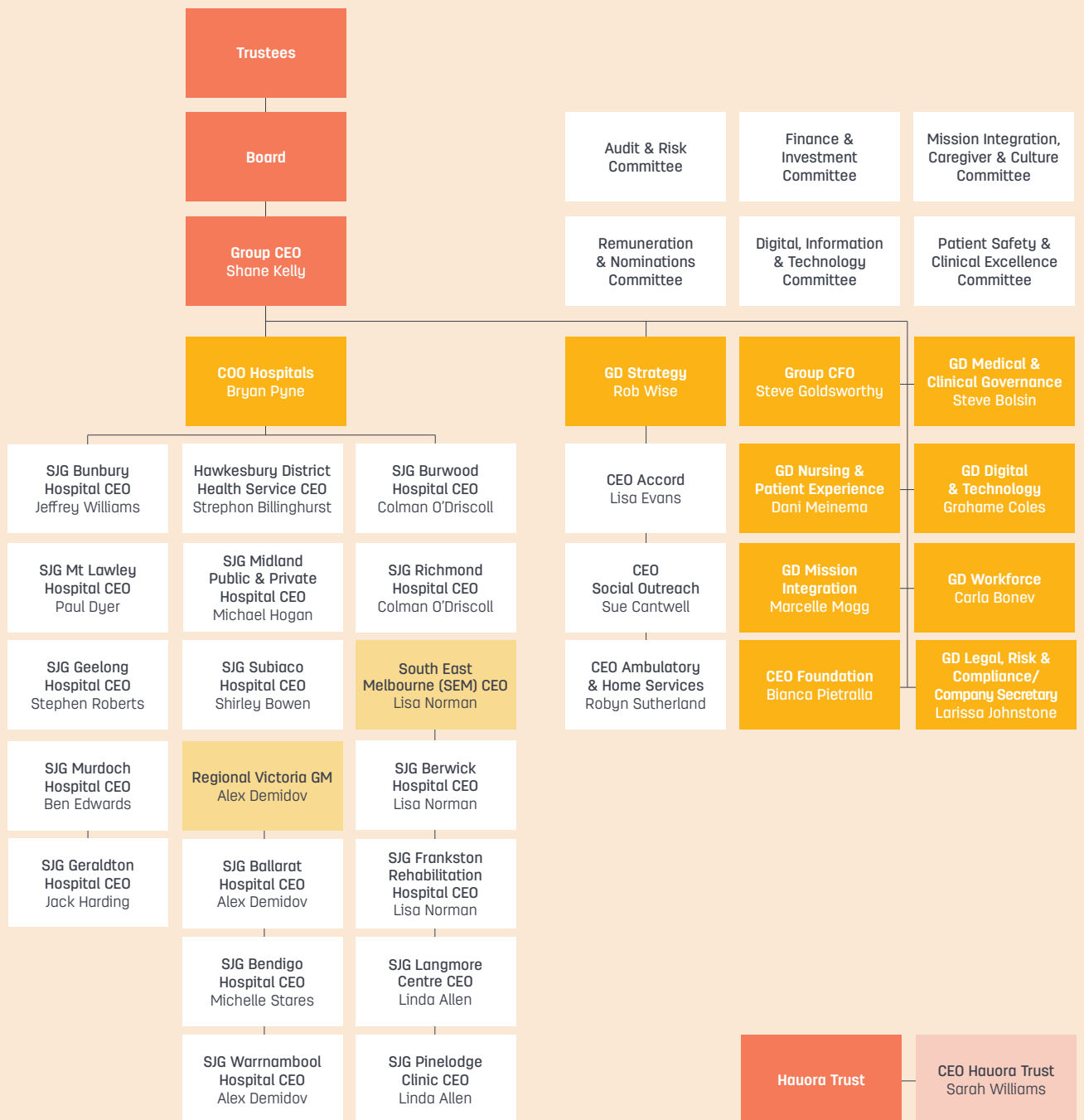
### Governance and organisational structure

St John of God Health Care Inc. is an incorporated association, the members of which are the directors of St John of God Australia Ltd, a civil and canon law entity established in 2004 to sponsor the ministry that was previously sponsored by the Sisters of St John of God.

The Sisters are members of St John of God Australia Ltd and share sponsorship of the ministry with eight of the dioceses in which the group operates as well as the Hospitaller Order of St John of God.



## Our organisational structure



## Our governance framework

Our governance structure is two-tiered, comprising Trustees and a Board.

The Trustees have canonical responsibility for St John of God Health Care. They appoint and evaluate the performance of Board members.

The Board is accountable for the organisation's ongoing stewardship and strategic development. The Board is assisted by the Board committees in discharging its responsibilities.

St John of God Health Care applies principles of good corporate governance and good practice, based on recommendations by the Corporate Governance Council of the Australian Stock Exchange and others.

The roles and responsibilities of the Trustees, Board and management are set out in the St John of God Health Care Inc. constitution and delegated responsibility to management is outlined in a *Governance Authority Matrix* and a *Management Authority Matrix*.

The Audit and Risk Committee (ARC) has accountability for oversight of the management of modern slavery risks.

## Our people

St John of God Health Care employs more than 15,500 people across Australia and the Asia-Pacific region.

We are an inclusive organisation and recognise the contribution of all our people for their skill, expertise, experience and innovative thinking.

A snapshot of our workforce reveals that 56 per cent are professional nurses and midwives, 81 per cent are female and 59 per cent work part-time, with a further 28 per cent being casual employees. This mix is consistent with our desire to provide a range of flexible employment options to attract the best people to our organisation.

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 Action and Inclusion Plan*.

We also continue to create more opportunities to welcome Aboriginal and Torres Strait Islander people as caregivers at St John of God Health Care, through our revised *Reconciliation Action Plan 2020-2022*.

We demonstrate leadership in safety in the workplace through a multi-faceted occupational health and safety strategy that includes prevention, early reporting and intervention and investigation into causal factors.

A connected and coordinated learning and development function enables our people to respond to emerging industry trends, community needs and organisational management.

## Our operations

St John of God Health Care is a provider of high quality health care and community services.

### Hospital operations and nursing

We are an experienced hospital operator with 14 private hospitals in Western Australia, Victoria and New South Wales. Most of our hospitals are acute and we are particularly well-known for our maternity, oncology and orthopedic services.

In addition to our general acute hospitals, we have three specialist mental health hospitals, St John of God Richmond and Burwood Hospitals in New South Wales and St John of God Pinelodge Clinic in Victoria, and a specialist rehabilitation hospital, St John of God Frankston Rehabilitation Hospital in south east Melbourne.

We operate two public hospitals under public private partnerships (PPPs), St John of God Midland Public Hospital in Western Australia and Hawkesbury District Health Service in New South Wales.

In total, we have 3,356 beds. In 2020-21 we treated more than 380,000 overnight and same day patients. We deliver more than 10,000 babies every year and are the biggest provider of private maternity services in our home state of Western Australia.

We also provide home nursing. In 2019-20, we delivered more than 78,000 episodes of care.

We operate a range of public and community health care contracts in all three states.

### St John of God Social Outreach

As a not-for-profit organisation, St John of God Health Care has a proud history of providing outreach services in areas of unmet need. These are delivered by St John of God Social Outreach for free or at low cost through an allocation of eligible revenue from hospitals.

The services build capacity and support the physical, mental and emotional wellness of people in vulnerable and disadvantaged communities in WA, Victoria, NSW and the Asia Pacific.

Services include:

- Community mental health counselling and support provided by St John of God Mental Wellbeing Services and Midland Head to Health
- Specialist mental health support for new parents via St John of God Raphael Services
- Support for people with drug and alcohol dependence, provided by the South West Community Alcohol and Drug Service and the Drug and Alcohol Withdrawal Network
- Accommodation services for young people and adults experiencing, or at risk of, homelessness, at St John of God Horizon House and Casa Venegas

St John of God Social Outreach's international health team also works with several Governments and Health Care providers in the Asia Pacific region:

- Timor-Leste – the team supports the Timorese government and counterparts to develop the capability of the Health Care workforce
- Papua New Guinea – St John of God Social Outreach supports the Brothers of St John of God to operate the first drop-in centre in the nation for people experiencing mental health issues

### St John of God Accord

For over 65 years, St John of God Accord has worked to make a difference in the lives of people with disability. They specialise in supporting people with intellectual disability, providing a range of services across all metropolitan regions of Melbourne.

- Support coordination
- Therapy services
- Individualised services
- School leaver employment supports
- Disability employment services
- Short-term accommodation
- Supported independent living
- Accord Plus (after hours)

### St John of God Health Care at Home

This service provides compassionate and timely Health Care to people in their own home following a hospital stay, so they can continue to receive expert assistance while benefitting from being in comfortable and familiar surroundings with those they love.

Services are provided in metropolitan and regional WA and Victoria, and include:

- After hospital clinical care at home
- Postnatal home assistance for families who have recently welcomed a new baby
- Rehabilitation in the home provided by therapists to enable patients to continue to build their strength and endurance after treatment or surgery in hospital

### St John of God Foundation

Our fundraising arm, called the St John of God Foundation, exists to provide support for state-of-the-art advancements in medical technology and research carried out at our hospitals.

### Group services and corporate functions

Our corporate head office is split with most functions managed from our office on Wellington Street, Perth and a small number of functions managed from St Kilda Road, Melbourne.



## Our supply chain

As a health care organisation, our direct supply chain consists primarily Health Care service provision to our patients and community we operate in.

What we buy:

- Medical and pharmaceutical products
- Food and beverages
- Energy and utilities (including fuel)
- Maintenance spares and services
- Electronics and electrical equipment
- Labour and corporate services
- Digital information and technology

In 2020 we had 153 active contracts and \$760 million non-payroll procurement spend with our suppliers where annual spend is >\$50,000 across approximately 4,800 suppliers.

In 2021 we had 201 active contracts and \$808 million non-payroll procurement spend across approximately 4,300 suppliers. We have established long-term relationships with most of our suppliers, the majority of which are located in Australia and comprise 98 per cent of our total expenditure. 80 per cent of our procurement spend is with 179 suppliers.

## Our supply chain: Key statistics

**\$808m**  
spend with suppliers

**4,300**  
Approximately 4,300 suppliers

**~201**  
Active contracts

**15**  
Categories

# Reporting criteria 3

## Modern slavery risks in our operations and supply chain

### Operational risks

St John of God Health Care has been operating for more than 125 years and is an integral part of the communities we serve.

Our Mission, Vision and Values set the foundation for a reflective and ethical culture. Our service ethos and deep belief in the dignity of the human individual are fundamental to our operations and guide decision-making.

In addition to external audit, we have a well-resourced and effective internal audit function that operates and reports to the Audit and Risk Committee. The focus of internal audit is on the key risks faced by the organisation. This is supported by integrated assurance, which is focused on building the systems that provide confidence that St John of God Health Care can reliably, repeatedly and efficiently understand and communicate changes in risks that matter.

Ongoing assessment of the adequacy and effectiveness of risk management systems is undertaken by the Board through its committees and various internal, external and regulatory agency reviews including the internal audit program.

A dedicated risk and compliance team are responsible for establishing and monitoring the systems that enable the key risk and compliance artefacts articulated by the board to be operationalised across the group.

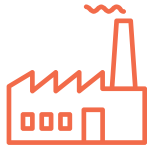
Internal audits are undertaken in relation to specific areas of risk for the organisation. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

Areas of assurance are mapped against key risk areas as part of the annual internal audit planning process, ensuring targeted and effective reviews. Management responses to risk issues, and action plans to rectify identified or potential risks, are monitored to ensure effectiveness and appropriate implementation.

We have a Code of Conduct that all employees are required to abide by, which supplements our Mission, Vision and Values. Our goal is to ensure we provide the highest standards of care and support to patients and clients within an environment that ensures the behaviours and actions of caregivers comply with all regulatory and legislative requirements and are honest and transparent.

## Supply chain risks

In 2021, we identified our highest risk suppliers according to the risk indicators below.



### Industry sector

Specific industry sectors deemed as high risk in international and national guidance documentation.

### Commodity /product

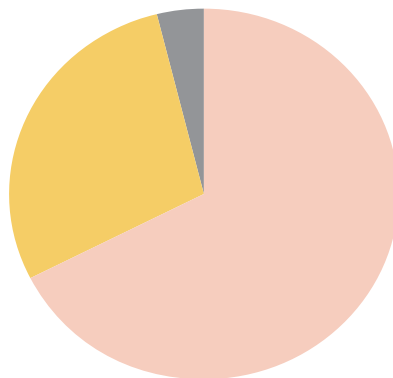
Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.

### Geographic location

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.

### Workforce profile

In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous).



### Suppliers classed according to risk with total spend

- **67.5%**  
\$416,830,857, 366 suppliers are in the high risk category
- **28.7%**  
\$177,452,453, 161 suppliers are in the medium risk category
- **3.8%**  
\$23,694,817, 38 suppliers are in the low risk category

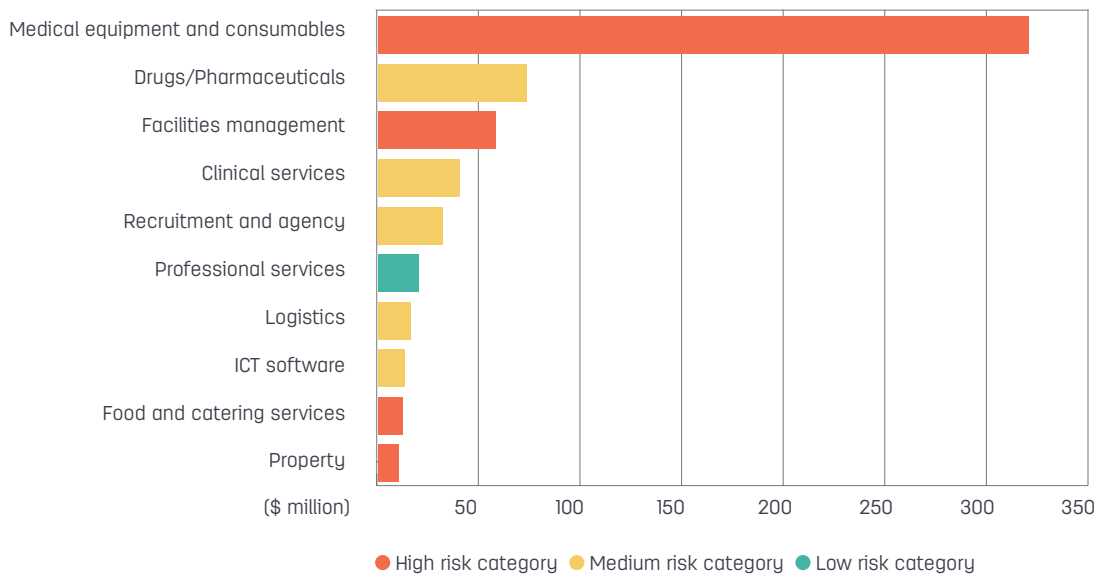
The total spend for the top 13 per cent of suppliers for whom the risk assessment was completed amounts to \$617,978,127 million.

Using these categories above, we identified that the high risk spend is within four spend categories: medical equipment and consumables, facilities management, food and catering services and property management services (67 per cent).

These four highest risk spend categories are made up of 565 suppliers out of 4,300 suppliers.

Our focus for 2021 has been on the top 50 suppliers within high risk categories, which we also extended to suppliers in two additional categories (PPE with spend of \$8 million and ICT with spend of \$29 million) with plans in place to extend our focus during the next 12 months.

### Modern slavery risk by spend category



### 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.



# Our COVID-19 response

As a health care provider, St John of God Health Care has played a significant role working with State and Federal governments and their respective health departments to respond to the coronavirus (COVID-19) pandemic.

Throughout the pandemic, there has been exceptional cooperation and collaboration across public and private health care providers.

The management of the COVID-19 pandemic at St John of God Health Care has always been in line with our Mission and Values, ensuring our ethic of care continues to inform all aspects of our health care, community services, decision-making and response to the challenges the community faces.

We established a *Coronavirus Sprint Steering Committee* to implement the COVID Response Hospital Operation Plan with accountability for the execution of “Sprints” by the Sprint team, led by GCEO, and comprising all critical functions of the organisation, including the supply and procurement team. The Sprint Leads (Clinical Sprints and Non-Clinical Sprints) are accountable to the COVID Management Directors to execute Sprints

The worldwide shortage of personal protective equipment (PPE) has been well documented as a key risk to the health care sector throughout the pandemic. St John of God Health Care faced the same challenges as other providers in this regard.

St John of God Health Care, led by our supply and procurement team established a comprehensive approach to managing our critical services and supply chain during the COVID-19 pandemic, undertaking the following actions:

- Performed an analysis across all new suppliers who claimed that they could provide PPE
- Reviewed the origin of the products before new suppliers added to our supplier pool
- Performed a clinical assessment and approval before PPE was made available to frontline staff
- Requested top 50 suppliers to sign the Social Responsible and *Ethical Business Practice Statement*



# Reporting criteria 4

## Actions taken to assess and address risk

St John of God Health Care commenced action to assess and address the risks of modern slavery in 2021 across our top 75 suppliers.

### Modern slavery gap analysis

We conducted a maturity/gap review during Dec 2021 to measure against our previous gap assessment on how we are tracking in our approach to the modern slavery risks.

The results showed a relatively low level of maturity across the key indicators of management systems, risk management, human resources and recruitment, customers and stakeholders, and procurement and supply chain.

St John of God Health Care has progressed significantly from this initial gap analysis and commenced initiatives across all the listed categories above.



Indicator / target	Progress by calendar year			
	2020	2021	2022	2023
<b>Management systems</b>				
Governance				
Commitment				
Business systems				
Action				
Monitor and report				
<b>Risk management</b>				
Risk management framework				
Operational risk				
Identifying external risk				
Monitoring and reporting risk				
<b>Human resources and recruitment</b>				
Awareness				
Policies and systems				
Training				
Labour hire / outsourcing				
<b>Customers and stakeholders</b>				
Customer attitude				
Information provision				
Feedback mechanisms				
Worker voice				
<b>Procurement and supply chain</b>				
Policy and procedures				
Contract management				
Screening and traceability				
Supplier engagement				
Monitoring and corrective action				



All of our 2021 initiatives have been achieved since this gap analysis:

#### Modern slavery working group

We continued working as a cross-functional working group from supply and procurement, workforce, legal, international health and corporate affairs.

#### Partnered with other Catholic health care providers

We recommitted to the Australian Catholic Anti-Slavery Network (ACAN) to leverage their strength and expertise across Australia's large network of Catholic hospitals and aged care service providers.

We also continued to work with the Catholic Network Alliance (CAN) Joint Procurement Network (JPN) to engage with suppliers collaboratively.

We partnered with ACRATH via our Formation team across a range of events to promote awareness of modern slavery and specifically human trafficking.

#### Supplier surveys

As part of ACAN and CNA, we expanded our previous survey of our top 25 suppliers to the top 50 to understand their procurement and sourcing practices. We use the information for risk assessment and vendor management.

#### Risk assessment and framework

Following the extension of our risk assessment to include the top 565 suppliers, we will review and update the analysis as we improve our understanding of the supply chain risk in their environment.

We have engaged our top 50 suppliers with a detailed review of the risks in their supply chain and will extend this to the top 75.

#### Ethical sourcing guidelines

We revisited the ethical sourcing guidelines and the Social Responsible and Ethical Business Practice Statement. We translated the statement from English to Tetun to be used by our International Health Division in Timor-Leste as a Statement of Commitments by suppliers. We have not extended the use of the ethical sourcing guideline beyond the top 50 St John of God Health Care suppliers while we are conducting a review of our Environmental Sustainability Strategy. Once the overarching strategy is approved, we plan to incorporate the guidelines into our environment and sustainability policy under the sustainable procurement and supply chain section.

### Supplier Code of Conduct

We have completed the *Suppliers Code of Conduct*, which provides guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

### Modern Slavery Policy

The *Modern Slavery Policy* was approved by the Board in March 2021. To align to this policy the *Social Responsible and Ethical Business Policy* was also reviewed and amended in October 2021 to include statements relating to the support of eradication of modern slavery by managing and mitigating modern slavery risk with St John of God Health Care operations and supply chains.

### Education and training

All members of the working group undertook *Modern Slavery 101, Business Readiness and Grievance Mechanisms and Remedy* training, developed by ACAN, to build organisational understanding and knowledge. We have also included the five training modules *Modern Slavery 101, Business Relevance, Implementing a Modern Slavery Risk Management Program, Grievance Mechanism and Remedy*, and *Modern Slavery Risk Management for Suppliers* training in our learning and development platform.

### Governance and reporting

We have continued standardised, regular reporting to the St John of God Health Care Board Audit and Risk Committee (ARC) to ensure scrutiny and oversight.

### Change impact assessment

We completed a re-assessment of changes needed across St John of God Health Care. As a result, we identified additional areas impacted by modern slavery practices and have taken steps to implement internal changes to identify and address modern slavery.

### Vendor onboarding

We re-assessed the process and documentation for onboarding new vendors and modern slavery is explicitly stated as a focus. Vendor onboarding links directly to the *St John of God Health Care Supplier Code of Conduct*.

We have included modern slavery commitments in our supplier onboarding online application, and expect all new suppliers to be aware of the St John of God Health Care focus on modern slavery during the onboarding process.

## Modern slavery action plan and roadmap

### Action plan

We have a three year roadmap with an eighteen-month action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance and communication.

<b>Year 1 / 2019</b> <b>Awareness and Mobilisation</b>	<b>Year 2 / 2020</b> <b>Approach</b>	<b>Year 3 / 2021</b> <b>Extend and Involve</b>	<b>Year 4 / 2022</b> <b>Effectiveness Review &amp; Monitoring</b>
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework	Improve communication and awareness campaign
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond tier 1 suppliers	Improve supplier engagement and communication
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required	Review goals, targets and KPIs	Extend SEDEX adoption across all tier 1 suppliers
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations	Rollout modern slavery training to a broader group of caregivers
Engaged Board and Audit and Risk Committee.	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress	Revisit assessment and show maturity improvement
Established communication with ACAN	Updated governance framework	Implement <i>Modern Slavery 101</i> training for caregivers as identified through gap analysis and change impact	Operationalise supplier risk assessment
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers	Embed supplier engagement on modern slavery practices and supply chain risk in annual/ quarterly contract review meetings
Commenced engagement with suppliers to commit to ethical sourcing	Conducted system maturity review and established a baseline	Confirm changes to policy and procedures with all Facilities Managers and ensure 100 per cent compliance	Improve supplier annual performance measures to include modern slavery risks and feedback from regular meetings
Formed working group	Identified KPIs	Revisit <i>Bridge the Gap</i> assessment and show maturity improvement	Extend modern slavery to a broader group of caregivers
	Launched awareness and communication campaign		
	Changed the vendor onboarding process and documentation	Updated agreement and RFx templates to include modern slavery clauses	
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses	Revisited Change Impact Assessment	
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	Added top 25 suppliers to SEDEX platform	
	Reviewed and updated the <i>Supplier Code of Conduct</i> and published on St John of God Health Care website	Reviewed modern slavery policies and procedures	
	Prepared first Modern Slavery Statement	Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across St John of God Health Care	

# Reporting criteria 5

## Effectiveness assessment

Our modern slavery governance and risk management action plan will be reviewed on a regular basis as part of our audit and risk management review process.

Our *Audit and Risk Committee* (ARC) meets on a regular basis to review and potential risk in our organisation and provide guidance and propose mitigation actions for all the risk identified in across our organisation as a whole.

Assessing the effectiveness of our actions is an important actions to manage and mitigate modern slavery risks in our operations and supply chain. We plan to develop specific measures during the next period to ensure that we track progress and identify any potential risk proactively.

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

Indicator / target	Achieved
Re-assessed the business maturity across the main modern slavery criteria	Yes
Extended the supplier risk assessment across a broader range of supplier and categories	Yes
Included contract variations across top tier, PPE and ICT suppliers	Yes
Partnered with ACRATH to communicate the impact of modern slavery to improve awareness across St John of God Health Care	Yes
Continued partnership with ACAN and CNA partners for a further term.	Yes
Reviewed and updated modern slavery policies and procedures	Yes
Added / on-boarded top 25 suppliers to the SEDEX platform	Yes
Re-assessed the change impact required for modern slavery across the organisation	Yes
Included modern slavery training in the St John of God Health Care learning and development platform	Yes



## Reporting criteria 6 Process of consultation with owned or controlled entities

The controlled entities are listed in the disclosure statement at the front of this document. They all operate under the direction and governance of St John of God Health Care Inc and share the same executive management.









# Modern Slavery Statement

2021



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## 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.

## About us

Calvary has provided health care to the most vulnerable Australians, including those reaching the end of their life, since the arrival in Australia of the Sisters of the Little Company of Mary in 1885. We are a charitable Catholic not-for-profit organisation operating across seven states and territories in Australia with 14 public and private hospitals, 72 Residential Care and Retirement Communities, and 19 Community Care Services Centres.

The Spirit of Calvary expresses how we care for each other, and how we care for our patients, our residents and our clients by 'Being for Others'.

- Everyone is welcome
- You matter. We care about you.
- Your family, those who care for you, and the wider community we serve, matter.
- Your dignity guides and shapes the care we offer you.
- Your physical, emotional, spiritual, psychological and social needs are important to us.
- We will listen to you and to those who care for you.
- We will involve you in your care.
- We will deliver care tailored to your needs and goals.
- Your wellbeing inspires us to learn and improve.

## Our Vision and Values

As a Catholic Health, Community 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.

ABN: 11 079 875 697



## Modern Slavery; Our Approach

Our approach to modern slavery is grounded in our understanding of human dignity, in our understanding of the value of human work, of justice, and the respect of human rights. The Church teaches us of the sanctity of human life, that each person is precious, and that we all have a responsibility to fight against the violation and degradation of our brothers and sisters. We believe that modern slavery rejects this principle, and shows instead a contempt for human beings. For this reason, elimination of this scourge is a present concern of the Catholic Church and therefore of Calvary.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is committed to upholding human rights, not only with respect to its own employees, and the people we engage with daily, but also for the workers in our operations and supply chain. We believe our responsibilities as a Catholic, charitable organisation focussed on delivering the best possible care, extend to victims of modern slavery who may exist in our supply chains and operations.

This approach is enforced by our Ethical Sourcing Policy, Code of Business Practice, and our Business Partner's Criteria, which extend throughout the business to staff and suppliers.

## 2021 in Review

2021 saw a continuation of the supply chain and operational challenges we experienced during the Covid-19 Pandemic. In addition, Calvary acquired Japara, which brought an additional 55 Residential Care and Retirement Communities into our organisation. In 2021, we grew our Hospital in the home service offering, to include CovidCare@Home, expanding our service delivery into Western Australia.

This expansion in our operations gave us unprecedented reach as an organisation. In 2021, Calvary;

- Increased the number of staff trained in identifying modern slavery risks
- Surveyed our high risk suppliers, and conducted remediation activities
- Continued to communicate and enforce our requirements for modern slavery risk management in our operations and supply chain
- Continued to enforce our modern slavery approach, with a new focus on our relationship with third party labour hire agencies
- Continued to build our understanding of our supply chain
- Continued our program of Supplier modern slavery assessment for our top tier and high risk suppliers
- Directed our suppliers to training programs within the building and construction categories.

## Our Plans for 2022

In 2021, we repeated our modern slavery gap analysis, identifying some key initiatives which we will be implementing in 2022:

- Continuation of our long term road map, to strengthen our risk management of our supply chains
- Continuation of supplier surveys and remedial work where responses do not meet our evaluation criteria
- Expanding our program with a greater number of our suppliers who operate in high risk sectors
- 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
- Extension of training materials to new Calvary staff through the implementation of the Calvary Learning hub in mid-2022
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery.

## Our Plans Beyond 2022

Beyond 2022, Calvary will

- Continuously improve our due diligence in modern slavery risk management, encouraging our supply base to improve their risk management programs
- Conduct random audits of high risk suppliers
- Expand our supply chain mapping and update our risk profile, expanding our modern slavery program accordingly.
- Roll out our governance and process into an online supplier platform to capture more suppliers in our risk mitigation
- Monitor and report on adherence to our ethical sourcing policy and documents.

## Statement from Martin Bowles, National CEO, Little Company of Mary Health Care

This is Calvary's second Modern Slavery Statement, in line with the Modern Slavery Act 2018, which outlines the steps we have taken to understand and mitigate the risk of modern slavery in our supply chain and operations.

2021, in some ways saw a continuation of the challenges the industry experienced during 2020, with supply disruptions and work force shortages presenting ongoing challenges to our operations. 2021 was also quite unique, as it was a year of expansion and opportunity for Calvary. Our business grew with the purchase of Japara, and the subsequent integration of 55 new Residential Care and Retirement Communities into the Calvary business. Calvary grew significantly in size and reach. We ventured into new geographies, towards new business partners and welcomed new people as we pursue our goal of being the health, community, and aged care provider of choice. With this growth, Calvary has an opportunity to advance the important focus on modern slavery in the markets we serve.

Respecting the human rights of the people we care for every day is at the core of what we do. Our goal is to provide seamless, integrated, safe, and quality care with equity and compassion. We strongly believe that this responsibility extends to the people who support us, in our operations and supply chain. Without a modern slavery risk management program, the care we provide is inherently fractured, and we undermine the healing that we deliver to our patients, clients and residents. We do not believe that it is right to provide care to one group of human beings, whilst directly or indirectly contributing to the harm of other human beings less visible and more remote.

During the 2021 reporting period, we have seen a healthy rise in the number of staff members who have undertaken Modern Slavery training. We have reached out to more of our business partners, conveying our human rights requirements and delivered education and training. Our governance and internal management of the risk of modern slavery has become stronger. As our business grows, and we expand our operations into new areas, we are well placed to expand our modern slavery program and deepen our focus on human rights.

**This Modern Slavery Statement has been approved and endorsed by The Little Company of Mary Pty Ltd Board of Directors on 26 May 2022 and is for the period 1 January 2021 to 31 December 2021.**



**Jim Birch AM**  
Chair, LCMHC



**Martin Bowles AO PSM**  
National Chief Executive Officer



Martin Bowles AO PSM, National Chief Executive Officer.



# Reporting Criteria 1 & 2: About Calvary

## Our Organisational Structure

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

Calvary's Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and well-being of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found in our Annual Report.

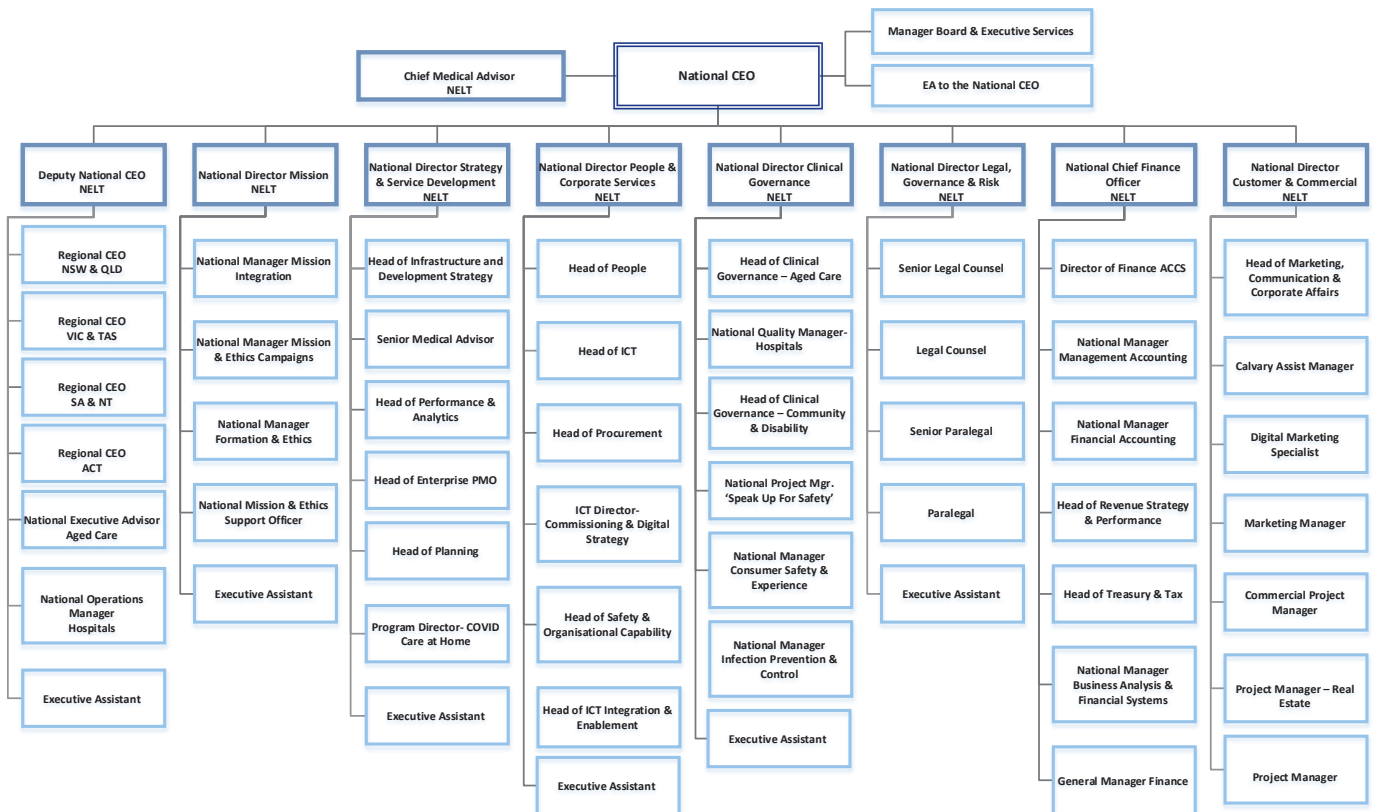
Our National Executive Leadership Team, under National CEO, Martin Bowles AO PSM, oversees Calvary's strategic intent, and delivers on Calvary's mission of Hospitality, Healing, Stewardship and Respect.

Calvary operates as a parent company (Little Company of Mary Healthcare Pty Ltd), with hospitals, Residential Aged Care and Community Care services as controlled entities.



Mr Jim Birch AM, Calvary Ministries Board Chair

## National Executive Leadership Team (NELT)



## Our Governance Framework

As a provider of healthcare to the Australian community, Calvary operates under a strong corporate governance framework, underpinned by our mission and values. During the 2021 reporting period, Calvary's modern slavery initiatives were overseen by the National Director of People and Corporate Services, and the National Director of Mission, reporting to the LCMHC Board, through the National Executive Leadership Committee. Under their guidance the team ensures that skills and resources can be accessed throughout the business, such as Human Resources, Procurement, Legal, and Training and Development teams.

In 2018 Calvary established a modern slavery steering committee, with representation strategically selected from a cross section of business units who 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 2021 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.

## Our Operations

Calvary operates 14 Public and Private Hospitals, 72 Retirement and Aged Care Facilities and a national network of 19 Community Care Centres around Australia. Calvary's head office is located at Level 12 - 135 King Street Sydney NSW 2000. With a team of nearly 18 thousand employees, in FY 21 Calvary delivered care to over 573,000 hospital outpatients, conducted 151,000 surgical procedures, provided home care services to over 9200 Community Care clients and residential aged care services to more than 5390 residents. In FY 21, revenue from our operations was \$1,523,982,000

Calvary has 4 public and 10 private hospitals that provide acute and sub-acute care. Our hospitals are cover a broad geographical region in VIC, TAS, SA, NSW, and ACT. Calvary Community Care has been supporting people in their own homes and communities for over twenty years in VIC, TAS, SA, NT, NSW, and ACT. We deliver a range of aged care, disability and other support services that enable independence, improve social connections and promote positive health and wellbeing. Calvary Residential Aged Care provides quality care and services within a supportive environment in which residents are respected for their individuality.

During the 2021 reporting period, Calvary purchased Japara, bringing an additional 55 aged care sites into our business. As of 2021, Calvary operate 72 aged care sites across VIC, TAS, SA, NSW, ACT and QLD.

In order to resource the many areas of our business, our direct supply chain consists of a range of large multinationals and small, local business, who provide our services with medical and surgical supplies, pharmaceuticals, energy, food and beverages, and ICT hardware and software.

A significant focus over the reporting period was the successful implementation of the "New Calvary" homes into the Calvary business. This was delivered in 2021, with the new homes being absorbed into Calvary's regional business model, combining operational structures to support a more integrated care model.

## Our Supply Chain

As a multifaceted healthcare organisation operating throughout Australia our supplier base is diverse, ranging from large multinational organisations with highly diverse supply chains through to sole traders delivering site specific services.

During the 2021 reporting period, Calvary transacted with 3,817 regular suppliers. With the acquisition of Japara, an additional 1,404 suppliers were added to Calvary's supplier base.

We procure 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 2021 was almost \$730 million dollars, which is managed by the National Procurement team under 157 core contracts. During the reporting period, 'New Calvary' had 228 active contracts.

In order to effectively manage security of supply Calvary operates a "multi region multi supplier sourcing strategy". This strategy in conjunction with the broad 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 day to day operations are heavily concentrated in China, Europe, and the USA.

## Reporting Criteria 3: Modern slavery risks in operations and supply chain

We believe that 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.

Our efforts in 2021 continue to focus on fostering a transparent and collaborative relationship between us 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 2021 reporting period, Calvary extended our membership of the Australian Catholic Anti-Slavery Network (ACAN). We believe that combining our efforts with other like-minded organisations in our business sector will deliver the greatest impact in the shortest time.

Our supplier heat map mapping 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 is contained in this report.



Registered Nurse, Brodi Lucas, Calvary St Luke's Hospital, Tasmania.

## OPERATIONAL RISKS

### Overview

Calvary provides a diverse range of services to patients, residents and other 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.

The Covid-19 pandemic has continued to present challenges in supply chain security, particularly for medical PPE, however we maintained our process of review and approval of new suppliers and products, as defined in our Covid-19 pandemic management response. Under this process, we conduct additional due diligence into our suppliers to ensure that each product meets Calvary's strict clinical and safety requirements, and that the manufacture and supply chain of the product has robust mechanisms to mitigate the risk of modern slavery.

During the 2021 reporting period, workforce shortages and recruitment was a challenge for many healthcare providers, considering the constraint on international travel, and our Covid-19 management plan. In order to meet workforce requirements, we engaged with third party labour companies, presenting an operational risk which required management.

### Our People

Calvary takes pride in our commitment to be an equal employment opportunity provider, encourage workplace diversity and continue to promote equity, transparency, efficiency and a non-discriminatory approach to the recruitment, selection and appointment of staff.

Calvary employs most of our team directly, lowering the risk of modern slavery occurring within our workforce. However, we occasionally utilise third party labour hire.

As of December 2021, Calvary have 17,996 employees. Of our staff, 14,601 are female, making up approximately 81% of our workforce.

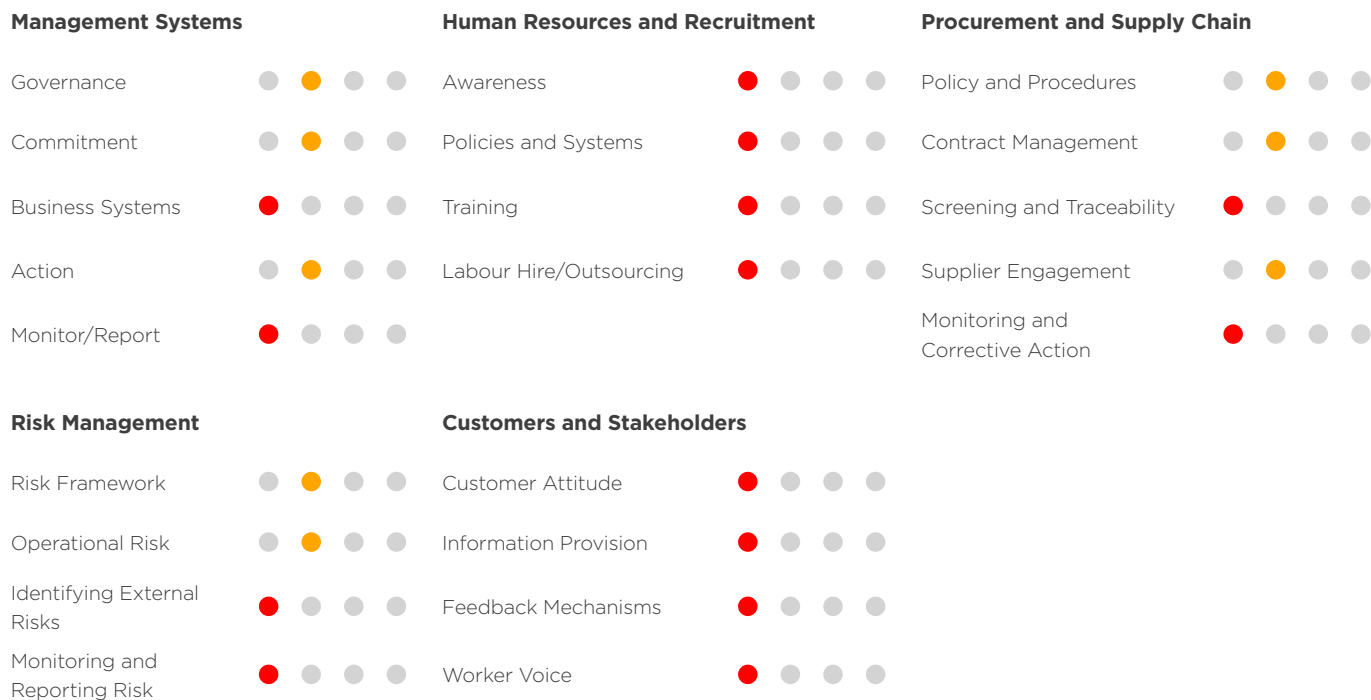
Calvary's recruitment and hiring policies are governed by our Recruitment, Selection and Appointment Procedure. This policy outlines responsibilities of hiring managers who are supported by a strong national and local Human Resources team.

## Modern Slavery Gap Analysis

In 2019, Calvary conducted a gap analysis on our own organisation, and the wider Catholic community, in partnership with the Australian Catholic Anti-Slavery Network (ACAN). Our gap analysis provided considerable insight into areas of improvement which we endeavoured to rectify over the 2020 and 2021 reporting periods.

### Calvary's 2019 Heat Map

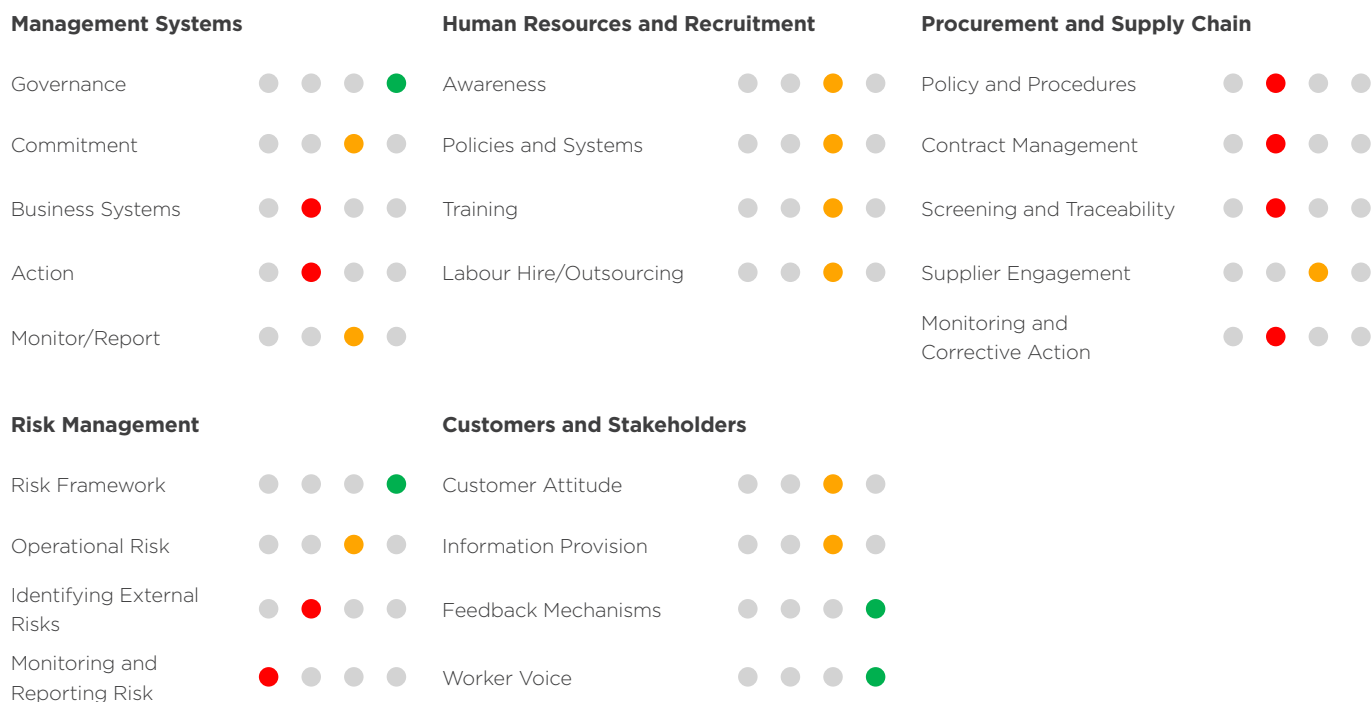
The heat map provides a snapshot of how we are tracking in our approach to managing modern slavery risks.



Utilising the insights from the gap analysis, Calvary established a cross functional team who are responsible for developing reforms and recommending Calvary's modern slavery program.

In 2021, we repeated the Heat Mapping exercise;

### Calvary's 2021 Heat Map:



This data shows the effectiveness of actions taken between 2019 and 2021, particularly through

- supplier communications
- internal reviews of our operations, and risk management within Calvary's systems
- staff training requirements, and
- Implementation of new internal feedback mechanisms and Whistleblower policy.

This data also identifies key areas of improvement for future reporting periods;

- risk identification capabilities across third tier supply chains
- Integration of the modern slavery program into 'New Calvary' sites.

Overall, our program saw improvements across the following areas:

## Change Analysis

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Orange	Green	▲
	Commitment	Orange	Yellow	▲
	Business Systems	Red	Orange	▲
	Action	Orange	Orange	
	Monitoring & Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Orange	Green	▲
	Operational Risk	Orange	Yellow	▲
	Identifying External Risks	Red	Orange	▲
	Monitoring and Reporting on Risk	Red	Red	
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Yellow	▲
	Labour Hire / Outsourcing	Red	Yellow	▲
Customer and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Green	▲
Procurement and Supply Chain	Policies and Procedures	Orange	Orange	
	Contract Management	Orange	Orange	
	Screening and Traceability	Red	Orange	▲
	Supplier Engagement	Orange	Yellow	▲
	Monitoring and Corrective Actions	Red	Orange	▲

## SUPPLY CHAIN RISKS

In 2019 and 2020, Calvary, along with the Australian Catholic Anti-Slavery Network, undertook a risk assessment on our supply chain. The risk analysis examined our top 50 suppliers by spend within high risk industries. Risk were assessed on the basis of the following indicators:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of *Labor's 2018 List of Goods Produced by Child and Forced Labor*, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of the suppliers' "headquarters" or registered place of business.

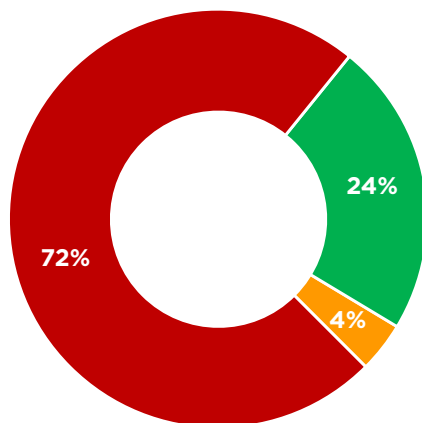
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as '3D' work (dirty, dull or dangerous).

Based on these indicators, we identified that over 70% of potentially high risk spend is within 5 spend categories:

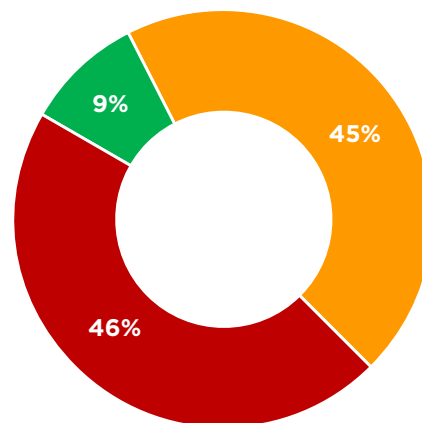
- Building and Construction
- Food and Beverage
- ICT Hardware
- Medical Supplies
- Waste Management

Number of Suppliers	High Risk Suppliers	Spend Categories	High Risk Categories	Total Spend	High Risk Spend
50	36	11	5	\$268,380,362	\$194,497,922

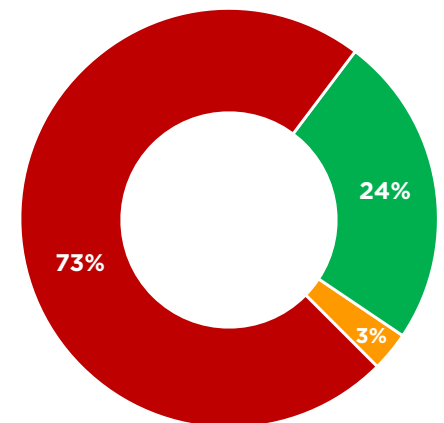
Risk by suppliers



Risk by category



Risk by spend



Our early focus was our high spend and high risk suppliers, and although this provided some helpful insight into our supplier capabilities, in 2021, we focussed on smaller key suppliers with a lower spend, and a similar risk profile. This approach identified suppliers who had fewer capabilities and lower levels of internal governance around modern slavery and human rights. This presented us with opportunities for supplier development and more meaningful remediation work.

# Reporting Criteria 4: Actions taken to assess and address risk

Calvary's primary focus to date has been to deepen our understanding of the risk of modern slavery risks in our operations and supply chain, and in 2021, seek out opportunities to strengthen our supplier's capabilities in modern slavery risk management. In October 2019 Calvary partnered with the Australian Catholic Anti-Slavery Network (ACAN) and have worked collectively with the Catholic Negotiating Alliance (CNA). In 2021, we have continued with these affiliations sharing knowledge and resources and developing a more encompassing process to identify and assess our risks high risk suppliers and define how we can work collaboratively with suppliers to address risks where they are identified.

## Modern slavery action plan and road map

### Increasing Awareness

- Calvary has continued to implement mandatory training for procurement staff and staff involved in supplier relationship management. The Modern Slavery 101 module provides an overview of what is defined as modern slavery, who is at risk and where it is most likely to occur in our supply chains and operations. During this reporting period, this module was assigned to 625 staff members. 27% of staff have completed this course in 2021, compared to 5% in 2020. This module has also been made available to all staff through our e-learning platform if they are interested in learning more about modern slavery.
- In 2020, we reported that a second module will be added during 2021. This stage was completed, and we are rolling out a third module to staff in 2022.
- Throughout 2021, Calvary's modern slavery initiatives have also been presented to various groups, including People, Values, Communications and Culture Committee, site based General Managers, and the extended procurement and supply teams.
- Calvary have maintained our electronic communications, which have been released to all staff from the National CEO. These communications outline the legislation, Calvary's approach to addressing modern slavery along with links and a point of contact provided for further information including Calvary's Corporate and Social Responsibility page; <https://www.calvarycare.org.au/about/corporate-social-responsibility/modern-slavery-act/>

### Supplier Engagement

- Calvary has continued to communicate with all current suppliers on the steps we have and are undertaking to ensure we meet, and where possible exceed, our obligations with regards to Modern Slavery legislation.
- Calvary has notified all suppliers of our expectations of them, as our partners, in supporting our efforts in addressing this issue including adhering to our Business Partner's Criteria and Ethical Procurement Policies and maintaining open and honest communications with us on this matter.
- Calvary joined Sedex via ACAN during the reporting period. Sedex is a data exchange platform, designed to enhance data sharing and minimise the burden of risk assessments and risk validation, by mutually recognising the results produced for specific shared suppliers, produced by other members' efforts, and vice-versa.
- Calvary invited high risk / high volume suppliers for on-boarding to the Sedex platform. Once invited to join the platform as a supplier of Calvary, the suppliers fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).
  - Moving forward Calvary plan to use Sedex to:
  - Manage the risk of modern slavery with existing suppliers
  - Validate inherent risk against actual risk
  - Screen new suppliers as part of tenders and supplier on-boarding processes
  - Gain visibility further upstream in the supply chains
  - Monitor and report on progress in the profile of suppliers.

### Our People

- Calvary's third Party Labour Hire contracts have been updated to included modern slavery risk management requirements.

## Our Policies and Contract Terms

- Calvary maintained our policies on modern slavery and ethical sourcing including:
  - Business Partner’s Criteria
  - Ethical Sourcing Policy
  - Code of Business Practice
  - Declarable Minerals List.
- Calvary requires that all new contracted suppliers agree to our Business Partner’s criteria to be considered as a supplier to Calvary.
- Modern slavery clauses have been included in Calvary’s minor works and supply Contract templates which were revised in 2021.

## Sector collaboration

- Calvary is a member of the ACAN and have actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to Modern Slavery.
- Calvary is a member of the Catholic Negotiating Alliance (CNA) and issued supplier self-assessments to our joint top 30 high risk suppliers.
- Calvary continues to work with other CNA members to address any identified risks.

## Remediation

Calvary intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the Australian Modern Slavery Act 2018 (Cth) – Guidance for Reporting Entities and other relevant Australian laws.

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if Calvary is found to have caused or contributed to modern slavery. Due to the complexity of remediation, Calvary will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery. To this end, Archbishop Fisher established Domus 8.7, to provide remedy to people impacted by modern slavery.

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, Calvary will be able to help people impacted by modern slavery achieve outcomes that can be reported on and used to continuously improve risk management and operational response. It is the intention of Calvary to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where Calvary is directly linked to modern slavery by a business relationship Calvary is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

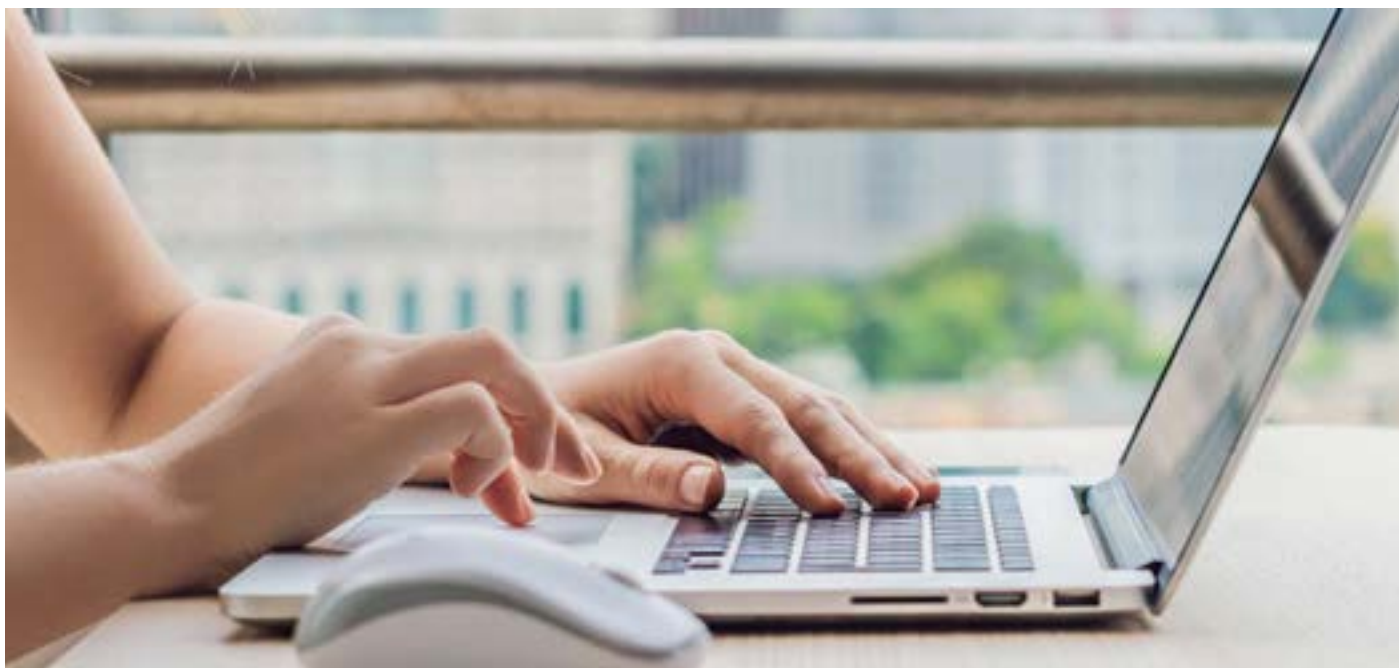
Calvary staff and stakeholders are being equipped to recognise the causes of modern slavery, and the mechanisms available to escalate poor labour practices, unsafe working conditions and other indicators of modern slavery.

Calvary has also developed a more detailed anti-slavery contract clause focusing on remediation obligations and expectations, for inclusion in contracts with high-risk suppliers. This clause imposes obligations on these suppliers to notify and consult Calvary to ensure victim-centred remediation processes are implemented to the satisfaction of Calvary.

In October 2021 the Taskforce successfully concluded the “Building Links” project which was funded by a Department of Home Affairs Modern Slavery Grant. “Building Links” delivered modern slavery awareness-raising tools specific to the construction industry; and a platform to access independent advice, support via safe conversations App “Whispli”.

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





## Reporting Criteria 5: Effectiveness Assessment

We are continuously monitoring our progress against our commitments in 2021, as well as identifying new opportunities to improve our modern slavery program.

In 2021 we met all targets as detailed in this report, including:

- Repeating the Gap Analysis assessment of our supplier base to identify high risk categories of spend and affected suppliers
- Continuation of a self-assessment survey to an increased number of suppliers
- identification of areas of improvement in the high risk areas of our supply chain and in conjunction with affected suppliers developing remediation plans
- developing training programs and completing approximately 105 hours of training over 70 staff involved in procurement related activities
- reviewing, updating and developing policies and procedures to address Modern Slavery.

In 2022 and future years, we will be establishing milestones centred around:

- percentage of staff who have completed mandatory training
- number of audits conducted against suppliers
- number of supplier remediation programs completed.

### Case Study:

Throughout the 2021 reporting period, Calvary continued our process of surveying our top tier suppliers. This process was done in conjunction with other members of the Catholic Negotiation Alliance in order to leverage our collective spend. Through self-assessment surveys, we build a picture of the internal capabilities of our suppliers in managing our combined modern slavery risks, and identify areas where we can collectively improve. During the 2021 period, we assessed 30 high risk, strategic suppliers, a process which includes feedback mechanisms and remediation where necessary. The suppliers were selected following a comprehensive risk assessment which determined the highest opportunities for risk mitigation. This assessment was based on category, geography, spend, and criticality of the supplier.

Supplier B are a major supplier of medical and surgical products to many healthcare providers. For Calvary, they provide significant proportion of consumables used through wards and operating theatres, in both public and private hospitals. Supplier B were surveyed and identified as presenting further opportunities for strengthening our combined supply chain risk mitigation.

Calvary's National Procurement Team met with senior leaders within Supplier B, holding a special meeting focussed on ethical sourcing, where it was acknowledged that they had a limited visibility into their suppliers, and therefore considerable gaps in their risk management.

During the 2021 reporting period, Supplier B provided Calvary with a range of new procedures and policies, including a process of third party audit of their suppliers in high risk geographies. Calvary will continue to monitor these as they are rolled out.

## Reporting Criteria 6: Process of consultation with entities owned or controlled

The Little Company of Mary Healthcare Board is the single Board which governs all entities, owned and controlled. Similarly the National Executive Leadership Team 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.

With the integration of Japara into the Calvary business in late 2021, Calvary began the process of communicating the Modern Slavery program to Calvary Aged Care Services (the entity which replaced Japara). This will continue into 2022.

## Reporting Criteria 7: Other

Since 2019, Calvary has been a member of the Australian Catholic Anti-Slavery Network. Along with ACAN, we have contributed to a wider risk management process across multiple industries.

We are continuing with our membership of ACAN next year, as addressing the risk of modern slavery involves long term commitment.



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*Founded in 1885 by the Sisters of the Little Company of Mary, Calvary is a charitable, not-for-profit, Catholic health care organisation. Our mission is to provide quality, compassionate health care to the most vulnerable, including those reaching the end of their life. With over 18,000 staff and volunteers, we have a national network of 14 Public and Private Hospitals, 72 Residential Care and Retirement Communities and 19 Community Care service centres.*

**Calvary Health Care**

**Little Company of Mary Health Care Limited**

Level 12, 135 King Street

Sydney NSW 2000

P: 02 9258 1700

For a description of our facilities and locations, visit [calvarylocations.org.au](http://calvarylocations.org.au)

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



# Modern Slavery Statement 2021





**This Modern Slavery Statement was approved by the Board of Mater Misericordiae Ltd as defined by the Modern Slavery Act 2018 (Cth) (the Act).**

**Francis Sullivan AO**

Chair, Mater Misericordiae Ltd. Board of Directors

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**Disclosure Note**

This statement has been made on behalf of Mater Misericordiae Ltd. ACN – 096708922 ABN – 83096708922. This Statement covers all entities owned or controlled by Mater Misericordiae Ltd.

This Statement has been developed in accordance with the Modern Slavery Act 2018 (Cth).

All patient and spend statistics referred to within this report are based on our 2020/2021 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 2021 to 31 December 2021.

**ABNs**

MML (ACN) – 83096708922 | Mater Education Ltd – 50148130349 | Mater Research Ltd – 28109834719  
Mater Foundation Ltd – 96723184640

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# About us

Mater is Queensland's largest Catholic, not-for-profit network of hospitals and healthcare services, bringing together our collective expertise across health, education and research with a shared vision to live better lives through improved health and wellbeing.

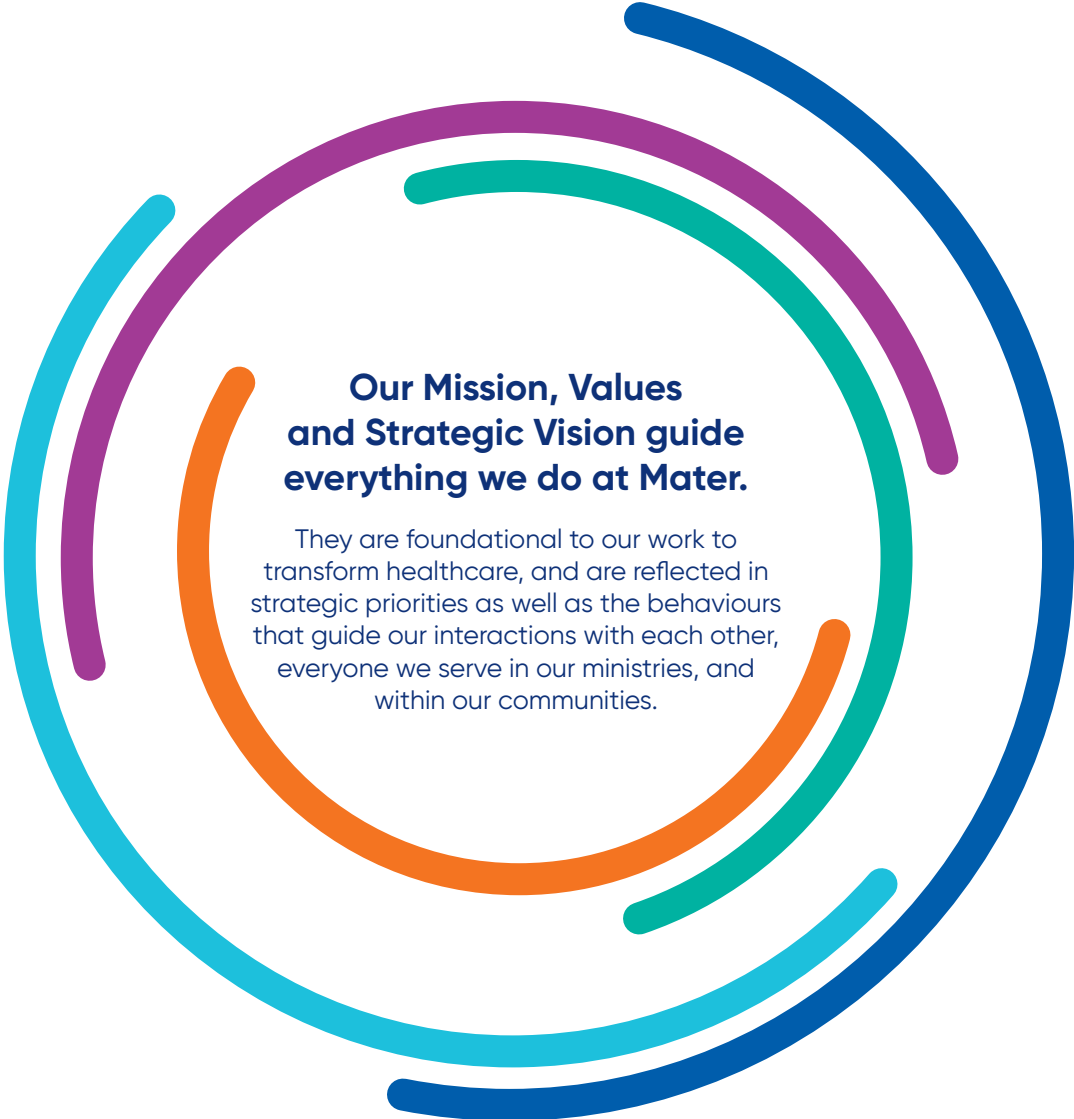
Mater is committed to a culture of compassion and care inspired by God's mission of mercy to help those in need. In the spirit of Catherine

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 and Values



## **Our Mission, Values and Strategic Vision guide everything we do at Mater.**

They are foundational to our work to transform healthcare, and are reflected in strategic priorities as well as the behaviours that guide our interactions with each other, everyone we serve in our ministries, and within our communities.

### **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.



# 2021 modern slavery risk management initiatives

Mater strives to embed ethical and sustainable practices into every aspect of our business.

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by Mater to address modern slavery in our operations and supply chain from 1 January 2021 to 31 December 2021.

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 2021 Mater continued our planned program of work to mitigate the risk of modern slavery in our operations and supply chain. Key areas of focus included:

## • Our supply chain

Mater worked with the Australian Catholic Anti-Slavery Network (ACAN) to approach a further 50 suppliers to encourage them to upload their modern slavery statements into a global database (SEDEX) to enable an assessment of the supplier's current risk profile and risk mitigation strategies.

Additionally, in conjunction with our Catholic Negotiating Alliance (CNA) hospitals—St. John of God, Calvary and Cabrini—Mater approached an additional 25 high-risk suppliers to gain an understanding on what suppliers have implemented within their operations and supply chain to mitigate modern slavery risks. Twenty-four suppliers provided responses to the survey. CNA members will work with these suppliers in 2022.

To support greater understanding of the Modern Slavery Act 2018 (Cth), Mater invited 104 suppliers across ICT, Construction, Clinical and Indirect Procurement categories to attend ACAN-hosted webinars.

## • Our operations

We continued forging stronger working relationships with ACAN and the CNA hospitals to draw on each other's expertise, resources and skills and work as a united voice against modern slavery.

We conducted a gap analysis survey as provided by ACAN (refer to page 16). The survey results demonstrated Mater's ongoing commitment to addressing modern slavery risks.

## • Our people

Mater's Board and Executive strongly support the legislation and take their roles, responsibilities, and accountabilities under the Act seriously. Modern slavery training has been mandated for all Board and Executive members, senior personnel and those involved in procurement to increase their knowledge, awareness and understanding.

Mater added modern slavery training modules on to our eLearning platform, and introduced new processes to ensure training would be monitored and reported to the Executive and Board.

A formal, cross-functional working group was implemented to progress actions on the program of work and the delivery of this Annual Statement.

## Our plans for 2022

- Continue to support and assist our suppliers with implementing modern slavery risk mitigation strategies while furthering our understanding of any risks that may be associated with suppliers' supply chains.
- Work with ACAN and SEDEX to gain greater collaboration between the ACAN members to standardise engagement with suppliers and reduce duplication of the work involved by members and suppliers. Additional metrics will be determined in line with the engagement approach inclusive of the monitoring for these engagements i.e. corrective actions, follow up, and escalation.
- In conjunction with the CNA, finalise assessments and discussions with 50 high-risk suppliers across high-risk categories such as ICT, Construction, Facilities Management and Clinical.
- Provide suppliers/contractors access to a supplier portal including a training module specifically developed by ACAN. Additionally, provide access to Mater's Modern Slavery Statements and Code of Conduct to reinforce Mater's commitment and position.
- Provide greater transparency around Mater's action plan and progress by uploading quarterly updates on our performance to the Mater Intranet.

## Our plans beyond 2022

- In conjunction with the CNA, finalise assessments and discussions with 50 high-risk suppliers in categories such as ICT, Construction, Facilities Management and Clinical.
- Deliver modern slavery online training modules on the SEDEX platform to support supplier onboarding, maintenance and risk management, to increase knowledge of the impacts of modern slavery on a global economy and examine how modern slavery affects healthcare in Australia.
- Progress review of the remaining supplier base to ensure modern slavery risks are appropriately mitigated.
  - Continue to work closely with ACAN and SEDEX to review supplier supply chain risks and to ensure controls are monitored and maintained.
  - Continue SEDEX training on the digital platform for personnel as required.



## Brief statement from our Chair

Throughout the past twelve months Mater has committed to ensuring ethical and sustainable practices are inherent in our operations and supply chain to mitigate modern slavery risks.

We have focussed our efforts in communicating awareness, training and education by ensuring training modules are available to all Mater staff to increase their knowledge and understanding.

We have actively worked with our suppliers to increase their knowledge of modern slavery risks in their own practices and supply chains.

By forming a united front with the Australian Catholic Anti-Slavery Network and the Catholic Negotiating Alliance, Mater has been tackling these important ethical issues and risks, to mitigate modern slavery.

We are looking forward to working with our suppliers and business partners in 2022 to ensure Mater's commitment to preserving human dignity continues to be a focus of work.

A handwritten signature in white ink, appearing to read 'Francis Sullivan', written in a cursive style.

**Francis Sullivan AO**

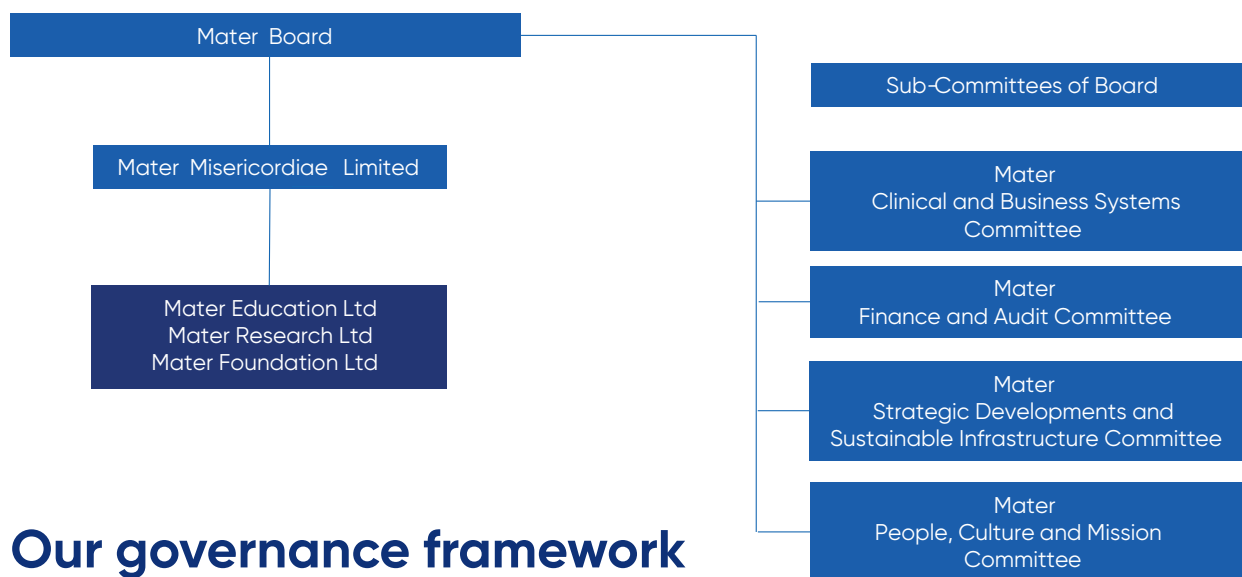
*Chair – Mater Misericordiae Limited Board of Directors*

# Reporting criteria 1 and 2: About Mater

## Our organisational structure

Mater’s organisational structure reflects our commitment to the strategic and consistent integration of health, education and research.

In July 2020, a single Board of Governance was established to unify all Mater hospitals and health services across Queensland to further our vision—empowering people to live better lives through improved health and wellbeing. Our Head Office is located in Newstead, Queensland.



## Our governance framework

Mater is primarily governed by our Board of Directors and the Mater Executive. Their collective leadership and expertise guide the direction of our organisation and ensure we stay true to our overarching Mission and Values.

While we’ll always value and celebrate our historical ties and strong links with our original founders the Sisters of Mercy, the canonical responsibility of Mater Misericordiae Limited (which includes Mater Foundation and Mater Research) was officially transferred to Mercy Partners on 23 April 2013.

Holy Cross Laundry, a world leading commercial laundry and cleaning service for medical, surgical, health, and aged care organisations, also reports to Mercy Partners.

Mater continues to take an organisation-wide approach to managing modern slavery risks in its operations and supply chains. This Modern Slavery Statement is a joint statement made by the whole of Mater Misericordiae Limited.



# Our operations

Mater comprises an extensive network of public and private hospitals, healthcare at home services, community services, health centres and related businesses, a nationally-accredited education provider, a world-class medical research institute and a philanthropic foundation.



## Mater Health

Mater Health comprises all our hospitals and healthcare services across Queensland. These services combine to help Mater offer comprehensive healthcare which meets identified community need.



## 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 through to highly experienced practising 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 Chief Executive Officer 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, which connects its findings from bench to bedside, 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 people and businesses to partner with Mater to improve health through a wide range of fundraising and philanthropic opportunities.

# Operations during 2021



Figure 1: Mater locations across Queensland



**732 508**  
patients seen



**12 231**  
babies born



**99 565**  
emergency  
attendances



**\$23 372 737**  
received in grants for  
Mater Research



**1723**  
students graduated  
from Mater Education's  
Registered Training  
Organisation



**9287**  
paid employees

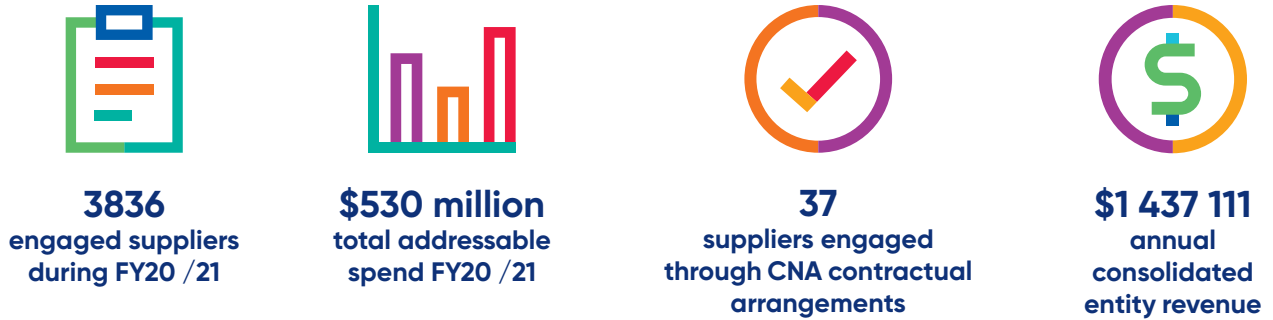


**est. 60 000**  
hours contributed by  
Mater volunteers

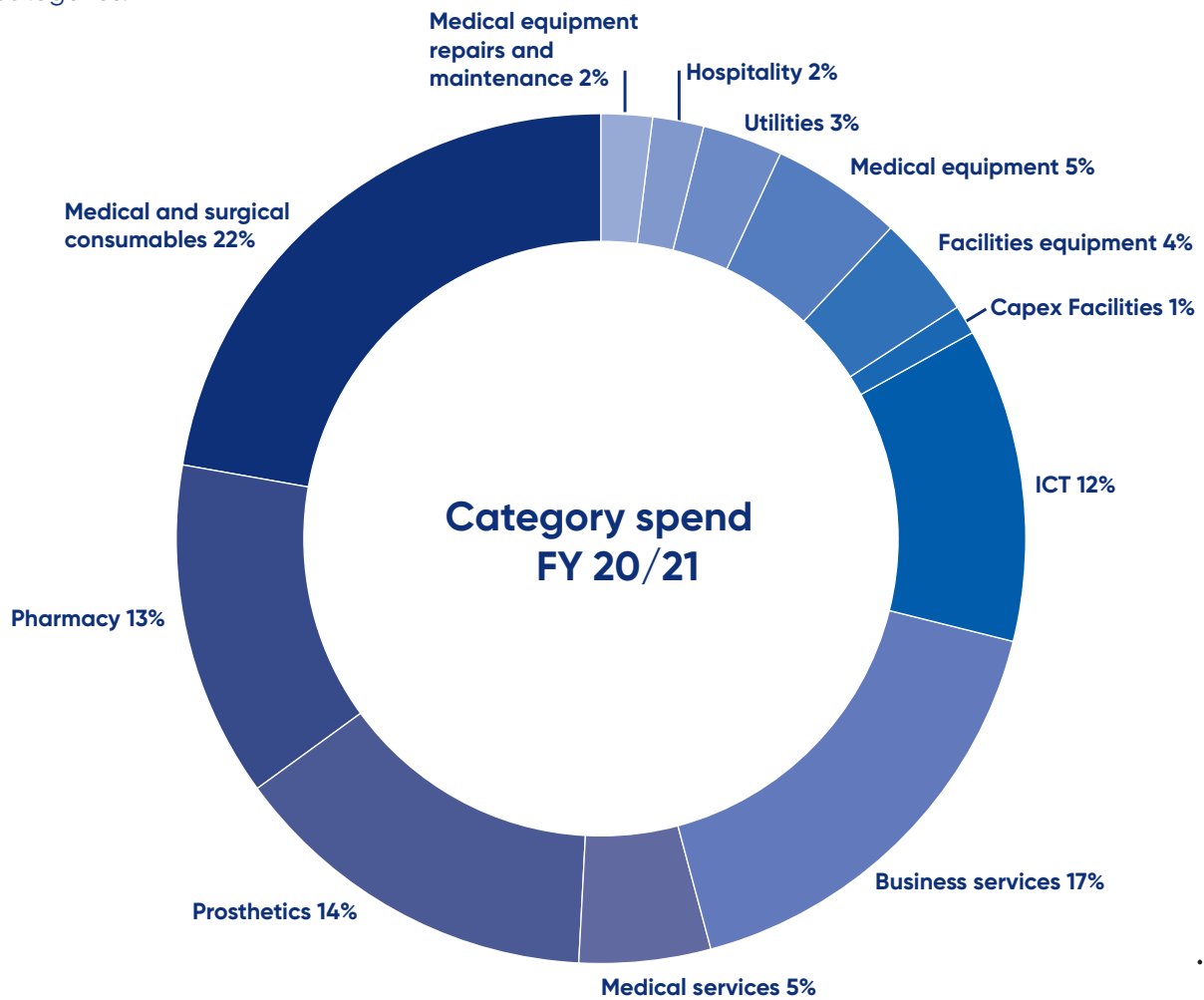
# Our supply chain

Mater's procurement and supply chain operations activities are delivered through a centre-led procurement operating model in partnership with our divisions. All high-value clinical procurement is managed centrally through the clinical procurement team. Organisation-wide non-clinical categories such as waste, uniforms or electricity are also managed centrally through the indirect procurement team. Procurement of ICT goods, services and equipment is managed through the ICT procurement team.

The below information provides a snapshot of the Mater's activities.



We procure goods and services from an international supply chain across 13 broad procurement categories.



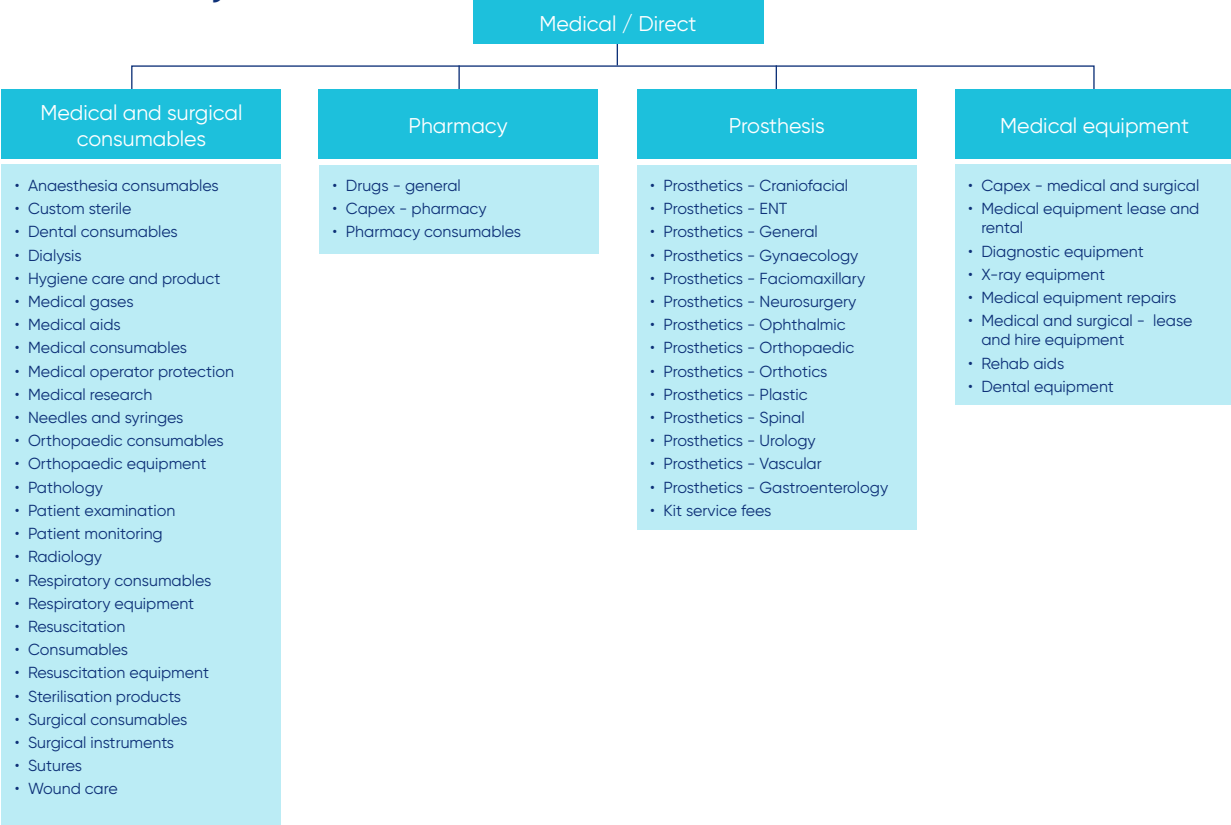
Mater is a member of the Catholic Negotiation Alliance (CNA)—a network of Catholic healthcare facilities authorised to collectively bargain with suppliers.

Holy Cross Laundry (HCL) procurement data included in figures until November 2020 with spend thereafter incorporated where Mater sourced supply of services from HCL.

Labour hire/recruitment is incorporated under Business Services data.

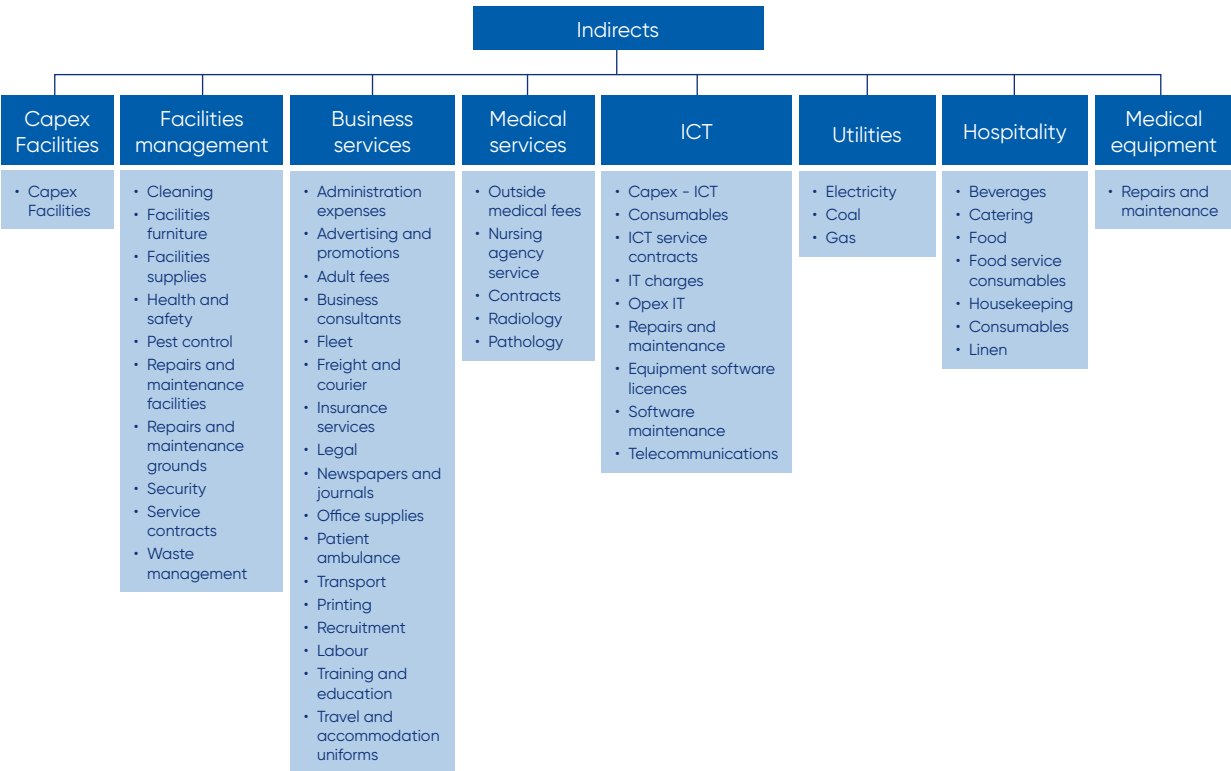
Our largest supply categories include medical and surgical consumables, pharmacy, prosthetics and medical services and medical equipment, equalling 59% of the spend as shown in the breakdown of the 13 procurement categories (refer to page 12). An overview of the products procured under each category has been listed below:

### What we buy—clinical:



The remaining 41 per cent includes non-clinical categories including business services, ICT and construction. An overview of the products and services procured is listed below:

### What we buy—non-clinical:





## Supplier Code of Conduct

Mater is committed to the responsible engagement of suppliers. This includes requiring all suppliers to comply with our Ethical and Sustainable Purchasing—Supplier Code of Conduct. New suppliers are selected based on their compliance with Mater's standards and their ability to provide and maintain high-quality products and services. We expect our suppliers and their supply chains to share our Values and adhere to the same principles. These include:

### • Complying

with international human rights laws and behaviours set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

### • Managing

all operations and supply chains to assess the risk of modern slavery practices and implement mitigation strategies to reduce this risk.

### • Ensuring

compliance with relevant laws regarding forced or involuntary labour, child labour, discrimination and security practices. This includes freedom of employees to leave their workplace after their shift ends or to resign giving reasonable notice.

### • Allowing

freedom of association and collective bargaining for workers to join or form trade unions of their own choosing and to bargain collectively.



# Reporting criteria 3: Modern slavery risks in operations and supply chain

Mater is committed to ensuring our procurement practices are transparent, fair and responsible and uphold high standards of integrity and honesty that align with our Values.

We also recognise that instances of modern slavery are often complex and hidden.

## Operational risks

### Our COVID-19 response

As a healthcare provider, our operations continue to be impacted by COVID-19, and our suppliers are under ongoing pressure to ensure sufficient supplies of high quality personal protective equipment.

As such, Mater has been twice as vigilant in our approach to identifying and managing the risks of modern slavery in our operations and supply chain.

We have responded to these challenges by continuing to purchase consumables, where possible, through known, long-term suppliers with a public, zero-tolerance position toward modern slavery.



### Our people

Mater has more than 9287 full-time, part-time and casual employees, and volunteers throughout Queensland.

### Agency suppliers

We engage a range of agency healthcare professionals daily to ensure we have adequate resources.

Mater engaged six nursing agency suppliers throughout 2021 at a cost of \$5.78 million. We provided each agency with the Mater Ethical and Sustainable Procurement—Supplier Code of Conduct. All contracts from January 2020 include Mater's standard Terms and Conditions that require suppliers to actively mitigate the risk of modern slavery within their own supply chains.

# Modern slavery gap analysis

In 2021, Mater Executive approved formal establishment of a cross-functional working group to assist with all activities associated with the Modern Slavery Risk Mitigation Strategy.

As part of our membership with ACAN, Mater undertook a review of our existing processes and practices through a gap analysis in 2020, and in 2021, as provided in the table overleaf.

The results demonstrated marked improvement across all five categories with 17 improvements completed out of the 23 topics identified.

Throughout 2022 we will build on these results by refining our reporting metrics and processes.

This will help us review the adequacy and effectiveness of our risk management program across five key areas:

## 1. External risks

Review and map risks and vulnerabilities of priority 1 suppliers and their extended supply chains, in conjunction with ACAN, SEDEX and CNA hospitals.

## 2. Awareness

Increase education-based communications to all Mater personnel in conjunction with Mater's External Relations, Marketing and Engagement team.

## 3. Training

Ensure all mandatory training is completed, monitored and reported in conjunction with Human Resources.

## 4. Supplier engagement

Develop a formal supplier engagement process for using the same supplier / product as other ACAN members, in conjunction with ACAN, SEDEX and CNA hospitals.

## 5. Monitoring and corrective actions

Implement strategies for supporting the risk assessment and documentation relating to supplier engagement, in conjunction with SEDEX.

**Table 1: Risk Mitigation Modern Slavery Gap Analysis**

Category	Topic	2020	2021
Management systems	Governance	●	●
	Commitment	●	●
	Business system	●	●
	Action	◐	●
	Monitor/report	◐	●
Risk management	Risk framework	◐	●
	Operational risk	●	●
	Identifying external risks	○	○
	Monitoring and reporting risk	◐	●
Human resources and recruitment	Awareness	○	◐
	Policies and systems	◐	●
	Training	○	◐
	Labour hire/outsourcing	◐	●
Customers and stakeholders	Customer attitude	◐	●
	Information provision	◐	●
	Feedback mechanisms	◐	●
	Worker voice	◐	●
Procurement and supply chain	Policy and procedures	◐	●
	Contract management	◐	●
	Screening and traceability	◐	●
	Supplier engagement	○	◐
	Monitoring and corrective action	○	◐

Legend: ○ not started | ◐ in progress | ● completed/on track

# Supply chain risks

Mater categorised the types of goods and services for our top 50 high spend suppliers to determine risk levels, and continued working with the CNA to complete a similar exercise with 25 high-risk suppliers, applying the following key indicators:

- **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.

- **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' work (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 we predominantly use Australian-based suppliers, we recognise that our goods and services may come from countries other than those where suppliers' headquarters are based.

Mater's highest risk is in the medical equipment and consumables category. Other high-risk categories include:

- Building construction and fabrication
- Property facility maintenance
- Food and hospitality.

We recognise that further work needs to be done to understand more about these suppliers and the countries in which they manufacture their products, in conjunction with ACAN and CNA hospitals.

In 2022, we are focussing on further improving the procurement categorisation against our suppliers and expenditure to improve our data and understanding of the supply chain.

# Reporting criteria 4: Actions taken to assess and address risk

In 2021, Mater revised its Procurement Policy and Procedures to ensure risks associated with modern slavery were adequately addressed within its procurement practices. Our Board and Executive then mandated modern slavery training for all Board and Executive members, senior personnel and personnel involved in procurement.

Mater introduced ACAN training modules on to our eLearning platform, and encouraged all Mater People to utilise the resources to learn about and better understand modern slavery and its risks.

We have continued sharing with staff, the progress of activities for completion as stated in Mater's Modern Slavery Annual Statement 2020. This was published internally and externally via the Australian Government's online Modern Slavery Register. It formally communicated Mater's position on modern slavery and reinforced our zero-tolerance approach to our suppliers, within the Ethical and Sustainable Code of Conduct.

Mater has commenced discussions with ACAN to access available remediation and counselling services offered to victims of modern slavery.

## 2022 modern slavery action plan and road map

Our 2022 action plan will continue to build upon the foundations laid during 2021.

Modern slavery training has been mandated for Board and Executive members, senior personnel, procurement and personnel overseeing procurement. The monitoring for the uplift of modern slavery education and awareness across all of Mater will continue throughout 2022.

We are committed to improving our supply chain data analytics through a more detailed review of the procurement category mapping of the spend.

We will continue to work with our fellow ACAN and CNA members to forge a better way of working together when using the same suppliers for the same or similar goods, services or equipment.

Monitoring social risks is a work in progress. In conjunction with ACAN members and SEDEX, we will work further on engagement, supplier onboarding and risk management throughout 2022. This will reduce duplication and create a more united supplier engagement approach.

We will continue to raise awareness and provide updates on our progress to the Mater Board, Mater Executive and all Mater People, and publish this information through Mater's internal channels.

# Reporting criteria 5: Effectiveness assessment

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

We have implemented a program review and evaluation process as part of our reporting requirements to the CEO and Executive Directors. As part of the reporting process, the gap analysis will continue to be a point of focus to ensure all categories and topics continue to be monitored and actions are completed in 2022.

Quarterly updates to the Board and Executive will continue with revised reporting metrics to be implemented on the progress, risks, and opportunities relating to all category areas on the gap analysis.



# Reporting criteria 6: Process of consultation with entities owned or controlled

The Mater Board also governs the wholly-owned subsidiaries, Mater Education Ltd, Mater Research Ltd and Mater Foundation Ltd, with representatives within these subsidiaries committed to mitigating modern slavery risks.

Representatives from both Mater Education and Mater Research are members of the cross-functional working group with representation from the Foundation and the Office of the Mission became members of the working group in 2022.

# Reporting criteria 7: Other

Mater is committed to internationally-recognised human rights frameworks, standards and goals including:

- International Bill of Human Rights
- International Labour Organisation (ILO) Declaration on 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



**Francis Sullivan AO**  
*Chair, Mater Misericordiae Limited Board of Directors*

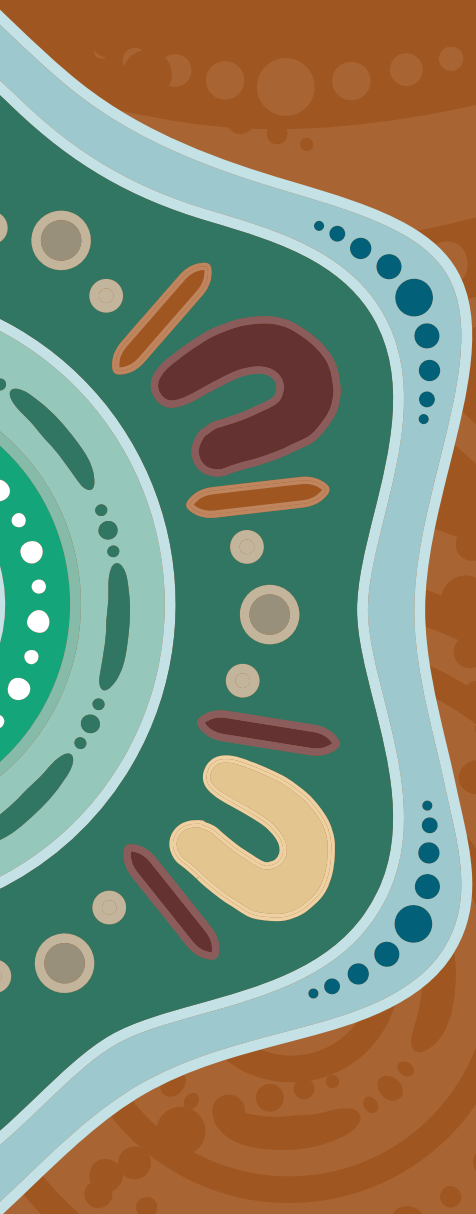






Mercy Health

Care first



Mercy Health

# Modern Slavery Statement 2021





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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



This second modern slavery statement given by Mercy Health under the *Modern Slavery Act 2018* (Cth) is an opportunity to look back at our efforts over the past 12 months.

The COVID-19 pandemic continues to occupy our minds and has created an urgency around the supply

of goods and services, which can distract from the potential for an increased risk of modern slavery in our supply chains and work practices. I am pleased to see Mercy Health continuing to develop our organisation's response to modern slavery.

I call to mind the work of Catherine McAuley and the slight beginnings from which ministries of the Sisters of Mercy emerged around the world. It is in that tradition that Mercy Health presents our second modern slavery statement.

It is important to Mercy Health that we continue to ask ourselves how we can turn ethical intention into practical outcomes for social justice. We should not be disheartened by what could be perceived as

slow progress in the national and global effort to shift awareness, policy and practice to address modern slavery. This is a problem for which we strive to provide moral and ethical leadership and voice; we are committed to a path of persistent effort toward achieving the common good.

This statement is made together with a range of Australian Catholic organisations in the Australian Catholic Anti-Slavery Network (ACAN). Mercy Health is pleased to be a part of ACAN and for our second modern slavery statement to form part of ACAN's compendium of modern slavery statements.

As Chair of Mercy Health, I would like to thank everyone who has helped develop this important piece of work, nurturing it from the beginnings described in Mercy Health's 2020 modern slavery statement, to delivering the 2021 statement. I look forward to continuing to lead and support our ongoing efforts to eliminate modern slavery.

A handwritten signature in black ink that reads "Virginia Bourke". The signature is written in a cursive, flowing style.

Virginia Bourke  
Chair, Mercy Health

## This modern slavery statement

This modern slavery statement is a joint statement made on behalf of the three reporting entities within Mercy Health:

- Mercy Hospitals Victoria Ltd (revenue \$496,641,650 in 2021)
- Mercy Aged and Community Care Ltd (revenue \$322,370,490 in 2021)
- 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 \$845 million in 2021).

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 2021.

In that period, Mercy Health continued the work we began in 2019 to assess and address the risk of modern slavery in our operations and supply chains. As well as partnering with others and raising awareness among our staff, suppliers and the community, Mercy Health continued our efforts to engage with suppliers to understand and reduce their (and our) modern slavery risks. That engagement revealed different levels of maturity among suppliers in their response to modern slavery. Our most significant suppliers were beginning to address the issue and demonstrated a lower risk than the *potential risk* we were able to assess in 2020.



## Our organisational structure

Mercy Health is comprised of Mercy Health Australia Ltd and its subsidiaries.

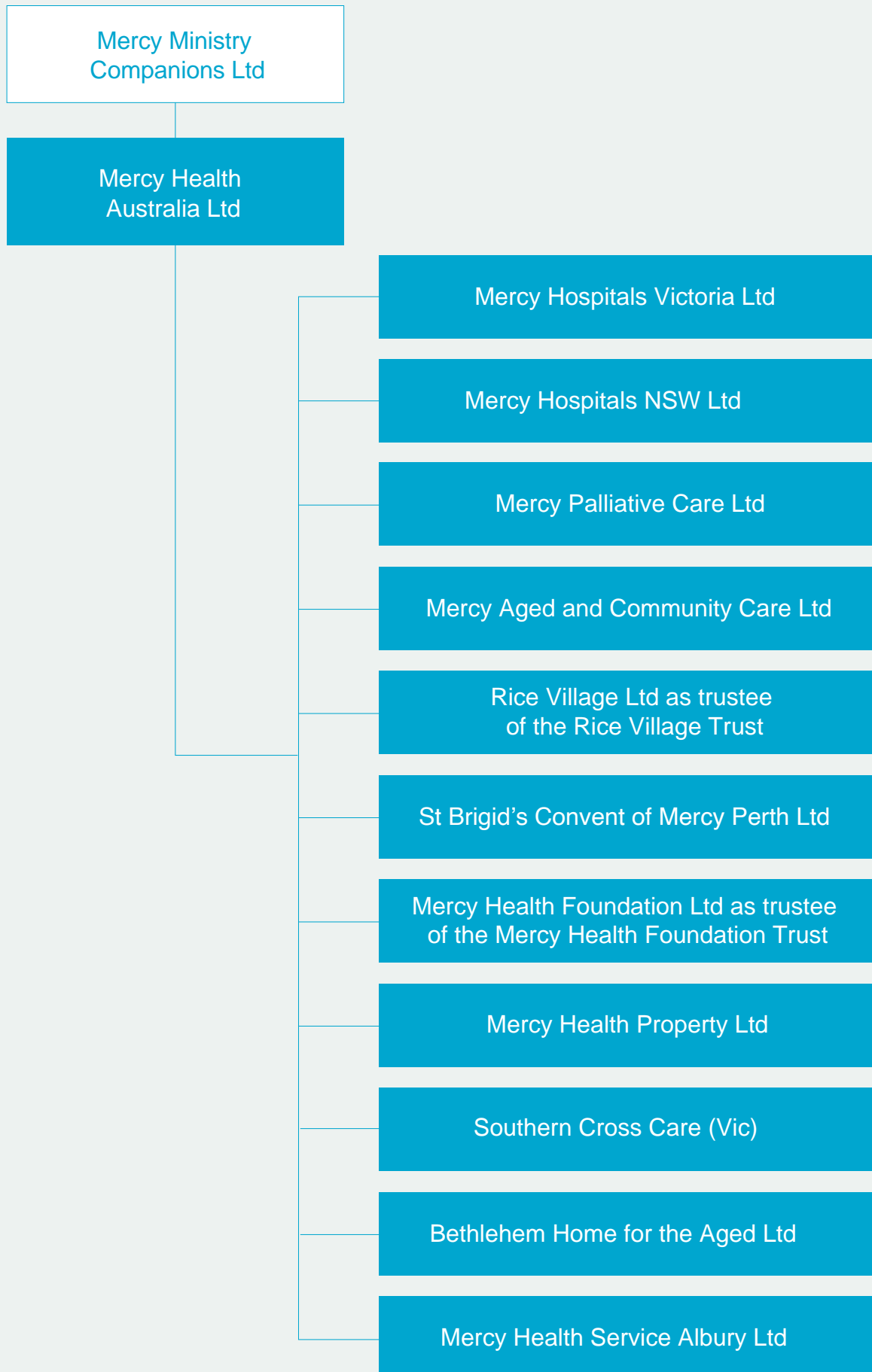
Mercy Health Australia Ltd is the sole member of each of the following companies:

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 Trust**	ACN 107 275 230	ABN 73 107 275 230
Mercy Health Property Ltd	ACN 082 093 150	ABN 26 412 756 615
Southern Cross Care (Vic)	ACN 004 788 612	ABN 27 004 788 612
Bethlehem Home for the Aged Ltd	ACN 614 116 308	ABN 68 554 957 510
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.

Mercy Health’s corporate structure is illustrated in the following chart:



### Mercy Ministry Companions

On 3 December 2021, ministries established by the Sisters of Mercy in Australia, including Mercy Health, were reorganised to become members of the Mercy Ministry Companions group, as illustrated in the chart below.

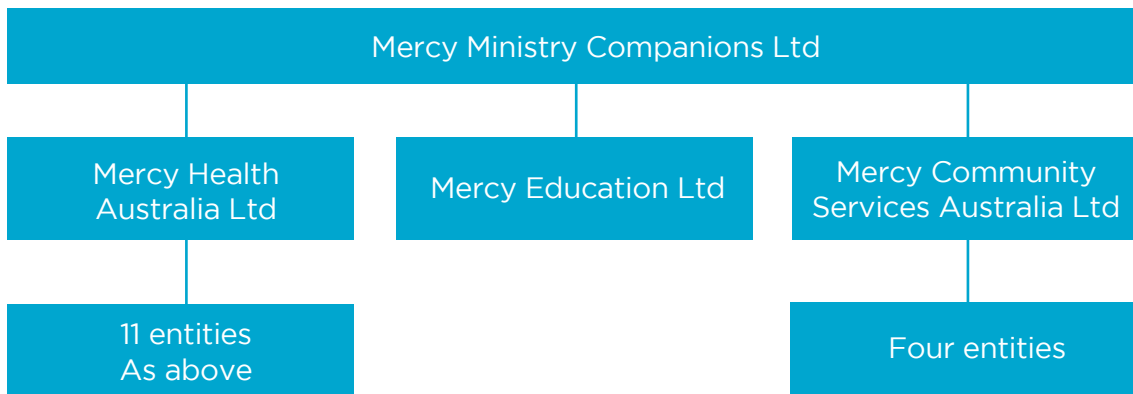
The reorganisation emerged out of the Sisters’ knowledge that the number of Sisters skilled in governance is declining, and a desire that their ministries should continue in accordance with their ethos. The reorganisation has empowered the laity (as directors of Mercy Ministry Companions Ltd) to take on a greater role in governance, while Sisters remain involved for now as members of Mercy Ministry Companions Ltd. The reorganisation has not changed the day-to-day operations of Mercy Health.

### Our governance framework

The membership of the Boards of all of the companies that make up Mercy Health, other than Mercy Health Foundation Ltd, is concurrent. The concurrent boards are known as ‘the Mercy Health Board’.

Mercy Health Foundation — which seeks philanthropic support for the work of Mercy Health — has a separate Board of Directors, referred to here as the ‘Foundation Board’.

All of the entities that make up Mercy Health are supported by our Group Chief Executive Officer and Executive management team based in Melbourne. Support services functions are also shared across the organisation. For example, human resources and procurement teams support the organisation as a whole.





## Our operations and supply chain

### Operations

Mercy Health provides a range of health, aged and community care services in Australia.

Mercy Health provides public hospital services in Victoria and New South Wales. We cared for approximately 103,000 people in our Victorian hospitals in 2020/21. In that year, nearly 9,700 babies were born in those Victorian hospitals, 686 families were supported by our early parenting centre and more than 1,200 people received mental health services.

At the end of 2021, Mercy Health was operating 30 residential aged care homes across four states, providing care to about 3,000 people.

Mercy Health also supports people to live independently at home. In 2020/21, we provided care for more than 9,500 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 12,090 people — 83 per cent of whom are women — worked for Mercy Health over the course of 2021. Of the total number of staff, 5,694 worked in health services, 4,962 worked in residential aged care, 997 worked in home care and 429 worked in support services.

While Mercy Health employs people from approximately 139 countries, including India, the Philippines, Nepal and the United Kingdom, the vast majority of our employees are engaged in Australia.

Just over 800 staff from 54 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 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

In 2021, Mercy Health purchased goods and services to the value of more than \$223 million from 3,808 suppliers for the purpose of carrying out its activities.

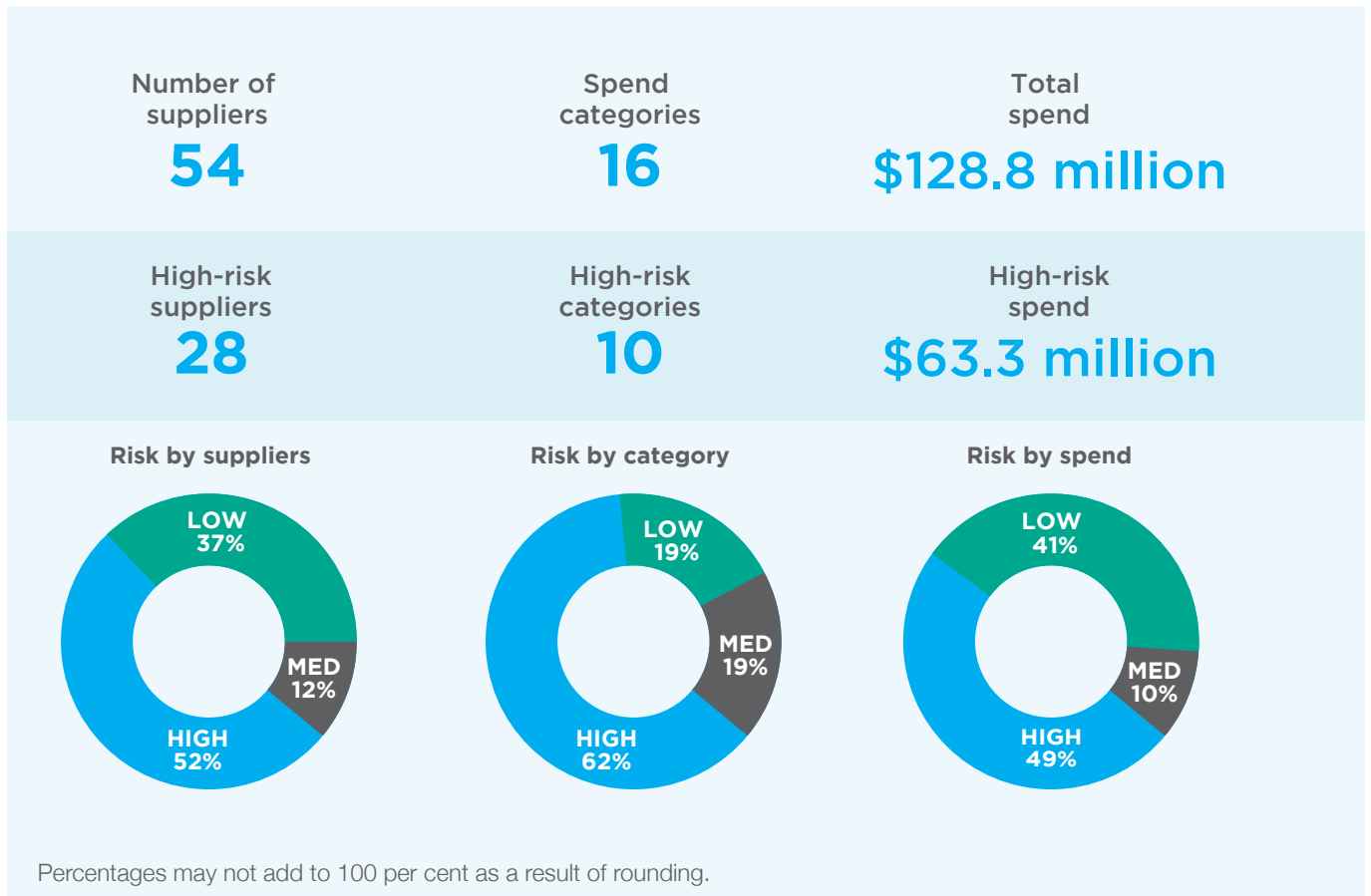
To target our efforts to address the risks of modern slavery, Mercy Health undertook a supplier risk analysis in 2019 of our top 54 suppliers by spend, in conjunction with ACAN.

Spend categories were divided into high, medium and low risk informed by ACAN's Category Risk Taxonomy.

### Mercy Health high-risk spend categories:

- building and construction
- cleaning services
- food and beverage
- furniture and office supplies
- labour hire (agency)
- linen/laundry
- medical supplies
- security services
- uniforms and workwear
- waste management.

The resulting Mercy Health Risk Dashboard identified that of the top 54 spend suppliers, 28 were categorised as *potentially* high risk by virtue of falling within 10 identified high-risk categories. The total high-risk spend in 2019 was more than \$63 million.



## Actions taken to assess and address the risks

### Modern Slavery and Ethical Purchasing Working Group

Mercy Health established a Modern Slavery and Ethical Purchasing Working Group in February 2020, chaired by General Counsel. The Working Group includes Executive representation from the Chief Financial Officer; Executive Director People, Learning and Culture; and the Executive Director Marketing, Communications and Stakeholder Relations. The Group also includes representatives from procurement, health services, aged care and risk teams.

### Partnerships

Mercy Health operates in partnership to address risks of modern slavery.

#### *Australian Catholic Anti-Slavery Network (ACAN)*

Mercy Health is a member of the Australian Catholic Anti-Slavery Network (ACAN), made up of more than 40 Catholic organisations around Australia including large Catholic health and aged care providers.

Mercy Health modern slavery liaison officers attended monthly ACAN meetings with the aim of understanding and responding to the potential risks of modern slavery in our organisation and supply chain.

Mercy Health worked with ACAN to develop our internal education and training and business systems.

#### *Health Share Victoria*

Mercy Health procures certain goods and services for its Victorian hospitals and community palliative care service through Health Share Victoria. Health Share Victoria procures goods and services for public sector health services in Victoria. Health Share Victoria repudiates modern slavery and has adopted a risk-based approach to combating modern slavery in health service supply chains.

#### *Sedex*

Mercy Health has begun using Sedex tools and services to map our supply chain and assist us in evaluating the risk of modern slavery in our supply chain. Sedex gives us access to information that we would otherwise find difficult to source ourselves.

#### *Catholic Health Australia*

Mercy Health is a member of Catholic Health Australia. A representative of the Working Group attended a Catholic Health Australia modern slavery working group in 2021 to share experiences and distil issues of concern to all of us.



### Bridge the Gap Analysis

Mercy Health repeated the ACAN ‘Bridge the Gap Analysis’, which we first undertook in 2019, to identify changes in how our systems deal with modern slavery risks and generate a new heat map of potential system gaps.

In 2019, this analysis showed that while we had started to understand the potential risks, we needed to implement strategic action plans to support a progressive program of risk mapping, identification and, where necessary, remediation.

The ‘Bridge the Gap Analysis’ was repeated in February 2021 and December 2021, showing that:

- the Board and Senior Executive are highly engaged
- dedicated business systems have been established
- detailed procurement policies, guidelines and processes are in place

- progress has been made to incorporate modern slavery into corporate risk and audit processes
- policies are in place to minimise risk of modern slavery when using labour hire companies.

The analyses show that, although improvement has been ongoing, further development is required in the following areas:

- Systems for treating and managing risk in our immediate and extended supply chains.
- Monitoring the effectiveness of actions to reduce the risk of modern slavery in our supply chain.
- Improving feedback mechanisms and staff engagement.
- Increasing contractor training and awareness programs.

### Engagement with suppliers

Mercy Health’s engagement with suppliers has been informed by a risk-assessment process summarised in the following chart.

Process	1. Risk stratify inventory	2. Risk-based engagement	3. Appropriate remediation
Risk management activities	Maintain inventory of suppliers with information regarding their potential modern slavery risk (high, medium or low) (ACAN Risk Taxonomy)	Assess the level of strategic and value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)  Develop an engagement strategy based on the strategic/value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)	Where instances of modern slavery are identified, a prioritised risk management approach is taken: i. Modern slavery risk caused by our Entity ii. Contributed to by our Entity iii. Directly linked to our Entity
Scope	Mercy 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		



### Supplier actions to address risk

Building on that work, we have commenced engagement with 24 of the 28 significant suppliers identified in 2019. The other four suppliers no longer supply Mercy Health.

We requested those significant suppliers to complete a supplier questionnaire with nine questions about key issues in assessing and addressing modern slavery risk.

From the response to these questions, a *residual risk rating* (high, medium, low) was assigned based on the remaining risk in the supply chain having considered

the steps they were taking to assess and address the risk of modern slavery. The resulting information is conveyed in the chart below.

The result demonstrates that our suppliers are taking action to address potential risks of modern slavery. It also shows that most organisations are in the early stages of reviewing and reforming their supply chain processes in light of modern slavery.

Using the information we gathered from those significant suppliers, we intend to work with a selection of those suppliers in 2022 to reduce the risks that remain in their operations and supply chains.

Supplier questionnaire category	Residual risk		
	High	Medium	Low
1. Modern slavery policy and processes	3	10	11
2. Training	7	8	9
3. Risk assessment	6	10	8
4. Supply chain mapping	7	11	6
5. High-risk services	5	3	16
6. High-risk locations	7	9	8
7. High-risk goods	8	7	9
8. Grievance mechanisms	8	8	8
9. Remedy pathway	10	8	6

## Case study

One supplier to Mercy Health demonstrated a comprehensive response to modern slavery.

The organisation informed us that it has a specific modern slavery policy. Modern slavery training has been provided to all board members, executives and key employees, and all employees and contractors have been provided with an introduction to modern slavery.

The organisation undertook an in-depth risk assessment, including at least the top two levels of the supply chain. Identified risks were either removed or are now being monitored where removal was not possible. Supplies are sourced from high-risk areas, but mechanisms — including auditing and inspections — have been put in place to identify and remove modern slavery risks.

The organisation has a reporting mechanism that can be accessed by workers from all levels of their supply chain. The organisation can demonstrate examples of how the process has been used and has clear policies and processes on what should be reported and how.

They have developed a detailed crisis management plan incorporating the steps to be taken in remediation of modern slavery harms, where necessary.

The organisation is accredited with an accreditation agency that safeguards the rights of workers in the organisation's sector.

Mercy Health hopes to improve its own processes and work with other suppliers to encourage them to address modern slavery risks in a similar way.

## 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.

## Internal education and awareness

Mercy Health has continued to promote internal education and awareness of modern slavery.

We are continuing to deliver online training using ACAN modules for the Working Group and relevant business units (procurement, information technology, finance and property). The number of staff who have completed training is listed below.

Training	Working Group	Business units
Modern slavery 101	6	10
Implementing a modern slavery risk management program	5	1
Business relevance	7	6
Grievance mechanisms and remedy	5	–

While we have focussed on educating and training the most relevant staff within Mercy Health, the online training module 'Modern slavery 101' was made available to all Mercy Health staff via our online education platform toward the end of 2021. We look forward to more staff undertaking that training in 2022.

We published an article in the Mercy Health quarterly newsletter, *Our Voice*, in spring 2021, to inform our staff, patients, residents and clients about the work Mercy Health is doing to address the risk of modern slavery.

### Supplier education and awareness

We also encouraged our suppliers to educate themselves about modern slavery.

In addition to the engagement work we did with our large, higher risk, suppliers, we wrote to 204 suppliers enclosing our Supplier Code of Conduct Policy, which includes modern slavery requirements. We asked those suppliers to commit to the Code; 146 agreed and three refused.

Mercy Health invited suppliers to attend the following webinars presented by ACAN:

- Construction industry: 10 respondents were Mercy Health suppliers
- Medical industry: 10 respondents were Mercy Health suppliers
- Information and communications technology industry: five respondents were Mercy Health suppliers



### Community awareness

To promote awareness of modern slavery and Mercy Health's efforts to overcome it, we placed the Mercy Health Modern Slavery Statement 2020 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.

Mercy Health funded an online 'Grievance mechanisms and remedy' training module that was made available to Working Group members in 2021.

### Impact of COVID-19

Throughout 2021, the COVID-19 pandemic continued to impact Mercy Health employees and the people we serve.

Mercy Health continues to provide hospital care to patients infected with COVID-19. Meantime, we continue to care for people in our residential aged care homes affected by COVID-19 exposures and outbreaks, as well as people living independently.

COVID-19 posed a particular challenge for our procurement team, which was engaged in sourcing and deploying essential personal protective equipment (PPE) in a difficult procurement environment. We procured PPE through the public sector stockpile for our Victorian hospitals, relying on the State's processes to minimise our exposure to risks of modern slavery. We entered the market directly to procure PPE for our aged care homes, using existing suppliers in order to avoid the risk of modern slavery in the supply chains of unknown and untested suppliers.

We look forward to pursuing engagement with suppliers on the subject of modern slavery in what we hope will be a more settled environment in 2022.



## 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.

The annual ACAN 'Gap Analysis' (as above) provides an annual structured assessment of the effectiveness of our actions.

In 2022, the Working Group intends to provide the minutes of its meetings to the Mercy Health Executive to allow ongoing assessment by that group of the Working Group's effectiveness.

## Consultation within Mercy Health

The entities owned or controlled by Mercy Health Australia Ltd were consulted in the preparation of this statement as follows:

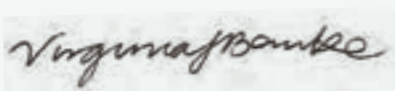
- The Mercy Health Board was briefed on progress and approved the giving of this statement.
- Foundation staff were consulted and the draft statement was provided to the Foundation Board for feedback.

- Members of the management team involved in the Working Group work across all entities that constitute Mercy Health.

Neither Mercy Hospitals Victoria Ltd nor Mercy Aged and Community Care Ltd own or control any other entities.

## 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 May 2022.



Virginia Bourke  
Chair, Mercy Health Australia Ltd

## For more information

General Counsel  
Mercy Health Support Services  
Level 2, 12 Shelley Street  
Richmond Vic 3121

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



### Cover artwork

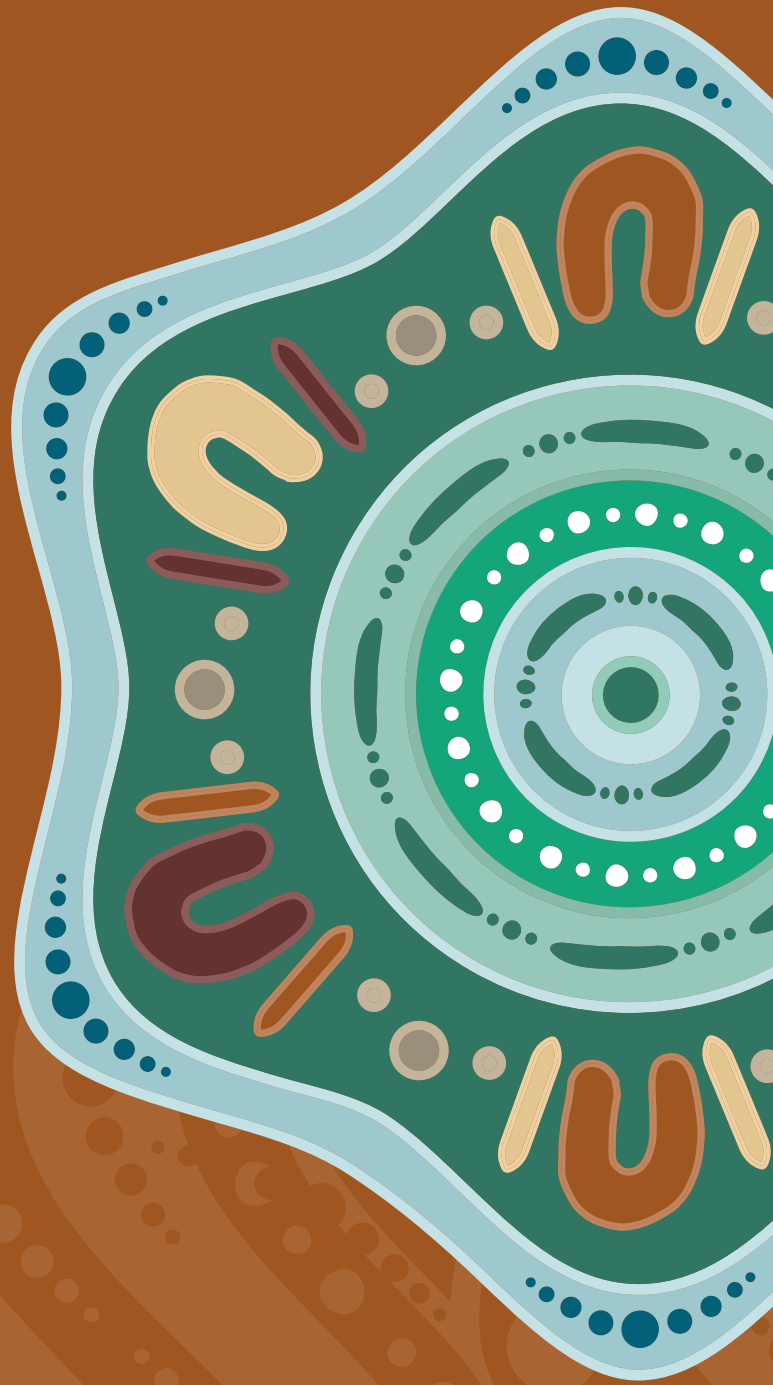
From wabung-ngetel (Call of Country)  
By Dixon Patten, Bayila Creative  
Gunnai and Yorta Yorta





Mercy Health

*Care first*



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 report was produced on Wurundjeri Country.



CABRINI AUSTRALIA LIMITED  
MODERN SLAVERY REPORTING STATEMENT  
2020-21

*“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 2020-21 financial year. This statement is made in accordance with the *Modern Slavery Act 2018* (Cth) and was approved by the Cabrini Australia Limited Board, as the principal governing body of Cabrini Australia Limited and all entities owned or controlled by Cabrini Australia Limited, on [insert date].

## **Disclosure note**

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 the 2019-20 financial year.

**ABN 42624828306**

## STATEMENT FROM THE CHAIRMAN AND CHIEF EXECUTIVE

This year has, once again, been a year of significant impact on the healthcare sector because of the continuing COVID-19 pandemic. While the pandemic was evident in all of Australia, it was particularly felt in Victoria during 2021. Restrictions on elective surgery, which changed frequently as the Government reacted to the latest public health advice, lockdowns and ongoing challenges in our supply chains created a difficult year.

As reported in our 2019-20 statement, Australia's supply of medical goods continues to be sourced primarily from overseas manufacturers. This provides an inherent risk that we continue to work through, however constraints of the pandemic have limited the assertive response that we would have preferred.

Cabrini has been able to expand its operations and is proud to have opened Australia's first private, women's-only mental health hospital. Located in the new Lisa Thurin Women's Health Centre in the heart of Elsternwick, the Cabrini Women's Mental Health service focuses on treatment for mental health conditions.

Cabrini continues to support the Victorian community in delivery of critical care during the pandemic which has significantly impacted normal healthcare operations.

Notwithstanding these disruptions, Cabrini published its modern slavery reporting statement in December 2020 and is now providing this update for 2021. This is to be published to Australian Border Force Modern Slavery Register as part of the Australian Catholic Anti-Slavery Network (ACAN) Compendium 2020 and is intended to be read in conjunction with Cabrini's statement for the 2019-20 financial year.

This Modern Slavery Statement for 2021 will show progress made on the commitments and plans made during 2020 as well as providing a roadmap for our continuing commitment to eradicating slavery from our supply chains.



**Sylvia Falzon**  
Chairman, Cabrini Australia



**Sue Williams**  
Chief Executive, Cabrini Australia

# 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.

For more detailed information about Cabrini’s mission and values and our divisions, please refer to page 4 of our 2019-20 statement.







## OUR MODERN SLAVERY COMMITMENT

Cabrini first became aware of the horror and tragedy of human trafficking, which is often driven by forced labour, through the work of the Cabrini Sisters of the Sacred Heart of Jesus 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.

As reported in our 2019-20 statement, eliminating human trafficking has been adopted as 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.

In our 2019-20 statement, we set out our plans for 2021 and beyond, demonstrating Cabrini's deep commitment to continue embedding ethical practices into every aspect of our business. Further information about what we have achieved in 2020-21, please refer to page 10 of this document.

# 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)

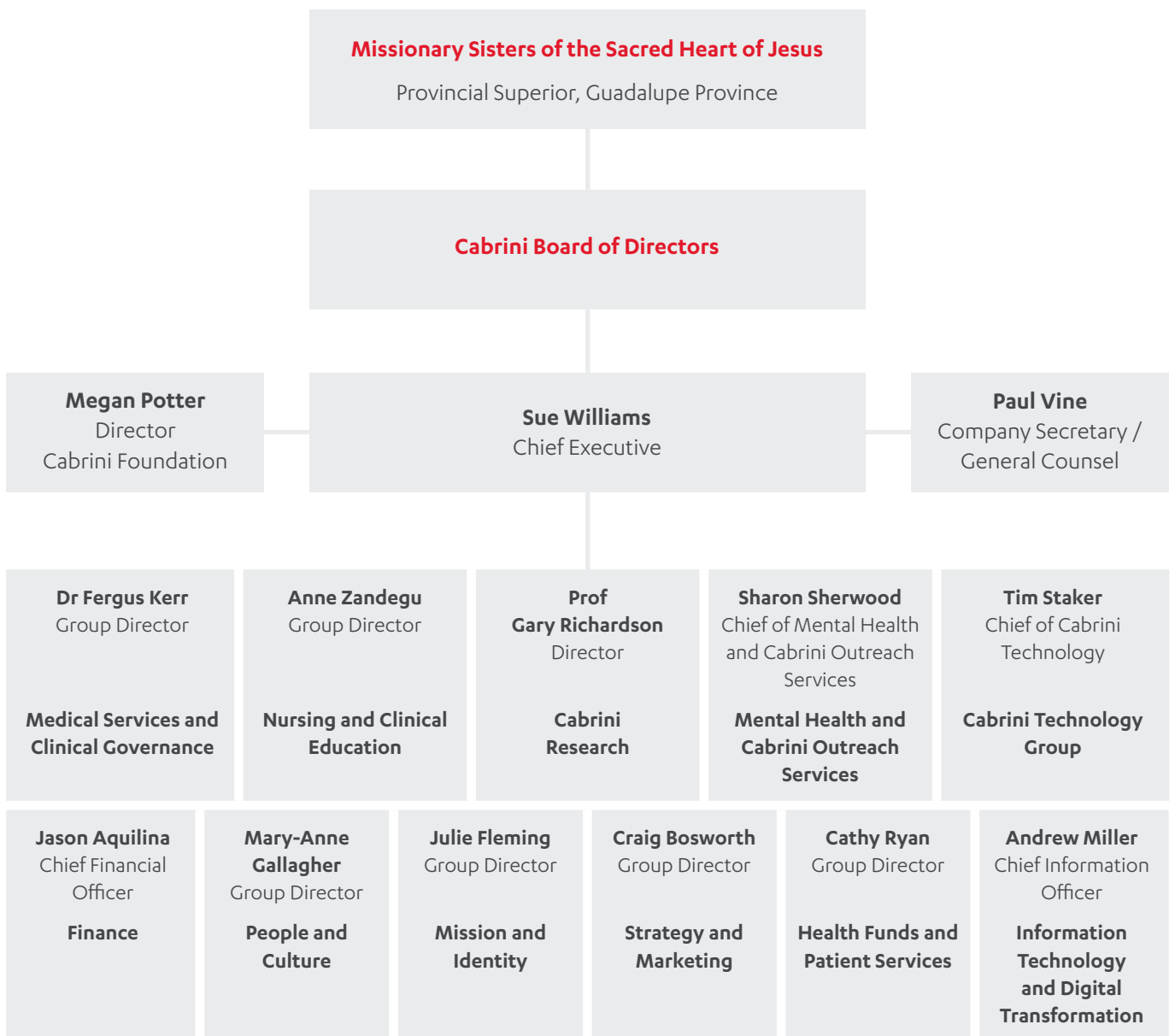


# OUR MANAGEMENT AND GOVERNANCE

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 co-sponsored by the Chief Financial Officer and the Group Director, Mission and Identity, reports to the Board and the Audit and Risk Management 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 December 2021:



Organisation chart as at December 2021.

# OUR OPERATIONS

Cabrini employs more than 4300 staff (2910 full-time equivalent employees) and engages more than 1600 visiting medical officers.

Cabrini provides essential healthcare services and delivers a comprehensive range of high-quality acute, subacute, palliative care, primary care, residential aged-care, diagnostic and community-based health services across its campuses, including our acute hospitals, palliative care hospital, women’s-only mental health hospital, residential aged care facility and outpatient health facilities.

Our services span, cancer care, cardiac services, orthopaedics, neurosurgery, urology, paediatrics, emergency care, maternity services, palliative care and women’s mental health.

Cabrini has been impacted by the global pandemic and measures introduced by government to protect the health and wellbeing of our community. Cabrini has continued to provide a high level of service as part of our healthcare operations:

<b>INDICATOR</b>	<b>2019-20</b>	<b>2020-21</b>
Inpatient care episodes	85,641	83,867
Surgical operations	41,170	42,117
Babies delivered	1,808	1,622
Emergency department attendances	23,679	23,355
Rehabilitation bed days	23,297	17,450
Medical images	141,044	141,044
Day procedures	50,566	50,818
Day oncology patient treatments	23,363	22,250



# OUR SUPPLY CHAIN

Cabrini remains committed to ensuring that our acquisition of goods and services is ethical, transparent, fair and responsible.

Since our last report, Cabrini's supply chain structure has remained unchanged.

Our procurement function for the health business is centralised. While lower value purchasing may be undertaken at a site/local level, all high-value procurement, including critical medical and information technology supplies, are managed under a single Procurement Director.

Our procurement processes require all potential 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 2019-20, Cabrini had dealings with 2238 suppliers and transacted \$301,170,000 on purchased goods and services. In 2020-21, Cabrini had dealings with 2158 suppliers and transacted \$312,000,000 on purchased goods and services.

Cabrini Technology Group imports and sells a range of medical equipment and consumables both directly and through a wholesale distribution arrangement. Procurement of inventory is performed within the relevant Cabrini Technology division by experienced procurement officers. All medical devices directly imported by Cabrini Technology Group are registered and comply with the requirements of the *Therapeutic Goods Act 1989* (Cth).

Cabrini is also a member of the Catholic Negotiating Alliance – a network of Catholic healthcare facilities that are authorised by the ACCC to collectively bargain with suppliers.

## RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

As our operations and supply chains have remained largely unchanged when compared to 2019-20, the risks of modern slavery practices in our operations and supply chains have also remained unchanged. Further work is needed, and we will continue growing our maturity and capability to identify risks of modern slavery as we implement the multi-divisional strategy approved by our Board.

For detailed information about the modern slavery risks identified in Cabrini's operations and supply chain, including the due diligence processes undertaken by Cabrini to identify and assess these risks and our seven-step modern slavery remediation process and actions to address these risks, please refer to pages 10 to 13 of our 2019-20 statement.



# OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

## 2020: WHAT DID WE DO?

- ✓ Established governance frameworks – trained Directors about modern slavery and established oversight by the Audit and Risk Management Committee of Cabrini’s modern slavery plans.
- ✓ Published social policy papers on areas relevant to modern slavery including:
  - Refugee and Asylum Seeker support
  - Australia’s First Peoples
  - End to modern slavery
- ✓ Completed initial supply chain risk analysis and key supplier survey.
- ✓ Adopted requirements of labour hire laws into work practices and supplier contracts.
- ✓ Reviewed internal policies and recommended changes to support anti-slavery best practice.
- ✓ Published first draft of Cabrini’s Ethical Sourcing Code, covering the policy position Cabrini has adopted to sourcing goods and services for its own use.
- ✓ Developed seven step remediation process.

2020

2021

## 2021: WHAT DID WE DO?

- ✓ Finalising redesign of procurement policy.
- ✓ Completing redraft of whistle-blower and conflict of interest policies.
- ✓ Publishing and embedding our Ethical Sourcing Code as requirement for all new tenders.
- ✓ Updating the “*Supplying to Cabrini*” webpage to include a link to Cabrini’s Ethical Sourcing Code and terms of trade for existing and potential suppliers.
- ✓ Updating and standardising all contract and tender documentation to include reference to and requirement for compliance with *Modern Slavery Act 2018* (Cth).
- ✓ Joining Sedex, a global ethical trade memberships organisation, as part of ACAN membership and using the Sedex online platform to map and manage risk in our supply chain.
- ✓ Commencing modern slavery training for Executives and targeted staff members.
- ✓ Implementing initial stages of remediation process.



2022

## 2022: WHAT WILL WE DO?

- › Deep-dive into high-risk categories and geographies.
- › Fully implement monitoring of top “at-risk” supply chains.
- › Finalise update of all supplier documentation, including contracts, terms of trade and associated tender documents.
- › Work on the implementation of a supplier portal, allowing existing and potential suppliers to self-credential/attest prior to engagement or at contract anniversary.
- › Continue the roll-out of modern slavery training to a wider audience and mandate training for critical staff cohort.
- › Develop first stages of frontline staff awareness and vulnerability training.
- › Complete supplier onboarding process refresh.

## ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

As reported in our 2019-20 statement, Cabrini is continuing to develop its measures of effectiveness so that we demonstrate the tangible impact of our work and measure our progress against our key priorities for eradicating modern slavery practices from our supply chains. We continue to rely on risk assessments and internal audits to ensure that we are procuring goods and services from suppliers that share and support our commitment to ethical supply chains.

For more information about how Cabrini is assessing the effectiveness of our practices, including how we are working with ACAN and the Catholic Negotiating Alliance to risk assess suppliers, please refer to page 15 of our 2019-20 statement.



183 Wattletree Road, Malvern Vic 3144  
Tel: 03 9508 1222



# MODERN SLAVERY STATEMENT

## 2021

Reporting Period 1 JAN 2021 – 31 DEC 2021

*Catholic Healthcare Limited*  
ABN 69 064 946 318



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## ABOUT US

Catholic Healthcare is a trusted, leading not-for-profit provider of residential aged care, home care, retirement living and healthcare across New South Wales and South East Queensland. We have a strong and proud history of providing care and support to people of all faiths, backgrounds and ethnicities, for more than 27 years. We are passionate about enriching our client's lives and offer services to nurture the body, mind and spirit. Our person-centred, holistic approach focuses on client wellbeing with a

continuum of care that is tailored, flexible and covers every stage of life's journey. Catholic Healthcare operates 42 Residential Aged Care homes serving more than 2600 residents, 12 Retirement Living communities that are home to more than 550 independent seniors and two healthcare services, as well as providing Home and Community Services to more than 5500 clients.

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### Disclosure Note

This statement has been made on behalf of Catholic Healthcare Limited ("Catholic Healthcare"). This Statement covers all entities owned or controlled by Catholic Healthcare.



# JOINT STATEMENT FROM THE

## *Board Chair & CEO*

*As a not-for-profit provider of aged care services established by the Bishops of NSW and ACT, Catholic Healthcare has a proud history of providing care inspired by the Catholic tradition and expressing the healing ministry of Jesus Christ.*

In presenting our second Modern Slavery Statement, we affirm our commitment to upholding human dignity at all stages of life. This includes not only the community members we care for, but all people and suppliers we engage with to deliver services. In our dealings with stakeholders, we seek to promote the core principles of Catholic Social Teaching including:

- The dignity of the human person;
- Protecting human rights and ensuring responsibilities are met;
- The dignity of work is protected and basic rights of workers are respected; and
- The pursuit of solidarity including justice and peace for all.

We are proud of the progress the organisation has made over the past year to take meaningful action against modern slavery, despite the challenging environment. The COVID-19 pandemic has created challenges with supply and transport for many essential goods and

services. We need to remain vigilant that people working for our suppliers in Australia and overseas are given safe and fair work conditions.

Internally, we have updated and improved our guidelines, education and procurement contracts to ensure we focus on the ethical production and supply of goods and services.

We acknowledge that there is still much work to do as we move forward with our efforts to eradicate modern slavery. In the year ahead, we will continue our work to raise awareness, identify risks, and focus on working with high quality, professional and ethical supply chain providers.

Thank you to Catholic Healthcare's employees and valued suppliers for your support and cooperation as we strive to ensure safe and fair conditions for all workers in our supply chain.

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 25 May, 2022.

**Karen Borg, CEO**  
Catholic Healthcare Ltd

**Stephen Teulan, Chair**  
Catholic Healthcare Ltd

# 2021 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

## Achievements

Catholic Healthcare has continued to make progress in addressing modern slavery risks within our operations during the 2021 reporting period.

Our taskforce, comprising representatives from across the organisation – including Procurement Services, Legal, Mission and the Executive – has continued to roll out educational initiatives relating to modern slavery.

We have made further modern slavery improvements to organisational policy and procedure. This work has taken place against the backdrop of the continuing COVID-19 pandemic which has placed great stress on aged care organisations and has also highlighted new risks within our operations to which we have responded to ensure those we care for, and employ, are protected.

## Our Plans for 2022 and Beyond

In 2022 and beyond, Catholic Healthcare intends to extend modern slavery training throughout the organisation, strengthen our policies and procedures, and promote further supplier involvement in anti-modern slavery actions. Further details are set out in this Statement.



# Reporting Criterion 1:

## OUR ORGANISATIONAL STRUCTURE

### Our Organisational Structure

Catholic Healthcare’s mission is that we promote the dignity, life and spirituality of older people through connected and inclusive communities.

Our organisation is guided by the values of courage, integrity and compassion. As a trusted, leading not-for-profit entity, we have a strong and proud history of providing residential aged care, home care, retirement living and healthcare across the east coast of Australia. Catholic Healthcare has been operating for more than 27 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, 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 three divisions:

<p>1</p>  <p>Residential Aged Care</p>	<ul style="list-style-type: none"> <li>• Residential aged care homes</li> <li>• Retirement living communities</li> <li>• Social housing for seniors</li> <li>• Healthcare services including rehabilitation, palliative care &amp; community nursing</li> </ul>
<p>2</p>  <p>Home and Community Services</p>	<ul style="list-style-type: none"> <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>
<p>3</p>  <p>Corporate Services</p>	<ul style="list-style-type: none"> <li>• Mission</li> <li>• Human resources</li> <li>• Information services</li> <li>• Finance</li> <li>• Property services</li> <li>• Marketing and communications</li> <li>• Residential aged care management</li> <li>• Home and community services management</li> <li>• Quality and Safe Care</li> <li>• Strategy</li> <li>• Legal and the CEO’s office</li> </ul>

# Reporting 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 those who are most vulnerable. Our approach to care is informed by the Parable of the Good Samaritan.

Our Trustees and Board, who both have oversight and governance of Catholic

Healthcare's Mission, are conscious of the risks of modern slavery infiltrating supply chains and as a result actively encourage management to progress initiatives aimed at identifying and addressing modern slavery risks.

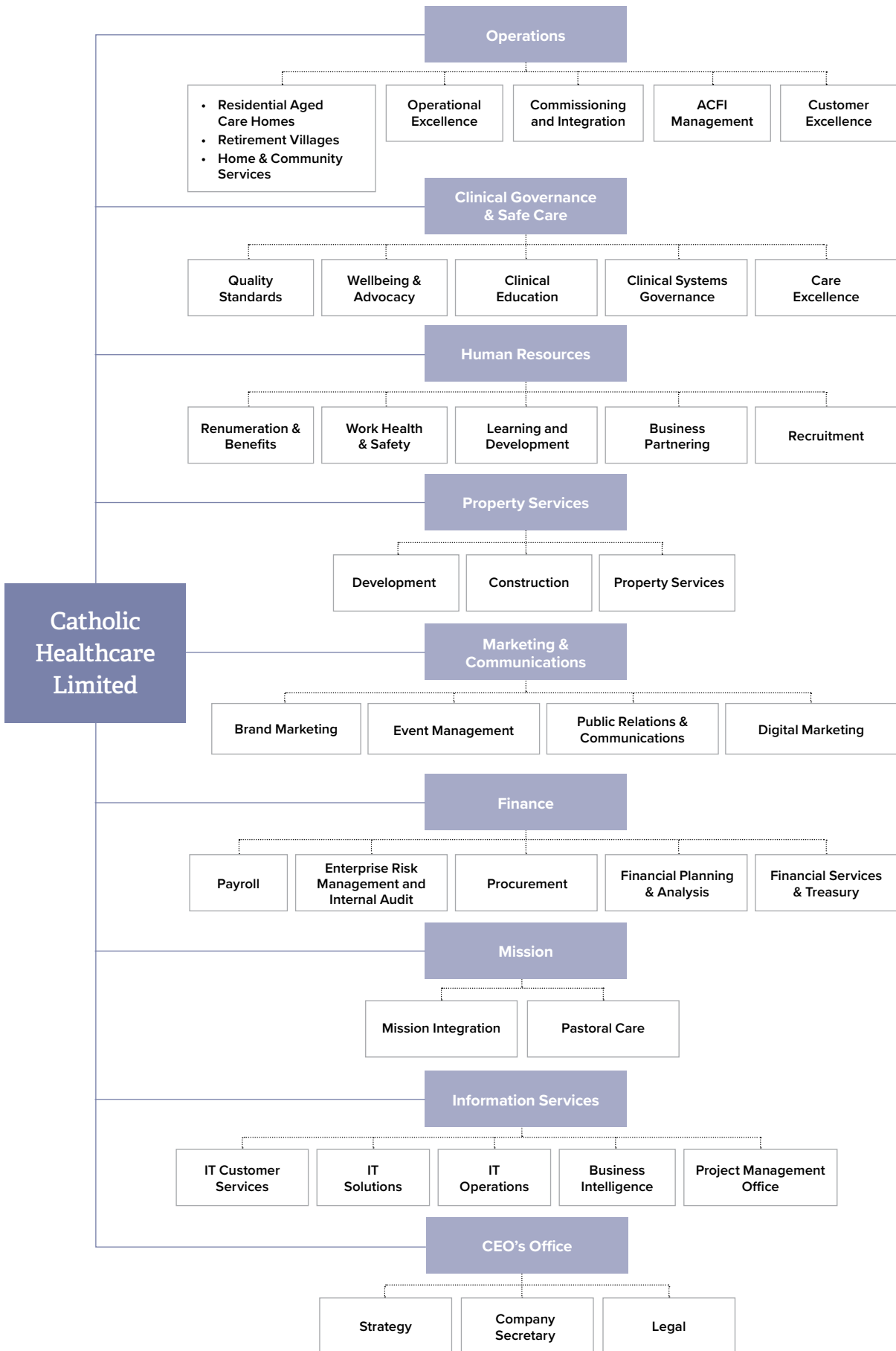
### Head Office Location

Suite 1, Level 5, 15 Talavera Road Macquarie Park, NSW 2113

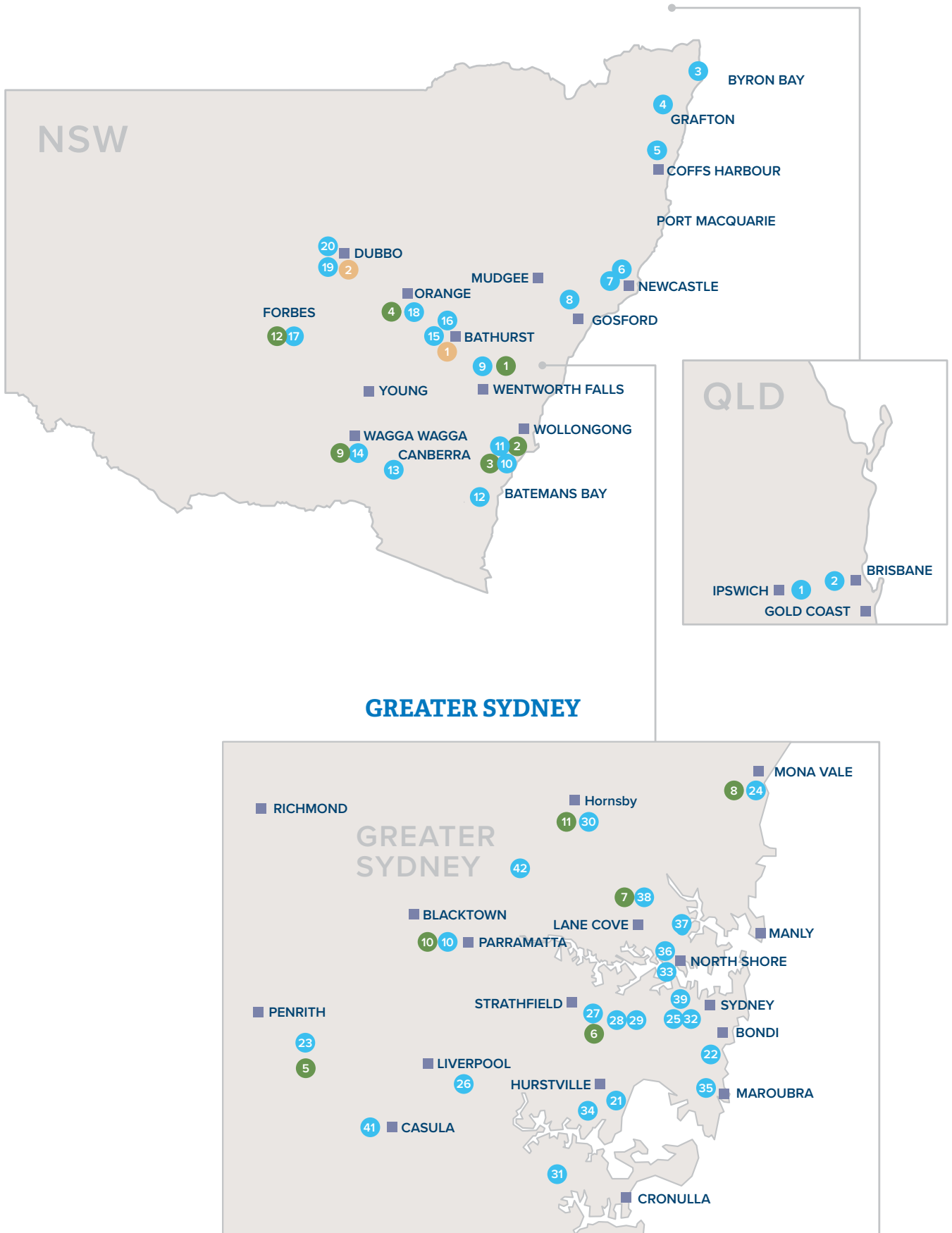
## At a Glance



# CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART



# 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 RETIREMENT VILLAGE**  
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 **ST MARY'S VILLA**  
Dubbo
- 20 **HOLY SPIRIT**  
Dubbo
- 21 **BETHLEHEM HOUSE**  
Kogarah
- 22 **BRIGIDINE HOUSE**  
Randwick
- 23 **EMMAUS VILLAGE**  
Kemps Creek
- 24 **GEORGE MOCKLER HOUSE**  
Mona Vale
- 25 **GERTRUDE ABBOTT AGED CARE**  
Surry Hills
- 26 **HOLY SPIRIT AGED CARE**  
Revesby
- 27 **HOLY SPIRIT**  
Croydon
- 28 **LEWISHAM NURSING HOME**  
Lewisham
- 29 **LEWISHAM RETIREMENT HOSTEL**  
Lewisham
- 30 **MCQUOIN PARK**  
Wahroonga
- 31 **PERCY MILES VILLA**  
Kirrawee
- 32 **THE SISTER ANNE COURT**  
Surry Hills
- 33 **ST ANNE'S AGED CARE**  
Hunters Hill
- 34 **ST BEDE'S HOME**  
South Hurstville
- 35 **ST JAMES VILLA**  
Matraville
- 36 **ST JOSEPH AGED CARE**  
Hunters Hill
- 37 **ST PAUL'S**  
Northbridge
- 38 **ST PETER'S**  
Lane Cove North
- 39 **VINCENTIAN AGED CARE SERVICE**  
East Sydney
- 40 **ST HEDWIG VILLAGE**  
Blacktown
- 41 **HOLY SPIRIT**  
Casula
- 42 **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 **MCQUOIN PARK RETIREMENT LIVING**  
Wahroonga
- 12 **JEMALONG RESIDENTIAL VILLAGE**  
Forbes

## ● HEALTHCARE

- 1 **ST VINCENT'S HEALTH & COMMUNITY SERVICES**  
Bathurst
- 2 **LOURDES HOSPITAL & COMMUNITY HEALTH SERVICE**  
Dubbo

## ■ HOME CARE

## Our Supply Chain

Catholic Healthcare sources a wide range of goods and services to support the delivery of aged care services to our clients, residents, and patients from over 2000 suppliers. These range from sophisticated global service providers to sole traders in the following categories:

- Food and beverages, sometimes sourced through larger providers, at other times sourced through local suppliers.
- Linen and laundry supplies.
- Medical and care supplies ranging from medications to incontinence aids, Protective Personal Equipment (PPE) and Rapid Antigen Tests (RATs).
- Other general supplies ranging from paper goods to photocopiers and uniforms.
- Property supplies and services, ranging from those supplies and services required for the building of new residential aged care and retirement living services, to property maintenance services for existing properties.

- Information and telephony services ranging from electronic resident and client records to nurse call systems, mobile devices, and computer cables.
- Marketing and Communications services including printing and publications and website design.
- Workforce supplies including staff, consultants, 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.



## Reporting Criterion 3:

# MODERN SLAVERY RISKS IN OPERATIONS & SUPPLY CHAIN

*Catholic Healthcare understands that some goods (including their component parts) acquired, may have been impacted by modern slavery practises.*

As explained in our previous Modern Slavery Statement, to better understand these risks, we undertook a comprehensive analysis of the top 50 suppliers by spend in our organisation, to determine which and how many of our top suppliers can be categorised as ‘high risk’

To expand upon this analysis, in 2021 Catholic Healthcare has maintained our membership with the Australian Catholic Anti-Slavery Network (ACAN) to support us in eradicating Modern Slavery practises from our organisation. For our 2021 analysis of Modern Slavery risks in the organisation, we have relied upon reporting from the ACAN Risk Management Program.

Drawing on data from 36 ACAN entities, the report provides a statistical overview of Modern Slavery risks according to industry and reviews the risks through a category lens. This risk assessment has guided Catholic Healthcare’s approach and the actions taken to minimise Modern Slavery practises within the organisation for 2021.

### Operational Risks

#### Our People

Catholic Healthcare employs more than 4,250 people including full time, part time and casual workers. 82.8% of our workforce identifies as female, which is recognised to be common among the caring professions. One of our strategic policies is to ensure that Catholic Healthcare is a wonderful place to work.

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 recognises that labour hire is a high-risk category in our supply chain but is nonetheless necessary for our operations. Most of our care workforce is employed under Enterprise Agreements approved by the Fair Work Commission making the risk of modern slavery in our directly employed workforce, low. A smaller percentage of workers in our corporate service divisions and head office are employed under individual contracts of employment.

Agency workers, such as Registered Nurse (RN), Enrolled Nurse (EN), Assistants in Nursing (AIN) and Care workers, are engaged when required under agency agreements with external suppliers. Other service providers including allied health professionals and hairdressers are employed under an individual contractor arrangement that allows for negotiation.

The use of employment agencies and labour hire contractors to procure agency workers represents a modern slavery risk category, and to address this we have updated our standard agency contracts to include robust anti-slavery clauses. To date no contractors have raised any issues with these new standard clauses.

## Supply Chain Risks

In 2020 we undertook a risk assessment that mapped the potential for modern slavery practises across our top 50 suppliers by spend to improve our understanding of the key procurement categorises that contain high risks of modern slavery.

Catholic Healthcare procures goods and services across 18 broad procurement categories including:

<b>Building &amp; Construction</b>	<b>Labour Hire</b>
<b>Professional Services</b>	<b>Cleaning Services</b>
<b>Linen &amp; Laundry</b>	<b>Uniforms &amp; PPE</b>
<b>Events &amp; Entertainment</b>	<b>Medical Supplies</b>
<b>Allied Health</b>	<b>Facility Management &amp; Property Management</b>
<b>Waste Management</b>	<b>Travel Services</b>
<b>Food &amp; Beverage</b>	<b>ICT Hardware</b>
<b>Utilities</b>	<b>Furniture &amp; Office Supplies</b>
<b>ICT Software &amp; Network Services</b>	<b>Printing &amp; Mail Provider</b>

## High-risk categories

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:

<b>Medical Equipment, Supplies &amp; Consumables</b>	<b>Office &amp; Teaching Supplies, Furniture &amp; Services</b>
<b>Building, Construction, &amp; Fabrication Services</b>	<b>Waste Management</b>
<b>Prosthesis, Implants And Medical Devices</b>	<b>Clothing/PPE/ Other Personal Equipment</b>
<b>Food, Beverage &amp; Hospitality</b>	<b>Linen/Laundry</b>
<b>Property, Facility, &amp; P&amp;E Maintenance</b>	<b>Events, Excursions, Camps &amp; Entertainment</b>
<b>Cleaning Services</b>	<b>Security Services</b>
<b>Labour Hire</b>	

# Reporting Criterion 4:

## ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISK

Catholic Healthcare has endeavoured to consolidate its policies and procedures concerning modern slavery and to evolve practises that prevent modern slavery in our organisation or supply chains.

Catholic Healthcare has acted on, and expanded, the research and analysis detailed in our year 1 report. This includes extending our analysis of top spend categories when examining the risk of

modern slavery in our supply chains and reviewing the organisational Gap Analysis. Catholic Healthcare has also explored the development of an Ethical Practises Questionnaire for staff and suppliers focused on modern slavery.

The overview of the Gap Analysis for both 2020 and 2021 reporting periods is set out below.

■ NS - Not Started    
 ■ C - Commenced    
 ■ P - Progressing    
 ■ FI - Fully Implemented

	Year 2020				Year 2021			
	NS	C	P	FI	NS	C	P	FI
<b>Management Systems</b>								
Governance		■				■		
Commitment		■				■		
Business Systems		■					■	
Action		■					■	
Monitor/Report	■				■			
<b>Human Resources and Recruitment</b>								
Awareness	■				■			
Policies and Systems	■						■	
Training	■					■		
Labour Hire/Outsourcing	■				■			

Continues over page >

■ NS - Not Started    
 ■ C - Commenced    
 ■ P - Progressing    
 ■ FI - Fully Implemented

	Year 2020				Year 2021			
Customers and Stakeholders	NS	C	P	FI	NS	C	P	FI
Customer Attitude	■				■			
Information Provision	■						■	
Feedback Mechanisms	■				■			
Worker Voice	■					■		

	Year 2020				Year 2021			
Procurement and Supply Chain	NS	C	P	FI	NS	C	P	FI
Policy and Procedure		■					■	
Contract Management		■					■	
Screening and Traceability		■				■		
Supplier Engagement	■						■	
Monitoring and Corrective Action	■					■		

	Year 2020				Year 2021			
Risk Management	NS	C	P	FI	NS	C	P	FI
Risk Framework	■					■		
Operation Risk	■					■		
Identifying External Risks		■				■		
Monitoring and Reporting Risk	■				■			

Modern slavery action plans have been created as needed with our Procurement and Marketing teams. We are currently writing modern slavery action plans with other departments such as Property and Human Resources. We are poised to create more action plans in the next year. 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 has now developed an organisational Modern Slavery Policy to be published both internally and externally in 2022.

After joining ACAN in 2020, Catholic Healthcare has made use of the resources made available through ACAN, including ACAN educational tools, which focus on what modern slavery means to Catholic organisations. Catholic Healthcare has also commenced Modern Slavery Awareness Training for those in key roles including senior members of the Modern Slavery Taskforce. We plan to expand this education program to include a presentation that will be incorporated into the onboarding process of new staff members.

Catholic Healthcare now has access to SEDEX, which is one of the world's leading online platforms to manage and improve working conditions in global supply chains. With greater understanding of the risks of modern slavery in our supply chains, Catholic Healthcare has begun training staff on

SEDEX and will encourage high spend suppliers to register with SEDEX to ensure transparency within our supply chains. Access to SEDEX also provides Catholic Healthcare with a marketplace of verified suppliers should we need to invite new suppliers to tender for existing services. Catholic Healthcare can use this platform to encourage existing suppliers to verify their operations and be more deliberate in our procurement processes by starting with a pool of pre-verified suppliers who have evidenced their work in reducing or eliminating Modern Slavery from their own supply chains.

Although the global outbreak of COVID-19 had a significant impact on the operations of Catholic Healthcare during the 2021 reporting period, we have acted on our commitment in the year one report to take actions to prevent modern slavery in our organisation as exemplified by Catholic Healthcare's procedures being updated to include contract clauses and tendering requirements that target modern slavery.

For example, our procurement policy now includes requests for modern slavery statements from high-risk suppliers as a part of their proposals. This was incorporated for all the tenders undertaken during 2021 and tenderers have complied with this requirement and have submitted modern slavery statements as part of their tenders.

## Reporting Criteria 5:

### EFFECTIVENESS ASSESSMENT

*Monitoring (tracking) is essential to ensure that policies and procedures are effective and operating. We seek to track our progress in relation to anti-modern slavery tasks by setting goals for each year.*

Set out below is a table outlining our goals and progress made towards them for the 2021 reporting period:

<b>Planned Completion Year</b>	<b>Action</b>	<b>Status as of 2021 FY</b>
<b>2021</b>	Introduce Modern Slavery clause to all Procurement Contracts.	Completed
<b>2021</b>	Develop Remediation guidelines based on findings/experiences from Y1.	Completed
<b>2022</b>	Develop KPIs for suppliers that correlate with Ethical Sourcing.	Ongoing
<b>2023</b>	Design, formalise and introduce Ethical vendor questionnaires (e.g., ACAN guidelines) or Disseminate Supplier Self-Assessment Questionnaire (SAQ).	Ongoing
<b>2023</b>	Design and develop Supplier MS workshops based on supplier group/ classification and risk rating.	Ongoing

We will continue to use goal-setting as our primary metric of measuring the success of Modern Slavery initiatives and continue to review and evaluate our performance.



# Reporting Criteria 6 & 7:

## PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

*Catholic Healthcare has one current operating entity, Catholic Healthcare Limited. Consultation is as described in this statement, primarily through the mechanism of the Modern Slavery Taskforce referred to on page 2.*

### Any other relevant information

Planned future actions are as follows:

- ✓ Update Procurement Policy to incorporate provisions relating to Ethical Sourcing and Human Rights
- ✓ Provide Sourcing Ethical Training to Procurement Category Managers to upgrade sourcing skills (certification as compulsory)
- ✓ Update and Disseminate Supplier new Code of Conduct
- ✓ Incorporate Modern Slavery Training ACAN 101 as compulsory for those who carry purchasing activities and add module to CHL E-learning Platform and/or Onboarding process
- ✓ Develop and disseminate communication to all the high-risk vendors who do not publish MS statements to encourage them and educate them about the relevance of this practice, and advise that this is part of CHL prequalification for any sourcing process
- ✓ Update Supplier Preferred List and classify them by the strategic level.
- ✓ Update Supplier Evaluation process with minimum ethical sourcing requirements including exploring the development of an Ethical Practises Questionnaire.

### COVID-19 Related Information

In the 2021 reporting period, the COVID-19 pandemic continued into its second year and new challenges arose for residential aged care and home and community service providers. An unprecedented number of staff were furloughed in line with Government requirements and maintaining a focus on staffing adequacy became paramount. Ensuring an adequate supply of Personal Protective Equipment and Rapid Antigen COVID Tests was also a very high priority.

To the extent possible, we sourced supplies from highly credible suppliers and educated ourselves and our employees on the impacts of Covid-19 on more vulnerable workers in the supply chain and the potential modern slavery risks the pandemic posed.



This Modern Slavery Statement has been made on behalf of Southern Cross Care (NSW & ACT) Limited (SCC), and is approved by the Board of SCC.

Signed by:



Lawrie Hallinan (Chairman)

Date: 26 April 2022

## 1. Mandatory criteria

The following table summarises how this statement meets the reporting obligations and mandatory criteria under the Commonwealth Modern Slavery Act 2018.

Modern Slavery Act reporting requirement	Addressed in Section	Page No.
Identify the reporting entity.	3	2
Describe the reporting entity's structure, operations and supply chains.	4	2 to 3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5	3
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.	6	4 to 7
Describe how the reporting entity assesses the effectiveness of such actions.	6	7
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	4	2
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	2 -to 8	2 to 8

## 2. Introduction

This statement is published by SCC and sets out the actions taken by SCC to identify, prevent and mitigate modern slavery and human trafficking in our operations and supply chains during the year ended 31 December 2021.

SCC strongly opposes all forms of modern slavery and the harm it inflicts upon its victims, their families, their communities, and society as a whole. We strive to carry out our activities in a manner that respects and supports the protection of human rights and ensures that those we do business with do the same.

SCC is committed to eradicating modern slavery from our operations and supply chains.

This statement has been developed in consultation with the Australian Catholic Anti-Slavery Network.

## 3. Our company

SCC is a not-for-profit provider of aged care services with a strong presence in regional NSW. We currently operate in over 55 locations throughout New South Wales and The Australian Capital Territory.

We were founded in 1970 by the Knights of the Southern Cross, a group of socially aware Catholic laymen dedicated to improving the lives of the community, and in particular that of older people.

In 1972 we opened our first Retirement Community, Patrick Minahan Village, in Marrickville and in 1975 we established our first Residential Aged Care Home, John Woodward, in Merrylands. We have been delivering in-home care services to the community since 1996.

Our values help us create supportive environments that foster the physical, spiritual, emotional, intellectual and social well-being of our residents, clients and staff.

Our values are as follows:

- Honesty - We are open and truthful in all situations, even when things are difficult.
- Empathy - We consider things from the point of view of others. We listen carefully.
- Acceptance - We welcome everyone, treating all people equally and without judgement.
- Respect – We highly value people’s wishes, their dignity and their privacy.
- Teamwork - We don’t keep things to ourselves. We communicate well. We offer to help.

Everyone who works for us stands by our commitment and values.

## 4. Our structure, operations and supply chains

SCC is an Australian public company, registered with the Australian Charities and Not-for-profits Commission. We are a company limited by guarantee not having share capital. SCC does not own or control any other entities.

Our Head Office is located on Level 4, 16-18 Bridge Street, Epping, NSW. Our ABN is 76 131 082 374.

As at February 2022 we directly employ 2,091 employees, in full-time, part-time, and casual capacities. Our annual revenue for FY21 was \$194,824,852.

We offer a full spectrum of services, including Retirement Villages, Residential Aged Care Homes, and Home Care services.

Our supply chain is comprised of a broad range of 4,685 active suppliers, predominantly located within Australia. Our supply categories include facilities management, domestic and client services, medical supplies and equipment, HR services, professional services, information technology, utilities, corporate support services, and vehicle fleet management.

## 5. Risks of modern slavery practices in our operations and supply chains

SCC undertook a risk assessment of the potential for modern slavery practices of our top 50 suppliers by spend, who account for 45% of the total annual supplier spend. Suppliers were assessed against a category risk taxonomy specifically developed by the Australian Catholic Anti-Slavery Network (ACAN), of which SCC is a member. ACAN assists Catholic faith-based entities to assess and address operational and supply chain modern slavery risks, and to reduce slavery across the world.

The suppliers that were seen to have the greatest risk of modern slavery belong to the following categories:

- Staff Agency
- Construction
- Facilities Management
- IT
- Allied Health Services
- Vehicle Fleet
- Food & Beverage
- Medical Equipment
- Medical Consumables
- Cleaning Chemicals
- Office Supplies
- Workwear & Uniforms

We found that the key types of modern slavery driving the risk in these categories are:

- Forced labour and child labour associated with the production of building and construction materials;
- Forced labour, deceptive recruiting, coercive control and debt bondage in sub-contracting and labour hire services such as cleaning and other low skilled labour services;
- Exploitation of migrant workers, forced overtime, underpayment and workplace harassment in the supply chains of the Food & Beverage category;
- Passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours, in the electronics industry;
- Forced and child labour, 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, has been linked to the production of medical devices.

## The impact of COVID-19

The COVID-19 pandemic has created an unprecedented challenge for the aged care sector. The risk of infection to our residents, staff, volunteers and temporary staff has been significant during this time. Our priority is always to ensure the safety and well-being of our residents and staff. Throughout 2021, we were required to source extra Personal Protective Equipment, medical equipment, and medical supplies as a matter of urgency at times, which involved close collaboration with our existing supplier network. We also relied on temporary staff to a greater extent during 2021 as a result of the COVID-19 pandemic.

## 6. How we manage and address our risks

### Australian Catholic Anti-Slavery Network (ACAN)

In February 2020, SCC joined ACAN, in recognition of the achievements that could be made in tackling modern slavery collectively with other ACAN member organisations.

Our procurement staff, who play a critical role in working with our supply chain, participate in monthly modern slavery conference calls hosted by ACAN to keep abreast of changes and trends.

In 2021, SCC reinstated membership with ACAN for an additional 2 years, showing our commitment to eradicating modern slavery.

Through an ongoing process of consultation with ACAN, SCC will provide our modern slavery statement together with other ACAN members in a compendium, which ACAN will submit to the modern slavery public register.

### Catholic Health Australia Working Group

During 2021, SCC was invited by Catholic Health Australia to join a new working group with a number of other Catholic organisations committed to anti-slavery activities. This working group aims to:

- Share strategic insights on supply chain risks and issues;
- Explore prospects to use combined market power to influence cleaner supply chains; and
- Explore opportunities to advocate with Government on modern slavery concerns.

This group met during 2021 to discuss supply chain risks and issues, modern slavery compliance concerns and support, and explored opportunities to advocate with government on modern slavery concerns.

We plan to continue meeting during 2022 to progress with initiatives.

### SCC Modern Slavery Working Group

Our procurement team established an internal Modern Slavery Working Group with representatives from across our organisation, including Marketing and Communications, Property Operations, Learning and Development, and People & Culture.

Our Working Group is responsible for the outcomes of our modern slavery program.

Our Modern Slavery Working Group meets bi-monthly to work collectively to complete actions that aim to reduce the incidences of modern slavery in our supply chains and operations through thoughtful contributions from all members.

We will continue to meet during 2022 to progress with initiatives and actions.

#### Supply chain engagement and due diligence

To increase awareness of modern slavery within our supply chain, SCC provided 100 of our top spend suppliers with a Modern Slavery Supplier Awareness Presentation. This provided education on the definition of modern slavery and who is at risk in supply chains. It also communicated SCC's expectations for supplier conduct in this area.

Suppliers considered at risk of modern slavery were also requested to provide information on their anti-slavery initiatives during 2021. A total of fourteen suppliers provided SCC with additional information relating to their modern slavery progress and initiatives.

#### Sedex Online Platform

During 2021, SCC utilised the Sedex online platform to assess our highest spend suppliers, by asking suppliers a series of questions relating to their supply chain and modern slavery.

Sedex is one of the world's leading ethical trade membership organisations. Sedex works with businesses to ultimately improve conditions for workers in supply chains across the world.

Ten of our high spend suppliers provided responses to a detailed Sedex questionnaire. Whilst our suppliers did not show a high risk for modern slavery, we will continue to follow up with them and monitor their progress in this area.

#### Building Links

We engaged with our building contractors and had ten of our suppliers view an online training module designed for construction site supervisors to learn about the red flags of labour exploitation, risks to workers on-site, and how to respond if risks are identified.

Building Links is funded by an Australian Government grant. The Building Links module includes an online learning video and provides posters for construction industry leaders to help them better understand and respond to labour exploitation in their workplace.

#### Policies

The SCC Supplier Code of Conduct, publicly accessible on the SCC website, sets out principles for supplier behaviour. It outlines our expectation that our suppliers actively take measures to eliminate modern slavery

from their operations and undertake appropriate due diligence on their own supply chain. This Supplier Code of Conduct was sent to our entire supplier base during 2021.

We have also updated our standard supply agreement templates to ensure consistency and to support the implementation of our Supplier Code of Conduct, by making references to modern slavery law in our supply agreements. Our suppliers are obligated to ensure that modern slavery law is adhered to.

During 2021, we also completed and published a Modern Slavery Policy. This policy was also promoted to all SCC staff via our intranet, and internal 'Take 5' publication, and in this edition of 'Take 5' there was further information about modern slavery summarised for employees' education and awareness.

#### Training and education program

SCC has implemented an educational program on modern slavery for our Board, senior management, and wider employees.

Modern slavery training is now part of the mandatory training requirements for all new starters at SCC Head Office.

An introductory modern slavery e-learning module was completed by an additional 41 staff during 2021.

The following resources are also published on our Intranet to support staff in relation to modern slavery awareness:

- Modern slavery staff awareness presentation, which includes a summary of the SCC modern slavery risks and our obligations under the Modern Slavery Act;
- Modern Slavery Policy; and
- Modern slavery section within the SCC intranet sustainability page, including a summary of current initiatives.

#### Grievances and remediation of modern slavery

SCC encourages all employees, suppliers and workers in our supply chain to voice any concerns they have regarding modern slavery, with assurance of anonymity. Our Whistleblower Policy encourages employees to advise management of any potential case of reportable conduct, which may include cases of modern slavery. Alternatively, anonymous reports can be made to an independent external disclosure management service.

Our Whistleblower Policy was promoted to all staff during 2021 via a campaign named 'We're Listening'.

Any person concerned about a breach of our Supplier Code of Conduct can report concerns on a confidential basis to our Procurement team. In a case of a violation of our Supplier Code of Conduct, SCC will contact the supplier within 24 hours and request that the violation be remedied in consultation with SCC, and the Australian Catholic Anti-Slavery Network (ACAN). If there is a concern for a potential victim of modern slavery, appropriate action will be taken, consulting with authorities and ACAN to ensure that the victim is protected as the priority.



SCC is committed to ensuring it provides appropriate and timely remediation 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 Australian law. This includes providing for, and cooperating in, actions to address harms to people and root causes, to mitigate future risks if SCC 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, SCC is a member of ACAN who provides support and assistance in this regard. ACAN provides a program and ongoing support to provide remedy to people impacted by modern slavery.

SCC's remediation efforts will be further enhanced in the future through policy development. By partnering with ACAN, SCC is in a position to help any persons impacted by modern slavery in our supply chain or operations, to achieve meaningful outcomes that can be reported on. Where SCC is directly linked to modern slavery by a business relationship, we are committed to working with the entity that caused the harm, with the assistance of ACAN and authorities, to ensure remediation and mitigation of its recurrence.

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## 7. Assessing the effectiveness

The following processes and initiatives outline how we assess the effectiveness of our actions to address modern slavery risks.

### Procurement team and Modern Slavery Working Group

The SCC procurement team and Modern Slavery Working Group are responsible for progressing engagement and due diligence initiatives with our operations and suppliers. The procurement team also reviews supplier feedback and responds to questions or requests in relation to modern slavery matters.

### Senior Executive team and Board of Directors

The SCC procurement team reports progress of its Modern Slavery Working Group actions to the SCC Senior Executive team, who ultimately oversee and direct SCC modern slavery efforts. The Board is updated by our Chief Executive Officer on modern slavery matters.

If no cases of modern slavery have been found within our supply chain or operations, we acknowledge that this does not mean that we do not necessarily have any modern slavery instances, but that we need to review the effectiveness of our Whistleblower Policy, Whistleblower hotline and due diligence practices, and staff and supplier education.

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## 8. Plan for addressing modern slavery in 2022

SCC will continue working to mitigate modern slavery and progress and mature our approach in 2022 by focusing on the following objectives:

- Provide our modern slavery policy to our supplier base and request feedback;

- Ask 10 of our suppliers considered high risk to complete a detailed Sedex modern slavery self-assessment;
- Build on and expand on modern slavery information on the SCC intranet for improved staff education and awareness;
- Ask our top 50 suppliers by spend to provide information regarding their anti-slavery initiatives
- Publish a Procurement Policy which references the importance of modern slavery awareness in our supply chain;
- Attend monthly Modern Slavery ACAN webinars to progress collaborative initiatives with other member organisations;
- Continue to educate and train our staff to understand and recognise the signs of modern slavery via SCC's modern slavery e-learning program;
- Provide SCC's Supplier Code of Conduct to our supplier base and request feedback;
- Utilise SCC's internal communications channels to remind staff about SCC's commitment and obligations under the Modern Slavery Act;
- Include a modern slavery segment in the SCC annual conference to discuss the global modern slavery problem and what is being achieved, and the specific actions we can take;
- Develop a strategic partnership with a current or new vendor for a promotable joint initiative to help combat modern slavery; and
- Include additional relevant SCC stakeholders in vendor reviews and include modern slavery as an area of discussion.

# 2021 Modern Slavery Statement

1 January to 31 December 2021

Villa Maria Catholic Homes Ltd ABN 32 004 364 103



VMCH

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# We continue to oppose modern slavery

VMCH is committed to supporting people who are disadvantaged and marginalised.

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

Our Modern Slavery Statement (Statement) for the period 1 January to 31 December 2021 is set out in this document.

This Statement is our second public regulatory disclosure specifically addressing modern slavery in line with the requirements of the Modern Slavery Act 2018 (Cth) (the Act). We have always been committed to improving the rights and wellbeing of people across our operations. We do this via our focus on the disadvantaged and marginalised in all aspects of our operations and in line with our Catholic values and mission.

In 2021 the Board specifically stated its position in its risk appetite statement by reflecting that VMCH has 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 state its position for all within the organisation.

As reflected in the Board's risk appetite statement, a commitment to supporting the disadvantaged and marginalised is an essential part of our operations. This is appropriately reflected in the Board's risk appetite statement and our policies and procedures.

We do not tolerate behaviour that breaches the law, is non-compliant with our policies or does not align with our ethical values. We expect our employees, contractors, volunteers and suppliers to operate in a manner that is consistent with our values and standards.



This Statement sets out the steps we have taken throughout 2021 to identify and address modern slavery within our operations and supply chains. Our approach includes a commitment to continuous improvement as we increase our understanding and awareness of modern slavery risks.

This Statement has been prepared by VMCH's Modern Slavery Working Group, the VMCH Executive and the Board's Quality Compliance and Risk Committee. It was approved and endorsed by VMCH's Board on 2 June 2022.

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.

Our membership of ACAN is an integral part of the joint approach Catholic organisations continue to take to support the work to eliminate modern slavery which Pope Francis has described as "an open wound on contemporary society, a wound on the body of Christ and a crime against humanity."

A handwritten signature in black ink, appearing to read 'Julien O'Connell', written over a light blue horizontal line.

**Julien O'Connell A.O.**  
VMCH Board Chairman

# 1. Mandatory Criteria 1 & 2: The reporting entity and our structure, operations and supply chains

## 1.1 The reporting entity and our structure

The reporting entity covered by the Statement is Villa Maria Catholic Homes Ltd (ACN 004363103) (VMCH). VMCH is a not-for-profit company limited by guarantee. VMCH's registered office is L3, 486 Albert Street, East Melbourne, Victoria.

## 1.2 About VMCH

VMCH is a Catholic not for profit organisation, providing services to over 9,000 people across Victoria.

Our Mission is to continue the caring ministry of Jesus by creating choices, offering hospitality and building inclusive, compassionate and sustainable communities. We are especially committed to supporting people who are disadvantaged and marginalised.

We strive to be the Catholic Archdiocese of Melbourne's leading provider of high-quality disability, specialist education, aged care and retirement living services.

Our values underpin the work we do as a Catholic not-for-profit organisation. Our values of compassion, respect, integrity, collaboration and partnerships, stewardship and inclusion aren't 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.

### i) Living our Mission

Our mission is central to who we are and what we offer, it comes to life through our everyday actions and in our work. We are called to listen deeply. We hear the needs of those we care for, and we take time to discern what we can do to add meaning. We stay true to whom we are by supporting people and families to live their best lives, providing a place to call home and spaces to learn and grow.

### ii) 2021 Modern Slavery Risk Management Initiatives

Our approach to managing modern slavery risk is to have a continuous improvement program. 2020 was the foundation year where we formalised our commitment to identifying and eliminating modern slavery practices from our operations, business partnerships and supply chain.

We commenced our assessment of our modern slavery risk and established the governance structures consistent with VMCH's risk appetite statement and Enterprise Risk Management Framework. In 2021 we continued this work and focused on increasing awareness through communication, online learning and developing networks of champions throughout the organisation as well as commencing our work with our suppliers to understand modern slavery risks within our supply chain.

### iii) Our plans for 2022

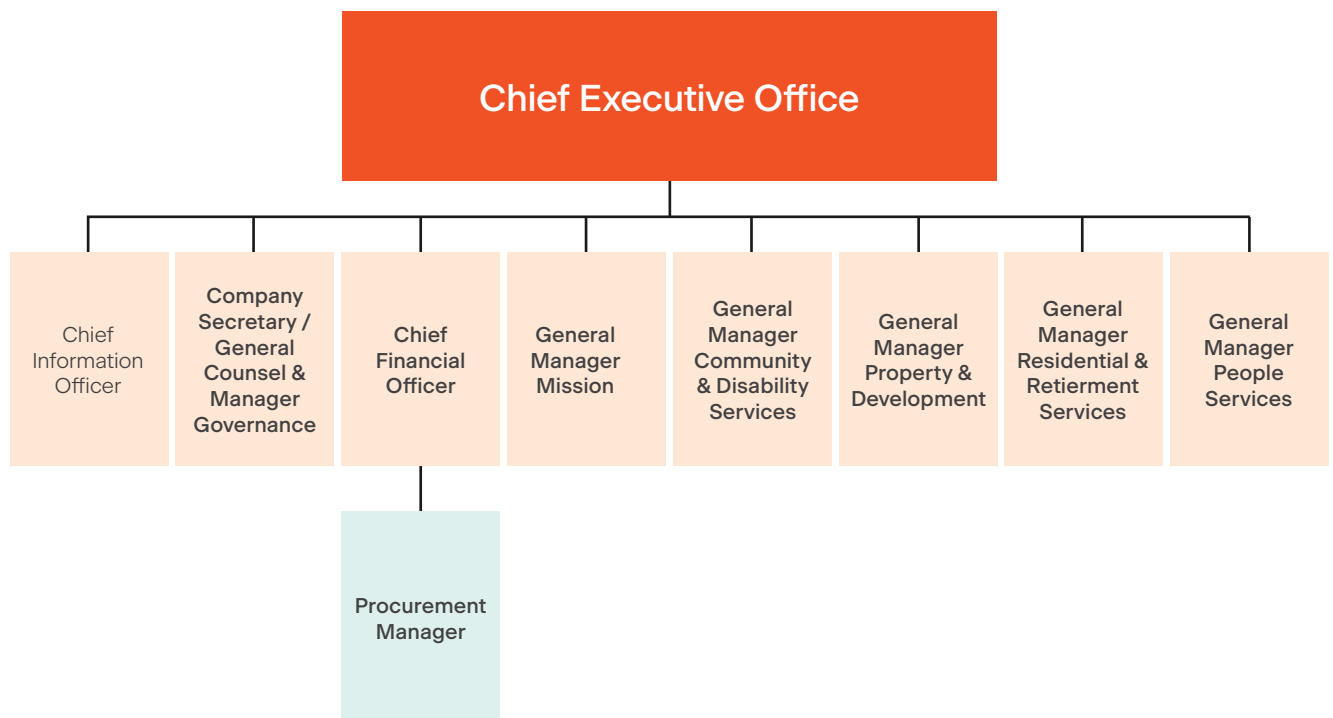
As mentioned above, VMCH takes a continuous improvement perspective to its approach to modern slavery risks. Our plans for 2022 will build on the work undertaken in 2020 and 2021. We will continue our membership of ACAN and consolidate the work undertaken in previous years to solidify and embed practices and further develop the awareness of modern slavery risk throughout the organisation.

### 1.3 Organisational structure and operations

Our operations include:

- At-home aged care which supports over 4000 people across metropolitan Melbourne, regional Victoria and southern New South Wales with allied health and in-home and carer support.
- Residential aged care services for 1041 people in thirteen locations across Victoria.
- Support for over 1500 individuals with disabilities including 220 children at specialist school St Paul's College and in our Early Learning and Therapy programs.
- 18 Specialist Disability Accommodation (SDA) houses across Melbourne that provide specialised support for adults with disability.
- One respite home that provides care and support for children overnight, on weeknights and weekends.
- 564 retirement living apartments/units across 18 locations in Victoria.
- Accommodation to 459 people living in our affordable homes across 21 locations across Victoria.
- Employment of approximately 2,590 people on a full time, part time or casual basis. Of these approximately 340 are full time, 1380 are part time and 736 are casual.

Our organisational structure in 2021 included a procurement function that provided, procurement advice and support to the operational areas.



## 1.4 Governance structure

Our approach to eradicating modern slavery is embedded in VMCH's broader governance framework. VMCH's Board has responsibility for ensuring a reporting culture and an enterprise risk management framework exists within VMCH. The Quality Compliance and 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.

A Modern Slavery Working Group (Working Group) was established in 2020 and continued to meet throughout 2021. The objectives of the 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.
- Ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).

The Working Group consists of participants with a diverse range of relevant experience and expertise from across the organisation including procurement, finance, operations, legal, work health and safety, information technology, mission, people and culture and facilities management. It is chaired by the Chief Legal and Risk Officer and Company Secretary (who is also VMCH's Modern Slavery Liaison Officer (MSLO) and representative on the ACAN). The Working Group meets regularly, and reports to the Executive on the work undertaken.

In 2021 we established a network of modern slavery champions. This group represents staff throughout the organisation who also may have some responsibility for ordering or receiving goods and services and would be staff who may be aware of any potential modern slavery issues. This network is a community of practice with a strong interest in upholding VMCH's position in relation to modern slavery and communicating about modern slavery to the broader VMCH community. In addition, it provides a forum to receive feedback from, and provide information on modern slavery, to the group.



## 1.5 Our supply chain

VMCH has over 125 suppliers who supply products to enable VMCH to maintain our operations and provide excellent care to our clients, residents, and students. They provide a range of goods and services to support VMCH's operations.

Our supply chain is diverse and encompasses small local businesses through to national and global 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.

Examples of goods	Examples of services
<ul style="list-style-type: none"><li>• Medical equipment</li><li>• Medical consumables</li><li>• Furnishing</li><li>• Food supply</li><li>• Textiles</li><li>• Building and construction materials</li></ul>	<ul style="list-style-type: none"><li>• Allied health</li><li>• Labour hire agencies including nursing agencies</li><li>• Cleaning</li><li>• Trade services for refurbishments and maintenance</li><li>• Lifestyle and entertainment</li><li>• Communications, information technology hardware and software solutions</li></ul>



## 2. Mandatory criteria 3: Identifying modern slavery risks in operations and supply chain

In 2021 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.

VMCH joined with other Catholic providers as a member of the Australian Catholic Anti-Slavery Network (ACAN). As part of ACAN, VMCH has accessed the work and resources made available by ACAN.

### 2.1 Our COVID-19 response

In 2021, COVID-19 restrictions created challenges for many organisations including VMCH. Our focus was on protecting the people we provide care for, our staff and volunteers from the risk of contracting COVID-19. In addition, our communities and suppliers faced extended lockdowns and rapidly changing health and safety situation and public health directives or Chief Health Officer Orders to deal with the constantly evolving pandemic conditions. The dynamic situation resulted in shifts in production, limited distribution, and shortages of some essential items.

VMCH's organisational Critical Incident Team (CIT) continually monitored the COVID-19 situation. Our procurement team was an integral part of the CIT and was responsible for managing the additional sourcing requirements which were required, especially for personal protective equipment (PPE).

During this period VMCH continued to honour our current contracts. In addition, precautions which were required for all staff in relation to PPE requirements were also extended to contractors.

Our commitment to providing care to our customers and our team providing frontline support required a rapid response to sourcing additional medical and consumable items. We worked closely with our preferred suppliers to manage and communicate the changing supply position and establish new supply relationships when required.

The pressures created by dealing with mitigating the risk to our customers and staff from COVID-19, meant that some of the work we would have undertaken in assessing and mitigating the risk of modern slavery during the year was delayed, particularly in the case of face-to-face engagement with suppliers.

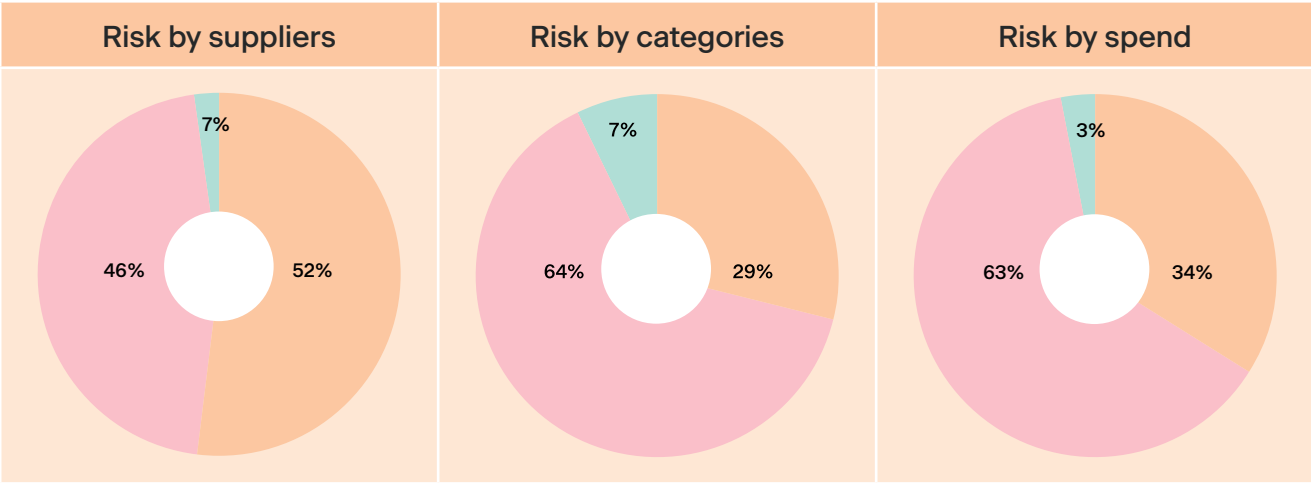
### 2.2 Operational and supply chain risks

VMCH recognises that modern slavery may occur in our organisation and extended supply chain. In conjunction with ACAN, in 2020 VMCH undertook a supplier risk analysis of our top 48 suppliers (by spend). As operations did not change substantially in 2021, the analysis was still relevant in the 2021 period.

The resulting VMCH dashboard identified that of the top 48 spend suppliers, 22 were categorised as potentially high risk. The risk was assessed based on the category the suppliers fell into.

There were nine high risk categories, informed by the ACAN Category Risk Taxonomy.

Number of suppliers	High risk suppliers	Spend categories	High risk categories	Total spend (\$)	High risk spend
48	22	14	9	\$43,826,909	\$27,620,436



■ Low 
 ■ Medium 
 ■ High

**The high risk spend categories for VMCH were:**

- Building and construction
- Cleaning services
- Facilities management
- Food and beverage
- Furniture and office supplies
- ICT hardware
- Linen/laundry
- Uniforms and workwear
- Waste management

Another area to consider that have may have a high risk of modern slavery is labour hire risk through hire, using agency and outsourcing of staff through via third party suppliers.

### 3. Mandatory criteria 4: Action taken to assess and address modern slavery risks

The focus for the initial phase of modern slavery risk mitigation in 2020 and 2021 was on establishing the foundations for further work. Actions taken to assess and address modern slavery risks are outlined below.

#### 3.1 Governance framework

VMCH became a member of the ACAN with a modern slavery liaison office (MSLO) representative. ACAN is a network of over 34 Catholic entities. VMCH's MSLO attended ACAN conferences and monthly meetings. These meetings aimed to understand the potential modern day 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.

The Modern Slavery Working Party continued to meet to:

1. provide input and advice to VMCH on issues related to modern slavery;
2. actively support the development and implementation of VMCH's modern slavery action plan;
3. assist VMCH determine priority actions to be undertaken and establish annual goals and targets;
4. monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness; and
5. ensure VMCH meets the requirements of the Modern Slavery Act 2018 (Cth).

The Modern Slavery Policy, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provides 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 findings and further treatments for modern slavery can be incorporated to ensure best practice.

VMCH began utilising the SEDEX tools and services ([www.sedex.com](http://www.sedex.com)) to map our supply chain and assist in evaluating the risk of modern slavery within our supply chain. 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 to manage modern slavery risks within our supply chain. The top 100 suppliers were invited to respond to surveys on questions relating to modern slavery risk. These responses will be analysed as part of VMCH's ongoing work.

The supplier code of conduct was in place.

The ACAN Supplier Engagement Strategy Guide was adopted following the supplier engagement workshop in late 2020 undertaken with key VMCH stakeholders and 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 VMCH's Modern Slavery Policy and any tenderer must accept and comply with the policy to be considered part of the tender.

### **3.3 Training and education**

Online training was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers. All the modern slavery champions have undertaken the online training.

Modern Slavery online training is included in the suite of modules directors are required to complete. A webinar was made available for suppliers.

The Modern Slavery Working Party took part in a training workshop to assist in engaging with suppliers.

### **3.4 Communication**

VMCH has used its multiple communication channels/mediums with staff to raise awareness of modern slavery issues so that staff are informed about and aware of modern slavery issues.

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

### **3.5 Procurement and operational actions**

We recognise that due to the nature of VMCH's workforce characteristics and required skillsets, there are modern slavery risks within our operations. To mitigate this, we are working to reduce our reliance on agency staff use wherever possible. This means that staff are instead engaged on contracts with VMCH, which lowers our modern slavery risk associated with workforce characteristics. 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 Future commitment**

VMCH has several actions planned for 2022 that directly relate to the identification, management and mitigation of our risks of modern slavery:

- Continued membership of ACAN to leverage best practice materials and approaches.
- Further roll out of the modern slavery online training to employees to raise awareness of risks, and how to identify and confidently report incidents.
- Any new tenders (including request for tenders and requests for proposals) will include a mandatory compliance requirement that the tenderer complies with VMCH's Modern Slavery Policy as part of the final agreement.
- Utilise the SEDEX platform to further understand the modern slavery risks within our supply chain.
- 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.
- Further development of VMCH's Modern Slavery action plan and road map to further enhance work undertaken to December 2021.

## 4. Mandatory criteria 5: Effectiveness Assessment

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

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

## 5. Mandatory criteria 6: Describe the process of consultation with any entities the reporting entity owns or control

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

## 6. Mandatory criteria 7: Any other information considered relevant

All relevant information has been incorporated into the Statement.







# ***Modern Slavery Statement***

*1 January to 31 December 2021*



*A Special Work of St Vincent de Paul Society Queensland*

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# About Us

*Ozcare is a leading organisation in the provision of health care, residential and community aged care, retirement living and disability support. We operate across the state of Queensland, employing nearly 3800 individuals to deliver our services to those who need assistance.*

*Ozcare operates 16 residential aged care services, a hospital, 8 day respite centres and four retirement living services across Queensland. In addition, we provide support and health care services to thousands of people in their own homes. Each day, we typically provide care and support for over 15,000 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**

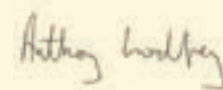
The Board of Ozcare believe that the steps being taken now to reduce the risk of modern slavery and those planned for the future are aligned with our guiding principles and values.

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 26 May 2022.

This Modern Slavery Statement is signed by a responsible member of Ozcare as defined by the ACT.



**John Thomas**  
Chairman



**Tony Godfrey**  
Chief Executive Officer



  
**3,815**  
*employees*


**356**  
 STAFF  
 CELEBRATED  
 SERVICE AWARD  
 ACHIEVEMENTS  
 (2020-21)

**254**  
*volunteers*

**16**  
 AGED CARE  
 FACILITIES

  
**2,084**  
 BED LICENSES



  
**53.26%**  
 CONCESSIONAL  
 RATIO

**7,026**  
 CHSP Clients

**HOW WE**  
*Care.*  
 As at 30 June 2021

**236**  
*day respite  
 centre  
 clients*

**4**  
*Retirement  
 villages*




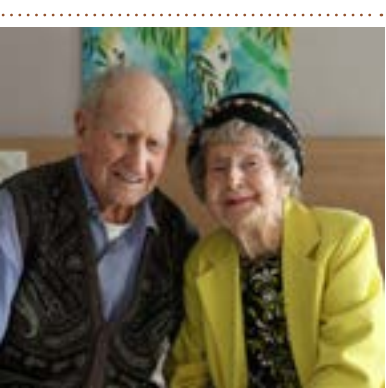
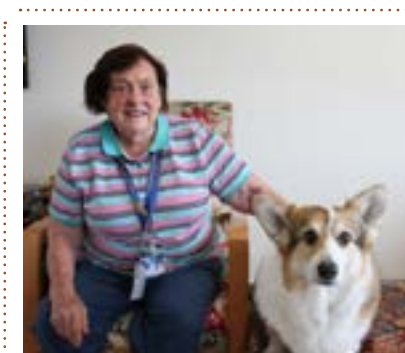
**1**   
 Retirement  
 Village Under  
 Construction

**214**   
 RETIREMENT  
 LIVING UNITS

  
**2,047**  
 HOME CARE  
 PACKAGES

  
**1** *Private  
 Hospital*

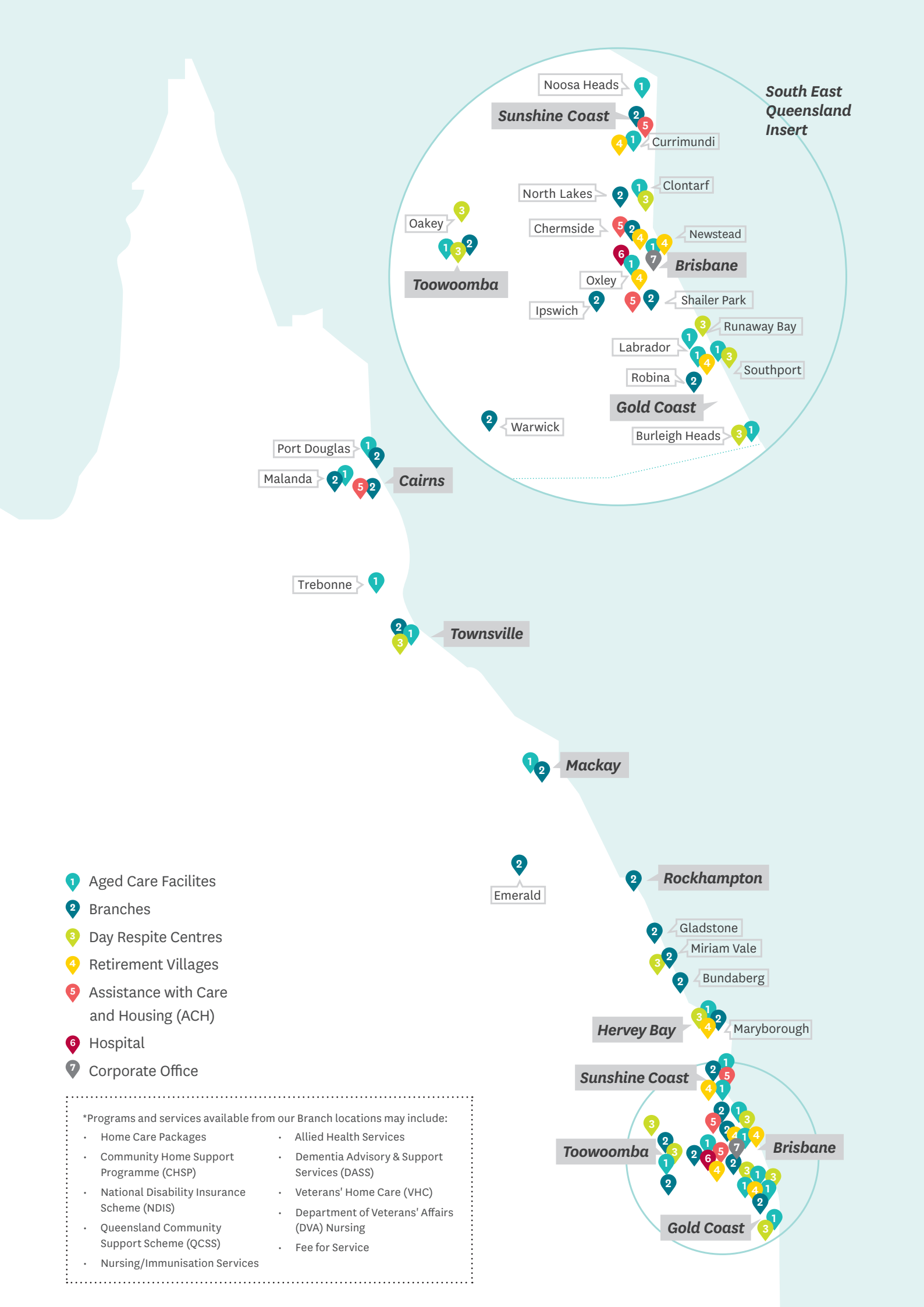
  
**60,242**  
 Enquiries to  
 1800 Ozcare  
 during the year



**876**  
 NDIS Clients

**94**   
 HOSPITAL  
 BEDS

**758**  
 QCSS  
 CLIENTS



- 1 Aged Care Facilities
- 2 Branches
- 3 Day Respite Centres
- 4 Retirement Villages
- 5 Assistance with Care and Housing (ACH)
- 6 Hospital
- 7 Corporate Office

\*Programs and services available from our Branch locations may include:

- Home Care Packages
- Community Home Support Programme (CHSP)
- National Disability Insurance Scheme (NDIS)
- Queensland Community Support Scheme (QCSS)
- Nursing/Immunisation Services
- Allied Health Services
- Dementia Advisory & Support Services (DASS)
- Veterans' Home Care (VHC)
- Department of Veterans' Affairs (DVA) Nursing
- Fee for Service

# 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 169 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 3950 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 2 years. Typically, across the organization we will engage in the vicinity of 1,800 suppliers per annum.

Ozcare is a growing organization, 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 and supply chain. In terms of risk taxonomy, our top 5 major spend categories ( in order ) for 2021 were:

1. Building and construction
2. Facilities and property maintenance
3. Food and catering
4. Medical devices and PPE
5. Furniture and office supplies

Labour hire contractors are engaged, for security service provision and also for short term nursing, allied health and in some instances for cleaning, and garden maintenance. In these instances, we have engaged companies that are Queensland based, and employ their staff under award conditions.

# Organisation Structure

CHIEF EXECUTIVE OFFICER							
CHIEF OPERATING OFFICER	CHIEF FINANCIAL OFFICER	GROUP MANAGER CONSTRUCTION & PROPERTY	GROUP MANAGER RISK & COMPLIANCE	GROUP MANAGER PEOPLE	GROUP MANAGER BRAND & COMMUNICATIONS	CHIEF INFORMATION OFFICER	DIRECTOR OF HOSPITAL SERVICES
AGED CARE	ACCOUNTING & FINANCE	CONSTRUCTION & PROPERTY	AUDIT & ACCREDITATION	HUMAN RESOURCES	PUBLIC RELATIONS	INFORMATION TECHNOLOGY	CANOSSA PRIVATE HOSPITAL
COMMUNITY CARE	PAYROLL	FLEET	BUSINESS RULES	HEALTH & SAFETY	MARKETING	IT SERVICE DESK	
RETIREMENT LIVING	INSURANCE	PROCUREMENT	CLINICAL & CARE GOVERNANCE	LEARNING & DEVELOPMENT		BUSINESS SYSTEMS & TECHNOLOGY APPLICATIONS	
OPERATIONS SUPPORT TEAM			PRIVACY				

## 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:





# 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 over 1,700 suppliers, but of those the top 100 suppliers constitute the very significant amount of our procurement expenditure. We have assessed the risk of our top suppliers.

Our major procurement categories, expenditure data and suppliers for 2021 is as follows :

Procurement Category	Expenditure	Number of Suppliers
Building and construction	\$18,844,287	2
Cleaning and security	\$843,200	111
Facility and property maintenance	\$9,500,634	879
Food and catering	\$8,360,250	232
Furniture and office supplies	\$1,825,637	235
ICT hardware	\$248,970	23
Linen and laundry	\$1,539,360	34
Medical devices and supplies	\$1,973,237	129
Uniforms and PPE	\$241,639	25



# **Criterion 4 – Steps Taken**

## ***Our Employment Practices***

Our staff are employed under our 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.

## ***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.

## ***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.

## ***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.

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.

## ***Criterion 5 - Assessing the Effectiveness of our Actions***

Our survey of supplier's 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. We have 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, and that is where we have focused our efforts with our suppliers.

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 2022, we are considering implementing Sedex which we believe will give us greater confidence in our ability to oversight our supplier's actions to address modern slavery risk in their own organization 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.

## ***Criterion 6 – Internal Consultation***

In 2021, 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 organization 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 centralized or whole-of-organisation perspective. We believe that will allow for better oversight of suppliers and our supply chain risks.

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 once per annum of our steps taken.

## ***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.

## ***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:

- Join 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 organization. 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
- Explore the implementation of SEDEX, in order to improve our supply chain oversight and management processes. We anticipate taking a risk based approach to it's utilization :
  - 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
- Consider making a joint statement with our parent entity

### ***Managing COVID-19 Risks***

We believe that COVID-19 has not presented a significantly higher risk of modern slavery regarding our practices for the following reasons:

- We have not modified any supply agreements, reduced payments etc during the pandemic. As a provider of essential services we are obliged by regulation to continue our operations, and that extends to maintaining our supply chains and purchasing agreements.
- Where we use labour hire companies, those companies have been contacted to ensure that they provide any necessary PPE in the environments in which they operate.
- When labour hire staff work in our own facilities, we provide them with the necessary PPE and if required, we will also perform rapid antigen testing for COVID on those individuals.
- In the event our own staff became COVID positive, we enable them to take any accrued leave that they may have so that they are not financially disadvantaged during their isolation period.
- Staff that have contracted COVID are permitted to work from home if that is an option for their particular role.
- We have agreed with our peak body's position that the safe return of migrant workers to Australia not only will help address workforce issues in Australia, it will provide a source of income for the worker and their families.



Call us  
1800 Ozcare  
(1800 692 273)  
or visit  
[ozcare.org.au](http://ozcare.org.au)





*Ozcare respects the rights and responsibilities of its staff members and its clients, including privacy rights and the respectful management of personal information.*

*Further information can be found on our website.*

*For more information, support and access to services, simply call 1800 Ozcare (1800 692 273) to speak with a helpful staff member.*

**[www.ozcare.org.au](http://www.ozcare.org.au)**

**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.**

.....

Ozcare is a quality certified organisation and has met the requirements of the International Standards Organisation (ISO 9001:2015)





ARCHDIOCESE  
OF BRISBANE

MODERN  
SLAVERY  
STATEMENT  
**2021**

The Corporation of the Trustees of the  
Roman Catholic Archdiocese of Brisbane



## DISCLOSURE

### 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**



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## ABOUT THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE

### About us

The Roman Catholic Archdiocese of Brisbane (the Archdiocese) comprises parishes and agencies across South East Queensland. We cover 77,000 square kilometres from the Queensland / New

South Wales border, north to Gin Gin and west to Eidsvold and Gatton. We have offices across our footprint with central administration based in Brisbane. Together we provide:



**240**

MASS CENTRES  
SERVING OVER

**708,000**

CATHOLICS



**146**

SCHOOLS EDUCATING  
OVER

**76,899**

STUDENTS EACH YEAR



**214**

CENTACARE SITES  
SUPPORTING

**83,189**

PEOPLE EVERY YEAR



**40**

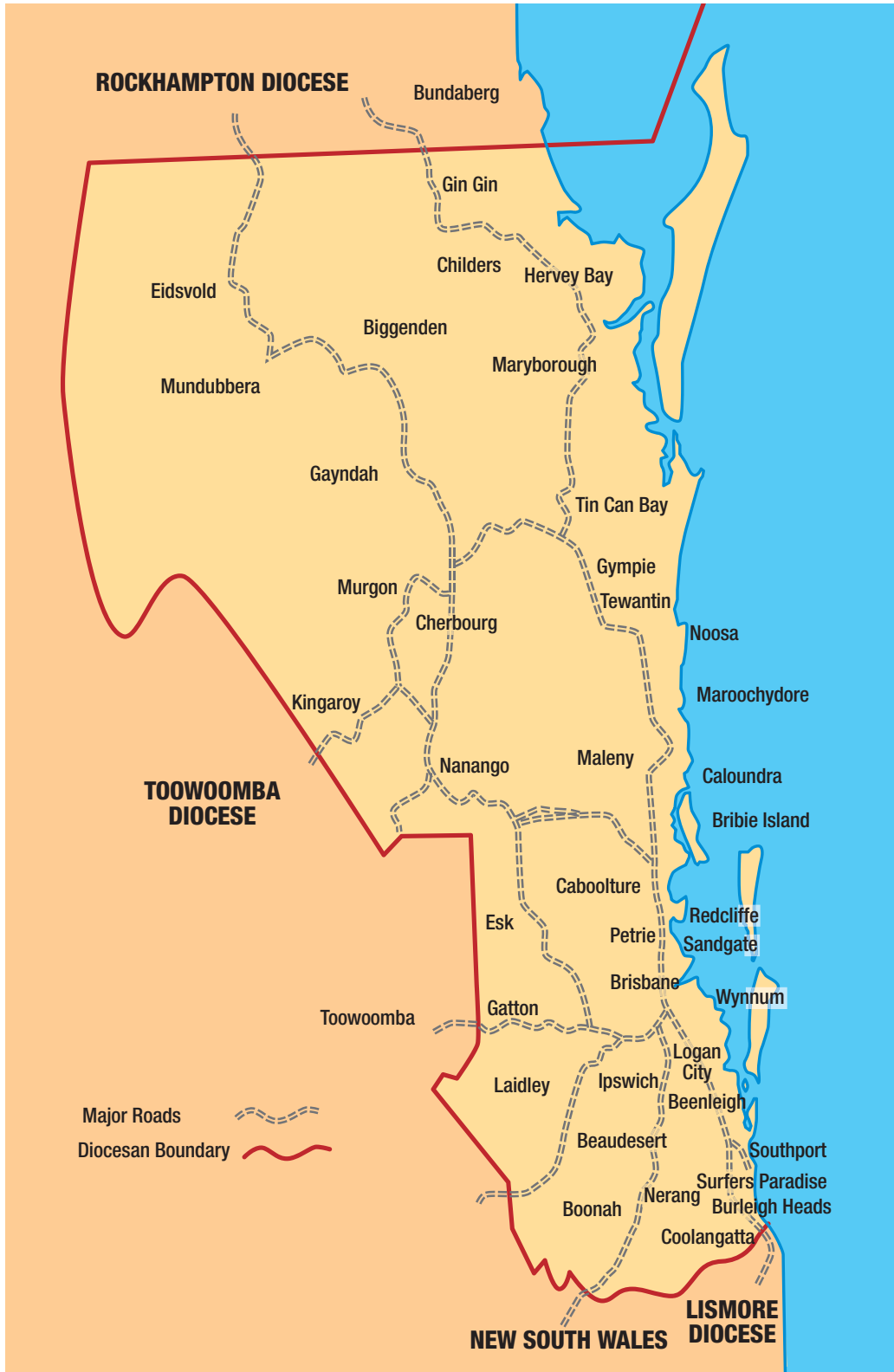
OFFICES EMPLOYING  
OVER

**16,000**

PEOPLE



# REPORTING CRITERIA ONE & TWO





## REPORTING CRITERIA ONE & TWO

The Archdiocese is led by Archbishop Mark Coleridge and Auxiliary Bishop Ken Howell. 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 Mark 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 around the world, 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 which 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 off the strength, flexibility and resilience of our parishes and the faithful to stand against the unrighteous acts of modern slavery in society.



## 2021 modern slavery risk management initiatives

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with archdiocesan labour standards, 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.

In 2021, we implemented a number of initiatives and reached some key milestones on our modern slavery prevention journey. These are summarised below and will be discussed in more detail in the body of this report.

1. The Archdiocese established a Modern Slavery Policy which was subsequently adopted by all agencies and offices.
2. The Archdiocese began the roll out of modern slavery training to relevant employees.
3. The first robust modern slavery process was included in an archdiocesan tender process, a cleaning tender for Brisbane Catholic Education. It is now a standard inclusion in our tender processes and was included in an archdiocesan legal services request for quote.
4. Brisbane Catholic Education introduced a procurement team that will establish procurement policies and procedures and will share these with other agencies in the Archdiocese to improve their procurement practices.
5. The Archdiocese designated a second Modern Slavery Liaison Officer and expanded the Modern Slavery Working Group.
6. The Archdiocese completed further analysis of our supply chain with a view to deeper engagement with our suppliers.

## Our plans for 2022 and beyond

To further our commitment to eliminating modern slavery in our supply chains and meet our legislative requirements, the Archdiocese has significant plans for the coming years. These are summarised below and will be discussed in more detail in the body of this report.

1. Solidifying business and management systems that will enhance our ability to identify and eliminate modern slavery risk.
2. Enhancing risk management strategies as they relate to modern slavery.
3. Establishing processes and teams to manage procurement and supply chain.
4. Communicating with employees about modern slavery and implementing further training.
5. Implementing a Supplier Code of Conduct.
6. Deepening engagement with tier one suppliers and key internal stakeholders.





## A brief statement from the Archbishop of Brisbane

- Mark Coleridge

The Australian Catholic Antislavery Network (ACAN) continues to be a shining light in the Church in Australia since its inception in 2019 and membership now exceeds 45 Australian Catholic entities.

As a proud member of ACAN, we in the Archdiocese of Brisbane are committed to ensuring people affected by modern slavery have access to comprehensive and rights-compatible outcomes. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery.

In 2021, we took important steps expanding our internal Modern Slavery Working Group and welcoming a second Modern Slavery Liaison Officer to the group.

We as an Archdiocese remain committed to playing our part in the effort to eliminate modern slavery in Australia and internationally. We look forward to continuing our prevention journey over the coming years with the support of our employees, community and vendors.

This is an essential part of the Church's mission "to let the oppressed go free" (Luke 4:18)

Yours sincerely in Christ,

+Mark Coleridge  
Archbishop of Brisbane



# REPORTING CRITERIA ONE & TWO

## Our organisational structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane is an incorporated entity in the State of Queensland established on 25 July 1935.

The agencies of the Archdiocese include:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Administration Services, Catholic Early EdCare and Xavier Children’s Support Network.

The other offices of the Archdiocese include:

- Archdiocesan Services
- Legal, Governance and Risk
- Financial Administrators Office
- Episcopal Office
- Evangelisation Brisbane.

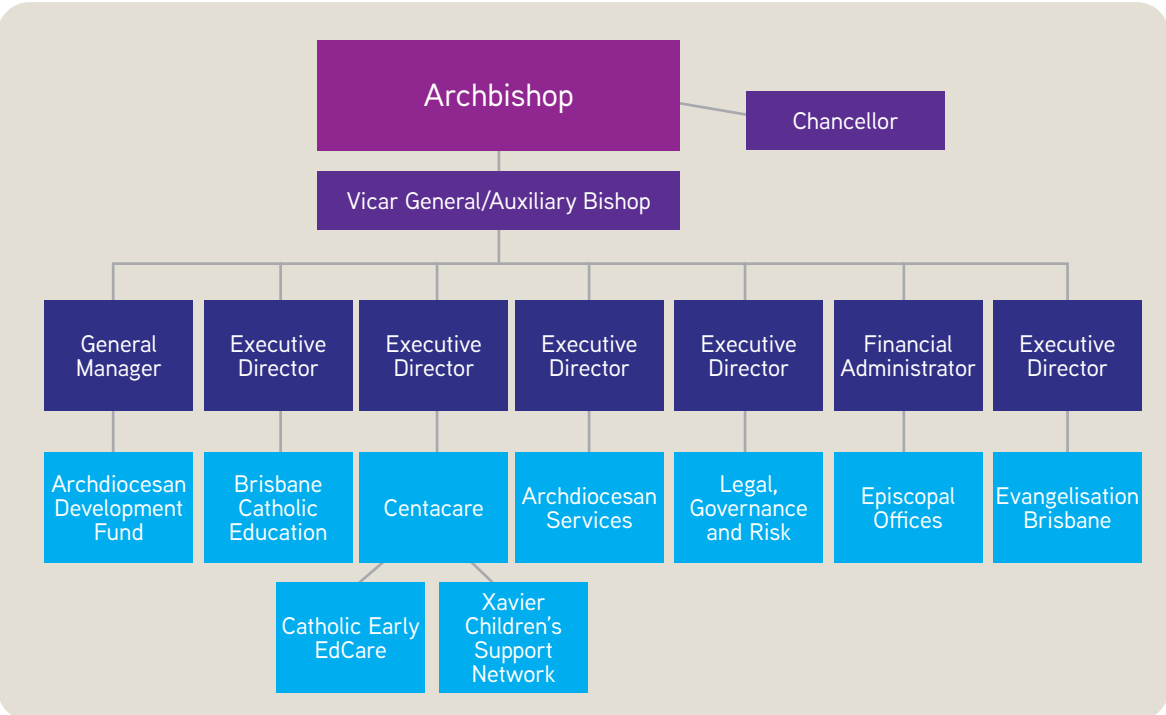


Figure one – Archdiocese of Brisbane organisation structure



# REPORTING CRITERIA ONE & TWO

## 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. 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 Executive Directors/ General Manager, the Archbishop and Vicar General form the Executive Forum. The Executive Forum meets regularly and has responsibility for matters of operational significance, including modern slavery. The governance structure of the Archdiocese is summarised in the chart below.

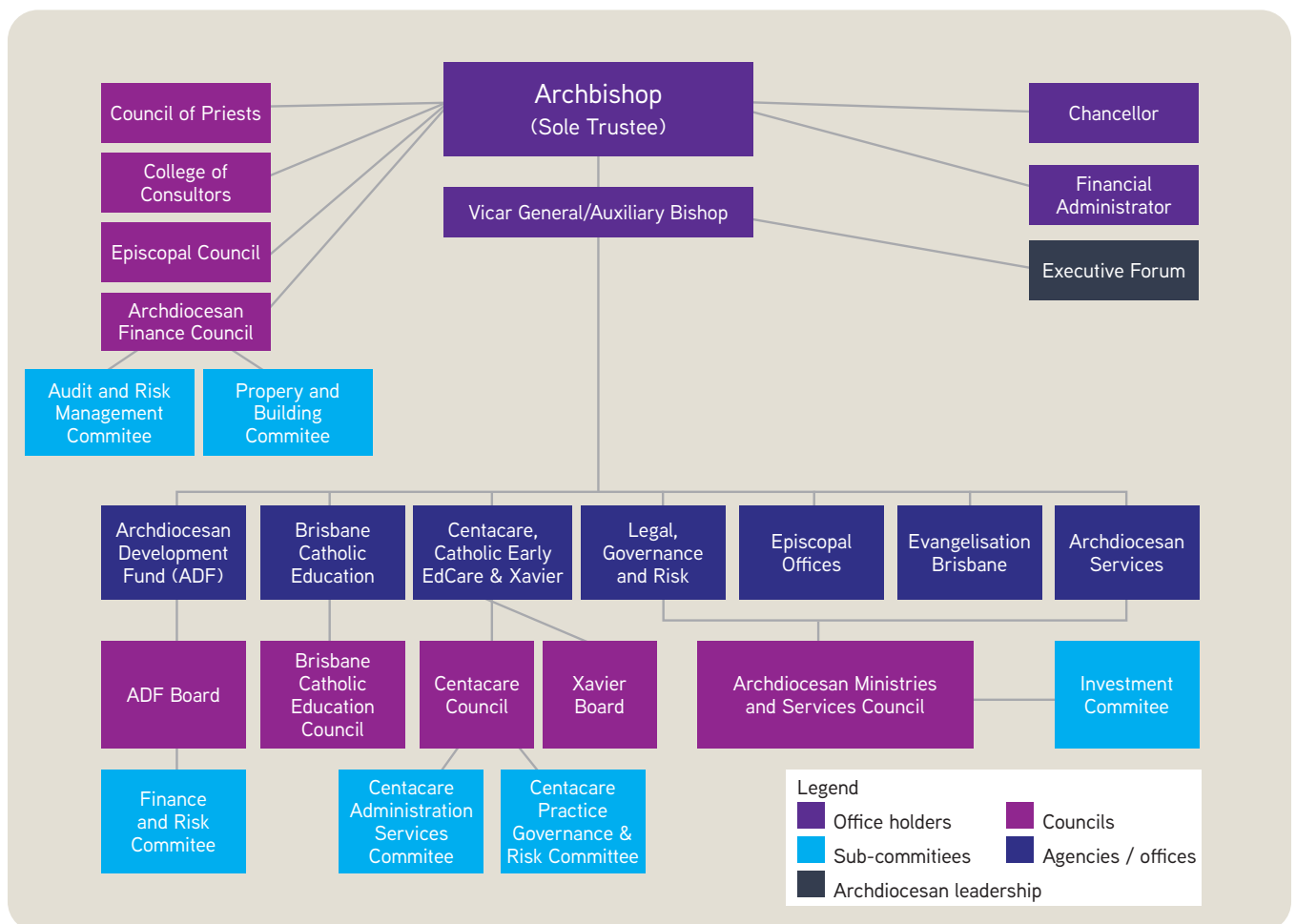


Figure two – Archdiocese of Brisbane governance framework



### Our operations

The Archdiocese contributes to the wellbeing of many communities across South East Queensland in diverse and sometimes, surprising ways.

While many people primarily associate the Archdiocese with priests, churches and parish communities, we also live out our faith and mission through important work in education and social services, being there to walk alongside people at critical moments in their lives.

To do this, the Archdiocese employs more than 16,000 Queenslanders. The activities undertaken by our entities are outlined below.

#### Parishes of the Archdiocese

Our 94 parishes support the religious and spiritual needs of their communities through masses, baptisms, wedding, funerals and other sacraments. They also provide a range of practical supports to members of their communities who are in need.

#### 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 Brisbane Catholic Education Executive Director. The Archbishop and Executive Director are supported by the advisory body, the Catholic Education Council. Refer to organisation chart in Appendix A for more information.

Brisbane Catholic Education is a learning community, which includes diocesan Catholic 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.





## REPORTING CRITERIA ONE & TWO

### **Centacare – including Catholic Early EdCare and Xavier Children’s Support Network**

The Centacare team share a commitment to doing whatever they can to ensure that everyone in their communities is not just cared for, but cared about, in ways that help them live their fullest lives. Across aged care, community and pastoral care, disability care, Early EdCare and family and relationship care, Centacare teams walk alongside people on life’s journey, providing the support they need to achieve what is important to them at that moment and into the future.

Since its establishment in the 1960s 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.

### **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.

### **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
- Procurement and Fleet
- Communication and Engagement.

### **Evangelisation Brisbane**

The mission of Evangelisation Brisbane is to work with, inspire and empower parishes and communities to encounter Jesus and live the joy of the Gospel.

Evangelisation Brisbane has a vision to see the Catholic Church become a home for every generation. We envisage a Church:

- that welcomes and engages children in such a way that they love to attend and ask their parents to take them
- where teenagers find purpose and meaning as they encounter truth, beauty and goodness
- where young adults not only continue to practise their faith, but develop it and are empowered to lead and minister
- where adults do not merely attend, but continue to deepen their faith and become missionary disciples
- where families find such welcome, love and support that Church becomes an extension of their family
- that reaches beyond its own walls in working towards justice and peace in our world and building relationships with other Christian traditions, other religious traditions and with government
- where every person is loved, welcomed, and transformed as they encounter Jesus and encounter those who walk in his footsteps.

### **Episcopal Office**

The Episcopal Office encompasses the offices of the Archbishop and Auxiliary Bishops as well as the office supporting clergy.



# REPORTING CRITERIA ONE & TWO

## Our agencies



**ARCHDIOCESAN DEVELOPMENT FUND**

ABN 25 328 758 007



**21**  
Employees



**1,432**  
members

Members include archdioceses, parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals.

### Income

In 2021 the ADF generated \$43.7 million through the provision of internal church treasury services to Catholic entities. Loan income was \$33.5 million and investment income \$10.2 million.



**Brisbane Catholic Education**

teaching · challenging · transforming

ABN 49 991 006 857



**12,142**  
Employees  
(8,194 FTEs)



**7,304**  
Teachers  
(5,424 FTEs)



**76,899**  
students

- 146** schools
- 107** primary schools
- 28** secondary schools
- 11** prep to grade 12 schools

- 12.6%** of students in the Archdiocese attend a Brisbane Catholic Education school
- 60%** of students identify as Catholic
- 7.1%** of students have a language background other than English
- 3.2%** of students identify as Aboriginal or Torres Strait Islander
- 33** different religious faiths amongst students

### Income

In 2021 Brisbane Catholic Education received an income of \$1,305.6 million of which \$1,022 million was recurrent funding. The main source of this income was Australian and Queensland Government grants for the provision of educational services.

- \$1,022M** in Australian and Queensland Government grants
- \$254.9M** in school fees and levies
- \$29.1M** in other income



# REPORTING CRITERIA ONE & TWO



## centacare

Care is our calling.

ABN 35 020 644 975



**1,858**  
Employees



**151**  
Volunteers



## Catholic Early EdCare

WATCH THEM GROW

ABN 51 626 296 801



**1,495**  
employees



**129**  
long day care centres,  
kindergartens and  
outside school hours care services

**28,950**

children were able to connect, grow and discover at a Catholic Early EdCare long day care centre, kindergarten or outside school hours care service.

**8,008**

older Queenslanders accessed services to help them to live well in their home and community.

**28,265**

people affected by domestic and family violence were provided early intervention and crisis response services.

**1,563**

people with disability accessed services to help them live the life they choose.

**11,864**

people received home maintenance and modification support to help maintain their independence.

**1,289**

people living with or at risk of developing a mental illness received a range of support services.

**2,590,716**

hours of support were provided to older people and people with disability.

**3,250**

Indigenous Queenslanders were supported through healing, education and advocacy across schools, parishes, and remote communities.

### Income

To 30 June 2021, Centacare received income of \$239.9 million of which \$64.7 million was from government funding of aged care and family and relationship services and Job Keeper payments. In addition, there was \$158.5 million in fee income from providing community services (NDIS, aged care co-payment and home care service) and childcare.

**\$64.7M** in government funding  
**\$158.5M** in fee income  
**\$16.7M** in other income



# REPORTING CRITERIA ONE & TWO



ABN 24 547 377 893

## Income

To 30 June 2021, Xavier Children's Support Network received income of \$7.7 million of which \$6.5 million was NDIS income, \$0.2 million of investment revenue, \$0.2 million of aged care income and \$0.7 million of JobKeeper payments.

**\$6.5M** in NDIS income

**\$0.2M** in investment revenue

**\$0.2M** in aged care income

**\$0.7M** in JobKeeper payments

**\$0.1M** in other income

## Archdiocesan Services and Episcopal Offices

ABN 25 328 758 007



**157**  
Employees



**7**  
Volunteers

Providing services across:

- Finance and Accounting
- Government Relations
- Technology Solutions
- Parish Finance Services
- People and Culture
- Property and Building
- Procurement and Fleet
- Communication and Engagement
- Clergy Office
- Episcopal Office
- Financial Administrators Office
- Work Health Safety
- Archdiocesan Archives
- Safeguarding
- Legal, Governance and Risk

## Evangelisation Brisbane

ABN: 25 328 758 007



**28**  
Employees



**2**  
Volunteers

Providing services for:

- Children and families
- Youth and young adults
- Adult formation
- Inclusion
- Parish leadership
- Santa Teresa Spirituality Centre
- Vocations Office





## Parishes of the Archdiocese

ABN: 25 328 758 007



94

Parishes, 17 of which are  
religious order parishes



87

Parish Priests or  
Administrators

25 Priests in the Overseas Priests Program

708,466 Catholics in the Archdiocese

38,998 attending Sunday Mass per week (measured through Parish census in May 2021)

### Archdiocesan operations

In 2021, Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$41.5 million. This was represented by an internal distribution of \$15 million from the ADF, fees, rent and investment income of \$16.9 million, sales of \$4.3 million and other income of \$5.3 million.

The Archdiocese operates within the state of Queensland and has no offices in any other countries.



## Our people

The Archdiocese and our agencies have standards of conduct for employees and volunteers to maintain a safe and healthy environment. Our commitment to these standards requires that we conduct background checks for all persons who might engage in direct and regular involvement with children, young people and/or vulnerable adults.

The Archdiocese's People and Culture department has a Justice, Equity, Diversity and Inclusion (JEDI) group who consult with employees on issues concerning gender equality, diversity and inclusion in the workplace. The group meet regularly to identify and discuss workplace issues and undertake related activities.

The Executive Directors/ General Manager provide annual certifications to ensure they comply with all legal requirements in the engagement and employment of employees and that they meet their obligations under Australian employment legislation.

The Archdiocese established the Stopleveler whistleblower service in 2015. It provides employees, volunteers and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocese and our agencies continue to build knowledge and awareness of human rights issues among employees and volunteers and encourage them to voice concerns without fear of retribution and with full confidentiality, if required.

## Our supply chain

The Archdiocese and our agencies have a de-centralised procurement model, with the exception of fleet procurement, which will be undertaken by a shared office from 2022. The Archdiocese has identified approximately 17,000 suppliers engaged during the 2021 reporting period, with some duplication due to the decentralised model. Less than 700 vendors account for 73 percent of the total annual expenditure for goods and services across the Archdiocese and our agencies.

In the Archdiocese there is no centralised contracts system in place. Contracts can be short or medium term and responsibility for contracts lies at varying levels of the organisation including archdiocesan offices, schools, parishes and service centres.

Complex, higher value contracts are managed by senior agency offices (i.e. construction, design, consulting, internet and electricity). Brisbane Catholic Education will be implementing a contract management system in 2022 to manage key deliverables and KPIs within contracts including modern slavery risks.

COVID-19 affected the Archdiocese's ability to achieve the targeted vendor engagement in 2021. Vendor engagement and education will continue to be a focus in 2022 and beyond.

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

Across the Archdiocese, there continues to be a high degree of independence within schools, parishes and services to work with local suppliers, which provide support and employment to local communities. As risks are identified in the decentralised model, they will be assessed and appropriate engagement and risk assessments will be undertaken to mitigate the risk of modern slavery within the supply chain.

Based on the nature of the Archdiocese's spend, four sectors have been identified as high risk and will be the focus for 2022. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.



## REPORTING CRITERIA ONE & TWO

The following table summarises the Archdiocese vendor analysis for the 2021 financial year.

Analysis	Number of vendors	Vendor analysis			
		Vendors reviewed	% of total spend	Maximum spend / vendor	Minimum spend / vendor
Brisbane Catholic Education	11,964	348	71%	\$17,645,892	\$100,107
Archdiocesan Services	838	100	85%	\$2,216,600	\$33,231
Archdiocesan Development Fund	7	7	100%	\$748,772	\$90,757
Centacare - PBI *Public Benevolent Institution	2,335	100	69%	\$3,574,786	\$58,200
Centacare Administration Services	1,861	100	85%	\$1,710,425	\$18,432

*Table one – Archdiocesan entities revenue and vendors*

Analysis of the Archdiocese's financial data shows the major spend categories are:

- Building and construction (17%)
- ICT hardware (11%)
- Professional services (11%)
- Facility management and property maintenance (8%)

For a detailed breakdown of each agencies' spend by category see Appendix C.



# MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

## Our operations

The Archdiocese has undertaken a number of steps to identify modern slavery risks in our operations.

We have implemented sound recruitment processes to ensure that all employees are engaged in a fair and equitable manner. These processes provide us with confidence that the residual risk of modern slavery in our operations is low. Archdiocesan offices and agencies address human rights issues in our operations under our Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other 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.

The key modern slavery risk the Archdiocese has identified is tier one suppliers not complying with archdiocesan labour standards, 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.

We have identified three factors, which, if they exist in our tier one supplier's business, can

further increase the risk of modern slavery. Firstly, there is an increased risk of unfair working conditions when 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.

Secondly, there is an increased risk of unfair working conditions when people are employed through third party labour hire companies for unskilled and semi-skilled labour. Third party labour hire companies may be contracted to provide cleaning services, construction labour, or groundskeeping services.

Finally, some countries are associated with increased risks of modern slavery. In table two below we have identified some of the countries and risks relevant to our supply chain.

There has been some analysis of the source of materials on a small number of items.

In 2021 Brisbane Catholic Education established a new Procurement Team. The Procurement Team consists of a Procurement Manager and several procurement specialists who will establish policies, processes and systems within delegations approved by the Executive Director.

Country	Risk	Example of product / service sourced
Australia	Migrant labour exploitation	Cleaning contractors, construction contractors
China	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
Indonesia	Forced labour, bonded labour, migrant labour exploitation	General merchandise
Malaysia	Forced labour, bonded labour, migrant labour exploitation	IT products, office supplies, electronics, general merchandise
Thailand	Migrant labour exploitation	General merchandise
Vietnam	Excessive overtime	General merchandise, office supplies, electronics

Table two – Source country risks



# REPORTING CRITERIA THREE

The offices and agencies of the Archdiocese understand that holding direct relationships with tier one suppliers will help manage these risks. Therefore, we will be focusing on developing these relationships over the coming years. The Archdiocese acknowledges there may also be heightened risk of modern slavery among tier two and three 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.

In 2021, the Archdiocese Modern Slavery Working Group began analysing our external engagements for modern slavery risks. The group, which comprises members from all archdiocesan agencies, extracted data from each agency's accounting systems and analysed vendors with a consolidated annual expenditure of over \$100,000. This analysis was completed using the Australian Catholic Anti-Slavery Network's (ACAN) defined categories and their allocated risk levels.

Further analysis of vendors is being undertaken. If a modern slavery risk is identified the vendor will be asked to complete the Archdiocese's Modern Slavery Questionnaire. We will use this to identify and assess modern slavery risks within the operations and to work together to mitigate these risks.

In 2021, the majority of the Archdiocese's spend, across agencies and offices, has been categorised. It included 348 suppliers from Brisbane Catholic Education (accounting for 71% of their annual spend), 200 suppliers from Centacare (accounting for 74% of their annual spend) and 100 suppliers from Archdiocesan Operations (accounting for 85% of their annual spend). Figure three below outlines all of the key categories identified in the risk analysis and the Archdiocese consolidated spend for each category in 2021.

## Consolidated Archdiocese of Brisbane Percentage of Spend

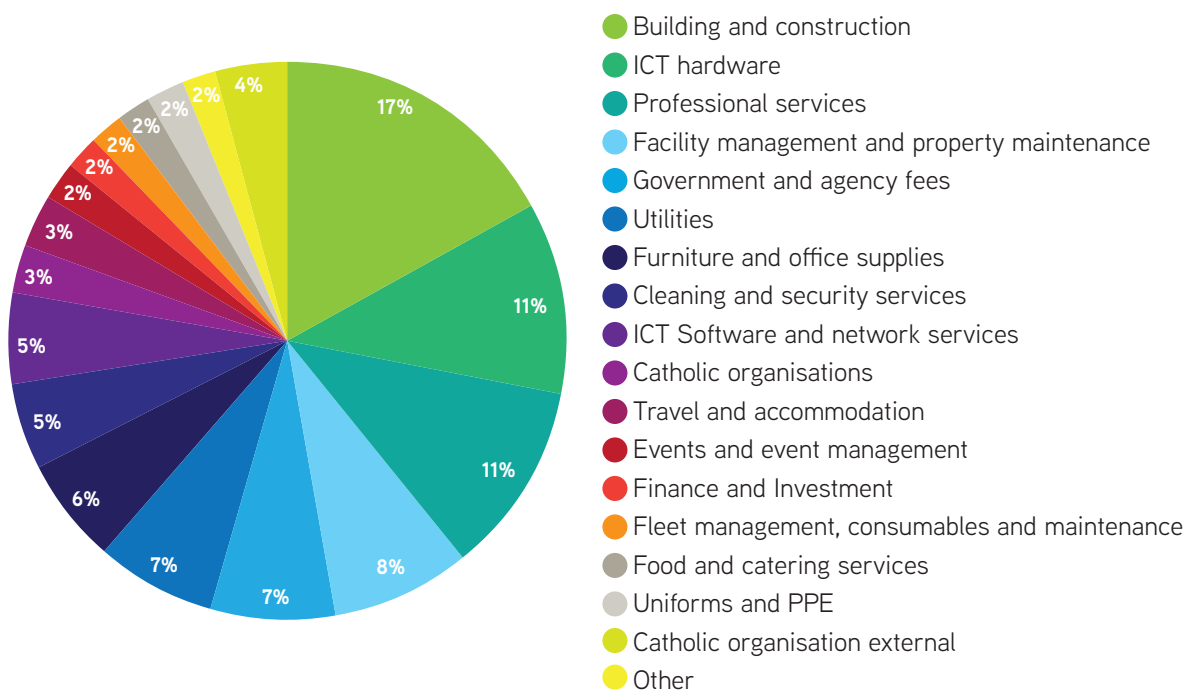


Figure three – 2021 Consolidated spend profile of the Archdiocese of Brisbane (excluding parishes)



## REPORTING CRITERIA THREE

As we expand our analysis of consolidated archdiocesan spend (excluding parishes), we continue to identify that building and construction, information and communications technology, facilities management and cleaning and security services are key risks within the Archdiocese's supply chain.

For a detailed breakdown of each entities' spend by category refer to Appendix C.

### Our COVID-19 response

The disruption caused by COVID-19 presented emerging human rights risks, including increased risks to worker health and safety and of modern slavery in key sourcing countries. This impacted global supply chains as the pandemic extended through 2021.

For example, Brisbane Catholic Education continued to operate all 146 schools, regardless of the number of students attending, to ensure essential workers and vulnerable families could access education and care. This along with the introduction of alternative learning programs, saw Brisbane Catholic Education increase its IT-related costs. This potentially led to increases in forced labour and other modern slavery risks in countries producing technology-related components. Another example was the cleaning industry. With increased cleaning requirements across the community since 2020, the industry has had to engage an increased number of staff and do so in an ethical and fair manner.

Many archdiocesan agency and office employees worked remotely during 2021. Every effort was made to ensure people could work safely in their homes and regular check-ins were mandated across all agencies and offices. Employee wellbeing was at the forefront of decision making and sick leave accruals were increased where necessary to ensure employees could access paid leave if required.

After the Queensland Government mandated COVID-19 vaccination for a number of the sectors the Archdiocese operates in, the Archbishop and Vicar General supported this directive and

mandated vaccination for all archdiocesan employees and clergy.

COVID-19 also affected the implementation of a number of planned modern slavery actions for 2021. These will be carried over to 2022.

### Case study: Ethical sourcing of facemasks

In 2021, in response to the COVID-19 pandemic, Brisbane Catholic Education needed to source child and adult facemasks. As facemasks are in a high-risk category, emphasis was placed on due diligence checks to reduce modern slavery risks in our supply chain and on selecting suppliers that share the Archdiocese's commitment to eradicating modern slavery.

Brisbane Catholic Education partnered with a distributor that undertook due diligence checks on their facemask suppliers. This due diligence included Sedex registration checks on manufacturers, providing social compliance factory assessment reports from manufacturers and other evidence to support risk assessments. To further minimise modern slavery risks, the child facemasks were sourced from an Australian manufacturer and supplier.

Once a contract was in place, Brisbane Catholic Education negotiated with the supplier to extend the favourable contract pricing and benefits to the Archdiocese and all Queensland Catholic schools. This ensured all schools had access to ethically sourced facemasks and helped to reduce supply chain risk beyond the Archdiocese.

### Modern slavery gap analysis

The Archdiocese is using ACAN's Bridge the Gap tool to assess our progress on modern slavery. The table below measures our journey from July 2019 to December 2021. Although we made minimal progress in the early stages, our 2021 results show significant improvement. By completing this analysis, we identified the need for procurement policies and procedures and a standardised approach to procurement across the Archdiocese.



# REPORTING CRITERIA THREE

Following careful analysis and investigation, a procurement function in Brisbane Catholic Education was approved in 2020 and established in 2021. While this was primarily to support Brisbane Catholic Education, which is responsible for 76% of the total spend of the Archdiocese, this team will set the procurement policy and direction for the Archdiocese as a whole to minimise the risks of modern slavery across all of our supply

chains. The Archdiocese Modern Slavery Working Group will work with the procurement team, coordinating and implementing ongoing modern slavery management tools and reporting.

In 2021, our objective was to reduce the number of high-risk categories in the Bridge the Gap Assessment from 11 to less than five. This objective was achieved as evidenced in the table below.

## Bridge The Gap Assessment

Category	Topic	Result 2019	Result 2020	Result 2021	Change
Management systems	Governance	Starting line	Starting line	Starting line	Up
	Commitment	Starting line	Starting line	Starting line	-
	Business systems	Starting line	Starting line	Starting line	-
	Action	Starting line	Starting line	Starting line	-
	Monitor /report	Starting line	Starting line	Starting line	-
Risk management	Risk framework	Starting line	Starting line	Starting line	-
	Operational risk	Starting line	Starting line	Leading practice	Up
	Identifying external risks	Starting line	Starting line	Starting line	-
	Monitoring and reporting risks	Starting line	Starting line	Starting line	Up
Procurement and supply chain	Policy and procedures	Starting line	Starting line	Starting line	-
	Contract management	Starting line	Starting line	Starting line	-
	Screening and traceability	Starting line	Starting line	Starting line	-
	Supplier engagement	Starting line	Starting line	Starting line	Up
	Monitoring and corrective action	Starting line	Starting line	Starting line	Up
Human resources and recruitment	Awareness	Starting line	Starting line	Starting line	Up
	Policies and systems	Starting line	Starting line	Starting line	Up
	Training	Starting line	Starting line	Starting line	Up
	Labour hire /outsourcing	Starting line	Starting line	Starting line	Up
Customers and stakeholders	Customer attitude	Starting line	Starting line	Starting line	Up
	Information provision	Starting line	Starting line	Starting line	Up
	Feedback mechanisms	Starting line	Starting line	Leading practice	Up
	Worker voice	Starting line	Starting line	Leading practice	Up

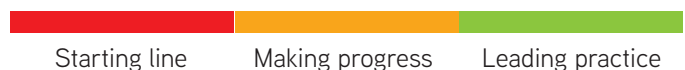


Table three – Bridge the Gap Assessment



## Supply chain risks

As identified above there are several spend categories that pose significant risk for the Archdiocese. In this section we have analysed the Archdiocese’s spend in these categories using a risk taxonomy developed by ACAN for member entities. To develop this risk taxonomy ACAN analysed supplier data from member entities and the final taxonomy has 22 high-level procurement categories that member organisations are involved with.

Table four – Risk taxonomy for the Archdiocese of Brisbane outlines the categories, a description of the spend in each, the risk level and the

percentage of archdiocesan expenditure which occurs in this category. This information has assisted the Archdiocese to prioritise engagement activities with suppliers, based on spend and risk.

The information in this table was used as the baseline for assessment. Additional analysis was undertaken for the Archdiocese’s key suppliers, who account for 73% of total spend. In this additional analysis, we used financial statement documents (when available), website reviews and 2020 Modern Slavery Statement information from our participating vendors.

Category	Spend description	Risk	% of expenditure
Building and construction	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, quarried stone, etc) sub-contracting and labour hire services, demolition, painting and landscaping.	High	17
ICT hardware	ICT hardware means all computers, servers, workstations, routers, hubs, switches and other information technology equipment, including data communications lines and other network equipment. <sup>1</sup>	High	11
Facilities management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols.	High	8
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks, etc), workplace supplies (cleaning, first aid, bathroom, etc), packaging, boxes, etc.	High	6

<sup>1</sup>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. 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.





# REPORTING CRITERIA THREE

Category	Spend description	Risk	% of expenditure
ICT software and network services	Software and application development, support services and call centres (off-shore).	High	5
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags, etc), personal protective equipment, uniforms and footwear.	High	5
Uniforms and personal protective equipment	Uniforms (work wear, school wear and sportswear), footwear and personal protective equipment (e.g. gloves, facemasks or respirators, glasses or goggles, ear muffs, safety wear, etc).	High	2
Other	Categories less than two percent requiring further analysis	Medium	14
Utilities	Electricity (including solar farms), gas, water and wastewater and telecommunications (linked to resources sector risk).	Medium	7
Finance and investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	Medium	2
Professional services	Other	Low	11
Government and agency fees	Other - includes government agencies and public and social organisations.	Low	7
Catholic organisations	Includes insurances, levies and inter organisational services.	Low	5
			<b>100</b>

Table four – Risk taxonomy for the Archdiocese of Brisbane



## ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

Throughout the reporting period, the Archdiocese has undertaken an extensive review of our decentralised supply chain to address the modern slavery risks in our operations. Our membership and active participation in ACAN, including monthly webinars, has greatly assisted with this. In addition, beginning the roll out of modern slavery e-learning modules for employees has assisted with ensuring employees are able to identify modern slavery risks and understand their role in eliminating these risks. The online learning modules will be allocated to all approved employees for completion in the 2022 calendar year.

### Actions taken during reporting period

#### 1. Designation of a second Modern Slavery Liaison Officer (MSLO)

The MSLO is responsible for coordinating overarching operational activities to identify and mitigate modern slavery risks within the Archdiocese. The MSLO is responsible for promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Anti-Slavery Taskforce executive to discuss implementation of risk management programs. The Archdiocese has recognised the importance of a dedicated MSLO to lead the anti-slavery program to minimise and where possible remove modern slavery risks from our extensive decentralised supply chain network. A second MSLO role was established to coordinate the implementation of modern slavery requirements within Brisbane Catholic Education.

#### 2. Expanded membership of the Modern Slavery Working Group (MSWG)

The Archdiocese's leadership team supported the MSLOs to expand the MSWG. It now consists of representatives from the following archdiocesan offices and agencies - risk, legal, social services, people and culture, training, procurement, education, property and building, communication and information and technology. The MSWG met on a regular basis in 2021 to:

- provide input and advice on modern slavery actions
- provide analysis and feedback on the supply chain spend within their areas
- collaborate in developing the modern slavery policy and guidelines
- assist in the preparation of the Modern Slavery Statement.

The MSLOs and MSWG were key to ensuring material steps were taken to comply with the modern slavery legislation. They were supported by operational groups in the Archdiocese, which supplied information included in the analysis of the goods and services acquired during the reporting period.

#### 3. Modern Slavery Policy and Modern Slavery Guidelines

As part of our ACAN membership we were able to access various tools which enabled us to deliver a modern slavery framework in 2021. A draft policy template was made available by ACAN in mid-2020. We adapted this to reflect the Archdiocese's context and approach to mitigating risk of modern slavery within our agencies and operations. This policy was approved in January 2021.



## 4. Training

ACAN made a number of e-learning training modules available to its members in 2020. These have been set up in the Archdiocese and Brisbane Catholic Education's e-learning systems. The training has been rolled out to the MSLOs and MSWG members who completed 27 modules in 2021. A plan is being developed to distribute the training to remaining relevant workers. Below is a summary of the training available:

- **Modern Slavery 101**  
Provides a comprehensive overview of modern slavery practices, who is vulnerable, how and why it occurs.
- **Business Relevance**  
Provides a business perspective on modern slavery and explains why it is important to manage modern slavery risk. It also outlines the responsibilities of businesses to respect human rights through enhanced corporate due diligence and the key economic, legislative and stakeholder drivers to manage risk.
- **Implementing a Modern Slavery Risk Management Program**  
A comprehensive overview of how to develop and implement a modern slavery risk management program using ACAN tools and resources.
- **Grievance Mechanisms and Remedy**  
Provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Guidance for Modern Slavery Act Reporting Entities.
- **Modern Slavery Risk Management for Suppliers**  
Assists suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers.

## 5. Introduced due diligence checks into procurement processes

In 2021, the Archdiocese introduced modern slavery due diligence checks into procurement processes to assess supplier commitment to the eradication of modern slavery and modern slavery risks in our supply chain. Examples include:

- Brisbane Catholic Education cleaning tender for seven office locations
- Brisbane Catholic Education contract lifecycle management solution
- Brisbane Catholic Education facemask procurement
- Brisbane Catholic Education Legal Matters System request for proposal
- Archdiocese legal services request for quote.

## Modern slavery action plan and road map

In 2021, the Archdiocese and our agencies provided the details of 100 vendors to Sedex, one of the world's largest ethical audit platforms dedicated to providing transparency in global supply chains. Sedex was engaged to undertake an initial assessment of the vendors and outline the support their system could provide to the Archdiocese to meet our requirements under the legislation.

Based on the outcomes of the 2020 and 2021 vendor assessments, the Archdiocese is working on ensuring procurement activities are conducted in a similar manner across all agencies. A central fleet function for all archdiocesan agencies will commence in 2022 and Brisbane Catholic Education's new procurement team will lead the development of a Supplier Engagement Action Plan for all agencies. The Supplier Engagement Plan will focus on centralising key procurement functions where our suppliers are identified as high-risk. It will also form the cornerstone of our approach to mitigating modern slavery risk



and eliminating modern slavery from our supply chains. The plan will also include an education

and awareness program for all employees who directly engage suppliers for goods and services.

## Action plan

Action category	Actions for implementation	Status
Business and management systems	Establish KPI's for the modern slavery action plan and ways to monitor compliance	To be established in 2022
	Communicate action plan to the executive	To occur in 2022
	Expand the Modern Slavery Working Group	Completed - with ongoing review
Risk management	Include modern slavery in corporate risk framework	Completed
	Review procurement processes and expectations of suppliers that may increase modern slavery risk exposure	In progress with new procurement function
	Develop tools to effectively report and identify actions taken to minimise modern slavery risk	Testing of Sedex service in progress
Procurement and supply chain	Establish a procurement framework within Brisbane Catholic Education to reflect legislative requirements and support the engagement of 'pre-qualified' suppliers	Procurement function established 2021 Pre-qualifying of suppliers in progress (greater than \$100, 000 annual spend)
	Promote approach to modern slavery internally	Training yet to be rolled out to employees
	Develop a supplier engagement strategy that includes a code of conduct	In progress
	Ensure all contracts contain appropriate modern slavery clauses	Commenced 2021 and to be completed 2022
	Map tier one suppliers across all agencies	Completed
Human resources and recruitment	Develop a modern slavery communications strategy	Delayed to 2022
	Implement a phased training program for key procurement and support staff	Delayed due to impacts of COVID-19
Customers and stakeholders	Engage key stakeholders on our modern slavery expectations	Commenced in 2021 and is ongoing
	Implement supplier/vendor questionnaires as required	Completed
	Implement supplier code of conduct and communicate to suppliers	Draft completed pending approval

Table five – Archdiocese's action plan



## Domus 8.7

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

We recognise the complexity of remediation, the need for specialist resources and want to ensure the most comprehensive and rights-compatible outcomes for people affected by modern slavery. Therefore, the Archdiocese is a founding partner of Domus 8.7, an independent program to provide remedy to people impacted by modern slavery. The Archdiocese's remediation efforts will continue to be enhanced through further policy development, development of detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering in Domus 8.7 the Archdiocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve our risk management and responses.

Domus 8.7 affirms that:

1. Modern slavery remediation is about the victim, first and foremost.
2. Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights, etc.
3. Proper remediation teaches us something about where the risks were not adequately managed, and serves as a feedback mechanism.

4. Remediation is not only about having a whistle blower policy, it is about righting the wrongs/ harms to people.
5. Partnership with Domus 8.7 is not about outsourcing responsibility, it is about improving the ability to respond.

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

The Archdiocese is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery come to the Archdiocese's attention through whistle-blower 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. The Archdiocese has funded a remedy pathways module in our modern slavery e-learning course that will be shared with employees and other stakeholders in 2022.



## REPORTING CRITERIA FOUR

Figure four below, describes the reporting process through Domus 8.7. Additional information about Domus 8.7 and the process applied can be found at [www.acan.org.au/domus87](http://www.acan.org.au/domus87)



Figure four – Domus 8.7 reporting process

### Whistleblower hotline

The Archdiocese believes that everyone is entitled to work in an ethical workplace free of harassment, bullying, corruption and illegal activities. The Stopleveler 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.



**Stopleveler can be contacted via the following:**

Telephone: **1300 304 550**

Email: **AOB@stopleveler.com.au**

Web: **[www.bnecatholic.stoplevelerreport.com](http://www.bnecatholic.stoplevelerreport.com)**



## EFFECTIVENESS ASSESSMENT

The Archdiocese completed the Bridge the Gap Assessment in 2019, 2020 and 2021, which focuses on management systems, risk management, procurement and supply chain, human resources and recruitment and customers and stakeholders. These assessments provided the foundation for addressing modern slavery in our supply chain and confirmed the need to focus on these critical components in our procurement framework.

Our 2021 objective was to show improvement against the majority of indicators in the above categories.

The 2021 analysis saw improvement in 13 of the 22 components. Although improvements to date have been modest, greater improvements are a key component of our action plan for 2022 and beyond. This includes:

- inclusion of modern slavery assessments in annual certifications by Executive Directors – implemented in 2021
- annual reporting to the Archbishop through the Archdiocesan Finance Council and agency councils, to include updates on modern slavery – scheduled for April 2022
- alignment of assurance functions across all Archdiocesan agencies to be introduced in 2023.

In addition to the above, each agency regularly reviews and assesses the effectiveness of policies, codes, standards and procedures as part of their risk management framework.



## PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Archdiocese established a Modern Slavery Working Group in 2020 with representatives from all agencies. In 2021, we welcomed additional members leading to a deeper understanding of the potential impact of modern slavery on the organisation. The MSWG meet regularly to discuss the seven criteria set out in the modern slavery legislation, and how the Archdiocese can address these within the agencies' governance and risk management frameworks. Some of the MSWG's actions include:

- implementing a modern slavery policy and guidelines – approved in January 2021
- analysing vendor/supplier spends across all agencies
- implementing contract clauses for major and minor contracts
- planning for the rollout of ACAN e-learning modules
- drafting a supplier code of conduct and planning for its implementation.

In performing the actions described in this statement, consultation occurred with various managers and business unit representatives who have oversight of suppliers. We anticipate expanding consultation as the Archdiocese further embeds the goals outlined in this statement.

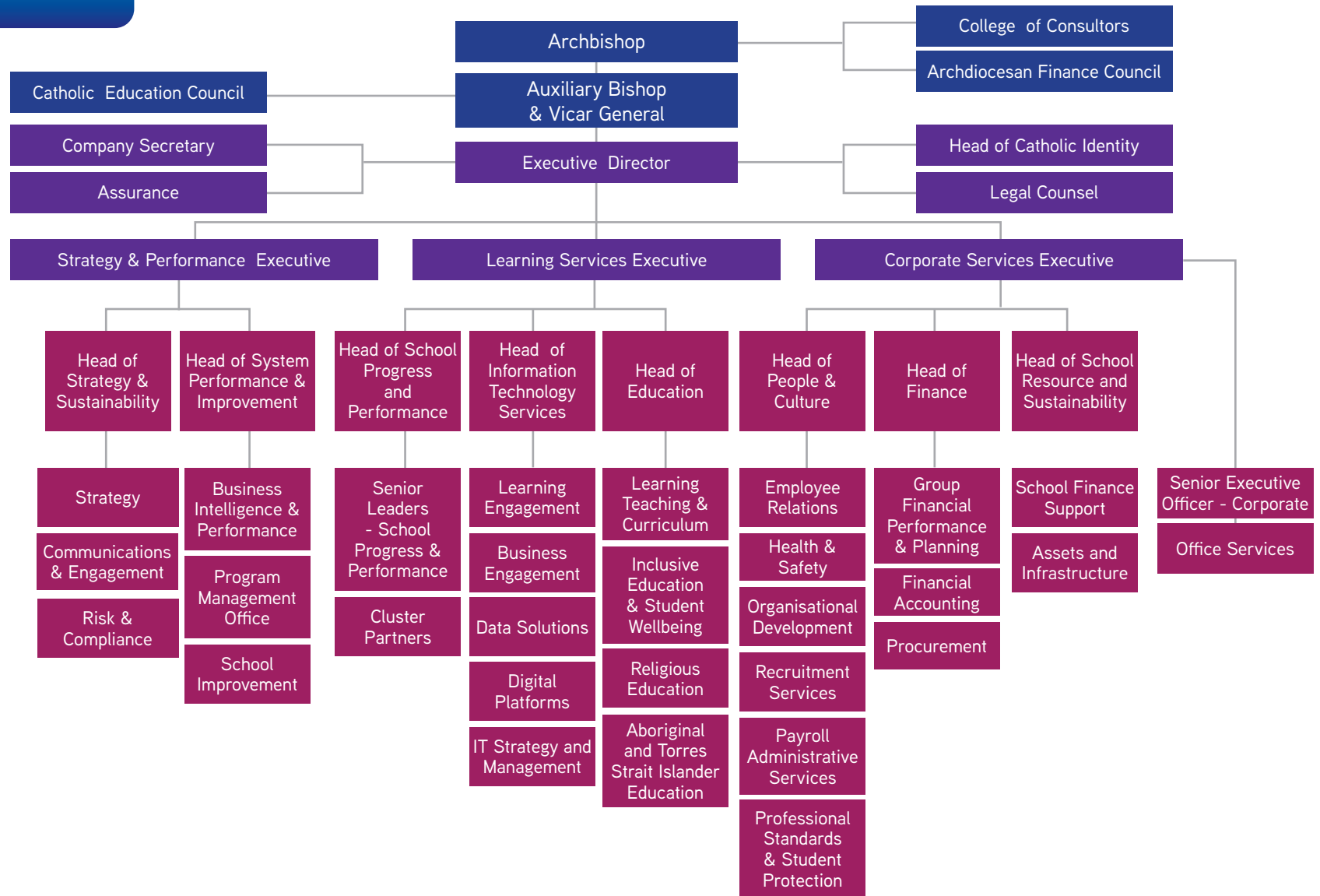
The Archdiocesan Audit and Risk Management Committee will retain oversight of the human rights and modern slavery risks through the Risk Management Framework. The executive leadership of all archdiocesan agencies and offices have also been involved in the development of this statement and endorsed it for approval by the relevant councils and the Archbishop.





# APPENDIX A

Brisbane Catholic Education organisation chart





# REPORTING CRITERIA APPENDICES

## APPENDIX B

Centacare organisation chart

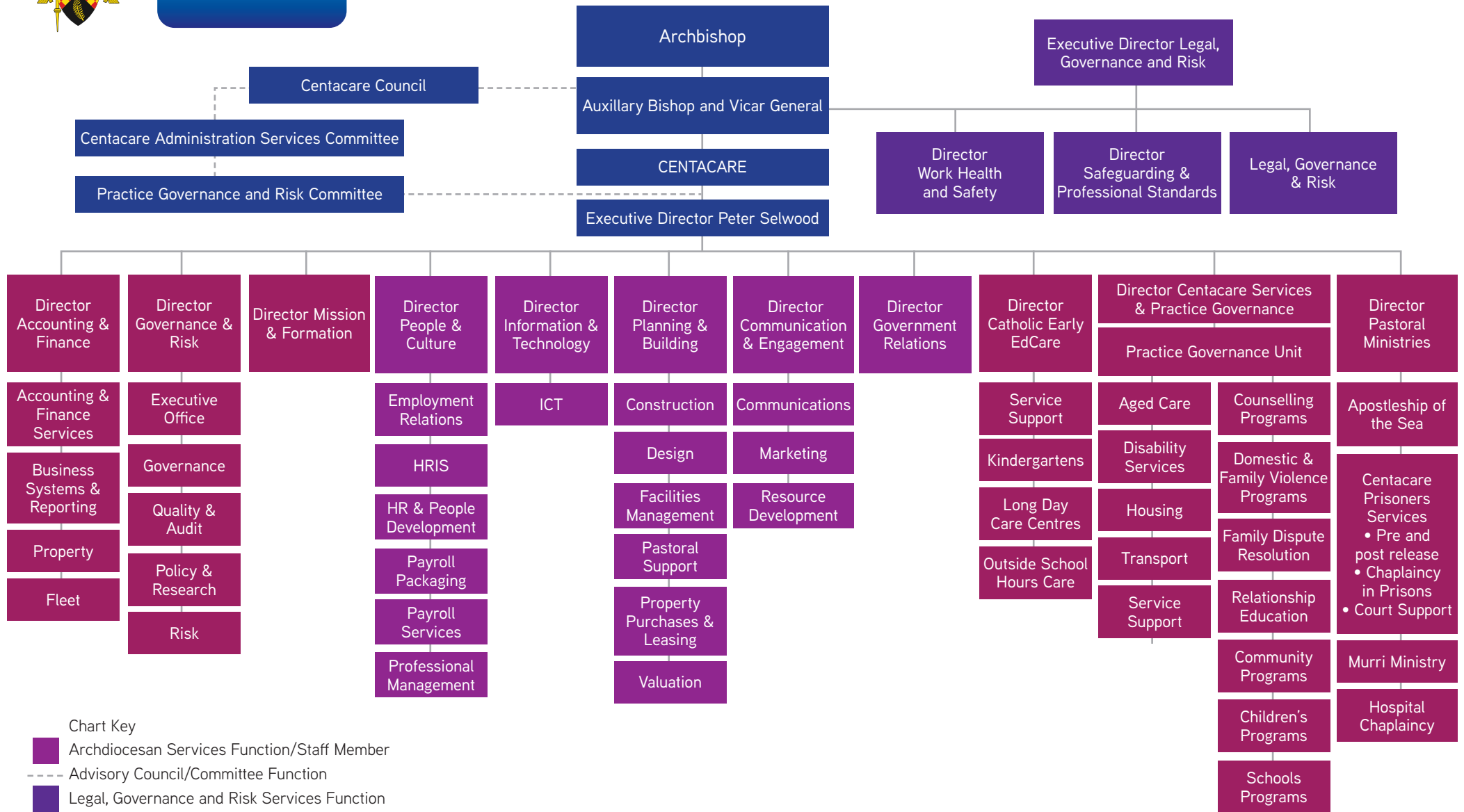


Chart Key

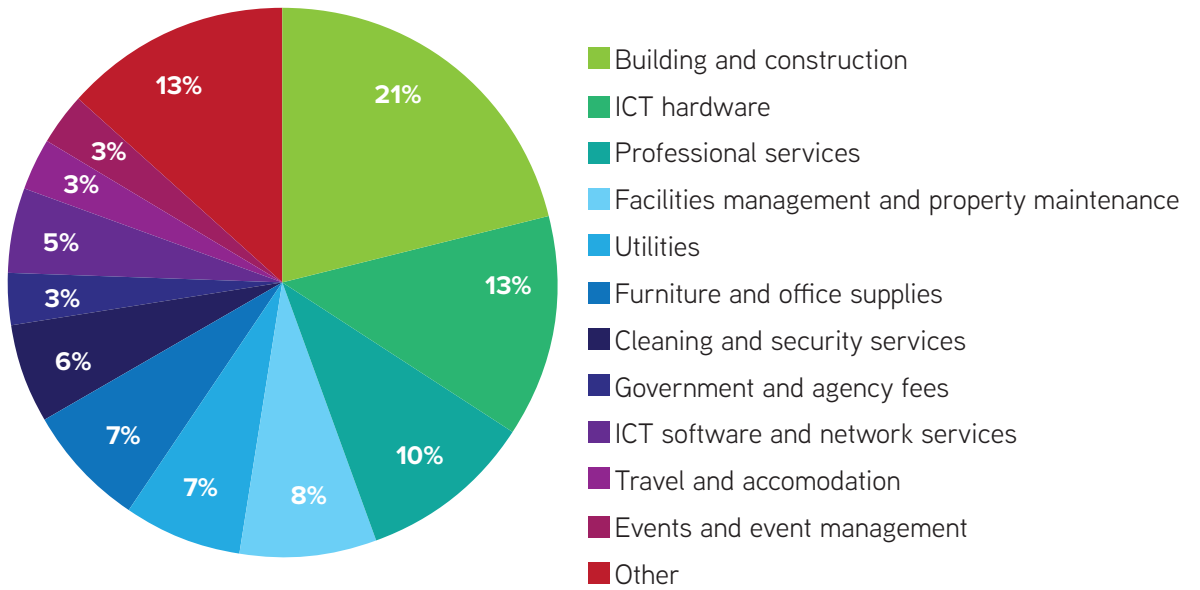
- Archdiocesan Services Function/Staff Member
- Advisory Council/Committee Function
- Legal, Governance and Risk Services Function



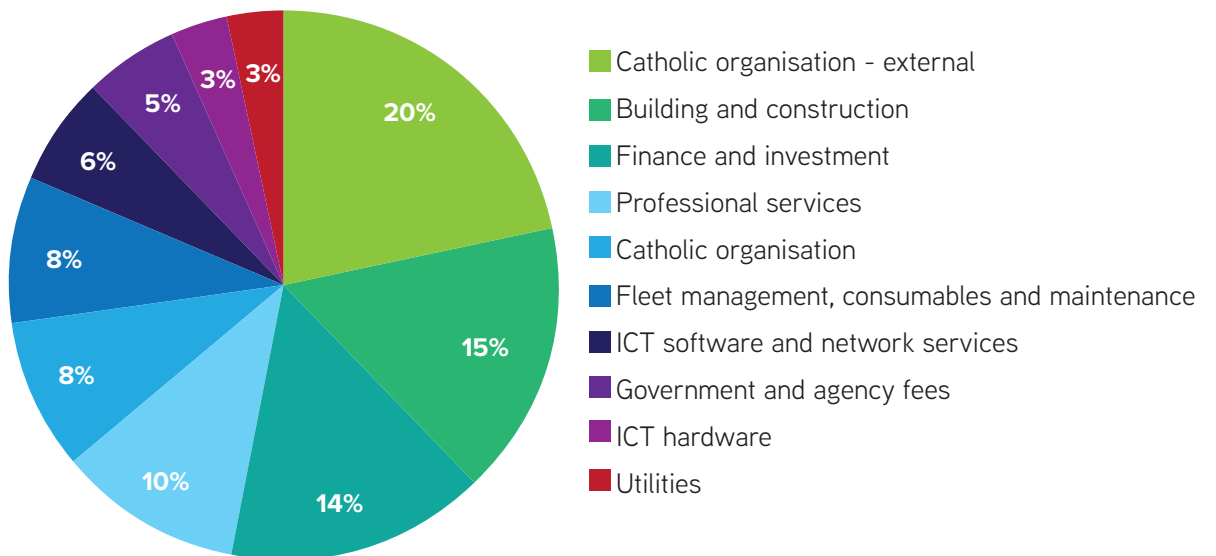
## APPENDIX C

### Entity spend by category

Brisbane Catholic Education

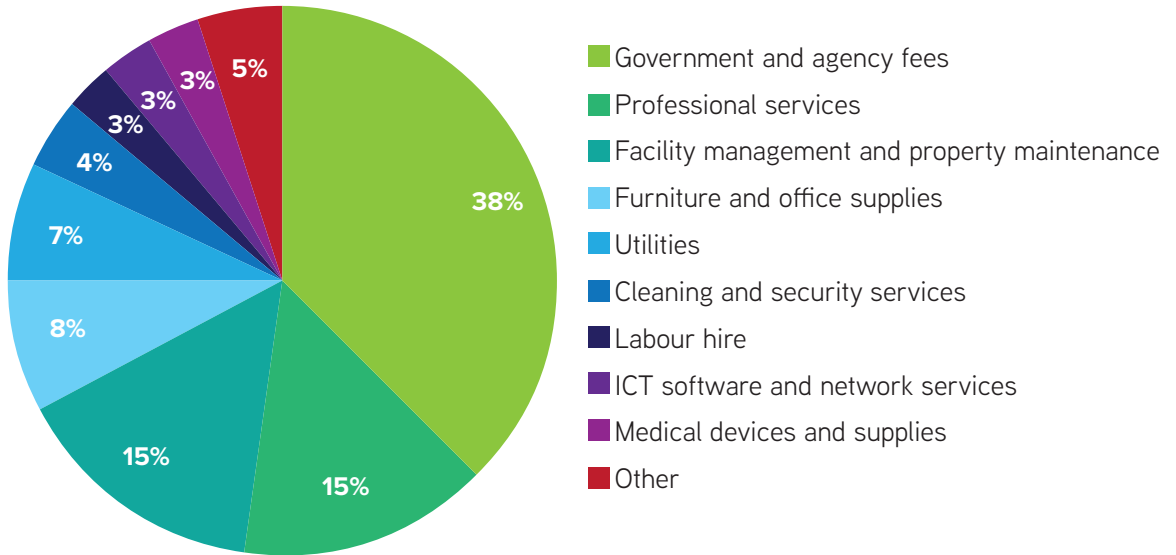


Archdiocesan Services

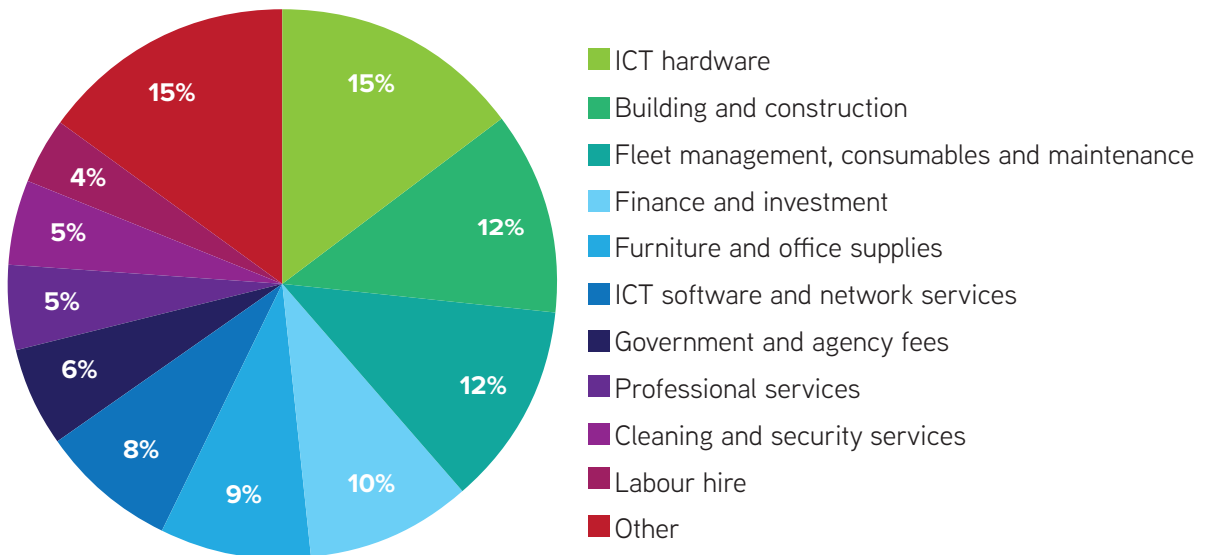




Centacare PBI

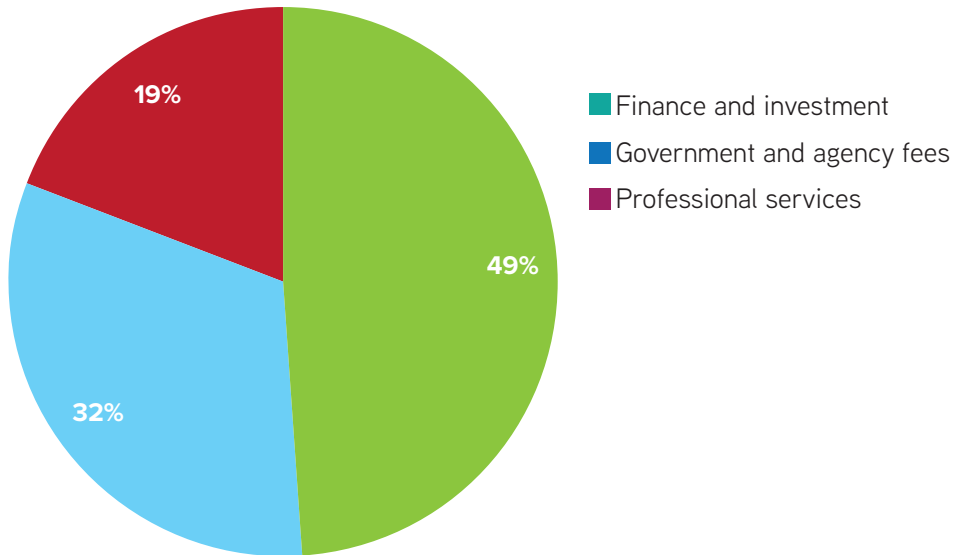


CENTACARE - NON-PBI





Archdiocesan Development Fund





CATHOLIC  
ARCHDIOCESE  
OF SYDNEY

# Modern Slavery Statement

1 January 2021 - 31 December 2021

# Disclosure

This statement has been produced on behalf of the Catholic Archdiocese of Sydney and key entities of the Archdiocese.

Catholic Archdiocese of Sydney ABN 72 823 907 843  
Polding Centre 133 Liverpool St Sydney NSW 2000  
[www.sydneycatholic.org](http://www.sydneycatholic.org)



Michael Diges  
Executive Director,  
Administration & Finance for the  
Catholic Archdiocese of Sydney



# Authorisation by Most Rev Archbishop Anthony Fisher OP

I am pleased to submit the second Modern Slavery Statement for the Catholic Archdiocese of Sydney (CAS), its agencies and Sydney Catholic Schools (SCS). Five years ago, I committed the Church in Sydney to work towards eliminating modern slavery from the supply chains and operations of the Archdiocese and charged the Anti-Slavery Taskforce under the leadership of John McCarthy QC.

This work is a reflection of Pope Francis' leadership who continues to call for prayer and action to end all forms of modern slavery by 2030. The Holy Father recognises that this can only be achieved through a holistic approach to Sustainable Development Goal (SDG) 8.7 and that the roots of modern slavery are entwined with the other SDGs. The Catholic Church is, therefore, working to end modern slavery everywhere its people are engaged in alleviating poverty, advancing labour and migrant rights, providing education and health care, pursuing peace, justice and equality and caring for the Earth.

This Statement will again be included as part of the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. The Compendium is an important record of the collaboration that has taken place across the Church in Australia to provide practical ways that we can work together on this issue. The Compendium is the collective record of the work undertaken so far but most importantly, it shows us how much work there is still to do.



The Archdiocese of Sydney will continue to drive best practice and take action in our agencies to end modern slavery in our generation.

I thank the respective CAS and SCS Modern Slavery Working Groups for the work undertaken over the last 12 months and the decision to consolidate reporting into a joint Modern Slavery Statement. We renew our resolve to work for the day where modern slavery is remembered in the history books.

I approve this statement as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 2nd June 2022.

Yours sincerely in Christ,

A handwritten signature in black ink that reads 'Anthony Fisher, OP'.

Most Rev. Anthony Fisher OP





**Sydney Catholic Schools is committed to supporting its staff, students, their families, broader communities, and most particularly those who are in need or marginalised.**

Our approach to the elimination of modern slavery is part of this ongoing commitment to protect and advocate for the dignity of each and every person who is born in the image and likeness of God.

As an organisation, we work with our staff and other Catholic entities as an active participant in the Australian Catholic Anti-slavery Network (ACAN) to improve procurement practices and raise awareness of modern slavery.

In keeping with Catholic Social Teaching, Sydney Catholic School reaffirms its commitment to the requirements of the Modern Slavery Act 2018 (Cth) by ensuring the elimination of modern slavery from our supply chains through policies, processes and training programs that further educate our community and strengthen our modern slavery response.

This Modern Slavery Statement was approved by the principal governing body of Sydney Catholic Schools as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22nd June 2022.



Tony Farley  
Executive Director,  
Sydney Catholic Schools



## Signatories



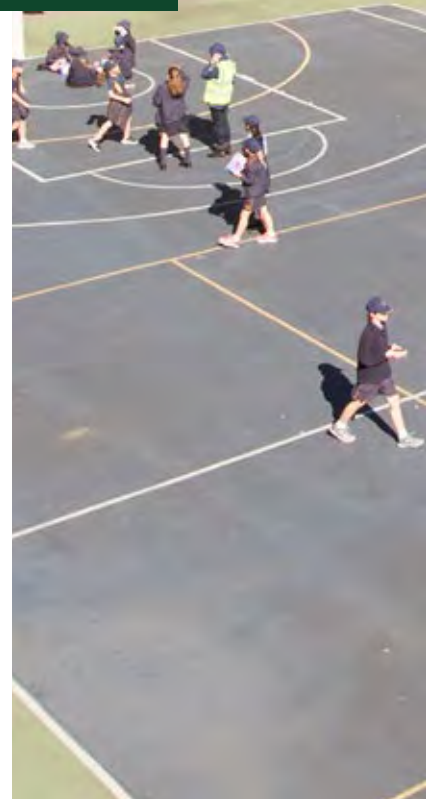
Very Rev Dr Gerald Gleeson  
Chair, Sydney Catholic  
Schools Board



Alastair McGibbon,  
CEO  
CatholicCare Sydney



Richard Haddock AO, KSG  
Chair, CatholicCare  
Sydney Board





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# CRITERIA 1 and 2: About the Catholic Archdiocese of Sydney (CAS)

The Catholic Archdiocese of Sydney, 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 the Polding Centre, 133 Liverpool Street, Sydney, NSW 2000. [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, 640 George St, Sydney, NSW 2000.  
[www.sydcatholicalschools.nsw.edu.au](http://www.sydcatholicalschools.nsw.edu.au)

Catholic Development Fund (CDF)  
ABN: 73866037848, Polding Centre,  
133 Liverpool St, Sydney, NSW 2000.  
[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)

137  
Parishes

CAS  
Agencies

149  
Schools



Serving

**593,000** Catholics spiritually supported by **516** Priests and **1200** Catholic Religious

Employing

**7358** staff

Educating

**71,144** students

## Archdiocesan Entities

Annual Revenue



**\$1.27B**

Capital Works



**\$250M**

Suppliers



**6000**



# 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.

### 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."*

## Sydney Catholic Schools

The Mission of Sydney Catholic Schools 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





*Leaders in a Rosary Campaign at St Mary's Cathedral, praying for an end to the COVID-19 pandemic. Left to right: Augustino Dut, representing the Sudanese Catholic community, Ann Marie Boumerhe and Anitra Yu from City Compass, the Chair of the Anti-Slavery Taskforce for the Archdiocese of Sydney, John McCarthy QC and Sr Mary Julian Ekman RSM. Photo: Giovanni Portelli.*

# Governance Framework

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## Catholic Archdiocese of Sydney

The Catholic Archdiocese of Sydney is an unincorporated association and registered charity, under the supervision of Archbishop Anthony Fisher OP. **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 includes a number of divisions or operations known internally at CAS 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 Sydney Catholic Schools with 149 systemic schools overseen by Sydney Catholic Schools Limited as Trustee for the Sydney Catholic Schools Trust.

## Sydney Catholic Schools

Sydney Catholic Schools is governed by the Sydney Catholic Schools Board of Directors (SCS Board). The Board is responsible for ensuring SCS is undertaking its activities for the purpose of:

*The advancement of education through the operation of an effective system of Catholic education at all levels which contributes to the total educational needs of young people in Catholic schools, in accordance with the principles of the Catholic Church.*

The SCS Board is supported by the Executive Director, the Executive Leadership team and Board Advisory Committees. SCS Ltd is the corporate Trustee of the SCS Trust and the approved authority to conduct and operate Catholic systemic schools in the Archdiocese of Sydney. The SCS Board governs the corporate Trustee and is responsible for providing leadership and strategic guidance to SCS and for corporate governance.

The SCS Audit and Risk Committee assists the SCS Board to exercise due care, diligence and skill through the revision of risk management and compliance frameworks and activities and making recommendations to the SCS Board on those matters.

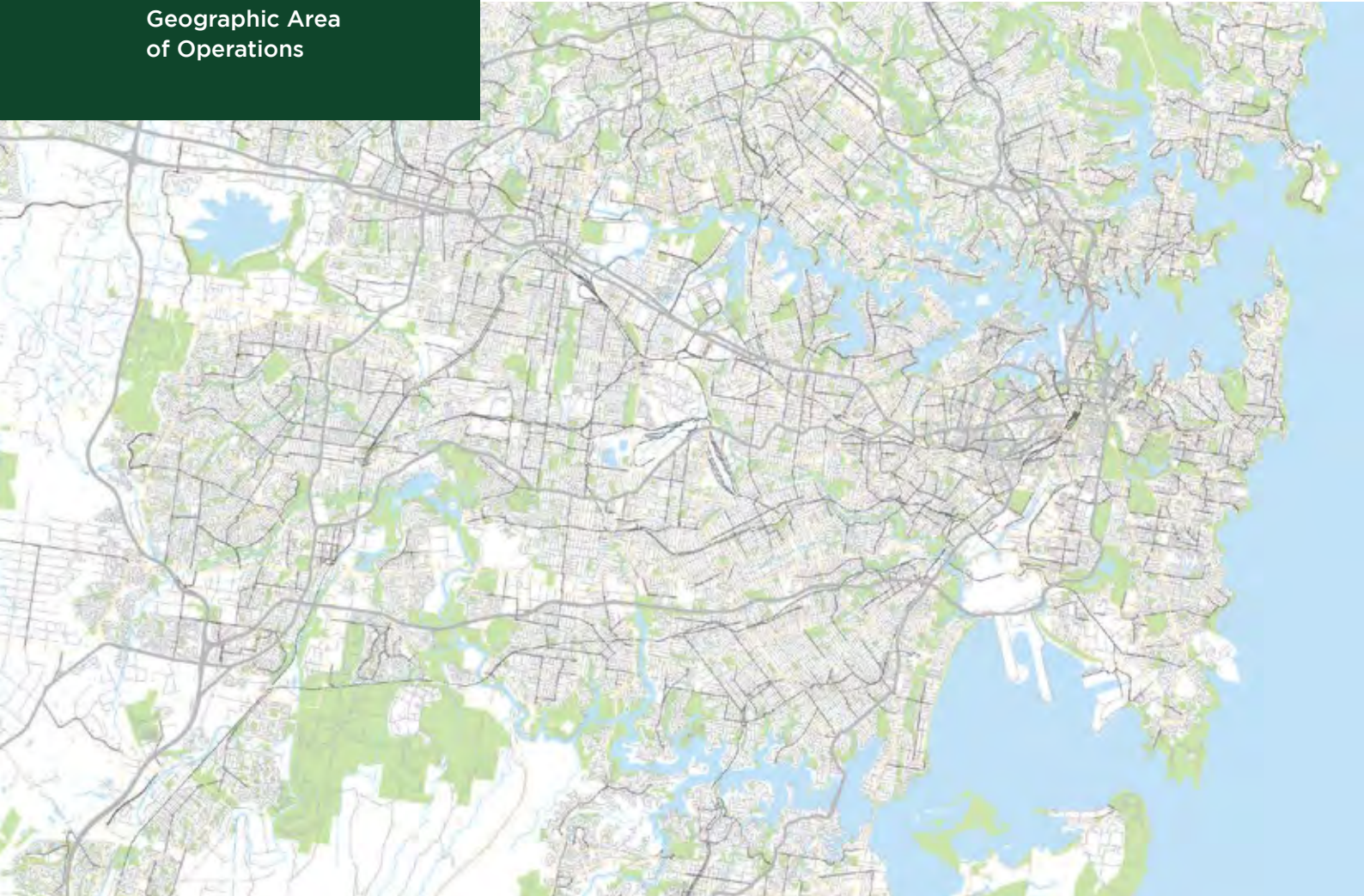
## The Sydney Archdiocesan Anti-Slavery Taskforce

Archbishop Fisher established the Sydney Archdiocesan Anti-Slavery Taskforce (Taskforce) in May 2017 to enact his vision for the Archdiocese of Sydney to lead the Australian Catholic Church response to end modern slavery.

The Taskforce includes three modern slavery specialist staff, who coordinate the ACAN modern slavery risk management program, in response to the Act. The Taskforce specialist staff also manage Domus 8.7 providing independent advice and service to people impacted by modern slavery. (Refer to Criteria 4).



## 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

SCS is a not for profit organisation that provides educational services to over 70,000 students across 149 schools within Metropolitan Sydney. SCS staff and school staff, including principals, are responsible for maintaining schools and each school's ability to educate students.

SCS revenue was \$1,089.5M, the main expenditure being \$787.8M on the salaries of over 10,000 employees. Throughout the reporting period SCS engaged with over 5,000 suppliers. Key categories of expenditure are:

- ICT hardware
- Building and construction
- Facilities management and property maintenance
- Cleaning and security services
- Uniforms
- Transport services
- Food and catering services
- Furniture and office supplies
- Professional services



## CatholicCare Sydney

CatholicCare is the social services agency of CAS. CatholicCare has a team of caring professionals who lead and assist the Sydney Catholic community in works of love and charity, supporting those who are vulnerable or in need. CatholicCare has operated continuously since 1941, delivering a wide range of social services to the community and those in need.

### CatholicCare Profile:

- Annual revenue \$48M, the vast majority of which is expended on employees (80.1%), facilities management and property maintenance, and ICT
- Operating from 13 locations across Sydney
- CatholicCare Board comprises of seven independent directors
- CatholicCare has approximately 195 active suppliers

### Core Service Areas (with % of total employees)

- Families and children, including counselling and clinical care, relationships, parenting (41%)
- Aged home care support (24%)
- Disability, including Centacare Industries and NDIS (15%)
- Pastoral care (7%)
- Administration and support services (13%)

CatholicCare operates both CCareline (131819) and Carer's Gateway platforms. CatholicCare also holds a non-participating 100% share in Access Programs Australia Ltd., (ABN 81068235398), an independent employee counselling service, and a 50% share in Family Spirit Ltd., (ABN 35623563422), an adoption and foster care agency in which the other 50% is held by Marist 360.

## 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 \$24.4M and expenditure of approximately \$2M 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
- Meeting the costs of the Parish Support Team and providing other forms of assistance
- 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.

## Summary of 2021 Modern Slavery Risk Management Activities

In 2021, CAS and SCS implemented a number of initiatives and reached important milestones. These are summarised below and will be discussed in more detail in the body of this Statement:

1. Active participation in the ACAN modern slavery risk management program and collaboration with other Catholic dioceses, social services and school systems
2. Roll out of the four ACAN e-learning modules to key stakeholders
3. Commenced on-boarding suppliers to Sedex via ACAN's group membership
4. New members appointed to both Modern Slavery Working Groups
5. SCS Board reviewed and updated **Anti-Modern Slavery Policy**
6. SCS introduced modern slavery tendering documents:
  - a. Catholic Archdiocese of Sydney's Guide for Business Practice and
  - b. Sydney Catholic Schools Suppliers Code of Practice

Plans for 2022 and beyond:

1. Conduct ACAN action planning workshops
2. Commence joint Modern Slavery Working Group (MSWG) meetings
3. Create a process to embed Sedex as part of procurement practices
4. Initiate supplier engagement strategy specific to labour related services
5. Enhance reporting capabilities and develop Key Performance Indicators (KPIs)
6. Deploy ACAN e-learning modules onto the SCS Learning Management System (LMS)



**Peter Bokeyar**  
General Manager at Catholic Development Fund, Catholic Archdiocese of Sydney

# CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

## Catholic Archdiocese of Sydney

### 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. The supplier categories assessed as high risk:

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

### CAS Supplier Analysis

	Total	High Risk	Low Risk
<b>CAS Spend</b>	\$45.3M	\$7.2M	\$38.1M
<b>CAS Number of Suppliers</b>	290	18	272

### CAS High Risk Suppliers

- 6 ICT
- 6 Property maintenance
- 6 Cleaning and security services

In comparison to 2020, the reduction in the number of suppliers in high-risk categories and the reduction in number of high-risk procurement categories can be ascribed to the conclusion of significant restoration work on the Archdiocese’s heritage buildings, for example slate roofing on St. Marys Cathedral.

COVID-19 lock down significantly impacted procurement volume, where limitations on staff on site meant delays and postponement of expenses. The categories of risk were consistent between reporting years 2020 and 2021. CAS continues to focus on suppliers in high spend and high risk in operations and supply chains.

### CAS Workforce

There are approximately 300 staff employed by CAS, in addition to 516 Priests and 1200 Catholic Religious, working across 137 parishes.





# CRITERIA 3: Modern Slavery Risks in Operations and Supply Chains

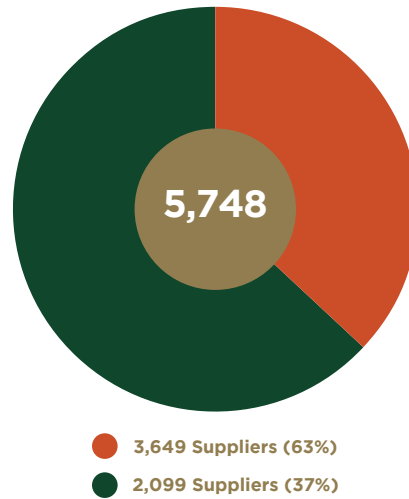
## Sydney Catholic Schools

### SCS Supply Chain Risk

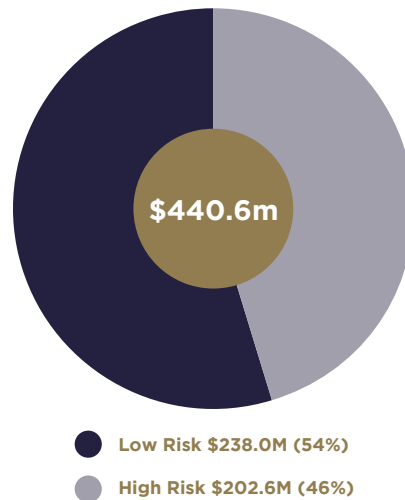
Modern slavery risks associated with SCS have been identified in multiple spend categories using the ACAN Category Risk Taxonomy across 23 categories. In comparison to 2020, the reduction in the total number of suppliers is primarily attributed to the consolidation of suppliers post the implementation of a single operating platform across the organisation.

	Total	High Risk	Low Risk
<b>SCS Spend</b>	\$440.6M	\$202.6M	\$238.0M
<b>SCS Number of Suppliers</b>	5,748	2,099	3,649

### Number of Suppliers



### Supplier Spend

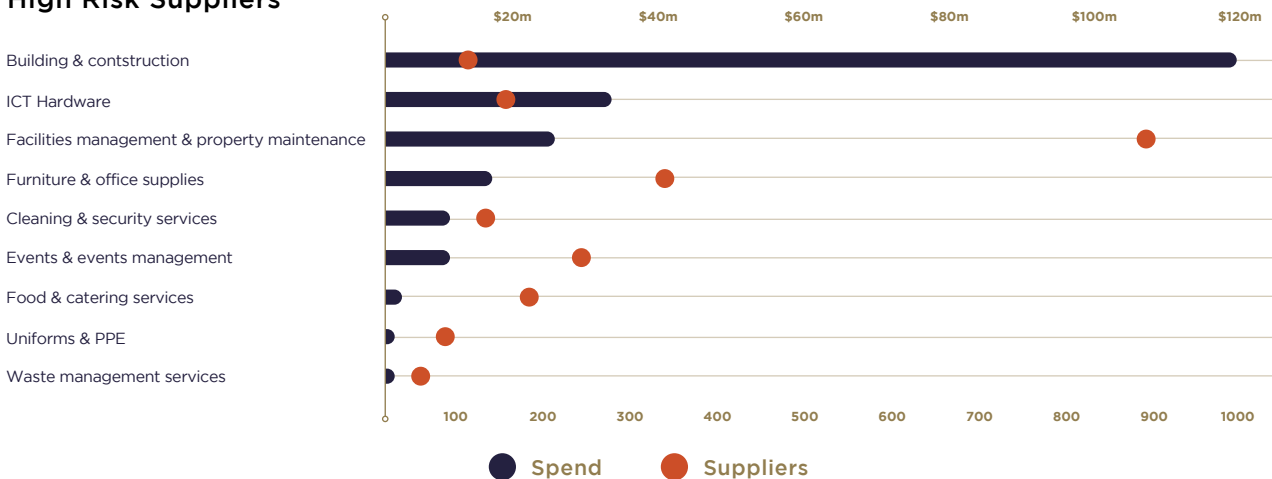


### High Risk Categories

SCS expenditure for calendar year 2021 was \$440.6M, across 5,748 suppliers. The suppliers assessed as high risk represent a smaller percentage of the total number of suppliers, however, the average expenditure was significantly higher. The charts illustrate the split of spend and number of high versus low risk suppliers.

Construction related spend presents the greatest spend risk for SCS at 57% (\$117.0M) of total high risk spend. ICT expenditure accounted for 15% (\$31.1M) of the total high risk spend categories. Facilities management and property maintenance category, represented 41% of all high risk suppliers.

### High Risk Suppliers



## Workforce

SCS maintains standards of conduct based on Catholic Social Teaching for all employees and volunteers, and provides a safe work environment for everyone visiting or working on SCS premises. However, SCS recognises that there are areas with heightened risks of modern slavery such as security, cleaning and maintenance. These areas are described under supply chain risks because they are outsourced functions.

The SCS workforce is managed through multiple Enterprise Agreements in accordance with workplace laws and freedom of association. The risk of modern slavery in SCS's directly employed workforce is minimal. This is coupled with recruitment practices that ensure a fair and transparent merit-based process of appointment, ensuring appropriate controls are in place during the hiring process.

## Students

SCS has a duty of care to all students in its schools. Although, not typically a part of risks associated with operations or supply chains, the impacts of modern slavery on children, such as forced marriages or debt bondage, have been considered by SCS. Training on how to identify and escalate concerns are addressed in SCS compulsory induction training that all staff are required to complete.

## COVID-19 Response

A major responsibility for both CAS and SCS during the pandemic was to ensure the health and safety of staff and everyone in the community associated with CAS and SCS. The COVID-19 pandemic presented an increased risk to worker safety and health. Staff wellbeing was at the forefront of all decisions relating to working arrangements and office management.

COVID-19 impacted global supply chains and increased modern slavery risk particularly for cleaning and personal protective equipment (PPE).

The risk of modern slavery in cleaning was addressed by SCS through the SCS preferred supplier register. To be listed on the SCS preferred supplier register, suppliers undergo a vetting process. The cleaning tender pricing is evaluated against **Cleaning Services Award 2020** to ensure SCS is not contributing to underpayment of wages or labour exploitation.

The additional cleaning requirements at schools was addressed with the engagement of suppliers that had the capacity and infrastructure to complete the additional cleans without resorting to unsafe practices. However, due diligence of those cleaning suppliers has yet to be undertaken.

The increased need of PPE was met through the SCS's strategic supply partners and the NSW Department of Education. The Department provided COVID-19 related supplies such as masks to schools.



# CRITERIA 4: Actions taken to assess and address risk

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In 2021, CAS and SCS implemented several initiatives as part of the ACAN modern slavery risk management program. Key personnel include the Modern Slavery Liaison Officer (MSLO) whose role is to lead the MSWG and coordinate modern slavery risk management initiatives and liaise with the Taskforce and ACAN.

The essential components of the 2021 ACAN program were Sedex and e-learning. (Refer to Appendix B timeline for other key activities).

## Supplier Engagement

Both CAS and SCS 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.

CAS and SCS intend that Sedex will be utilised to:

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

Both CAS and SCS used the ACAN Risk taxonomy to select 50 high risk and high volume suppliers for on-boarding to the Sedex. Once invited to join the platform, suppliers are required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

CAS then prioritises which suppliers are approached, seeking additional clarification and assessment in regard to undertaking additional due diligence work. CAS has not yet reached the step of conducting due diligence, outside desktop research.

Both CAS and SCS have a policy of using standard contracts for all third party engagements, except under exceptional circumstances. Standard contracts include terms and conditions relating to modern slavery and more comprehensive clauses for high risk contracts.

Schools have autonomy to engage suppliers, however for certain categories the SCS procurement team engages with suppliers on behalf of the school network. SCS centralises procurement in categories such as ICT, waste management, utilities, building and construction.

## E-learning

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program. The four modules are delivered online and the Learning Management System provides transparency of reporting on staff participation. The MSWGs determine which staff should be required to complete the modules, based on roles and responsibilities.

In 2022, SCS plans to incorporate the ACAN e-learning into the internal Learning Management System (SALT) to provide greater oversight and accountability.



The ACAN modern slavery modules are summarised as follows:



### Module 1: Modern Slavery 101 (MS101)

The module provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. This module shares insights about slavery in all stages of the supply chain relating to the production of goods, from raw materials, to the manufacturing, and various stages of transport and logistics. Modern slavery risks in the labour services industry, particularly the sectors of cleaning, security and hospitality are also explored.



### Module 2: Business Relevance

The module provides a business perspective on modern slavery risks. This module explains the responsibilities of businesses to respect human rights through enhanced corporate due diligence, and the key economic, legislative and stakeholder drivers to manage risks. A review of relevant modern slavery case studies and key reporting requirements of the Act are covered.



### Module 3: Implementing a Modern Slavery Risk Management Program

The module provides a comprehensive overview on how to develop and implement a modern slavery risk management program through:

- Commitment – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities
- Business State of Play – understanding gaps, developing a modern slavery action plan and monitoring progress Supplier Risk – prioritising suppliers according to risk and spend and conducting supplier due diligence
- Engage, Educate, Respond – ensuring staff, contractors and suppliers are trained and educated on modern slavery risks and that mechanisms to mitigate risks are in place



### Module 4: Grievance Mechanisms and Remedy

The 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 Modern Slavery Act 2018 Guidance for Reporting Entities

The module also includes extracts from the UN Global Compact Network Australia's publication on Implementing Effective Modern Slavery Grievance Mechanisms, and case studies about initiatives, such as the Cleaning Accountability Framework (CAF).



# CRITERIA 4: Actions taken to assess and address risk

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## Remediation

Both CAS and SCS 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 CAS or SCS 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, Archbishop Fisher established **Domus 8.7**, an agency of CAS, 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.

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, CAS and SCS 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. CAS and SCS intend that any grievances in relation to modern slavery are mediated through Domus 8.7. Where CAS and SCS are directly linked to modern slavery by a business relationship, CAS and SCS are committed to working with the entity that caused the harm to ensure remediation and prevention of recurrence.

Both CAS and SCS 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.

CAS and SCS did not find any cases of modern slavery in operations and supply chains in 2021. The absence of any cases was due to the risk assessment remaining focussed at a high level, on industry sector or commodity inherent risk, and not yet drilling down into specific risk of a particular supplier.

SCS expanded the whistle-blower service **SCS Stoptline** to include modern slavery. This service is open to all employees and labour hire workers such as cleaners. The Disclosure Officer within Sydney Catholic Schools is responsible for ensuring that all serious complaints are handled appropriately and is the contact point for both Stoptline and the Sydney Catholic Schools Board.

When suspicions of modern slavery practices are notified through the whistle-blower service or other channels, CAS or SCS 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.

CAS 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 CAS to ensure victim-centred remediation processes are implemented to the satisfaction of CAS.

Furthermore, in October 2021, the Taskforce successfully concluded the 'Building Links' project which was funded by a Department of Home Affairs modern slavery grant. 'Building Links' delivered modern slavery awareness-raising tools specific to the construction industry, and a platform to access independent advice, support via a safe conversations App.



## Case Studies

Providing a practical response to people impacted by modern slavery is an important part of remedy. Specialists in the Taskforce receive referrals from external organisations and parish networks to provide support to people potentially impacted by modern slavery. The Taskforce triaged a number of cases for people presenting as victims in 2021.

Several migrant workers also accessed direct support from CAS because the target migrant community used the 'Building Links' worker voice mechanism. This reduced the workers vulnerability to further exploitation. The workers received a needs assessment, and as a consequence, were able to access services and migration legal advice. Several migrant workers in the construction industry were also able to make informed decisions about their choices for support, such as for medical care due to severe workplace injuries.

'Building Links' provided direct funding and material support to vulnerable migrant workers, such as short term accommodation, food vouchers, employment rights and migration advice. Some workers received case management support and were placed into suitable paid work on construction sites with ethical businesses. Financial support was also provided for training and certification required for the construction sector.

## Enabling Survivors to Become Agents of Change

Both CAS and SCS are committed to supporting survivors of modern slavery to contribute to the development of policies, procedures and programs to assist them and to prevent modern slavery in the future. CAS does this by assisting survivors to assess how to participate meaningfully in events, coordinating participation logistics, providing relevant event documentation, ensuring travel costs and speaker fees/compensation are provided to survivor participants.

In 2021 CAS supported survivor, Moe Turaga, to participate in a national conference funded by the Commonwealth Government, and survivor Ima Matul, based in the United States, to participate in an Australian webinar reviewing survivor responses. Survivor voice and participation are critical to understanding how to deliver remedy.



Moe Turaga

# Action Plan

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## CAS 2021 – 2023 Action Plan

CAS is in a strong strategic position, as many foundational activities and actions have been implemented. The next steps in the CAS Action Plan are to further address modern slavery risks and to provide a remedy pathway for modern slavery victims.

The CAS Action Plan is structured around the same five risk categories analysed as part of the ACAN Gap Analysis, with the Action Plan proposing specific initiatives across the categories, as well as annual recurrent actions. For the year 2021, CAS has initiated the actions to commence in that year. The actions initiated may vary slightly in commencement date, as CAS progresses through the Action Plan and Road Map.

## SCS 2021 – 2023 Action Plan

The expanded SCS MSWG will provide additional resources across directorates to drive implementation of the ACAN modern slavery risk management program and embed mitigation initiatives in SCS procurement practices.

During 2021, the SCS **Anti-Modern Slavery Policy** was updated. This policy applies to all SCS staff and suppliers, including their employees, agents, volunteers, contractors, consultants and business partners.



## Gap Analysis results:

CAS and SCS ACTION PLAN 2021 - 2023	Timeframe
<b>Management Systems</b>	
CAS continued to develop policies, principles and processes, and integrate these into management tools.	2021
SCS appointed a MLSO to liaise with ACAN and appointed new members to an expanded MSWG.	2021
CAS will work to integrate anti-slavery into governance structure and define metrics to measure, manage, and report.	2022
SCS MSWG to enhance reporting capabilities and develop KPIs.	2022
<b>Risk Management</b>	
CAS continued working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2021
SCS to update the Risk Register to include modern slavery related risks. These risks and associated mitigation plans to be presented to the Audit and Risk Committee (ARC) and the SCS Board Bi-Annually.	2022
CAS will develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022 - 2023
<b>Procurement and Supply Chains</b>	
CAS informed suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021
SCS Modern Slavery Policy approved, tender documents finalised and contracts updated to include modern slavery clauses. Cleaning tender pricing evaluated against Cleaning Services Award 2020 to reduce the risk of SCS causing or contributing to underpayments.	2021
SCS supplier engagement via ACAN e-learning and on-boarding to SEDEX, monitor and report on Sedex SAQ results. SCS to expand due diligence process specific to labour services.	2022
CAS will develop protocols for reviewing suppliers and for following up on adverse findings. CAS is also working on supplier engagement initiatives whereby CAS will actively liaise with high risk suppliers via Sedex.	2023
<b>Human Resources and Recruitment</b>	
Activate all five ACAN e-learning modules and make available to CAS staff, boards and senior management. CAS updated hiring policies to ensure consistency with modern slavery initiatives.	2021
83 SCS staff completed the ACAN e-learning modules MS 101 and Business Relevance. The SCS Property team participated in the ACAN 'Building Links' webinars.	2021
SCS to expand the MSWG to include representation from all directorates and ACAN e-learning modules incorporated into SCS Learning Management System for all staff.	2022
<b>Customers and Stakeholders</b>	
SCS expanded the <b>Whistleblower hotline</b> and policy. Commenced supplier engagement, SCS suppliers invited to participate in the ACAN Webinars and asked to join SEDEX.	2021
Continued collaboration with ACAN, CAS, Catholic Schools NSW and Catholic school systems.	2022

# CRITERIA 5: Effectiveness

## Modern Slavery Gap Analysis

Both CAS and SCS conducted an operational gap analysis in 2019, 2020 and again at the end of 2021 to identify internal capacity to implement a modern slavery risk management program across the five key areas of focus.

### Gap Analysis results:

Indicator	2019		2020		2021		Progress
	CAS	SCS	CAS	SCS	CAS	SCS	
<b>Management Systems</b>							
Governance	Work has not commenced	Appropriate practices are in place	Basic steps have been taken	Appropriate practices are in place	Progress is well underway	Appropriate practices are in place	🔄
Commitment	Basic steps have been taken	Progress is well underway	Progress is well underway	Basic steps have been taken	Progress is well underway	Basic steps have been taken	🔄
Business Systems	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Basic steps have been taken	🔄
Action	Basic steps have been taken	Progress is well underway	Basic steps have been taken	Basic steps have been taken	Appropriate practices are in place	Basic steps have been taken	🔄🔄
Monitor and Report	Work has not commenced	Work has not commenced	Basic steps have been taken	Work has not commenced	Appropriate practices are in place	Work has not commenced	🔄🔄
<b>Risk Management</b>							
Risk Framework	Work has not commenced	Progress is well underway	Progress is well underway	Progress is well underway	Progress is well underway	Progress is well underway	🔄
Operational Risk	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Appropriate practices are in place	Progress is well underway	🔄
Identifying External Risks	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Progress is well underway	Progress is well underway	🔄
Monitoring and Reporting Risk	Work has not commenced	Work has not commenced	Basic steps have been taken	Work has not commenced	Basic steps have been taken	Work has not commenced	🔄
<b>Human Resources and Recruitment</b>							
Awareness	Work has not commenced	Progress is well underway	Appropriate practices are in place	Progress is well underway	Appropriate practices are in place	Progress is well underway	🔄
Policies and Systems	Work has not commenced	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	🔄
Training	Work has not commenced	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Progress is well underway	🔄
Labour Hire and Outsourcing	Work has not commenced	Basic steps have been taken	Work has not commenced	Basic steps have been taken	Progress is well underway	Progress is well underway	🔄🔄
<b>Procurement and Supply Chain</b>							
Policies and Procedures	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Basic steps have been taken	Progress is well underway	🔄
Contract Management	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Progress is well underway	Progress is well underway	🔄
Screening and Traceability	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	🔄
Supplier Engagement	Basic steps have been taken	Appropriate practices are in place	Basic steps have been taken	Appropriate practices are in place	Appropriate practices are in place	Appropriate practices are in place	🔄🔄
Monitoring and Corrective Action	Work has not commenced	Basic steps have been taken	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	🔄
<b>Customers and Stakeholders</b>							
Customer Attitude	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Progress is well underway	🔄
Information Provision	Work has not commenced	Basic steps have been taken	Basic steps have been taken	Basic steps have been taken	Appropriate practices are in place	Progress is well underway	🔄🔄
Feedback Mechanisms	Work has not commenced	Work has not commenced	Progress is well underway	Progress is well underway	Progress is well underway	Progress is well underway	🔄
Worker Voice	Work has not commenced	Work has not commenced	Basic steps have been taken	Work has not commenced	Appropriate practices are in place	Work has not commenced	🔄🔄

Work has not commenced  
 Basic steps have been taken

Progress is well underway  
 Appropriate practices are in place



MADISON CATHOLIC HIGH SCHOOL  
FOUNDED 1953

# CAS and SCS 2020/2021 Gap Analysis

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## Management Systems

CAS and SCS continued to implement key elements of the ACAN Modern Slavery Risk Management Program and ensuring that previous actions were integrated into existing management systems. Progress should be simpler to monitor and report in the next Gap Analysis.

## Risk Management

In 2021 risk management improved in relation to training and information processing. However as awareness of modern slavery risk matures, new questions emerge about the way risk is assessed and managed. SCS ability to monitor and report will assist in developing the necessary data to establish better risk identification and mitigation efforts.

## Human Resources and Recruitment

Deployment of an additional three online learning modules via ACAN's e-learning (LMS) system, resulted in improved staff awareness for both CAS and SCS. Discussions on how CAS hiring and on-boarding processes can reference modern slavery risk were also undertaken. For SCS, reviewing the outsourcing and labour hire process improved the rating for this category in the Gap Analysis.

## Procurement and Supply Chains

Both CAS and SCS contracts were updated to include modern slavery. CAS and SCS worked to on-board selected suppliers, based on spend and risk, onto the Sedex Platform. CAS commenced the important work of understanding and prioritising actions when dealing with modern slavery risk. Furthermore, for CAS, communication with suppliers was an important step prior to inviting suppliers to join Sedex.

For both CAS and SCS, Sedex will now form an important part of efforts to monitor and track progress.

Through membership of Sedex, and subsequent improvement of supplier oversight and risk identification, CAS and SCS should see improvements in screening and traceability, supplier engagement and monitoring as well as corrective actions. This will enable a maturing of the perception of risk in supply chains, and test the resilience of the modern slavery contract clauses.

## Customers and Stakeholders

CAS's stakeholders showed the most improvement in the worker voice and information provision category. Information in the form of e-newsletters, webinars and online videos were distributed during 2021. For SCS, there was improvement in customer attitude and information provision. For the future, worker voice will be addressed through SCS participation in Domus 8.7.

## CAS Overall:

Over the 22 areas measured in the ACAN Gap Analysis:

- Progress in 6 areas
- Improvement in 7 areas
- Maintaining the status quo in 9 areas
- Regressing in 0 areas

## SCS Overall:

Over the 22 areas measured in the ACAN Gap Analysis:

- Progress in 6 areas
- Maintaining the status quo in 16 areas
- Regressing in 0 areas

For SCS, the Gap Analysis demonstrated the need have systems to measure improvement, to enable monitoring and improve reporting capabilities.



## Future measures of effectiveness

In the future, CAS and SCS will use its SEDEX membership to improve visibility and reporting into supply chains. CAS and SCS expect that SEDEX membership, as well as additional efforts to build anti-slavery capacity with suppliers and staff, will eliminate any risk that CAS or SCS is directly linked to modern slavery, dramatically lowering the risk of directly causing modern slavery, and diminishing the risk of indirectly causing modern slavery.

As part of CAS and SCS Modern Slavery Action Plan for 2022 and beyond, a key priority is the enhancement of reporting capabilities, metrics and development of Key Performance Indicators (KPIs). KPIs will continue to be developed in collaboration with respective MSWGs.

KPIs already formulated:

- Number of employees to complete modern slavery training
- Number of suppliers to join SEDEX

KPIs under consideration in 2022:

- Number of active contracts to include modern slavery clauses
- Number of modern slavery cases identified and remediated

To support the development of KPIs, CAS developed a set of baseline metrics to begin assessing the effectiveness of CAS and SCS initiatives to address the five focus areas of the Gap Analysis.

## CAS and SCS baseline metrics:

	Activity	2020	2021
<b>Staff</b>	E-learning modules commenced	58	596
<b>MSWG</b>	Number of meetings	3	4
<b>Suppliers</b>	Total number of suppliers (CAS)	100	100
	Total number of suppliers (SCS)	8000	5730
	Total number of suppliers (CatholicCare)	195	200
	E-learning modules completed	0	37
	Contracts that include MS clause	0	66
	Engaged on MS	48	150
	Invited to join Sedex	0	163
	Joined Sedex	0	21
	Sedex SAQ results shared	0	0
	Social audits	0	0
	Corrective actions	0	0
	Worker voice / grievance mechanism deployed	0	11
	Modern slavery cases identified (CAS and SCS)	0	0
	Modern slavery cases remediated (CAS and SCS)	0	0
<b>Domus 8.7</b>	Referrals for advice and assistance	6	3
	Worker's case remediated	0	1



## CRITERIA 6: Process of consultation with key Archdiocesan entities

The CAS Modern Slavery Working Group (Refer to Appendix B for meeting dates) is coordinated by the Taskforce and 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

### Related entities:

The Taskforce engaged with the following organisations in relation to compliance activities of the Church in response to the Modern Slavery Act:

- Australian Catholic Anti-slavery Network (ACAN) participating entities
- Australian Catholic Bishops Conference
- Australian Catholic Migrant and Refugee Office
- National Catholic Education Commission
- Catholic Social Services Australia
- Catholic Healthcare Australia
- Catholic Employment Relations
- Catholic Mission
- Caritas Australia
- Marist Schools Australia
- Good Samaritan Education
- Jesuit Education Australia
- Dioceses of Wagga Wagga, Armidale, Broken Bay, Sale, Cairns, Townsville and Toowoomba





# CRITERIA 7:

## Other

CAS provides administrative support to the Taskforce. The Taskforce executive of two staff, both modern slavery and labour rights specialists, expanded in 2021 with the appointment of a Business Human Rights specialist. The Taskforce operates as a support and referral service for any ACAN entities requiring advice, additional training and resources.

The Taskforce provides subject matter expertise to participants and facilitates delivery of the ACAN modern slavery risk management program through the following activities:

- Developing new ACAN resources to share via the **ACAN website and portal**
- Induction of new MSLOs and new ACAN participating entities
- Monthly ACAN webinars
- Monthly ACAN newsletter to Catholic entities
- Graphic design, digital/social media and communications resources
- Management of external suppliers and consultants
- Expert advice and assistance in relation to modern slavery issues
- Support service and advice to MSLOs
- Participation in entity events, board meetings, working group or team meetings
- Government relations
- Review and feedback of 34 draft Modern Slavery Statements
- Submission of ACAN Compendium of Modern Slavery Statements to the **Online Register for Modern Slavery Statements**

### Outreach and collaboration

The Taskforce executive presented at webinars, workshops and conferences on topics such as supplier engagement, remediation, ESG and the response of the Catholic Church in Australia to the Act (Refer to Appendix B).

The Taskforce participates in the Australian Government's Modern Slavery Expert Advisory Group (EAG) and the National Roundtable on Human Trafficking and Modern Slavery. The Taskforce provided written feedback on the impact of the Act on SMEs, and user experience of the Online Register for Modern Slavery Statements.

The Taskforce also provided expert advice to **'The essential guide for managing modern slavery risks in the health services sector'**, a collaboration between KPMG and the Australian Human Rights Commission. The guide outlines:

- Key modern slavery risk areas across the operations and supply chains of health service sector organisations
- Tips for the health services sector on leading practice and a rights-based approach to managing modern slavery risk
- Transparent modern slavery reporting for the benefit of organisations, government and the people at risk of harm

In 2021, the Taskforce conducted individual meetings to build strategic relationships and explore collaboration with the following businesses, public sector agencies, industry associations, academics and trade unions:

Ausbil	Jones Day
Australia Post	Lendlease
Australian Border Force	Migrant Justice Institute
Australian Council of Trade Unions	Mills Oakley
Australian Human Rights Commission	Mirvac
Australian Workers Union	Monash University
Baker McKenzie	NSW Builders Association
BHP	Pacific Equity Partners
Cbus Property	Property Council of Australia
Centrl	Responsible Investment Association Australasia (RIAA)
Cleaning Accountability Framework	Sedex
Coles	South32
Colin, Biggers and Paisley	St Barbara
Daiwa Capital	Stronger Together
Department of Home Affairs	TPG
Dexus	Unicharm Australasia
Downer EDI	WalkFree Foundation

The Taskforce also organised several networking events in partnership with Sedex, Jones Day and Colin, Biggers and Paisley - providing NGOs, business and law firms the opportunity to identify areas for collaboration and partnership.

The Taskforce expanded the program of modern slavery activities with the Australian Catholic University (ACU) to include:

- ACU webinar series facilitated by the Taskforce
  - **“Modern Slavery: Moving Forward, Looking Back”** featured a survivor leader and the International Trade Union Confederation General Secretary
  - **“What’s the Plan?”** an overview of the **Commonwealth National Action Plan (NAP) to Combat Modern Slavery 2020-2025** and the evaluation framework
- Domus 8.7 Index Benchmarking Modern Slavery Statements: The Taskforce commenced an internship program with the **Australian Catholic University Thomas More Law School** to host 70 students who completed 5,000 hours of pro bono research and analysis of 1,350 Modern Slavery Statements
- Taskforce participation in the ACU Eradicating Modern Slavery Working Group meetings
- Stakeholder Engaged Scholarship Unit (SESU) community grant to develop core curriculum with a focus on modern slavery
- Official opening of the ACU St Bakhita Blacktown Campus and participation in the St Bakhita Feast Day Mass at Mary, Queen of the Family Parish, Blacktown organising committee

Communications: The Taskforce initiated and contributed to the following:

- Let victims’ voices end modern slavery **Catholic Weekly**
- Ending a modern scourge **Catholic Weekly**
- “NSW MPs must act against modern slavery and human trafficking”: Archbishop Fisher **Catholic Weekly**
- New voices honour saint of slaves in word and deed **Catholic Outlook**
- Backpacker abuse on farms **ABC News**
- New app from Catholic Church targets modern slavery in Aussie construction industry **The Fifth Estate**
- Managing Modern Slavery Risks in Construction **Master Builders Quarterly Magazine**

## International

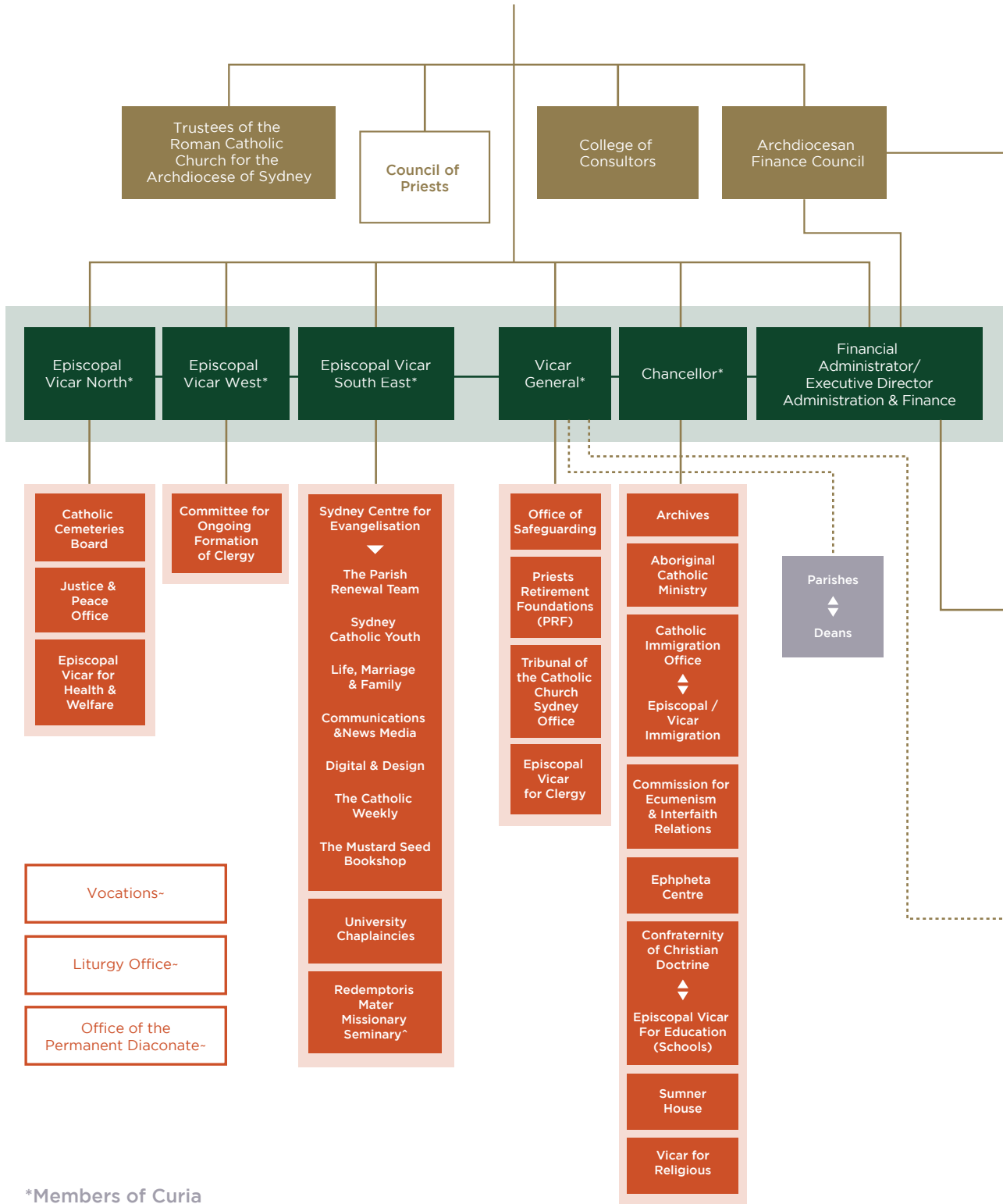
The Taskforce regularly shares information about modern slavery, the plight of migrant workers and Catholic social teaching by the Holy Father Pope Francis in the ACAN monthly newsletter. A Spanish translation of the ACAN Compendium of Modern Slavery Statements Executive Summary was presented to Pope Francis and the curial officials in the Holy See’s Congregation covering Migrants and Refugees.

Pope Francis called for the Church to unite in prayer to ask, through the intercession of the Blessed Virgin Mary, for an end to the pandemic. St Mary’s Cathedral, Sydney was selected as one of thirty Marian shrines around the world in which the special Rosary and associated prayers was celebrated. On Sunday 16th May, Archbishop Fisher and the Catholic community prayed for all victims of violence and human trafficking. The Chair of the Taskforce said the second decade of the Rosary.



# APPENDIX A ORGANISATIONAL CHARTS

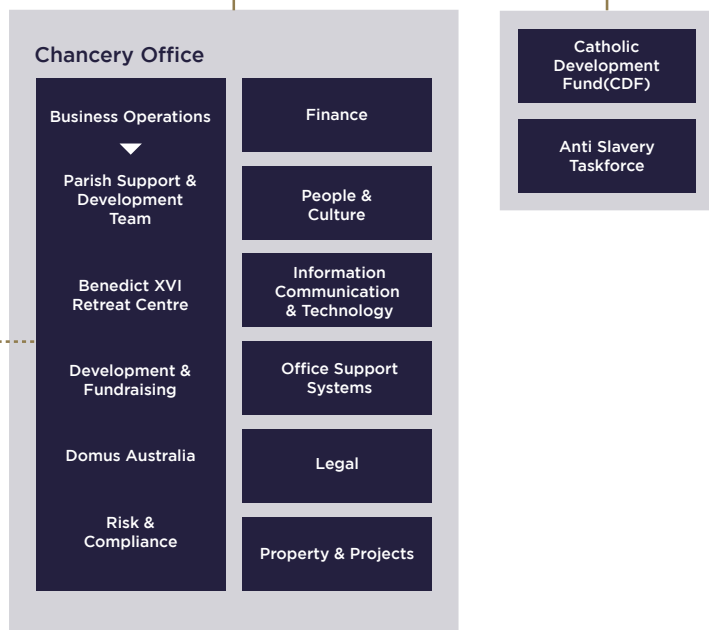
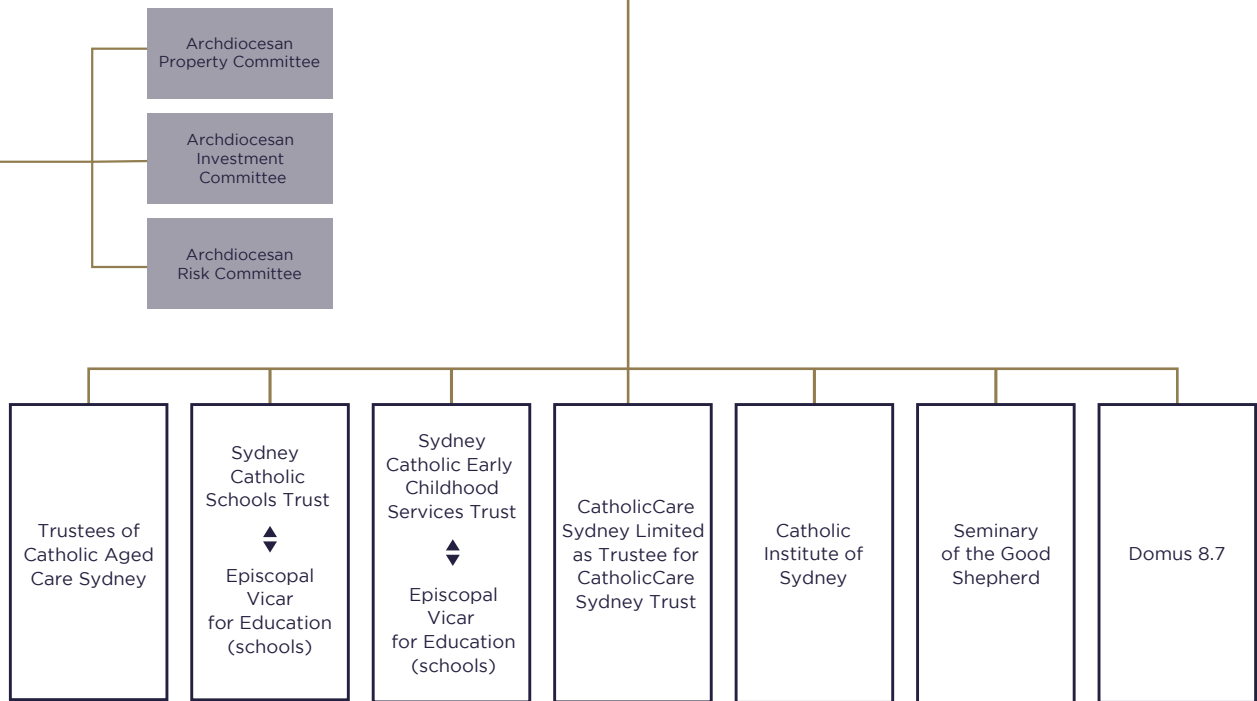
## ARCHBISHOP OF SYDNEY



\*Members of Curia

^Conducted by Redemptoris Mater Sydney Incorporated

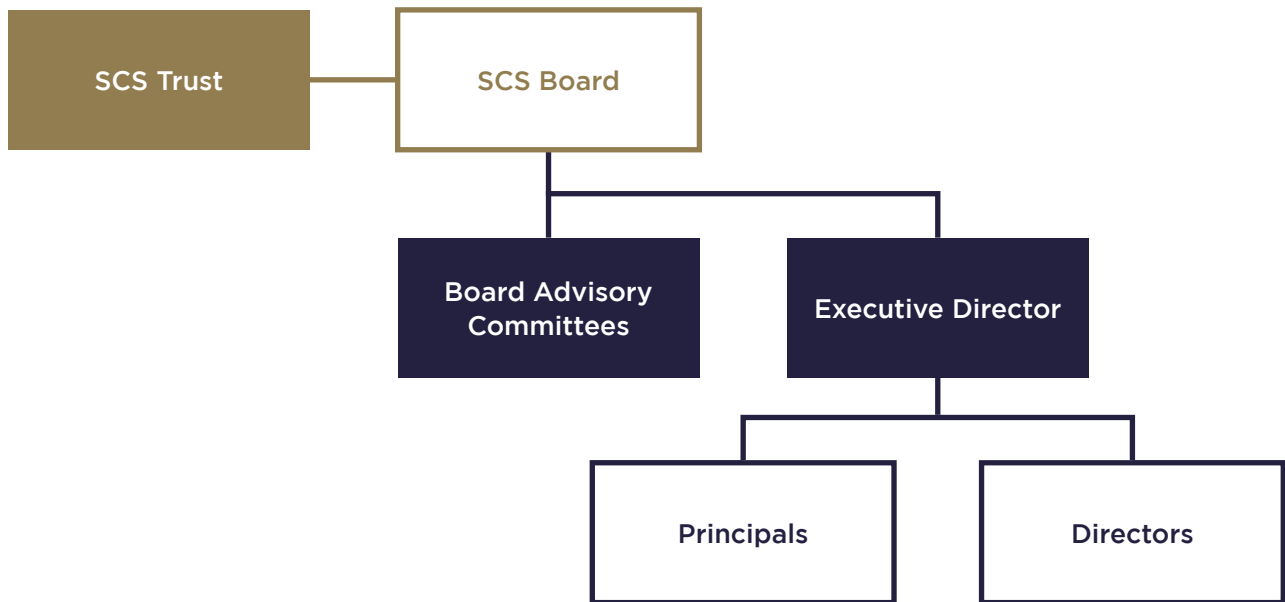
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# APPENDIX A ORGANISATIONAL CHARTS

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Sydney Catholic Schools Organisational Chart:



# APPENDIX B

## TIMELINE OF ACTIVITIES

2021

	ACAN event: Coordinated by the Taskforce	External event: Taskforce presenting or facilitating
8 Jan	<b>Presentation:</b> From the board room to the emergency room - how modern slavery interacts with health care University of Notre Dame Australia (UNDA) 140 first year medical students	
14 Jan	<b>Presentation:</b> Human trafficking and technology, faith in action Human Trafficking in Asia, Religions for Peace Conference	
28 Jan	<b>Workshop:</b> ACAN Final Modern Slavery Statement Writing	
8 Feb	St Josephine Bakhita, Patron Saint Modern Slavery Victims, Feast Day Mass, Blacktown	
26 Feb	<b>Webinar:</b> ACAN MSLOs and MSWGs	
10 Mar	<b>Presentation:</b> ESG from the investor perspective hosted by Bridgewater Associates	
26 Mar	<b>Webinar:</b> ACAN MSLOs and MSWGs	
7 April	<b>Presentation:</b> ESG and the materiality to business hosted by Daiwa Capital	
30 April	<b>Webinar:</b> ACAN MSLOs and MSWGs	
19 May	<b>Presentation:</b> Modern Slavery Programs and Initiatives Ethical Trade Alliance event	
28 May	<b>Webinar:</b> ACAN MSLOs and MSWGs	
10 June	<b>Presentation:</b> Partnering to End Modern Slavery Online National Conference	
22 June	<b>Presentation:</b> Catholic action in Australia to eradicate modern slavery and human trafficking One World, No Slavery Conference German Catholic Mission	
25 June	<b>Webinar:</b> ACAN MSLOs and MSWGs	
8 July	<b>Presentation:</b> Lessons from reporting on modern slavery Minerals Council of Australia webinar	
14 July	<b>Presentation:</b> Slavery free supply chains in Church institutions German Bishops Conference webinar	
30 July	<b>Webinar:</b> ACAN MSLOs and MSWGs	
9 Aug	SCS Board approves updated Anti-Modern Slavery Policy	
12 Aug		CAS MSWG meeting
27 Aug		<b>Webinar:</b> ACAN MSLOs and MSWGs
8 Sept		<b>Presentation:</b> Modern slavery Catholic Schools NSW all staff meeting
14 Sept		<b>Webinar:</b> CAS and SCS facilities management and construction suppliers invited
24 Sept		<b>Webinar:</b> ACAN MSLOs and MSWGs
12 Oct		<b>Presentation:</b> 'Legal approaches to reducing the demand behind human trafficking' Order of Malta
12 Oct		<b>Webinar:</b> CAS and SCS ICT suppliers invited
13 Oct		Presentation: Equipping Boards to Effectively Address Australia's Modern Slavery Act Centrl webinar
14 Oct		CAS MSWG meeting
19 Oct		<b>Webinar:</b> CAS and SCS suppliers invited to learn about Sedex
27 Oct		Presentation: Tackling Modern Slavery: Sharing Learnings from Australian and UK Businesses Stronger Together webinar
28 Oct		CAS MSWG meeting
29 Oct		<b>Webinar:</b> ACAN MSLOs and MSWGs
29 Oct		'Building Links' final report submitted to Department of Home Affairs concluding grant activities
26 Nov		<b>Webinar:</b> ACAN MSLOs and MSWGs
7 Dec		<b>Presentation:</b> Approaches to grievance mechanisms and remediation and The S in ESG - investor views and expectations around social risk in supply chains Sedex JANZ Conference
13 Dec		CAS MSWG meeting
14 Dec		<b>Presentation:</b> Business Transformation and ESG Business Transformation and Operational Excellence Summit (BTOES) international conference Orlando, Florida





CATHOLIC  
ARCHDIOCESE  
OF SYDNEY

# Modern Slavery **Statement**

1 January 2021 -31 December 2021

Catholic Archdiocese of Sydney ABN 72 823 907 843  
Polding Centre 133 Liverpool St Sydney NSW 2000  
[www.sydneycatholic.org](http://www.sydneycatholic.org)



CATHOLIC EDUCATION  
WESTERN AUSTRALIA

# Modern Slavery Statement

2021

## 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.

# Contents



Cover Photo: Kearnan College, Manjimup; St Brigid's School, Bridgetown;  
St Mary's Catholic School, Boyup Brook; St Joseph's Catholic Primary  
School, Pinjarra  
Photo: St Francis of Assisi Catholic Primary School, Butler

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# About Us

Catholic Education Western Australia Limited (CEWA) is the second largest education provider in Western Australia, providing a faith-based education for 17% of the State's total school-age population, including 19% of all secondary students. In 2021, approximately 78,000 students were enrolled in 163 Catholic schools across Western Australia.

CEWA provides employment for more than 11,000 staff, making it the State's fourth largest private employer and a significant contributor to the WA economy.

CEWA, through the [Catholic Education Commission of Western Australia \(CECWA\) Strategic Directions 2019–2023](#), has a particular focus of ensuring the accessibility, affordability and sustainability of Catholic schools. Quality Catholic Education (QCE), embraced across Catholic schools and offices, ensures CEWA's commitment to practices that reflect Catholic social teaching. CEWA is committed to making Catholic education available to any family who seeks it for their child. Receiving a quality Catholic education, care and support enables children to make a positive contribution to society in line with Catholic social teachings. CEWA schools and offices support all students, regardless of their individual circumstances.



Photo: St Mary's Catholic School, Boyup Brook

## Modern Slavery

Modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights and are crimes under the *Criminal Code Act 1995 (Cth)*. The Act defines modern slavery as encompassing slavery and slavery-like practices, including servitude, forced labour, the deceptive recruiting for labour or services, debt bondage, forced marriage, human trafficking, and the worst forms of child labour. Appendix 1 of CEWA's Modern Slavery Prevention Executive Directive provides information on the types of modern slavery relevant to CEWA's business.



# Statement

**The Most Reverend Gerard J Holohan DD,**  
*Bishop of Bunbury and Chair, Catholic  
 Education Commission of Western Australia*



Catholic Education Western Australia Limited (CEWA) recognises that modern slavery is a significant, complex and expanding human rights issue that affects tens of millions of lives. Globally, great strides have been made to ensure

greater transparency in organisational protocols concerning the protection of human rights and ending modern slavery practices; a commitment that CEWA both supports and recognises as fundamental to our institution.

CEWA welcomes the implementation of the *Modern Slavery Act 2018* (Cth) and the increased requirements on organisations across Australia. While CEWA has not identified occurrences of modern slavery harm, we are committed to contributing to the prevention, and ultimately eradication, of modern slavery by 2030. Following extensive consultation we have been able to identify the mitigation practices required to limit risks that may exist and invite the opportunity to further mature our approach in this discipline.

As a Catholic agency, this program of work empowers us to give witness to our Catholic faith, to live out our Gospel values, and contribute to a path of hope for the future, particularly for the millions of people who are trapped in modern slavery.

I urge all within the Catholic Church and in our wider society, to consider the livelihoods of peoples and communities in our decision-making processes. I ask all to routinely reflect on and examine practices across procurement, human resources, contractor management and risk management to ensure that we are focused on the wellbeing and social, political and economic equity of humankind. I also encourage each individual to consider what personal contribution they can make to eradicate 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 trust that CEWA's commitment to this shared goal of eradicating modern slavery will be realised through significant and continuous dedication to the human rights of all.

On behalf of the Catholic Education Commission of Western Australia, who have approved this statement, I commend it to you.

Bishop Gerard J Holohan  
*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 3 June 2022.*

*This Modern Slavery Statement is signed by a responsible member of Catholic Education Western Australia as defined by the Act.*



# Statement

**Dr Debra Sayce,**  
Executive Director, Catholic Education  
Western Australia Limited



Catholic Education Western Australia Limited (CEWA) is a Christ-centred and child-focused community of learning environments, inspiring all to actively live the Gospel. Central to this is a recognition of, and commitment

to, the dignity of all human persons and being of service to those in need, particularly those who face injustice. Guided by [CECWA's Strategic Directions 2019–2023](#) and [Quality Catholic Education \(QCE\)](#), CEWA is motivated by its mission to make a significant and socially responsible commitment to the world, both through the education of our future leaders - the next generation and by leading with example, through our actions today.

Advocacy for the marginalised and equity for vulnerable persons is a critical component of CEWA's work. In this way, CEWA welcomes its partnership with corporations sharing a common purpose to end modern slavery in all its forms, fostering instead the opportunity for people to meaningfully and actively embrace their human rights. This has been a key priority for CEWA in 2021, ensuring that both economic and political affiliations speak to the ethical responsibility of countering modern slavery, and I am pleased with our organisation's progress in this space. CEWA has worked tirelessly toward maturing its processes,

understanding that modern slavery is not an isolated occurrence but is instead an example of complex challenges facing local and global our society, requiring a diligent, committed and purposeful response.

In 2021, CEWA initiated state-wide learning opportunities for staff, drawing on expertise to integrate sustainability into decision-making, improving procurement practices and increasing supplier engagement to communicate the requirements of engaging with CEWA. Through CEWA's Modern Slavery Prevention Program of Work 2021–2023, focus will continue in leadership, procurement, communications, investment, governance and research.

As a community, CEWA is committed to working in partnership with other Catholic organisations in the Australian Catholic Antislavery Network (ACAN) collaboration and, as in previous years, appreciates the expertise and guidance that has been and continues to be provided to CEWA by the members of the Antislavery Taskforce.

I am pleased to provide CEWA's Modern Slavery Statement, which has been approved by the Catholic Education Commission of Western Australia and endorsed by CEWA's Executive Team.

Dr Debra Sayce  
Executive Director  
Catholic Education Western Australia Limited



# Summary of Achievements 2021

Throughout 2021, modern slavery prevention became an increased focus across CEWA, aligned with both the CECWA Strategic Directions 2019–2023 and Quality Catholic Education. CEWA continued its active participation in the Archdiocese of Perth Modern Slavery Working Party with the focus to foster a collective approach in assessing modern slavery risks and to explore how these risks could be addressed.

CEWA has maintained membership with the Australian Catholic Antislavery Network (ACAN), a collaboration of more than 30 Catholic entities throughout all states and territories of Australia.

CEWA established a Working Party, comprised of office and school staff, to lead the implementation of the modern slavery prevention scope of work across the System. The Working Group informed CEWA leaders on modern slavery related issues and facilitated CEWA's role in managing and mitigating modern slavery risks. The Working Group advised development, implementation, monitoring and review of CEWA's Modern Slavery Prevention Action Plan.

# Our Plans for 2022

For 2022, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- Continue to embed the Executive Directive – Modern Slavery Prevention across all CEWA schools and offices.
- Strengthen the risk management framework to ensure that CECWA and the Audit and Risk Committee have awareness of the modern slavery risks with the potential to impact CEWA.
- Continue to strengthen procurement management approaches and documentation to guard against slavery or slavery-like practices.
- Promote the educational opportunities available to the CEWA community on modern slavery.
- Communicate CEWA's commitment to the eradication of modern slavery from supply chains and operations.
- Strengthen engagement with suppliers to communicate the expectations for practices relating to the prevention of modern slavery.
- Continue to work within ACAN's priorities, including supporting Domus 8.7 – ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service.



# Our Plans Beyond 2022

CEWA has established a Modern Slavery Prevention Program of Work 2021–2023, with specific deliverables across several focus areas. The Program of Work proactively guides CEWA's strategic actions and deliverables. The document has been endorsed by CEWA's Executive Team.

CEWA's Program of Work is built across the following focus areas to ensure that CEWA meets and exceeds all obligations in respect to modern slavery prevention:

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.
<b>Procurement and Supplier Management</b>	To increase CEWA's understanding and oversight of the risks of modern slavery.
<b>Legal Documentation</b>	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.
<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>Communications</b>	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.
<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.







# Reporting Criterion 1: About Catholic Education Western Australia Limited

## Our Organisational Structure

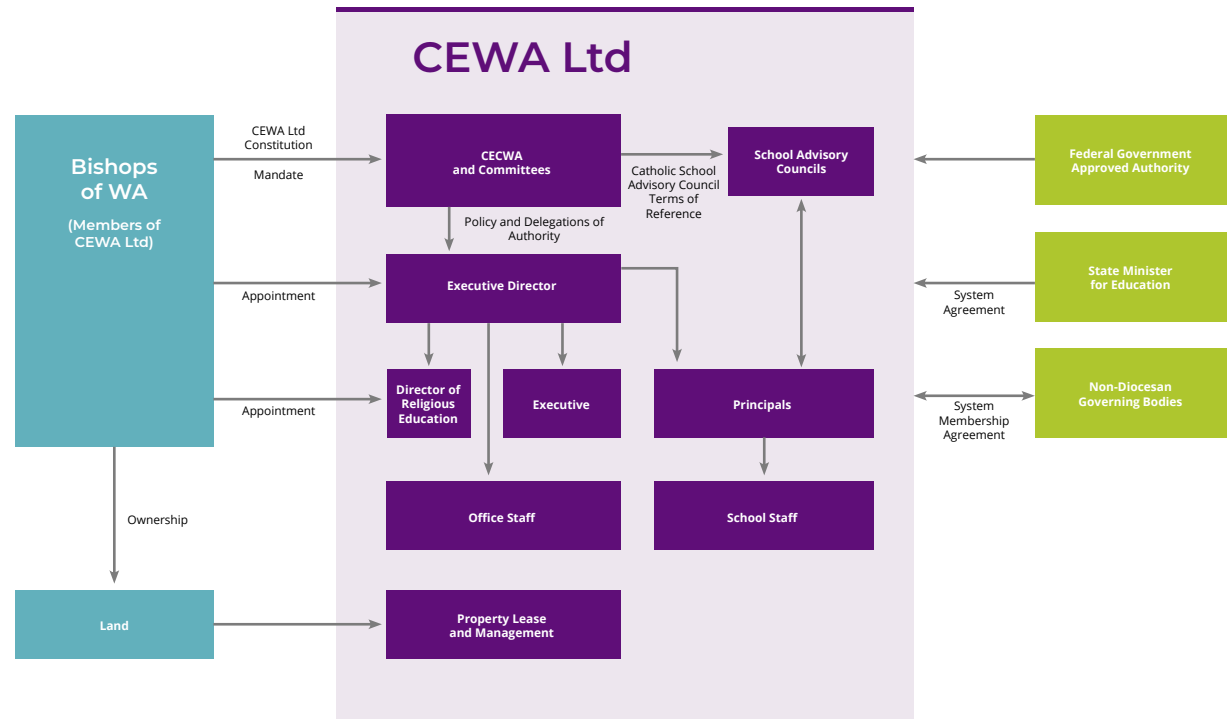
On 1 January 2020, the Bishops of Western Australia formed a new corporate governance structure as an incorporated body for Catholic schools in Western Australia. Catholic Education Western Australia Limited (CEWA) is the governing body for 149 diocesan Catholic schools and provides registration oversight for an additional 14 non-diocesan Catholic schools. The Members of CEWA are the diocesan Bishops of Western Australia.

In addition to being registered as a company with ASIC (ABN: 47 634 504 135), CEWA Ltd 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 Ltd, directs CEWA to develop learning opportunities that fulfil the goals of Catholic schools as outlined in the [Bishops' Mandate Letter](#). CECWA is supported through five committees, established to advance the strategic priorities of CEWA Ltd and monitor activities. These committees are:

- Aboriginal Community Committee
- Audit and Risk Committee
- Catholic Education Community Committee
- Curriculum Committee
- Finance Committee

CEWA's governance structure is illustrated below:





## Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)

CEWA's latest published *Annual Report (2020)* is available [here](#).

### Diocesan and non-diocesan schools

In addition to the 149 diocesan schools, the CEWA system includes 14 schools that are governed by eight non-diocesan governing bodies. For the purposes of school registration in WA, the non-diocesan schools are included within the Catholic Education System, creating CEWA Ltd's responsibility for compliance for all school registration matters. For all governance purposes other than school registration, decisions are taken by the respective governing bodies.

### CEWA Executive Team

Dr Debra Sayce is the Executive Director of Catholic Education Western Australia. In 2021, the Executive Director was supported by the following Directors within the CEWA Executive Team:

- Wayne Bull – Deputy Executive Director
- Mandy Connor – Director Teaching and Learning
- Dr Christopher Cotter – Director Religious Education
- Dr Tony Curry – Director Leadership and Employee Services
- Dr Glenda Scully – Director Finance, Infrastructure and Digital Technology
- Dr Edward Simons – Director Governance, Strategy and Digital Technology

The CEWA Executive Team is based in CEWA's West Leederville office and is supported by approximately 320 office staff working across the four Catholic dioceses in Western Australia.





## Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)



### Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of ASIC, ACNC, the Bishops of Western Australia, the Federal Government, the State Government 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 22 Executive Directives. CEWA's Executive Directives articulate CEWA's policy requirements and provide direct processes to be followed across the system.

CEWA has evolved its Modern Slavery Prevention Policy to become the *Executive Directive – Modern Slavery Prevention*. This Executive Directive calls for CEWA to actively and consciously counter any presence of modern slavery within operations, business relationships and extended supply chains. Importantly, the Executive Directive guides all CEWA staff 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 CEWA system - at both enterprise level and individual school 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 eradicate modern slavery through the Executive Director's monthly report to CECWA, or as matters arise.

A photograph of a school playground with children in yellow shirts and a teacher. A large quote is overlaid on the image.

“ As a Catholic agency, this program of work empowers us to give witness to our Catholic faith, to live out our Gospel values, and contribute to a path of hope for the future, particularly for the millions of people who are trapped in modern slavery. ”

The Most Reverend Gerard J Holohan DD

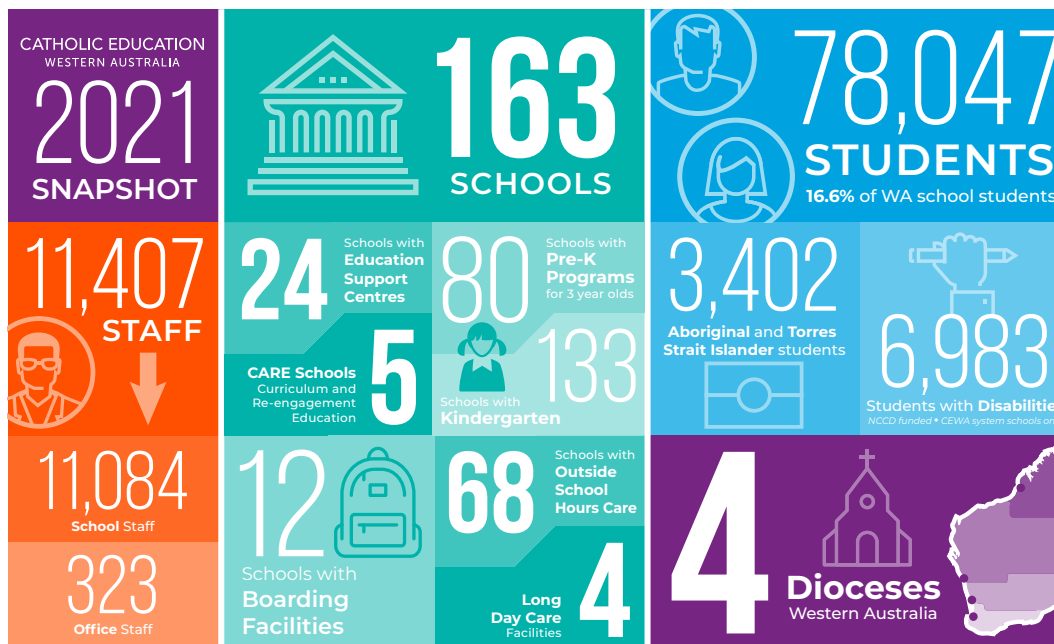


# Reporting Criterion 2: Operations and Supply Chains

## 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.

An overview of CEWA's reach in 2021 is provided in the figure below:



As well as playing a pivotal role in supporting the sustained learning and development of children and young people, Catholic schools provide vital faith formation, pastoral care and wellbeing support to all involved within the System.

CEWA also engages with contractors and subcontractors to service cleaning, waste management, and some maintenance requirements and acknowledges that labour hire is a high-risk area. Accordingly, CEWA is careful to work with reputable recruitment agencies.

The development and advancement of CEWA's procurement strategy and policy will increase

due diligence in contractor management. The documentation is anticipated to set out social, environment and ethical expectations of suppliers, including the requirement that forced, involuntary or underage labour is expressly forbidden. Construction and capital development account for significant spend within CEWA due to new school construction, provision of new facilities and maintenance of existing facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas will also be subject to improved due diligence processes through CEWA's *Building Quality Catholic Schools* document.



## Reporting Criterion 2: Operations and Supply Chains (continued)

In 2021 CEWA procured

# \$163.86M

of goods and services

These goods and services were  
sourced from approximately

# 1,550

predominantly Australian suppliers

### Our Supply Chains

Across CEWA, purchases are made at a system-level and this report is focused on purchases that are driven by administration-made decisions. However, Catholic school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases. Through further maturity of system processes because of incorporation, including the appointment of a Contracts and Procurement Manager, it is anticipated that future ethical purchasing decisions will be made by the system, with schools potentially operating through a preferred suppliers' program.

CEWA acknowledges that uniform purchasing, although managed individually by Catholic schools, is known and acknowledged to be a potentially high-risk area, both with regards to cotton growing and garment manufacturing.

CEWA has identified, through a procurement review, that the CEWA office purchases a wide range of goods and services, including the areas listed below:

- construction services and suppliers
- cleaning and security
- electronics
- furniture
- stationery
- food and catering supplies
- travel and accommodation services; and
- books and printing.

In 2021, CEWA procured \$163,864,378 of goods and services from approximately 1,550 direct suppliers<sup>1</sup>, predominantly Australian suppliers. These purchases included cleaning, catering, building contractor and security and waste service provision, all of which are known to be at increased risk of worker vulnerability, labour exploitation and modern slavery due to the low level of pay and the high prevalence of employment of migrant workers.


CEWA 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.

As communicated in 2021, in 2022, 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.



<sup>1</sup> Figures relate to 3rd party suppliers to diocesan schools and CEWA offices.

Photo: Infant Jesus School, Morley; Santa Clara School, St James



# Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains

As of December 2021 CEWA supported

# 11,407

teaching and non-teaching jobs

# \$2.37bn

GVA contribution in 2021; 17% of total  
WA Education & Training sector

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.

## Operational Risks

### CEWA's COVID-19 response

CEWA acknowledges and understands that the COVID-19 pandemic has had and is continuing to have a devastating health and economic impact globally. The economic and human rights effect on the most vulnerable and resource-poor in extended supply chains is of particular significance, and CEWA is concerned that workers, particularly in longer, more complex supply chains are likely to face increased vulnerabilities and exposure to modern slavery risks.

CEWA is aware of the importance to understand the risks of uniform suppliers, for example, as garment factories face the potential for increased health risks if a lack of personal protective equipment is available and overcrowded working conditions are not properly addressed.

The requirement to supply essential safety items, such as face masks and hand sanitiser very quickly and in vastly increased quantities has exposed a risk that availability and speed of supply was considered over and above the due diligence and checking of new suppliers.

From an operational perspective, CEWA focused on the health and wellbeing of students and staff and maintained educational continuity in full compliance with Federal and State Government response strategies. Ensuring continuity of operations also meant that CEWA was able to maintain contractual obligations with suppliers and contractors, guarding against job losses that would have put workers at increased risk of being exploited. Of note and continuing the work of 2020, was the speed at which CEWA staff worked to appoint cleaning companies that would be able to respond swiftly and according to government guidelines in the event that a case of COVID-19 was reported within a CEWA site. The tender that was issued specifically required tenderers to respond to questions that provided surety against modern slavery risks.

### CEWA's people

As of December 2021, CEWA supported 11,407 teaching and non-teaching jobs, approximately 80% of which were female<sup>2</sup>. It is estimated that the total Gross Value-Added contribution to the WA economy is approximately \$2.37 billion, which represents 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

<sup>2</sup> These figures include staff in diocesan schools and offices, including casual staff.



## Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)



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 is regularly reviewed and updated to ensure any changes in law and legislation are reflected accordingly.

CEWA also conducts regular and ongoing training to continually upskill and build capacity in system leaders to ensure appropriate legislation and best employment practices are adhered to. If a case of modern slavery was suspected, it would be fully investigated, and appropriate disciplinary action would be taken against any member of staff found to have acted in breach of any CEWA policies.

### Research

Recognising that management of modern slavery risks calls for a collaborative, multi-stakeholder approach, transparency of disclosure and the integration of the decision-making oversight into all operational aspects, CEWA considers that an ethical human rights approach to the approval of research applications is important.

The Executive Director is responsible for two forms of research that are facilitated across CEWA:

- research that occurs in CEWA schools or offices; and
- research commissioned by CEWA, engaging outside organisations, for system improvement purposes.

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 – children and adults. 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.

### Investments

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





## Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)



CEWA investment activities account for the management of

**\$1.2B**  
worth of assets.

Photo: St Francis of Assisi Catholic Primary School, Butler

<sup>3</sup> As of 31 December 2021. Does not include cash and term deposits invested with the Catholic Development Fund.

this potential risk that requires assessment and management of potential modern slavery risks in investment portfolios.

CEWA's investment activities account for the management of \$1,200,000,000 worth of assets.<sup>3</sup>

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.

### Modern slavery gap analysis

A gap analysis was undertaken to understand the modern slavery risks facing CEWA and identify areas for improvement. The analysis was first undertaken during July 2019 and the exercise was repeated in December 2020 and December 2021.

The comparative results are presented below in a heat map.

Category	Topic	Result 2019	Result 2020	Result 2021	Change
Management Systems	Governance	●	●	●	↑
	Commitment	●	●	●	↑
	Business Systems	●	●	●	↑
	Action	●	●	●	↑
	Monitor / Report	●	●	●	↑
Risk Management	Risk Framework	●	●	●	↑
	Operational Risk	●	●	●	↑
	Identifying External Risks	●	●	●	↑
	Monitoring and Reporting Risk	●	●	●	↑
	Policy and Procedures	●	●	●	↑
Procurement and Supply Chain	Contract Management	●	●	●	↑
	Screening and Traceability	●	●	●	-
	Supplier Engagement	●	●	●	↑
	Monitoring and Corrective Action	●	●	●	↑
	Human Resources and Recruitment	Awareness	●	●	●
Policies and Systems		●	●	●	↑
Training		●	●	●	↑
Labour Hire / Outsourcing		●	●	●	↑
Customers and Stakeholders	Customer Attitude	●	●	●	↑
	Information Provision	●	●	●	↑
	Feedback Mechanisms	●	●	●	↑
	Worker Voice	●	●	●	↑

#### Legend

- Leading practice
- Making progress
- Starting out
- At the starting line



## Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

### Supply Chain Risks

In 2020, CEWA appointed a Contracts and Procurement Manager with duties that include increasing CEWA's understanding and oversight of risks of modern slavery in supply chains and operations, and to work and mitigate these risks through responsible procurement. CEWA is commencing the process of engaging effectively with suppliers in two ways:

- educating and providing information around modern slavery risks, and
- embedding appropriate oversight and documentation into onboarding of new suppliers, increasing due diligence of existing suppliers, and pre-qualifying companies tendering for work.

CEWA is continuing the process to analyse supply chains, especially for high-risk products and geographies, particularly for areas of highest spend.

From a previous, external assessment of CEWA's spend, the highest risks area:

- in the construction industry – both in labour hire and sourced materials used
- in outsourced, labour intensive and low skilled work, particularly facilities management including cleaning and security, and
- in supply chains, especially beyond Tier 1 suppliers.



# Reporting Criterion 4: Actions Taken to Assess and Address Risks

CEWA established a Working Party in 2021 to strengthen a shared understanding, across the system, of modern slavery and assessing the potential risks in CEWA's operations in supply chains.

Specific actions undertaken throughout 2021 are depicted in the table below:

FOCUS AREA	INTENT	ACTIONS
<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.	<ul style="list-style-type: none"> <li>• Revision of Modern Slavery Prevention Executive Directive.</li> <li>• Committed to joining ACAN from July 2021 to June 2023.</li> <li>• Hosted webinars to raise awareness regarding modern slavery.</li> <li>• Included modern slavery risks within CEWA's risk management framework.</li> <li>• Included modern slavery risks with the CEWA school risk management framework.</li> <li>• Completed gap analysis on operations.</li> </ul>
<b>Procurement and Supplier Management</b>	To increase CEWA's understanding and oversight of the risks of modern slavery.	<ul style="list-style-type: none"> <li>• Commencement of the drafting of an Executive Directive for procurement and associated procedures.</li> <li>• Identification of the Top 50 High Risk Suppliers using ACAN's Risk Taxonomy.</li> <li>• Identification of the Top 20 IT suppliers.</li> <li>• Invitations sent to all suppliers to join the Sedex Platform.</li> <li>• Development of purchase order terms including relevant modern slavery prevention clauses.</li> <li>• Development of tender templates that include relevant modern slavery prevention requirements.</li> <li>• Development of contract terms and conditions that include appropriate modern slavery prevention clauses and obligations.</li> <li>• Communication to suppliers on CEWA's modern slavery prevention commitment.</li> <li>• Development of supplier documentation that sets out ethical expectations of suppliers.</li> <li>• Development of documentation to enable oversight of suppliers' commitments to modern slavery eradication.</li> </ul>
<b>Legal Documentation</b>	To improve CEWA's due diligence through the application of legal documentation that addresses the risks of modern slavery.	<ul style="list-style-type: none"> <li>• Inclusion of modern slavery prevention clauses in standard supplier contracts.</li> </ul>
<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.	<ul style="list-style-type: none"> <li>• Establishment of Fairtrade staffrooms at all CEWA offices.</li> <li>• Engagement with cleaners, security and waste management providers to raise awareness of fair work practices.</li> </ul>
<b>Investment</b>	To strengthen the ethical considerations alongside more traditional financial factors into investment analysis and decision making.	<ul style="list-style-type: none"> <li>• Reviewed Investment Policy Statement to ensure it remained fit for purpose in light of the Executive Directive.</li> </ul>
<b>Research</b>	To introduce considerations around modern slavery prevention into the approval process for research applications.	<ul style="list-style-type: none"> <li>• Conducted a due diligence examination of research organisations including reputation, non-commercial focus, any third-party involvement and funding sources.</li> <li>• Assess the methodology for research proposals including data and information protocols.</li> </ul>

## Reporting Criterion 4: Actions Taken to Assess and Address Risks (continued)

FOCUS AREA	INTENT	ACTIONS
<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.	<ul style="list-style-type: none"> <li>Development of eLearning Module into CEWA's system.</li> <li>Consideration of the eLearning Module by the CEWA Executive Team and approval for system roll-out.</li> <li>Completion of eLearning Module by all Working Party members.</li> </ul>
<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.	<ul style="list-style-type: none"> <li>Membership of the Modern Slavery Working Party representative of 70% of all CEWA schools and offices.</li> <li>Commencement of a Fairtrade website for use across the CEWA system.</li> </ul>
<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.	<ul style="list-style-type: none"> <li>Identification of the top 50 construction suppliers.</li> <li>Invitations sent to all suppliers to join the Sedex Platform.</li> </ul>
<b>Human Resources</b>	To model best employment practice and articulate that modern slavery prevention is a shared commitment across CEWA.	<ul style="list-style-type: none"> <li>Initial discussions regarding updating the Executive Directive – Employment to articulate a commitment against slavery and slavery-like practices.</li> </ul>
<b>Communications</b>	To enrich understanding of the complex reality of modern slavery, its root causes, the paradigms that contribute to increasing people's vulnerability to it and what progress can be made.	<ul style="list-style-type: none"> <li>Promotion of the Feast Day of St Bakhita (8 February).</li> <li>Promotion of the UN Day Against Trafficking in Persons (30 July) throughout system.</li> <li>Promotion of Fairtrade Fortnight (6–19 August) across the system.</li> </ul>
<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.	<ul style="list-style-type: none"> <li>Lesson prepared for use as part of the delivery of the Keeping Safe Child Protection Curriculum in secondary schools.</li> <li>Incorporation of forced marriage information into the Keeping Safe Child Protection Curriculum teacher training.</li> </ul>

## Modern Slavery Action Plan and Road Map

CEWA's current approach to modern slavery prevention will continue into future years.

A future action plan will be developed in 2022, as a collaboration across all Catholic schools and offices.

The implementation plan, as in 2021, will assign deliverables to teams or groups within CEWA.


The Working Party will continue in 2022 with the following objectives:

- Provide input and advice to the CEWA community on issues related to modern slavery;

- Lead the development and implementation of CEWA's modern slavery prevention action plan;
- Assist CEWA to 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 CEWA meets the requirements of the *Modern Slavery Act 2018* (Cth).

In addition to the existing work streams, CEWA will also work across the following areas for action:

- Leadership:** to ensure leaders understand the requirement for CEWA to address modern slavery risks
- Remedy:** to adopt Domus 8.7 remedy pathway for victims of modern slavery abuse.
- Partnerships:** to ensure a collaborative and coordinated approach throughout Western Australia and to support relevant projects that further CEWA's understanding and support of works with the same intent.



“ CEWA is motivated by its mission to make a significant and socially responsible commitment to the world, both through the education of our future leaders - the next generation and by leading with example, through our actions today. ”

Dr Debra Sayce



# Reporting Criterion 5: Effectiveness Assessment

In assessing the effectiveness of the work to date, CEWA is guided by the relevant legislation with interpretation guided by Catholic Social Teaching principles.

Specific means of monitoring and evaluating CEWA's modern slavery prevention efforts were developed by the Working Party and reported accordingly to CEWA's Executive. However, it is acknowledged that there remains significant focus required. As in 2021, it is anticipated that this will entail increased engagement and surveying of stakeholders including employees and key suppliers.

Particular findings and learnings include:


- Modern slavery is a complex issue that is often hidden. CEWA remains committed to collaboration, communication, time and sustained engagement being vital to reducing the risk and ultimately effecting lasting change.
- CEWA recognises that raising awareness of this important issue and providing appropriate opportunities for staff and stakeholders to increase knowledge on modern slavery issues is critical and in full alignment with CEWA's vision and mission.
- Increased focus is required on the procurement practices as CEWA matures as a company limited by guarantee.
- CEWA acknowledges its responsibility to continue to educate, raise awareness and suggest actions that can be taken – and especially to provide leadership through meaningful action.

CEWA, through the governance structure, will 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
- Engaging with the CEWA community through staff meetings, announcements and information shared through the modern slavery prevention Microsoft Team, and via social media in connection to particular advocacy days
- Continuing to be vigilant to and process concerns or reports, including whistleblower disclosures, relating to modern slavery; and
- Advance procurement processes that enable monitoring of suppliers and, where appropriate, a review of the implementation of any corrective action plans.

During 2021 CEWA received no disclosures, reports or concerns relating to modern slavery.





# Reporting Criterion 6: Process of Consultation with Entities Owned or Controlled

CEWA does not own or control any entities. 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 149 diocesan schools.

While CEWA does not control schools, the system operates within a network of 'connected autonomy' through QCE; every school and office is part of the CEWA system and compliance through system-wide policies and directives is required. Within that compliance framework, schools are encouraged to explore opportunities and initiatives that reflect their individual charisms and priorities for their communities. This directly applies to CEWA's shared commitment to modern slavery eradication, with centrally led processes and requirements and school-initiated projects that reflect their situations, capabilities and interests.

The connected nature of the CEWA system has enabled the establishment of a CEWA-wide Microsoft Team dedicated to modern slavery prevention. All schools have been invited to nominate at least one person to join this Team, which provides opportunities for learning, sharing of ideas and support for implementing local initiatives within schools





# Reporting Criterion 7: Other



During 2021, CEWA has supported several organisations that work to address the root causes of slavery, including Caritas Australia and Catholic Mission. CEWA has also directly supported or connected with organisations both in Australia and abroad that work to support and build the capacity of vulnerable people, including:

- Good Shepherd Sisters Fatima Training Centre in Bangkok for vulnerable, disadvantaged girls and young women
- Australian Catholic Religious Against Trafficking in Humans, and
- The Humanitarian Group, Perth.

CEWA intends to continue to collaborate and partner with organisations that advocate for human rights throughout 2022.

This Modern Slavery Statement 2021 was endorsed by the CEWA Executive Team and approved by the Catholic Education Commission of Western Australia, the board of Catholic Education Western Australia Limited, on 3 June 2022, in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

Signed

Bishop Gerard J Holohan  
*Chair*

*Catholic Education Commission of Western Australia*

#### Commissioners of Catholic Education Commission of Western Australia 2020

Bishop Gerard J Holohan	Chair
Bishop Michael Morrissey	Commissioner
Donella Brown	Chair, Aboriginal Community Committee
Margaret Collins	Chair, Curriculum Committee
Gladys Demissie	Commissioner
Wojciech Grzech	Chair, Audit and Risk Committee
Michelle Shafizadeh	Chair, Finance Committee
Jonathon Woolfrey	Deputy Chair / Chair, Catholic Education Community Committee
Peter Yensch	Commissioner

#### CEWA Executive Team 2021

Dr Debra Sayce	Executive Director
Wayne Bull	Deputy Executive Director
Mandy Connor	Director Teaching and Learning
Dr Christopher Cotter	Director Religious Education
Dr Tony Curry	Director Leadership and Employee Services
Dr Glenda Scully	Director Finance, Infrastructure and Digital Technology
Dr Edward Simons	Director Governance, Strategy and Digital Technology






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**EREA**  
Modern Slavery  
Statement



EDMUND RICE EDUCATION  
AUSTRALIA

# EREA – Modern Slavery Statement

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## 1. Introduction

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (Cth) (“the Act”) by Edmund Rice Education Australia (ABN 96 372 268 340) and relates to the financial year ended 31 December 2020.

As a Catholic entity, Edmund Rice Education Australia (EREA) acknowledges 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 as it generates confidence in our service to the community.

Our Modern Slavery policy outlines the steps EREA will take to work with other Catholic entities, suppliers, business partners and community stakeholders to fulfil a common goal of ending modern slavery globally.

We expect all our employees, contractors, and suppliers – both current and those who seek to have a future business relationship with us – to comply with all aspects of our policy and we strive to protect and respect the freedom and dignity of people everywhere.

### Our position on Modern Slavery

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.

The following principles inform the implementation of our Modern Slavery policy:

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

## 2. About EREA

### Our Story

The Congregation of Christian Brothers in Australia has always directed their energies to work with those most in need, both here and abroad. Ministries serving refugees, Indigenous peoples, social justice and inclusion, the marginalised in Africa, East Timor and the Philippines, have become the ongoing foci of the current Congregation.

The formation of Edmund Rice Education Australia (EREA) by the Congregation of Christian Brothers continues their work in education that began in Australia 1872. The name represents the founder of the global Christian Brothers Congregation, Br Edmund Ignatius Rice. The governance, accountability and responsibility for all Christian Brothers owned and operated schools in Australia transferred to EREA on 1 October 2007. EREA is an incorporated body under the Roman Catholic Church Communities Lands Act 1942 (NSW).

The Council and Board of EREA have been entrusted with the governance of the schools. In turn, they appoint an Executive which administers the schools, ensures their faithfulness to their mission, and maintains relationships with Church and government authorities.

EREA, as part of the mission of the Catholic Church, is charged with the responsibility for the governance of over 55 schools throughout Australia. Each school has a separate character and history but all draw life from the charism of Edmund Rice and the Gospel.

### Our Charter

The Charter for Catholic Schools in the Edmund Rice tradition describes our distinct, though not unique, identity as Edmund Rice Education Australia. The Charter provides a practical expression of this identity and so is of crucial use in decision-making, planning and review.

The Charter uses four Touchstones to describe the culture of a Catholic school which is striving for authenticity in the Edmund Rice tradition.

These Touchstones give us ideals authentically linked with the Charism which underpins the ministry in our schools and educational endeavours. They help us set our direction and define our goals as, following Blessed Edmund's vision, we continue to reflect and to seek to make the Gospel a living reality in our communities.



Liberating  
Education



Gospel  
Spirituality



Inclusive  
Community



Justice and  
Solidarity

## EREA - A Snapshot



### 3. Our structure, operations, and supply chains

#### EREA Governance Structure

EREA was established to succeed, carry on and expand the education ministries conducted by the Congregation of Christian Brothers in Australia. The purpose of EREA is to own, govern, manage and conduct these ministries in fulfilment of the mission of Jesus Christ in the Catholic tradition and in continuation of the charism of Blessed Edmund Rice.

#### EREA Council

The members of the Council of EREA comprise the governing body of EREA under canon law and they are also the members of the body corporate known as Trustees of Edmund Rice Education Australia under civil law. The members of the EREA Council are appointed by the Congregation Leader of the Christian Brothers. The EREA Council appoints the EREA Board and delegates to it certain responsibilities related to the management and strategic direction of EREA.

The EREA Council (as canonical stewards):

- ensures the Identity of EREA as Catholic and an expression of the charism of Blessed Edmund Rice.
- relates on behalf of EREA to Church authorities, and
- approves the establishment or termination of an apostolic work of EREA.

The EREA Council (as civil stewards):

- is the proprietor of the schools, and
- approves the acquisition or alienation of the resources of EREA (according to the Constitution).

#### EREA Board

The EREA Board:

- governs the operation of the schools.
- sets the strategic directions for EREA.
- sets the operational policy framework.
- oversees the financial wellbeing of EREA and each of the schools.
- oversees the management of EREA.
- contributes to the nurturing of key external relationships.
- provides opportunities for formation in the mission of the Catholic Church and the charism of Edmund Rice, and
- supports and guides the Executive.

#### The Executive Director

The EREA Executive Director provides day-to-day leadership and management of the operation of all EREA schools.

The Executive Director:

- implements the strategy and policy approved by the EREA Board.
- articulates the Vision and Mission of EREA and provides leadership which empowers others to bring the EREA Charter to life.
- appoints staff to fulfil the leadership, management and operational structures of EREA.
- ensures the provision of appropriate faith formation and spiritual development of all staff, and
- ensures the sustainability, growth and development of EREA while complying with statutory obligations.

## Schools

The Executive Director delegates the day-to-day operation and management of EREA's schools to its Principals and certain other responsibilities to School Advisory Councils.



Across Australia, Catholic Schools in the Edmund Rice tradition have been educating young Australians in every state and territory since 1872. All our schools aim to offer a Liberating Education, based on a Gospel Spirituality, within an Inclusive Community committed to Justice and Solidarity. Our schools are diverse, including primary and secondary, co-educational, boys, regional/rural, boarding, early learning centres and flexible education.

Around Australia, EREA operates 22 flexible learning centres (FLC's), each a registered school. They provide a place and an opportunity for young people to re-engage with learning and community. Flexible learning centres operate on a common

ground basis in which young people are empowered to determine their own pathways.

The young people who attend our FLC's have typically experienced one or more significant and complex educational, social, developmental, psychological, health, legal or familial situations which demand unique responses. Such interventions are embedded within an educational framework but also typically involve medical, multidisciplinary, legal and/or social support personnel network systems.

A fundamental component of flexible learning is an emphasis on relationship development. Complementing this process is the provision of a values and relationship education program, which draws on the common ground principles and relates to the life experiences of young people.

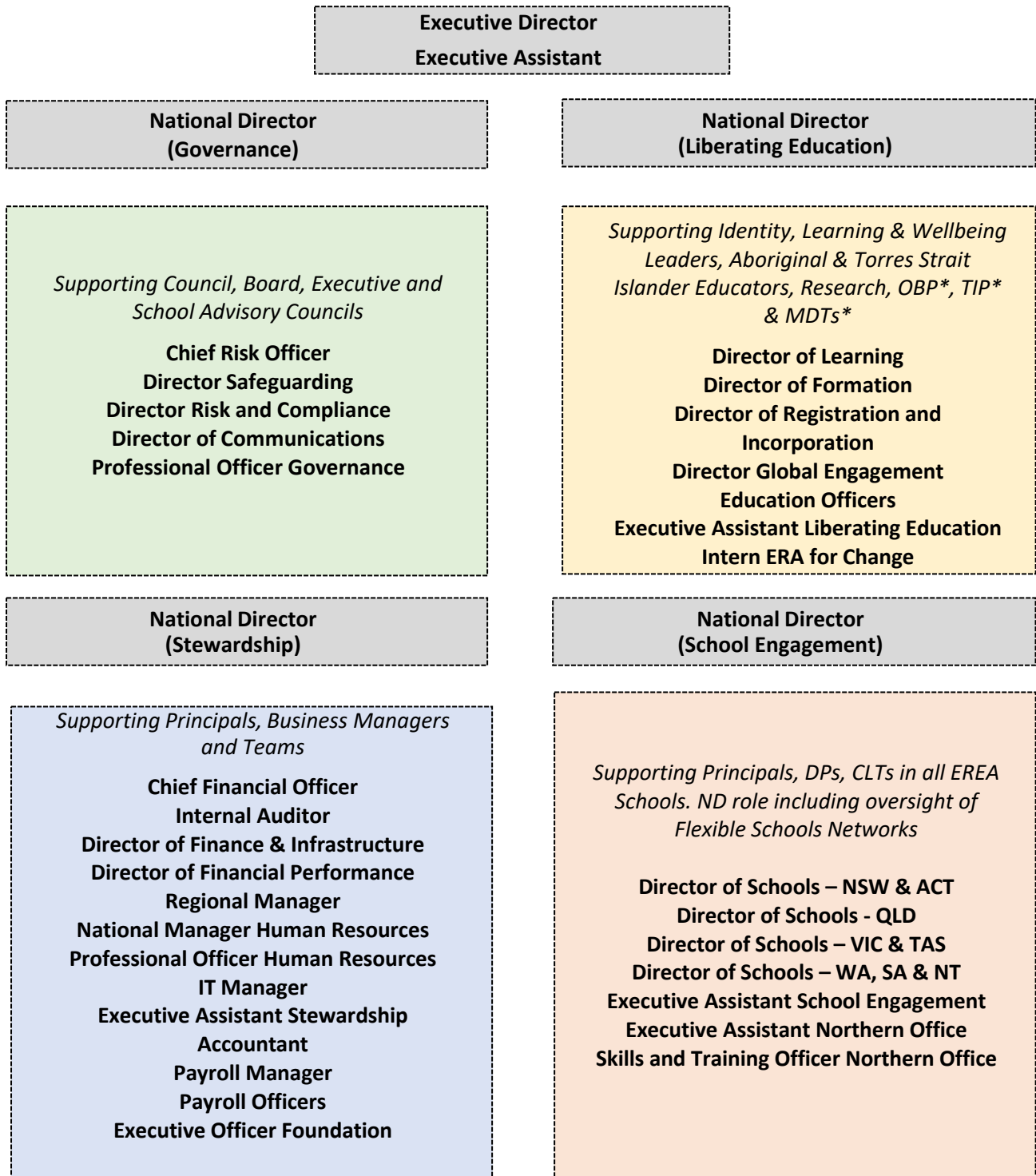
## Supply Chains

With 55 Schools across all states and territories in Australia, our supply chains are very diverse. We have analysed our supply chains and have highlighted categories that we would consider high risk. These categories include construction, facilities management, ICT Software & services, clothing suppliers, food services, IT supplies and services.

Our policy underpins EREA's commitment to working with suppliers to promote social justice. EREA will seek to increase the value of procuring goods and services to encompass additional objectives for social justice and inclusion. We intend to hold our suppliers to the highest standards with the implementation of a Supplier Code of Conduct. This Code of Conduct will outline the standards and behaviours expected of our suppliers, including their employment practices to ensure no forced or involuntary labour is used.



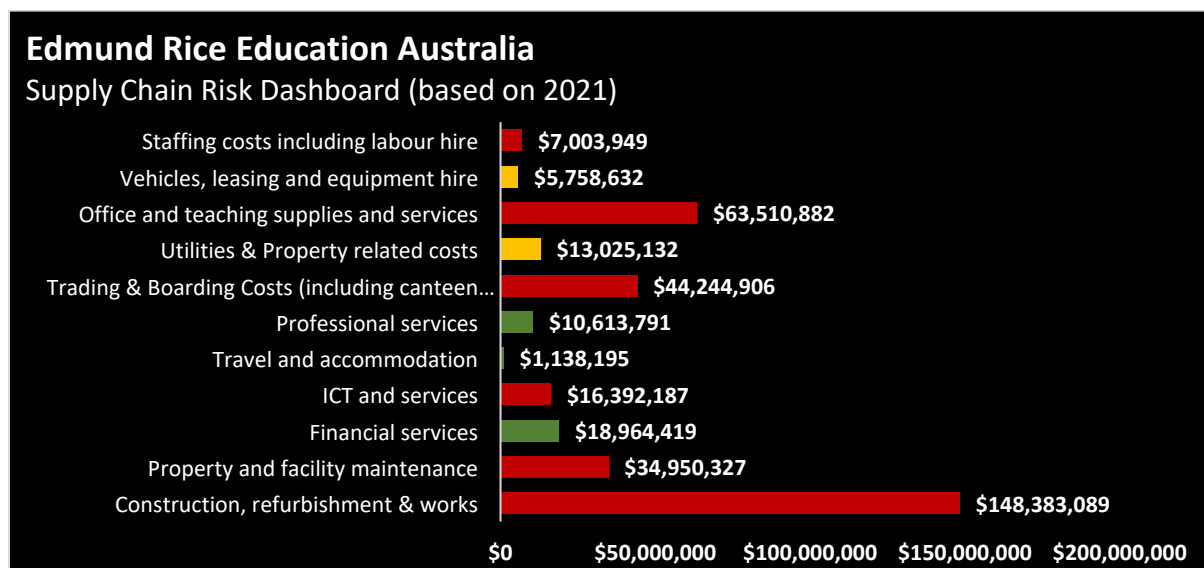
## Our Organisation Chart



#### 4. Modern Slavery risks in our operation and supply chains

EREA has developed a structured approach to understanding the risks of modern slavery in our supply chains. We have worked closely with several of our schools by selecting a range of their procured products and services with diverse risk profiles. Through this work, we have identified a particular range of products and services that we would consider as high-risk areas and have implemented actions to mitigate these risks wherever possible. This work includes the development of our “*Modern Slavery Risk by Spend Category*” (see Table 1 below) which considers types of products and services, industry sector, and to some extent, the location of their business.

**Table 1 – Modern Slavery Risk by Spend Category (\$)**



## 5. Our actions to prevent and manage Modern Slavery Risk

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 and Statement. We view our membership of this network as essential in our quest to eradicate modern slavery, human trafficking and forced labour. Some of the key ACAN resources we have utilised include the Supplier Engagement and Forum Training Workshop, Supplier spend and data analysis and Modern Slavery Statement Writing Workshop.

**We also ask that the following actions are addressed by our workers, business partners and suppliers.**

### Management, Staff and Contractors

- Anyone working for EREA, or on our behalf, is expected to implement the following measures:
  - i. ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers.
  - ii. communicating that business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden.
  - iii. reporting any actual or suspected activity that could breach our Policy to EREA immediately.
- Any relevant, external stakeholders engaged will support our Policy (for example suppliers, contractors, joint venture or other business partners).
- Anti-slavery clauses shall be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment to eradicating modern slavery in supply chains, and capacity to manage identified risks. This includes any new company that wants to do business with EREA.

### Roles and Responsibilities

Role	Responsibilities
EREA Board	<ul style="list-style-type: none"> <li>• Approving our Modern Slavery Policy</li> <li>• Ensuring our policy is reviewed and updated as needed</li> <li>• Reviewing compliance with our policy</li> <li>• Ensuring our policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.</li> </ul>
EREA Executive Director	<ul style="list-style-type: none"> <li>• Developing procedures and guidelines supporting adherence with our policy</li> <li>• Ensuring our Policy is implemented</li> </ul>
Principals	<ul style="list-style-type: none"> <li>• Implementing our Policy and any associated procedures and guidelines</li> </ul>

## Suppliers and business partners

- EREA will actively engage with suppliers to promote our Policy and assist to develop their capabilities to identify and manage modern slavery risks in their own supply chains.
- EREA expects suppliers to share our goals and values in relation to ending modern slavery.
- Suppliers are expected to support EREA's efforts to assess the levels of risk within their operations and supply chains, and to gauge their commitment and capability to manage modern slavery risks.
- Suppliers shall demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

## What we do if slavery is suspected or discovered



Internal reporting of actual or potential modern slavery risks by staff is expected. Staff shall immediately report any suspected violations of the Policy or other illegal or unethical conduct to their line manager for escalation through to their Principal and EREA through Assurance.

Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. EREA commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

If a supplier or any other person outside EREA provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation through to their Principal and EREA.

## Breach of our Modern Slavery Policy

EREA takes infringements of our Policy very seriously. Employees who fail to abide by these principles may face disciplinary action, including dismissal.

Individuals who are aware of a suspected breach of our Policy should refer to EREA's procedure for reporting complaints and can make a report to EREA's Complaints Officer. All reports will be treated confidentially.

EREA will not criticise or penalise employees for any loss resulting from adherence to our Policy. Similarly, we will not penalise employees/officers who report concerns in good faith, even if on closer investigation, these turn out to be unfounded.

EREA retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf, or engaged by it, if they breach our Policy.

## Remedy Pathway

EREA 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 EREA 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, EREA is a founding partner of Domus 8.7, - an independent program to provide remedy to people impacted by modern slavery. EREA 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, EREA can help people impacted by modern slavery achieve meaningful outcomes that can be reported on, and continuously improve risk management and our response.

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

EREA is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

EREA has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2021.

Additional information about Domus 8.7 and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au)

## 6. How we assess the effectiveness of our actions

To determine the effectiveness of our actions, EREA will review the Modern Slavery Statements of each of our suppliers to determine if they are appropriately identifying their modern slavery risks. It is our intention to complete regular risk assessments of our operations and those of our suppliers to address any modern slavery concerns.

We will actively promote Domus 8.7 as our remedy pathway and we will continually review and monitor any complaints made by people impacted by modern slavery.

Currently we have not found any Modern Slavery related incidents within our organisation.

## 7. Consultation with our entities

EREA will continue to review and develop innovative approaches to critically analysing our extended supply chains across 55 schools. We work collaboratively with our schools and suppliers to create an ongoing awareness of the risks of modern slavery, and we will work tirelessly to educate them on this important matter.

## 8. Other relevant information



### Our future commitments

Over the next year, we commit to:

- continue training all stakeholders, both internal and external, on Modern Slavery issues.
- broaden the scope of our supplier risk assessment to include other products and services.
- continue to promote to our suppliers, who are non-reporting entities, how they can comply with the Modern Slavery Act and voluntarily report.
- review and update our risk related policies and governance controls.

### Our COVID-19 approach

The impact of the Coronavirus (COVID-19) pandemic continues to affect communities and businesses throughout the world, including Australia and the communities within which our schools operate. This pandemic will likely have an impact for EREA throughout 2022 and beyond.

As it is with most organisations, the scale, timing and duration of the potential impacts on EREA is difficult to accurately predict, and we recognise that it may unknowingly increase our risk of modern slavery.

We will continue to support our suppliers throughout these troubled times, and we remain committed in continuing to identify and address the risks of modern slavery in our operations and supply chains.

## 9. EREA Board Approval

Edmund Rice Education Australia (EREA) is committed to creating an environment through which we contribute to the eradication of Modern Slavery, Human Rights abuses and Human Trafficking from our society. In support of this initiative, we have prepared this statement as the first step in this process.

We further commit to continually review our practices and those of our suppliers to ensure the risks of modern slavery in our operations are addressed. We will periodically monitor our work practices and implement the necessary polices to appropriately mitigate the risks of modern slavery.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Edmund Rice Education Australia.

The Board of Edmund Rice Education Australia has approved this statement on 21 June 2022.

Signed,



Mark Anderson  
**Acting Board Chair**  
Edmund Rice Education Australia  
21 June 2022

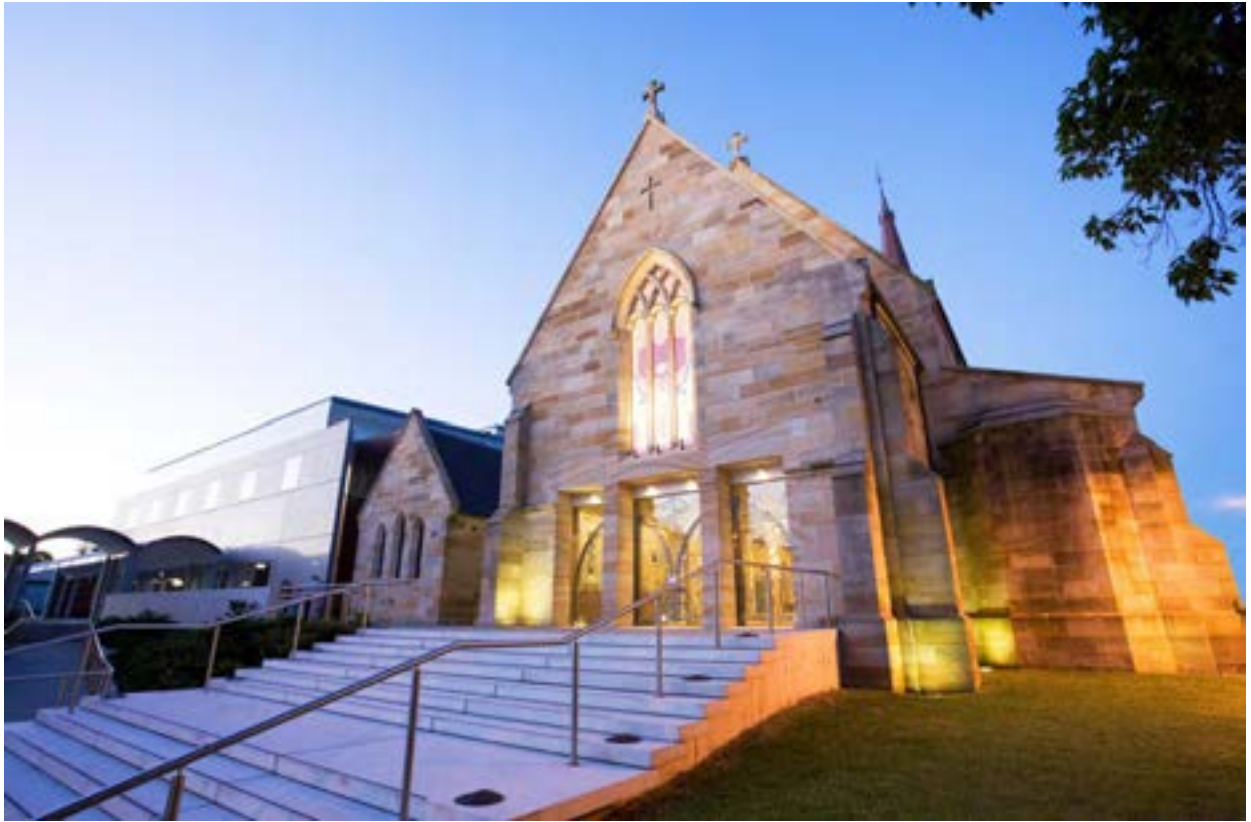
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*Edmund Rice Education Australia offers a  
liberating education, based on a gospel spirituality,  
within an inclusive community committed to  
justice and solidarity*

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# Modern Slavery Statement 2021

## Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. For 2021, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta* as well as *Chancery*.

Catholic Education Diocese of Parramatta (CEDP) ABN 86 875 623 906 is the Reporting Entity. CEDP's Head Office is located at the Bethany Centre, 470 Church Street, North Parramatta NSW 2150.

## Brief Statement from our Bishop

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***There is no longer Jew or Greek, there is no longer slave or free, there is no longer male and female; for all of you are one in Christ Jesus. - Galatians 3:28***

Dear Brothers and Sisters,

Slavery may seem like an outdated phenomenon from ancient times. However, modern-day forms of slavery exist around the world, even here in Australia. Modern slavery includes terrible practices like forced labour, child labour, debt bondage, forced marriage and human trafficking.

Catholic Social Teaching proclaims that our human dignity comes from God, as all human beings are made in the image and likeness of God. Modern slavery is an attack on this God-given dignity and grace given to each person. It is directly contrary to the will of God.

As the largest non-government producer of goods and services in Australia, the Catholic Church has an important and unavoidable role to play in the eradication of modern slavery both in our own country and in the production of goods that Australia imports from overseas.

For the second time, the Diocese of Parramatta has produced a Modern Slavery Statement, which focuses on the year 2021. It reports on how the Diocese's largest agency Catholic Education Diocese of Parramatta (CEDP) and the Chancery Office work together to confront modern slavery and ensure that our supply chains respect the dignity and value of each person.

As the Bishop of Parramatta, I commend and fully support this report. It is important that all our Diocesan agencies and ministries support this statement and ensure voluntary disclosure statements are produced.



As the Catholic Church in Western Sydney and the Blue Mountains, the Diocese of Parramatta is committed to ensuring that we work with governments and other organisations towards the dismantling and elimination of modern slavery.

St Josephine Bakhita, Patron Saint of Victims of Modern Slavery and Human Trafficking, Pray for Us.

A handwritten signature in green ink that reads "+ Vincent Long".

Bishop Vincent Long OFM Conv  
Bishop of Parramatta

10 June 2022

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# About us

The Catholic Diocese of Parramatta is an unincorporated association that is part of and associates itself for civil law purposes through the Trustees of the Roman Catholic Church for the Diocese of Parramatta.

The Trustees of the Roman Catholic Church for the Diocese of Parramatta is incorporated under the Roman Catholic Church Trust Property Act 1936.



The Trustees are the custodian of the assets of the various unincorporated associations and the association is governed by the Code of Canon Law 1983.

Originally classified as the Western Region of the Archdiocese of Sydney, the Diocese of Parramatta was created by Pope John Paul II on 8 April 1986 but most parishes are much older – Parramatta parish was established in 1827, Windsor in 1832 and Penrith in 1839, while Rouse Hill was formed in 2007.

The Diocese, under the leadership of the Bishop, serves the People of God in the west of Sydney reaching from Dundas Valley, west to Megalong Valley, south to Bringelly, and north to Wisemans Ferry. The Diocese takes in seven local government divisions: The Hills Shire, Blacktown City, Blue Mountains City Council, Hawkesbury Shire, Cumberland Council, City of Parramatta, and Penrith City Council, as well as parts of Wollondilly and Liverpool. With more than 320,000 Catholics and covering an area of 4,289 square kilometres, the Diocese comprises 46 Parishes managed by their respective Parish Priests/Administrators. The Diocesan Head Office is located at 470 Church Street North Parramatta NSW 2150.

## **Catholic Education Diocese of Parramatta**

The Diocese has a system of schools which are managed by a separate 'entity' named *Catholic Education Diocese of Parramatta* (CEDP). In 2020, CEDP manages 82 Catholic schools, CathWest Innovation College, 25 Catholic Out of School Hours care centres (COSH) and five Catholic Early Learning Centres which educate 43,000 students and employ 5,000 teachers and staff.

CEDP is an unincorporated entity whose trustee is the Diocese of Parramatta, under the leadership of Bishop Vincent Long Van Nguyen OFM Conv DD STL. The Bishop delegates the responsibility of the management of the schools to the Executive Director. The Executive Director, Mr Gregory B. Whitby AM, has a group of six Directors that form the Executive Team and provide strategic direction and leadership to CEDP. CEDP 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. CEDP 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. CEDP's revenue and expenditure for 2021 were \$751 million and \$708 million, respectively.

Having its head office in Parramatta, CEDP has stewardship of all the activities that can be standardised across the schools (e.g., payroll, recruitment, provision of technology, professional learning, facilities, etc) and allows the schools to focus on their core business of flexible learning and teaching.

The education and formation of students in Catholic discipleship are at the heart of our Catholic school system. CEDP provides quality learning and teaching in a faith-centred environment.

The purpose, intent, and priorities of CEDP are:

### ***Purpose***

Catholic education is integral to the evangelising mission of the Catholic Church in the Diocese of Parramatta under the leadership of the Bishop. It is through learning and teaching that Catholic education promotes the work of the Church, the formation of the individual and the good of society.

Catholic schooling is a work of love, for the full human development of students, grounded in the person of Jesus Christ and at the service of society. All staff share in the evangelising mission of the Church as they endeavour to accomplish synthesis of faith, life, and culture in their communities.

### ***Intent***

Our intent is to transform the learning of each student and enrich the professional lives of staff within a Catholic learning community.

### ***Priorities***

CEDP will focus on four priorities from 2020-2025. These are:

1. Mission is counter cultural;
2. Learning is owned by the learner;
3. Equity is the norm; and
4. Everyone is a leader.

## 2021 Modern Slavery Risk Management Initiatives

The Catholic Church in Australia is amongst the largest non-government procurers of goods and services and understands that some of these goods and services may be tainted by the practices of modern slavery. The Catholic Church has a history of opposing slavery and has been working to end the slave trade and to support victims currently trapped in exploitative industries.

Throughout 2021 CEDP has continued to work under the umbrella of the Australian Catholic Anti-Slavery Network (ACAN) towards eradicating modern slavery. ACAN is steadfast in its commitment to eradicate modern slavery both nationally and globally. ACAN continues to support participating entities in efforts to identify and manage modern slavery risks in their operations and supply chains. This encompasses the following activities:

1. Sharing resources and experience through team building;
2. Offering tailored education programs to member entities and their suppliers;
3. Offering tailored webinars to suppliers of goods and services to member entities;
4. Provision of templates for policy and other documentation;
5. Risk assessment;
6. Action planning; and
7. Completion of Modern Slavery Statements.

This is the second Modern Slavery Statement completed as a compendium together with other ACAN entities. This statement covers the work that the Diocese of Parramatta performed in 2021. The focus for 2021 was on onboarding major CEDP suppliers, training of the initial group of staff on Modern Slavery, further supplier engagement through eLearning resources provided by ACAN and the inclusion of modern slavery clauses in additional CEDP agreement templates and supplier templates during tendering and contract negotiation processes.

ACAN participating entities remain united in the belief that action against Modern Slavery is a fundamental Catholic Social Teaching. The Diocese of Parramatta has continued its cooperation with other Catholic entities affiliated to ACAN, keeping up to date with the requirements of the Modern Slavery Act.

In 2021, following the completion of supplier categorisation in 2019/20<sup>1</sup> CEDP invited its top 50 suppliers to onboard the Sedex platform. Sedex is a membership organisation that provides online platforms for companies to manage and improve working conditions in global supply chains<sup>2</sup>.

As of 31 December 2021, the Diocese of Parramatta had onboarded 15 major suppliers, representing 30% of those invited. The Diocese will continue to encourage the remaining suppliers to onboard Sedex through 2022.

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<sup>1</sup> Identification of high expenditure and high-risk categories. A supplier database was presented to ACAN to help develop category risk taxonomies for participating entities.

<sup>2</sup> <https://www.sedex.com/>

### **Modern Slavery Working Group**

The Modern Slavery Working Group (the Working Group) comprises two members from Chancery, one each from the Office of the Executive Director and Mission, and 2 from Procurement.

Due to challenges imposed by COVID-19, the Modern Slavery Working Group was unable to meet face-to-face throughout 2021. All meetings were conducted virtually. It is notable that despite a very busy 2021, the Working Group achieved a significant proportion of its 2021 commitments.

### **Modern Slavery Policy, Procedures and Guidelines**

The Working Group will engage stakeholders in finalising the Modern Slavery Prevention Policy developed in 2020/21 and presenting it to Directors for ratification in 2021. Procedures and Guidelines will also be developed and presented to Directors with the Policy for ratification.

### **Participation in Building Links Modern Slavery Webinar**

CEDP was a participant in the ACAN organised webinar for suppliers in the construction industry held on 14 September 2021, and the webinar for suppliers in the Information and Communications Technology (ICT) industry held on 12 October 2021. The purpose of the webinars was to help CEDP suppliers understand the following:

1. Business relevance and the Modern Slavery Act;
2. Catholic customer/buyer expectations;
3. Ways to access free modern slavery e-learning;
4. Sedex supplier membership; and
5. Domus 8.7 modern slavery specialist remediation services.

The Diocese of Parramatta was represented by four staff from Chancery, Mission and Procurement. Fifty suppliers were invited to attend.

### **eLearning**

The Diocese continues to encourage staff to complete the ACAN Modern Slavery eLearning modules. In 2021 there were 37 modules completed by CEDP staff. There is consideration by the Committee to recommend that all staff complete the basic Modern Slavery 101 module.

### **Management System Action Plan for 2021 - Completed Activities**

#### *Governance*

1. Educated Board of Directors on modern slavery risks and Modern Slavery Act 2018 (MSA) legislative reporting requirements; and

2. Updated senior management on the modern slavery program, ensuring MSA responsibilities are understood.

#### *Commitment*

1. Assigned responsibilities for managing Modern Slavery risks to members of the Working Group.<sup>3</sup>
2. Commitment by the Working Group to continue to oversee and implement the action plans.
3. Development of a detailed action plan for addressing Modern Slavery risks.

### **Human Resources and Recruitment Action Plan for 2021 - Completed Activities**

#### *Policies and Systems*

Development and promotion of the Modern Slavery policy internally and externally. Draft policy was completed using the ACAN template. The draft will be reviewed internally before presentation to Directors for their consideration in 2022.

#### *Awareness and Training*

1. Sharing of internal modern slavery awareness program. There were 37 eLearning module completions by 19 staff.
2. Identification of opportunities for sharing information and training resources across industry sectors. An opportunity has been identified to share eLearning MS101 across all CEDP and Chancery staff in 2022. The Committee recommends all staff undertake the basic Modern Slavery 101 eLearning module offered by ACAN.

#### *Labour Hire and Outsourcing*

Delivery of modern slavery training to priority labour hire companies and contractors in tendering process. Modern Slavery clauses have been included in CEDP contract templates, purchasing order terms and conditions and in tender documents. This will continue through 2022 and beyond.

### **Customer and Stakeholder Action Plan for 2021 - Completed Activities**

#### *Attitude*

Development of customer and stakeholder communications strategy. Communicated with CEDP's top 50 suppliers through ACAN and Sedex.<sup>4</sup> A Modern Slavery clause was included in CEDP's purchase order terms and conditions and communicated to all CEDP suppliers.

#### *Information*

1. Issuing of a public statement on the Dioceses' position on modern slavery. This was accomplished through publication of the 2021 statement on the Government portal and CEDP website (<https://parracatholic.org/wp-content/uploads/2021/05/Diocese-of-Parramatta-Modern-Slavery-Statement.pdf>).
2. Development of employee and supplier Code of Conduct for publication on CEDP website. The

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<sup>3</sup> Procurement to engage suppliers, Chancery to engage the Parishes and Mission to be responsible for engaging the school communities.

<sup>4</sup> Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains.



drafts were completed in 2021. The Working Group will seek stakeholder views on the drafts and, in 2022, present them to Directors for their consideration.

3. Development of targeted information for key stakeholders. This was partially achieved through the inclusion of Modern Slavery clauses in CEDP contract templates. Additional work will be completed in 2022.

## **Procurement and Supply Chain Action Plan for 2021 - Completed Activities**

### *Policies and Procedures*

1. Incorporated modern slavery requirements into existing policies and procedures. The draft Contracts Management Plan (CMP) contains provisions on Modern Slavery. The CMP is to be presented to Directors for ratification and launch in 2022. The documents draw staff attention to the CEDP's Modern Slavery requirements in the acquisition of goods and services.
2. Inclusion of general clauses on modern slavery in all supplier contracts. Modern slavery clauses have been included in all supplier contracts on CEDP templates. Wherever supplier templates are used, one of CEDP's conditions is to have Modern Slavery clauses included.<sup>5</sup>
3. Undertaking of a gap analysis of procurement policies and procedures, and completion of policies and procedures documents. Procurement policies and procedures documents are due for ratification in 2022.

### *Supplier Engagement*

1. Development of targeted communications and engagement programs for high-risk suppliers. Developed a clause on Modern Slavery, which was included in CEDP's purchasing order terms and conditions and sent to all suppliers by CEDP's team working on a finance transformation project.
2. Engagement of all Tier 1 suppliers in modern slavery awareness programs. In collaboration with Sedex, communication was sent to top 50 suppliers, with follow-ups from CEDP and Sedex. Thirty percent (30%) onboarded the Sedex platform in 2021. CEDP commits to following up the rest in 2022.

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<sup>5</sup> Has been accomplished with several university contracts.

## Our 2021 Outstanding Plans

The following action plans intended for 2021 are outstanding. The Diocese intends to focus on these plans during 2022, whilst consolidating the gains made in 2021.

Management Systems Action Plan 2021		
Topic	Actions	
<b>Governance</b>	Establish governance framework for managing modern slavery risks.	Ongoing through completion of Policy Procedures and Guidelines to be presented to Directors for ratification in 2022.
<b>Commitment</b>	Educate senior management on modern slavery risks and legislative requirements – as above, Procurement Policies/Procedures.	Ongoing through completion of Policy, Procedures and Guidelines to be presented to Directors for ratification in 2022.
<b>Actions Taken</b>	Engage key business units and stakeholders to implement priority actions.	Ongoing.
Risk Management Action Plan 2021		
Topic	Actions	
<b>Risk Framework</b>	Develop team and process to commence action planning	Modern Slavery Working group set up, with representation from CEDP and Chancery. Action planning for 2022 and beyond in progress.
Procurement and Supply Chain Action Plan 2021		
Topic	Actions	

<b>Screening and Traceability</b>	Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow.	To be completed in 2022
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## Our Plans Beyond 2022

The Diocese intends to undertake the following further steps beyond 2022.<sup>6</sup>

<b>Management Systems Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Commitment</b>	<ul style="list-style-type: none"> <li>• Showcase the actions taken to address modern slavery risks across industry networks</li> </ul>
<b>Business Systems</b>	<ul style="list-style-type: none"> <li>• Engage key internal stakeholders to review existing business processes</li> </ul>
	<ul style="list-style-type: none"> <li>• Review existing business systems against the requirements of modern slavery legislation</li> </ul>
	<ul style="list-style-type: none"> <li>• Integrate modern slavery risk management into existing business systems</li> </ul>
	<ul style="list-style-type: none"> <li>• Integrate modern slavery risk management into supplier review processes</li> </ul>
<b>Actions Taken</b>	<ul style="list-style-type: none"> <li>• Ensure elements of modern slavery risk management systems are reflected across the business</li> </ul>

<sup>6</sup>Should the Diocese accomplish any of the items scheduled beyond 2022, they will be included in the 2022 Statement.

	<ul style="list-style-type: none"> <li>● Establish goals, targets and KPIs to effectively address modern slavery risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations &amp; supply chain</li> </ul>
<b>Monitor and Report</b>	<ul style="list-style-type: none"> <li>● Undertake a review of modern slavery risks in your industry sector</li> </ul>
	<ul style="list-style-type: none"> <li>● Identify opportunities for leadership on modern slavery data collection and reporting processes</li> </ul>
	<ul style="list-style-type: none"> <li>● Integrate modern slavery risk findings into monthly management reports</li> </ul>
	<ul style="list-style-type: none"> <li>● Expand data collection process to include modern slavery data from national and international sources</li> </ul>
	<ul style="list-style-type: none"> <li>● Continuous improvement</li> </ul>

### Human Resources and Recruitment Action Plan Beyond 2022

Topic	Actions
<b>Awareness</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery information into induction programs</li> </ul>

<b>Policies and Systems</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery risk management specific responsibilities into position descriptions</li> </ul>
	<ul style="list-style-type: none"> <li>● Encourage lowering tolerance approach to modern slavery among all staff and contractors</li> </ul>
<b>Training</b>	<ul style="list-style-type: none"> <li>● Incorporate modern slavery awareness training into induction programs</li> </ul>
<b>Labour Hire &amp; Outsourcing</b>	<ul style="list-style-type: none"> <li>● Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts</li> </ul>
	<ul style="list-style-type: none"> <li>● Assess labour hire contractors and outsourcing programs for modern slavery risk                             <ul style="list-style-type: none"> <li>○ Individual Schools</li> <li>○ HR and Facilities</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>● Regularly review and update hiring and on- boarding processes</li> </ul>

## Customers and Stakeholder Action Plan Beyond 2022

Topic	Actions
<b>Attitude</b>	<ul style="list-style-type: none"> <li>● Develop curriculum appropriate to <u>stage</u> around the issue                             <ul style="list-style-type: none"> <li>○ Parent</li> <li>○ Teacher</li> </ul> </li> </ul>
<b>Feedback Mechanisms</b>	<ul style="list-style-type: none"> <li>● Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish systems and processes to evaluate and take immediate action on feedback received</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish stand-alone confidential modern slavery hotline for staff and contractors</li> </ul>
	<ul style="list-style-type: none"> <li>● Engage external third- party labour-rights auditors to validate worker voice data</li> </ul>

<b>Worker Voice</b>	<ul style="list-style-type: none"> <li>● Run pilot project worker voice program for high-risk suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement worker voice data collection and reporting system</li> </ul>
	<ul style="list-style-type: none"> <li>● Review worker voice data collection options for at-risk workers in the supply chain</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop a comprehensive modern slavery remediation program that is well resourced and supported</li> </ul>
<b>Risk Management Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Risk Framework</b>	<ul style="list-style-type: none"> <li>● Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work</li> </ul>
	<ul style="list-style-type: none"> <li>● Establish systems and processes to evaluate and take immediate action on identified risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Include modern slavery risk review into risk management policies and procedures</li> </ul>
	<ul style="list-style-type: none"> <li>● Incorporate modern slavery risk assessment into existing risk framework</li> </ul>

<b>Operational Risk</b>	<ul style="list-style-type: none"> <li>● Map operations against potential risks of modern slavery or Exploitation</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop action plan to address risks of modern slavery in internal operations</li> </ul>
	<ul style="list-style-type: none"> <li>● Enhance internal capacity to identify and manage operational risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement actions to mitigate or eliminate operational risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks</li> </ul>
<b>External Risk</b>	<ul style="list-style-type: none"> <li>● Develop risk management plan to address modern slavery risks among priority suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Undertake modern slavery risk review of priority direct (Tier 1) suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Assign resources to identify, prioritise and manage operational and supply chain risks</li> </ul>
	<ul style="list-style-type: none"> <li>● Map modern slavery risks and vulnerabilities along extended supply chain</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop and monitor implementation of corrective action plans</li> </ul>
<b>Monitor &amp; Report</b>	<ul style="list-style-type: none"> <li>● Identify opportunities to monitor and report on modern slavery risks</li> </ul>



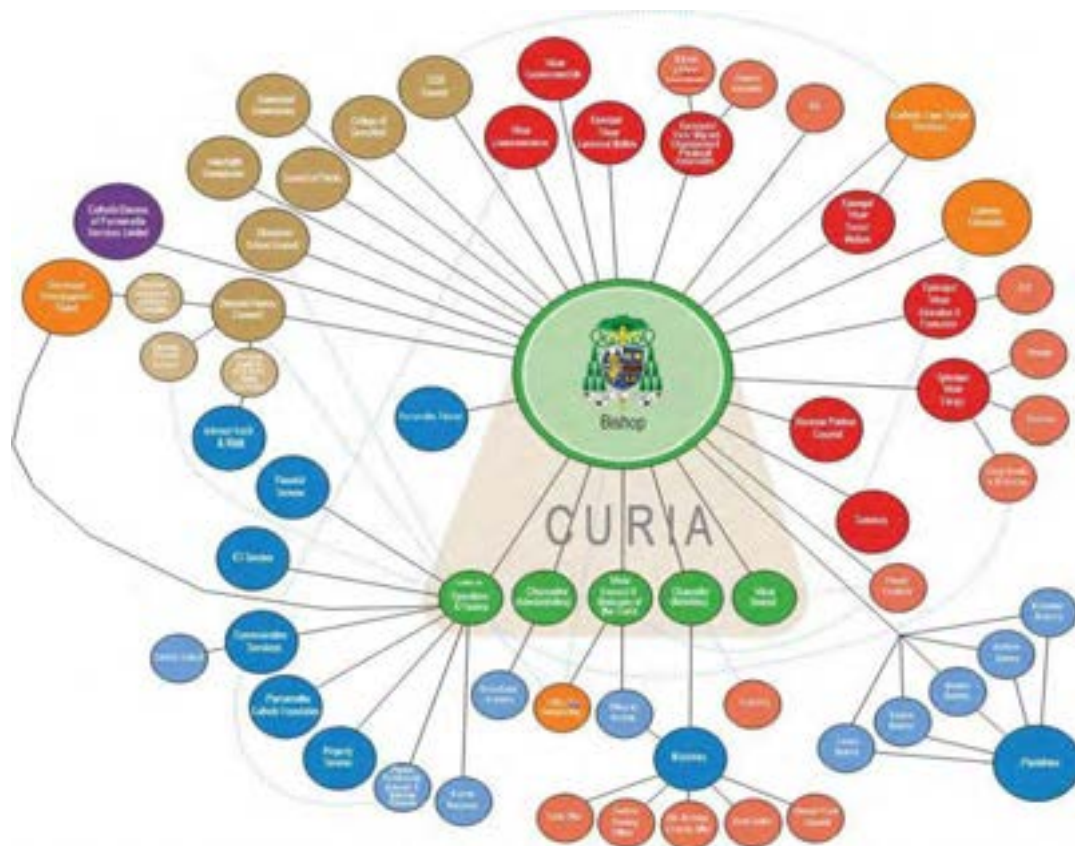
	<ul style="list-style-type: none"><li>● Develop procedures to effectively report and act where modern slavery risks are identified</li></ul>
	<ul style="list-style-type: none"><li>● Integrate modern slavery risk management into business evaluation and reporting processes</li></ul>
	<ul style="list-style-type: none"><li>● Integrate modern slavery risk reporting with stakeholder feedback mechanisms</li></ul>
	<ul style="list-style-type: none"><li>● Transparently report on modern slavery risks- both internally and externally</li></ul>

<b>Procurement and Supply Chain Action Plan Beyond 2022</b>	
<b>Topic</b>	<b>Actions</b>
<b>Contract Management</b>	<ul style="list-style-type: none"> <li>● Incorporate performance standards and contract evaluation criteria for high-risk contracts</li> </ul>
	<ul style="list-style-type: none"> <li>● Conduct desktop review of high-risk suppliers</li> </ul>
<b>Screening and Traceability</b>	<ul style="list-style-type: none"> <li>● Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)</li> </ul>
<b>Monitor &amp; Corrective Action</b>	<ul style="list-style-type: none"> <li>● Establish a supplier monitoring program through Sedex</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop a monitoring system to assess ongoing performance (Sedex)</li> </ul>
	<ul style="list-style-type: none"> <li>● Develop corrective action plans to address modern slavery risks among high-risk suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>● Work with suppliers to identify gaps and address barriers to implementation</li> </ul>

# Reporting Criteria 1 & 2: About Diocese of Parramatta and Catholic Education Diocese of Parramatta

## Our Organisational Structure

A graphic of the organisational structure of the Catholic Diocese of Parramatta follows. For the purpose of this Statement, the Diocese's largest agency, Catholic Education Diocese of Parramatta (CEDP), is also outlined below.



## CEDP EXECUTIVE TEAM



## CEDP SERVICE AREAS



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## Our Governance Framework

As a Diocese of the Roman Catholic Church, the Diocese of Parramatta's operations and the way the Bishop exercises his authority are governed by both canon law and civil law. The Diocese aims to keep a high ethical standard and a robust corporate governance framework. In this regard, the Diocesan Audit and Enterprise Risk Committee (DAERC) is in place to assist the Bishop, the Diocesan Finance Council, and the Diocesan Schools Council in fulfilling their oversight responsibilities to effective corporate governance. The Diocese recognises that this is critical to the success of eradicating modern slavery in the long term.

The Diocese and its agencies' approach to modern slavery compliance and its practical effectiveness is aligned with its policies related to conduct and ethical behaviour.

Managing the complex risk of modern slavery within our operations and supply chains requires ongoing commitment and collaboration between agencies and with our suppliers. Our Modern Slavery Working Group will continue to review our approach to human rights and modern slavery issues, including with respect to mitigation and remediation, and report our progress to the relevant committees and councils in charge of governance. The Modern Slavery Working Group draws representation from Chancery, Office of the Executive Director, and the Capital Resourcing and Mission Directorates.

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## Our Operations

Diocesan schools are managed by Catholic Education Diocese of Parramatta (CEDP). CEDP manages 82 Catholic Schools - (58 primary schools, 22 secondary schools and 2 trade pathway campuses), 43,000 students and 5,000 staff. The Head Office in Parramatta is in charge of 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.

The Diocesan Development Fund (DDF) provides a source of finance and credit for capital expenditure in the works of the Church and funds for welfare and pastoral programs in the Catholic Diocese of Parramatta.

Catholic Care Social Services (CCSS) is the official not-for-profit, professional social care agency of the Diocese and operates as an approved service provider contracted to deliver social care and education services to individuals, children, and families through a range of NSW and Australian government funded programs designed to meet the diverse needs of people living in local communities across the Diocese.

The above agencies are supported by their respective infrastructure, and by the Office of Bishop and the Diocesan Chancery which has its own administrative infrastructure and provides support to the Bishop and individual parishes.

COVID-19 has had an adverse impact on the completion of some key modern slavery commitments in 2021, including restricted supplier engagement and collaboration with a wider network of stakeholders. These commitments will be undertaken in 2022.

CEDP's focus in 2021 was:

1. Celebrating a special Mass in the honour of St Bakhita on 8 February 2021 at Mary Queen of the Family Parish, Blacktown, led by Bishop Vincent Long OFM Conv, Bishop of Parramatta. Details of the celebration are presented in the Appendix to this Statement.
2. Completion of Modern Slavery eLearning modules. The table below shows the number of completions by module. The total duration of the three courses is 2.5 hours.

eLearning Module	Description	Number of Completions
ACAN-Modern Slavery 101	Provides a comprehensive overview of modern slavery and worker vulnerability. 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.	6
ACAN-Implementing a Modern Slavery Risk Management Program	Provides a comprehensive overview on how to develop and implement a modern slavery risk management program including focused on: Commitment and Leadership, Gap analysis and Action planning, Supplier Risk and Building Staff Capabilities.	15
ACAN-Business Relevance	Outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. A review of relevant modern slavery criminal offences and key reporting requirements of the <i>Modern Slavery Act 2018</i> (Cth) are included.	16
<b>Total Completions</b>		<b>37</b>

3. Targeting our top 50 suppliers to create awareness about modern slavery and inviting them to onboard the Sedex platform. Of the 50 suppliers invited in 2021, 15 joined Sedex, representing a 30% success rate.
4. Followed up suppliers with email and telephone reminders to onboard Sedex.
5. Held a webinar for suppliers in the construction industry through ACAN and Sedex.
6. Held a webinar for suppliers in the construction industry through ACAN and Sedex.
7. Attended monthly Modern Slavery Liaison Officers (MSLO) teleconferences, organised by ACAN.

# Reporting Criteria 3: Modern slavery risks in operations and supply chain

## Our COVID-19 Response

COVID-19 continued to have a negative impact on CEDP employees and suppliers in 2021. In response to this, the following key measures were taken to continue supporting workers and maintaining our supplier relationships:

1. extension of contracts due for retendering in 2021
2. further waiver of canteen license fees during lockdown and reduction in fees upon reopening of schools where student numbers were down
3. waiver of automatic annual fee increases for canteen contracts by some schools
4. reduction in fees for cleaning contracts during school closure
5. Continued assessment of uniform suppliers on potential disruption to their supply chains as a consequence of COVID-19.

The above actions are in alignment with some of the measures outlined in the publication 'Modern Slavery Act Information Sheet: Coronavirus' by the Australian Border Force.

## Our People

The Diocese of Parramatta complies with labour, employment and immigration laws 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. This covers a broad range of legislation that governs the HR/fair work practices of the Diocese.





Staff Allocation Chancery

	Fulltime	Part-time	Casual	Total
Male	26	0	8	34
Female	31	12	12	55
<b>Total</b>	57	12	20	89

Staff Allocation DDF

	Fulltime	Part-time	Casual	Total
Male	4	2	0	6
Female	2	1	0	3
<b>Total</b>	6	3	0	9

Staff Allocation CEDP

	Fulltime	Part-time	Casual	Total
Male	933	199	72	1,204
Female	2,486	1,736	350	4,572
<b>Total</b>	3,419	1,935	422	5,776

## Modern Slavery Gap Analysis

ACAN Gap Analysis is an online tool to assist organisations to track and manage internal response and preparedness to identify, respond and mitigate the risk of modern slavery. CEDP completed its first Gap Analysis as part of the July 2019 Catholic Modern Slavery Conference and has been conducting the assessment annually to track the progress of improving systems in CEDP. The latest Gap Analysis for 2021, presented below alongside those for 2020 point to continuous improvement in implementing committed actions.

Category	Topic	Result 2020	Result 2021	Change
<b>Management Systems</b>	Governance	Yellow	Yellow	
	Commitment	Yellow	Yellow	
	Business Systems	Yellow	Yellow	▲
	Action	Yellow	Yellow	
	Monitoring & Reporting	Yellow	Yellow	
<b>Risk Management</b>	Risk Framework	Yellow	Yellow	
	Operational Risk	Yellow	Yellow	
	Identifying External Risks	Yellow	Yellow	
	Monitoring and Reporting on Risk	Yellow	Yellow	
<b>Human Resources and Recruitment</b>	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Red	
	Labour Hire / Outsourcing Training	Yellow	Yellow	▲
<b>Customers and Stakeholders</b>	Customer Attitude	Yellow	Yellow	
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Yellow	▲
<b>Procurement and Supply Chain</b>	Policies and Procedures	Yellow	Yellow	
	Contract Management	Yellow	Yellow	▲
	Screening and Traceability	Yellow	Yellow	▲
	Supplier Engagement	Yellow	Yellow	▲
	Monitoring and Corrective Actions	Yellow	Yellow	

## Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies, partnering with CEDP in learning services and providing ICT subscription services. There has been no significant change in the supplier base since 2021. The 2021 statement mentioned uniform, end user computers, multifunction devices and cleaning services as examples of suppliers from whom CEDP obtains goods and services. Other key suppliers are in the construction industry.

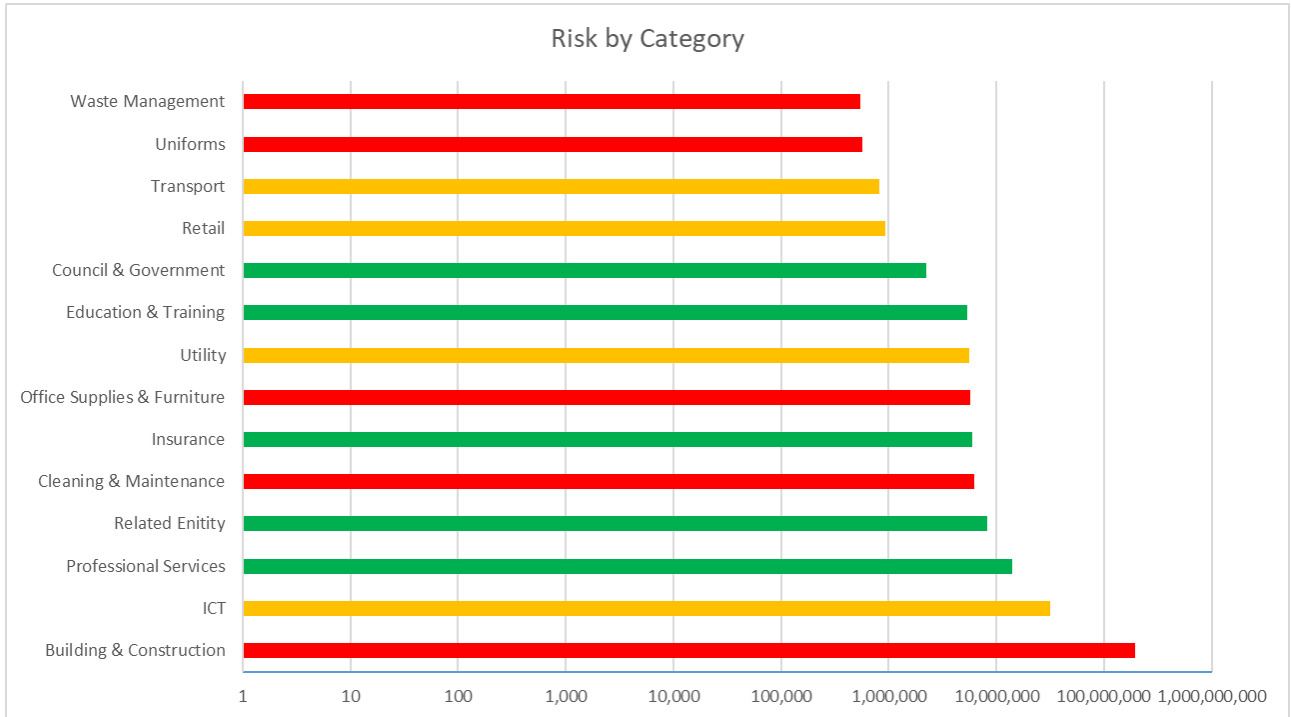
## Supply Chain Risk

There has been no change to CEDP’s highest risk suppliers since 2019 with the exception of the category of waste management which entered into the top 100 in 2021. The suppliers remain predominantly in the building and construction, uniform supply, cleaning and maintenance, ICT hardware and technology and finally waste management. The table below names some goods and/or services sourced by CEDP from these sectors and examples of the respective labour rights risks.

SECTOR	EXAMPLE GOOD OR SERVICE WITH POTENTIAL RISK	EXAMPLE LABOUR RIGHTS RISK
Building and Construction	Specific products and commodities deemed as high risk by the US Department of Labour’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	<ul style="list-style-type: none"> <li>● Forced labour in the production of building and construction materials</li> </ul>
Apparel/uniforms	Recognition of the clothing industry as one of the largest consumer industries. Potential for exploitation of workers, 70% of whom are women	<ul style="list-style-type: none"> <li>● Potential for exploitation of workers, 70% of whom are women</li> <li>● Some products and commodities deemed as high risk by the US Department of <i>Labor’s 2018 List of Goods Produced by Child and Forced Labor</i>, the Global Slavery Index (GSI) and other international guidance materials</li> </ul>
Cleaning and Maintenance	Cleaning services	<ul style="list-style-type: none"> <li>● Vulnerable or migrant labour is used, work is deemed as ‘3D’ work (dirty, dull, or dangerous)</li> <li>● Below award wages</li> <li>● Docking of wages</li> </ul>

Technology/ICT hardware	Inputs into ICT hardware from conflict mineral areas	<ul style="list-style-type: none"> <li>● Worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., cobalt, tungsten, tantalum, and gold from Central Africa (Republic of the Congo)</li> </ul>
Waste Management	Waste management services such as rubbish removal and recycling	<ul style="list-style-type: none"> <li>● Similar to the cleaning &amp; maintenance category which may feature a vulnerable or migrant labour workforce</li> <li>● Below award wages &amp; docking of wages</li> </ul>

Using organisational spend data generated for the period 1 January 2021 to 31 December 2021, the top 100 suppliers made up 83.14% of total supplier spend. There were 14 categories across the top 100 companies that CEDP engaged by spend. Of the 14 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



The high risk categories for CEDP are:

- Building and construction - 57.17% of supplier spend
- Cleaning and maintenance - 1.83%
- Furniture and office supplies - 1.68%
- Uniforms - 0.17%
- Waste Management - 0.16%

The graph below shows that 54% of CEDP’s top suppliers by spend were in the high-risk category. A further 16% had moderate risk and the remaining 30% had a low level of risk attached to their operations.



The majority of the top suppliers are from CEDP's building and construction partners (38 suppliers). The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. The next two biggest categories by both spend and numbers of suppliers is ICT and Professional Services respectively with 12 and 11 providers each. They include IT hardware, software and support suppliers, consulting, and labour hire services.



# Reporting Criteria 4: Actions taken to assess and address risk

The impact of COVID restricted some of the activities targeted for completion in 2021. That notwithstanding, the following measures were taken:

1. Continued the collaborative work of the Modern Slavery Working Group. The Working group held a series of 25 meetings in 2021.
2. Further engaging with the Australian Catholic Anti-slavery Network (ACAN) and education providers who are participating entities within ACAN. The engagement was in the form of MSLO and Working Group members participating in the monthly teleconferences and supplementary webinars.
3. Engaging with the internal stakeholders of the organisation to seek their input in completion of the 2021 Modern Slavery Statement
4. Compilation of the top 50 suppliers, and sending of the list to Sedex for purposes of onboarding to the (Sedex) platform.
5. Following up suppliers on the on-boarding process through collaboration with Sedex.
6. Invitation to suppliers to attend the construction webinar organised by Sedex and ACAN.
7. Invitation to suppliers to attend the ICT webinar organised by Sedex and ACAN.
8. Completion of 37 eLearning units by 19 staff across the Diocese. The modules completed and their descriptions are presented in the table under Reporting Criteria 1 and 2.
9. Inclusion of Modern Slavery clauses in CEDP contract templates.
10. approval from CEDP Directors to source a contracts management tool in 2021, which will also address some requirements relating to Modern Slavery.
11. Completion of a draft contracts management policy, to be ratified in 2022.
12. Completion of data gathering and spend analysis to assist with performing the third Gap Analysis.
13. Completion of the 2021 ACAN Gap Analysis, identifying areas, identifying areas of improvement, areas that remained static and those requiring attention in 2022. These will be addressed in accordance with the Action Plans for 2022 and later years.

## Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2022 and beyond are summarised under the headings "Our Outstanding Plans" and "Our Plans Beyond 2022". The action plans and road map focus on the following key areas:

1. Management systems.
2. Human resources and recruitment.
3. Customers and stakeholders.
4. Risk management.
5. Procurement.

Detailed timelines and responsibilities will be assigned to the relevant Business Units.



# Reporting Criteria 5: Effectiveness Assessment

The table below demonstrates the effectiveness of work performed in 2021, showing areas requiring further work in 2022.

Stakeholder	Activity	2021	2020
Staff	e-learning modules completed	37	17
Modern Slavery Working Group	Number of meetings	25	
Suppliers	Total number of suppliers	4,880 <sup>7</sup>	4,480
	e-learning modules completed by suppliers	0	0
	Contract templates include MS clause <sup>8</sup>	7	4
	Suppliers engaged on MS	50	0
	Suppliers invited to join Sedex	50	0
	Suppliers joined Sedex	15	0
	Suppliers shared Sedex SAQ results	0	0
	SMETA audits	0	0
	Corrective actions	0	0

<sup>7</sup> Estimated based on 2020 data.

<sup>8</sup> Multiple contractors in categories, including cleaning, canteen, waste services and grounds maintenance, ICT. Modern Slavery clauses also included by CEDP in agreement templates for universities.

The effectiveness of the work performed around modern slavery will continue to be measured against the following criteria:

Processes to review actions	The process of completing the Modern Slavery Statement each year will be used to review the actions of those Business Units who will complete the statement
Risk assessment	Using the GAP analysis with each Business Unit on a yearly basis for inclusion in the statement will highlight the areas of risk for the organisation
Engagement and feedback	The Modern Slavery Working Group will engage each Business Unit for the purpose of completing the Statement and provide appropriate feedback regarding review of actions and risk to each
Internal audit	Governance, Risk and Strategy will undertake the normal internal audit of the organisation
Tracking implementation	Regular feedback from the Modern Slavery Working Group will track implementation of the action plan
Supplier tracking	Procurement will continue to work with suppliers in this area

# Appendix:

Please click on the following link: <https://catholicoutlook.org/new-voices-honour-saint-of-slaves-in-word-and-deed/>

# Australian Catholic University (ACU)

# Modern Slavery Statement

1 January 2021 – 31 December 2021

**Disclosure note**  
This statement has been made on behalf of Australian Catholic University.  
This statement covers all entities owned or controlled by ACU.  
ABN 15 050 192 660

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# Statement from Professor Zlatko Skrbis, Vice-Chancellor and President

At ACU, we draw inspiration from Saint Josephine Bakhita, patron saint of our Blacktown Campus and patron saint of modern slavery victims and human trafficking, as we work to address the injustices inflicted upon the most vulnerable members of our communities. As a recently appointed member of the [Domus 8.7](#) committee, I am personally committed to promoting awareness of modern slavery practices and to our university acting to support those affected.

ACU has pledged to submit our annual Modern Slavery Statement to report on the risks of modern slavery in our operations and supply chains, and the actions we have taken to address those risks.

As a Catholic university, our obligation to the communities we serve, including our students, is upheld by leaving things in a better position than how we found them. For this reason, we are dedicated to upholding the dignity of every individual and community with any connection to the university's supply chain. Part of this commitment was introducing the [modern slavery training modules](#) developed by the [Australian Catholic Anti-Slavery Network](#) and the Catholic Archdiocese of Sydney. Many staff have already undertaken the first training modules and I am actively encouraging wider participation to raise awareness on how the impact of modern slavery plays out in everyday life and business.

ACU has taken the further step in our procurement processes to hold our partners, suppliers, vendors, and tenderers to the same standard by making these modules available to anyone who wishes to engage commercially with the university.

These small but important measures contribute to the collective action we take every day as a university community in supporting Pope Francis's call to action in *Laudato Si'* (LS 206): "Purchasing is always a moral – and not simply economic – act".

In 2021 we held our second annual Sustainability Week which was focused on 'Modern slavery impacts' and ACU's commitment to preventing and ultimately eliminating the impact of modern slavery. It also acknowledged the clear, but not immediately obvious, link between modern slavery and what we commonly call 'sustainability': when ecosystems break down, those who depend on them become vulnerable to modern slavery.

ACU's strong commitment and approach to anti modern slavery measures acknowledges the indivisible link between social, economic, and environmental sustainability and our university's future.

Our responsibility extends to shining a light in guidance and steering our students on the right path and to a better world. Our students' preparedness to step into the conversation and uphold a standard of service and accountability instils a great sense of pride that the future holds promise and great hope.

As a community, we prioritise these important areas not only because they are deeply embedded in our Catholic mission to honour the dignity of each being and to care for our common home, but simply because it is the right thing to do.

On behalf of the ACU Senate and all ACU staff and students, I hereby endorse this report to government on ACU's commitment to do what it can and play a role in eliminating the scourge of modern slavery from the world.

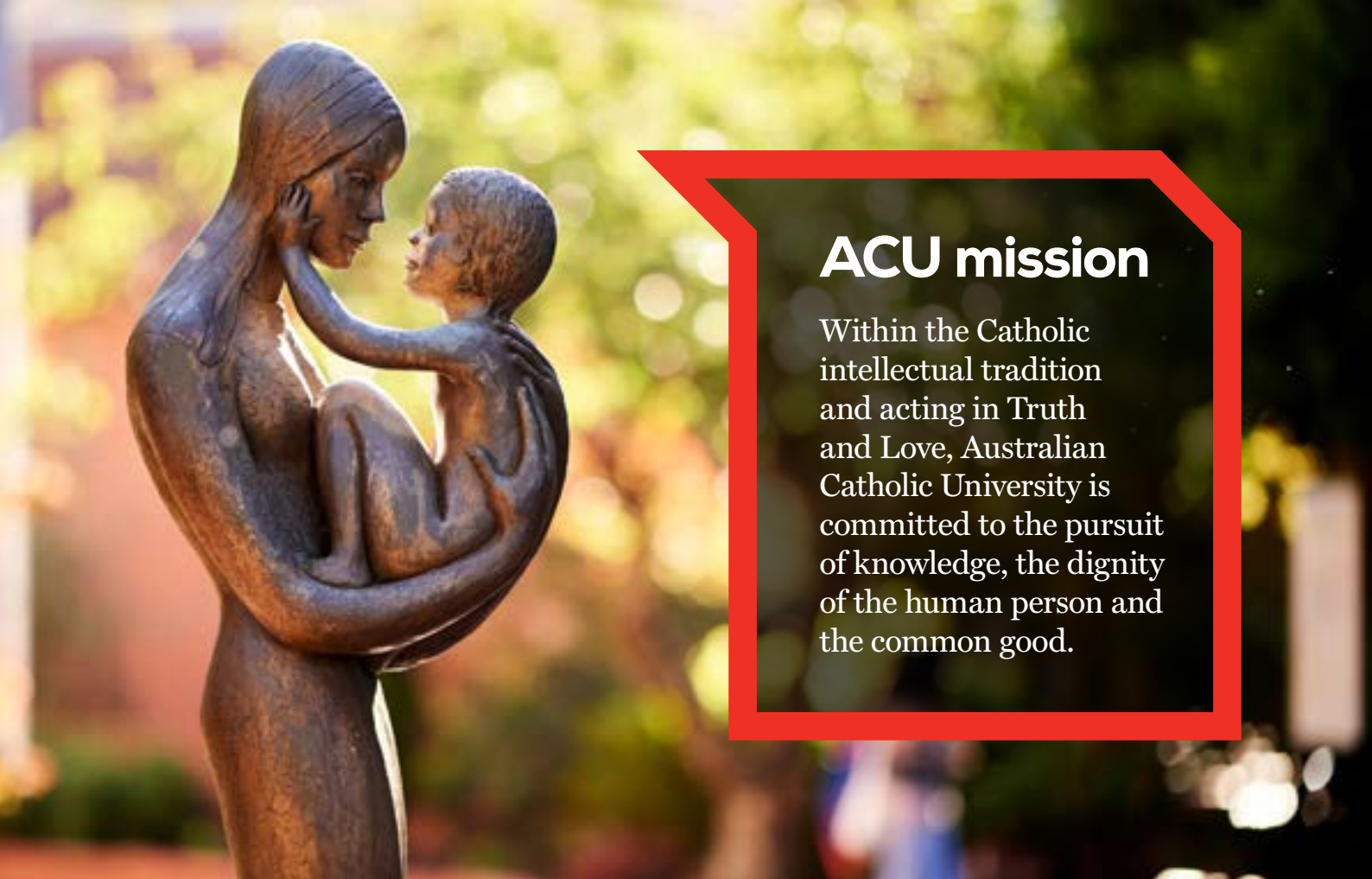
Signed:



Professor Zlatko Skrbis,  
Vice Chancellor and President,  
Australian Catholic University

This Modern Slavery Statement is signed by a responsible member of Australian Catholic University as defined by the Modern Slavery Act 2018 (Cth) ("the Act").

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University, as defined by the Act, on 16 June 2022.



## 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.

## About us

ACU was established in 1990 through incorporation as a public company limited by guarantee, incorporated pursuant to the Corporations Act. ACU is a public university, funded by the Commonwealth Government, and is open to students and staff of all religious beliefs.

ACU has around 33,000 students and around 2,400 staff, across seven Australian campuses: Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney, Strathfield, with two leadership centres (in Adelaide and Brisbane) and one international campus in Rome, with headquarters in North Sydney.

ACU is a world-leading research university in our priority areas of education, health, and theology and philosophy. Our culture of research excellence is founded on the principles of social justice and attracts global experts, students and collaborators.

Our research institutes collaborate with strategic partners across Australia and internationally to create real impact in our priority areas. Their research is founded on the principles of social justice and the common good.

Information about all aspects of ACU may be found online: [acu.edu.au](http://acu.edu.au)

## Mission, identity and values

We are guided by our clear mission, strong sense of identity and firm set of values. All three influence the decisions we make as an institute of higher education and guide our staff and students in their day-to-day lives.

Our mission is at the heart of everything we do at ACU. It guides our approach to learning and teaching, our welcoming and engaging on-campus culture, and our commitment to building a better society by producing graduates willing to invest in this same commitment.

Our university is founded on a long history of commitment to our core values of truth, academic excellence and service. But there are other important values that enhance the ACU experience for students and staff, including equity, diversity, accessibility, wellbeing and sustainability.

To ensure staff and students of all backgrounds and beliefs enjoy a safe and welcoming learning environment, we support the Australian Human Rights Commission's campaign, 'Racism. It stops with me.'

# 2021 and prior – Modern Slavery risk management

ACU is committed to tackling modern slavery practices at every level. Detailed information about specific initiatives and steps undertaken, in and prior to, 2021 can be found under the relevant Reporting Criteria 1 and 2, 3, 4,5 and 7 headings. These include:

- ACU membership of and close working relationship with key affiliated associations including both the **Australian Catholic Anti-Slavery Network (ACAN)** and the **Australian University Procurement Network (AUPN)** Anti-Modern Slavery Working groups to achieve desired outcomes (more information under **Reporting Criteria 4**).
- Establishment of ACU Eradicating Modern Slavery (EMS) Working Group (more information and under **Reporting Criteria 4**).
- Modern Slavery is included as an important objective in ACU's Strategic Plan 2020-2023 (more information can be found under **Reporting Criteria 1 and 2**).
- ACU staff personnel have actively participated in multiple government, ACAN, AUPN and supplier associations workshops and conferences either dedicated to, or having keynote sessions relating to, anti-modern slavery initiatives.
- ACU sourcing processes, tender and other related documentation and templates have been updated to include requirements for sustainable and ethical sourcing and anti-slavery requirements, (more information under **Reporting Criteria 4**).
- ACU became a member of Sedex, which provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains, enabling self-reporting of suppliers against industry sector databases (more information on progress under **Our Plans for 2022 and beyond**).
- Modern Slavery training modules rolled out to ACU management and staff, and targeted supplier workshops rolled out to suppliers (more detail under **Reporting Criteria 4**).



# ACU initiatives, developments and plans for 2022 and beyond

Our plan for 2022 and beyond is to consolidate the implementation of actions commenced in 2020 and 2021 as outlined in this Report. In addition, to continue to work with associated entities, industry groups and specialist anti-slavery service providers to help understand and help remediate slavery activities in global supply chains where they impact the operations of ACU.

This is to include working with suppliers to assist with requirements for auditing, compliance, and registration activities where opportunities exist, utilising software tools to analyse and identify at risk suppliers.

Awareness-raising across the organisation will also continue, to ensure all staff are aware of modern slavery vulnerabilities and activities, as well as the organisation's obligations under the Act.

The university will continue to respond to changes in the Act and its requirements.

A few select high level initiatives are listed below. Details relating to other specific initiatives, projects and steps commenced or undertaken prior to 2022, and their development into 2022 and beyond, can be found listed under the relevant **Reporting Criteria 1 and 2, 3, 4,5 and 7** headings.

## ACU Vice-Chancellor and President's ongoing commitment to Domus 8.7 Committee goals

Professor Skrbis was appointed to the **Domus 8.7** Committee just over a year ago and continues his commitment to Domus 8.7 to promote awareness of modern slavery practices and to take actions to support those affected.

**Domus 8.7**, which comes from the Latin word 'Domus' meaning 'home' and 'target 8.7' of the United Nations' Sustainable Development Goals, is an Australia-wide network assisting victims of modern slavery and those trapped in forced labour, debt bondage, forced marriage or human trafficking. It provides access to free legal advice, housing assistance, health care, financial advice and welfare support to people who face exploitation.

The appointment supports the efforts of ACU's dedicated Eradicating Modern Slavery working group, which works with ACAN to assess and mitigate the risk of modern slavery practices in the university's supply chain.

The university looks forward to continuing to work closely with ACAN and Domus 8.7 to further these aims which honour the inherent dignity of each human being and to ensure fair treatment and decent working conditions for all people.

## ACU's Thomas More Law School pro bono placements

ACU's Thomas More Law School students have completed their pro bono placements with organisations including the Anti-Slavery Taskforce - Archdiocese of Sydney.

To date, the collaboration has contributed over 5,000 hours of review and analysis in ranking almost 1,500 modern slavery statements with the pro bono program.

Their findings have been shared via the presentation of the **Domus 8.7 Index benchmarking of Modern Slavery Statements**.

All staff involved in purchasing and procurement decision-making have undertaken the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding on the impacts of modern slavery by undertaking the modules.

# ACU's seven-year commitment to implement the seven goals of the *Laudato Si'* Action Platform

Inspired by Pope Francis's second encyclical *Laudato Si'* (24 May 2015): Care for our Common Home, universities around the world were invited to commit to a global implemental plan. ACU announced its commitment to the *Laudato Si'* Action Plan in October 2021, to mark the Feast of St Francis Assisi, who is the inspiration behind *Laudato Si'*. Universities registered to be on the action platform before 22 April 2022 (Earth Day) are now officially enrolled in the "journey towards sustainability in the spirit of integral ecology".

In his 2015 *Laudato Si'* encyclical, Pope Francis writes: 'Injustice is not invincible' (*Laudato Si'* 74) and 'Strategies for a solution demand an integrated approach to combating poverty, restoring dignity to the excluded, and at the same time protecting nature' (*Laudato Si'* 139).

As a university, we view Modern Slavery as integrated with Pope Francis's call to action in *Laudato Si'* (LS 206) and that "Purchasing is always a moral – and not simply economic – act".

We believe it is critical that modern slavery work is not siloed from this effort.

As a *Laudato Si'* university, we will chart our own course through the Journey, with the assistance of the *Laudato Si'* Action Platform. We are in the process of gathering a group of faculty, students, administrators, staff, and neighbours to develop a *Laudato Si'* Action Plan that will integrally and boldly advance each of the seven *Laudato Si'* goals (or Pillars):

Pillar 1. Respond to the Cry of the Earth

Pillar 2. Respond to the Cry of the Poor

Pillar 3. Foster Ecological Economics

Pillar 4. Adopt a Sustainable Lifestyle

Pillar 5. Offer Ecological Education

Pillar 6. Develop Ecological Spirituality

Pillar 7. Support Local Communities

(Please see more detailed information related to this commitment under **Reporting Criteria 7**).

## Development and Expansion of use of Sedex tool capabilities to monitor, report on and mitigate ACU Supplier Risk

Sedex is the world's largest ethical audit online platform for collecting and sharing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases. In mid 2021, ACU signed an ACAN agreement to use the Sedex tool, and in late 2021 commenced the Supplier onboarding process, initially by inviting 49 potentially high risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation and connect with ACU. Once this process is complete, it will ultimately allow us to gain strong visibility and compliance capabilities over our supply chain and its inherent risks.

The tool has a number of useful capabilities and it is our intention in 2022 and beyond to expand our knowledge and use of these. The Sedex platform/process can be used to:

- Easily find existing suppliers within the sector and create relationships with them.
- Check progress of suppliers as they complete the steps in the onboarding process.

- Review each supplier individually and engage them around improvement.
- Put higher risk suppliers into an audit programme.
- Create intuitive data reports and insights.
- Identify deficiencies for discussion in more detail with the supplier.
- Pull out specific questions/topics of concern and take a specific issue-based approach.

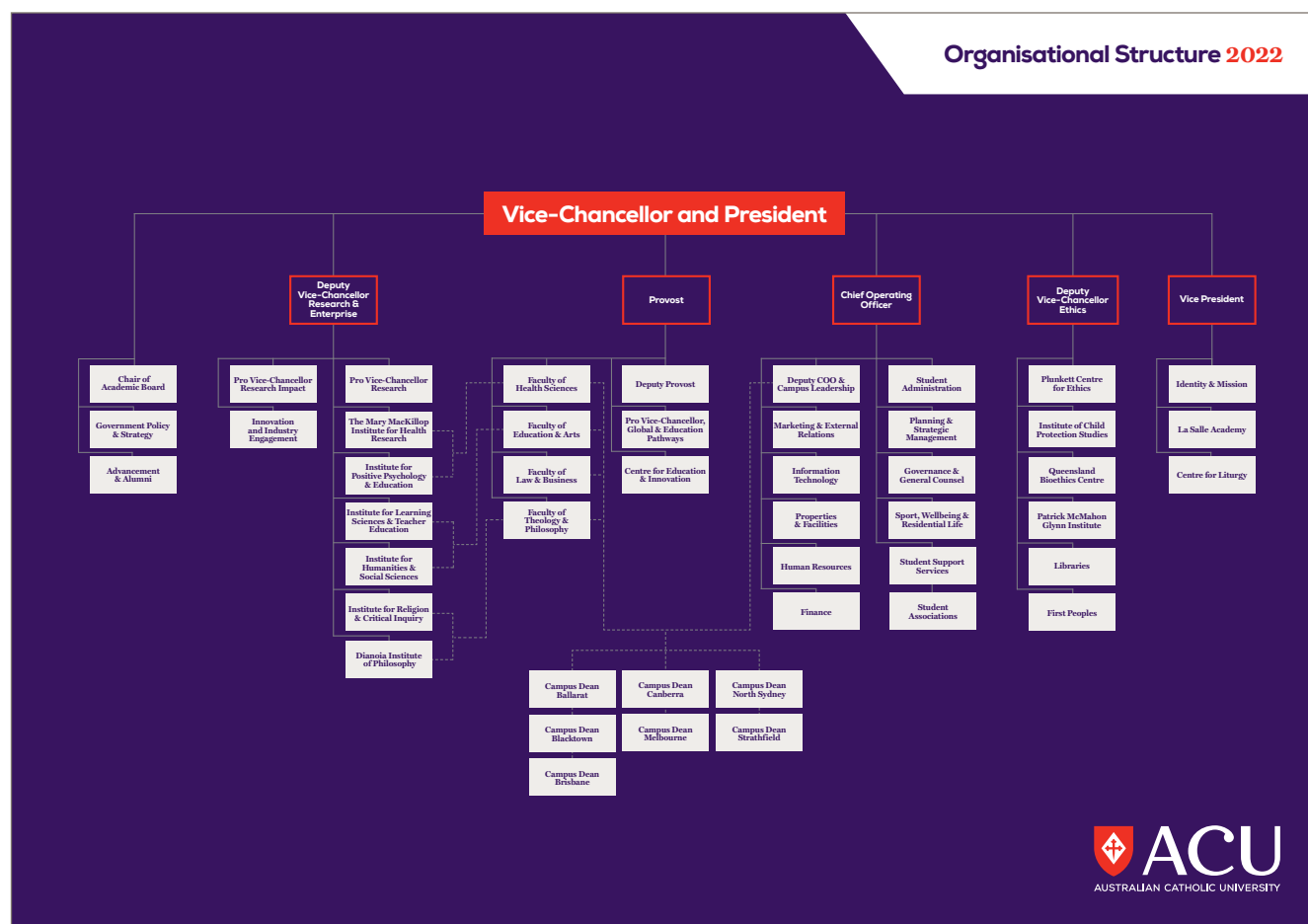
The Sedex representatives continue to offer valuable training to member staff, depending on where they are on their supplier compliance journey, offering assistance and guidance around: a next steps roadmap with options, use of tool capabilities, expectations and timeframe, a regulated and high-quality audit process etc.

This will complement the similar process also being undertaken through the AUPN tool.

# Reporting criteria 1 and 2: About ACU

## Our organisational structure

The diagram below represents ACU's organisational structure as at April 2022.



## Our governance framework

ACU's anti-modern slavery initiatives have been incorporated into the governance structure requiring the approval of ACU's Audit and Risk Committee and ACU's Senate.

ACU's key governance bodies are as follows:

### CHANCELLOR

ACU's Chancellor is the chairperson of the Senate, the chief governing body of ACU.

### PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee.

### CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

### VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, represents the university both nationally and internationally, and provides strategic leadership and management.

**PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)**

The Provost is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties, and providing the operational delivery of ACU’s academic programs.

**THE VICE-CHANCELLOR’S ADVISORY COMMITTEE AND VICE-CHANCELLOR’S EXECUTIVE BOARD**

The Vice-Chancellor’s Advisory Committee (VCAC) is an advisory forum with the purpose of advising the Vice-Chancellor and President on key strategic and operational university matters. Strategic matters discussed at VCAC are referred to the Vice-Chancellor’s Executive Board (VCEB), the university’s key management committee, for ratification.

**THE UNIVERSITY CONSULTATIVE COMMITTEE**

The University Consultative Committee (UCC) includes leaders from across various ACU leadership groups, and is chaired by the Chair of Academic Board. This committee meets twice per year, once virtually and once in person providing the opportunity for strategic discussion, information sharing and engagement.

**VICE PRESIDENT**

The Vice President is responsible for Catholic-related operations of the university. His portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement. The Office of the Vice President animates programs and activities that engage, celebrate and support the university community’s development in and understanding of the mission, Catholic identity and living traditions.

**CHIEF OPERATING OFFICER AND DEPUTY VICE-CHANCELLOR (ADMINISTRATION)**

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

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

The Deputy Vice-Chancellor (Research and Enterprise) oversees this growth area for ACU and works with researchers to foster ACU’s culture of research excellence and maintain our world-leading research outputs.

**DEPUTY VICE-CHANCELLOR (ETHICS)**

The Deputy Vice-Chancellor (Ethics) has responsibility for projects aligned to the university strategic priorities as assigned by the Vice-Chancellor. The position provides intellectual leadership, particularly in the fields of philosophy and ethics.

**SENATE**

The Senate is ACU’s chief governing authority. Its members’ roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU’s Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

**STATE CHAPTERS**

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

**ACADEMIC BOARD**

Our Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate, and initiating course reviews.

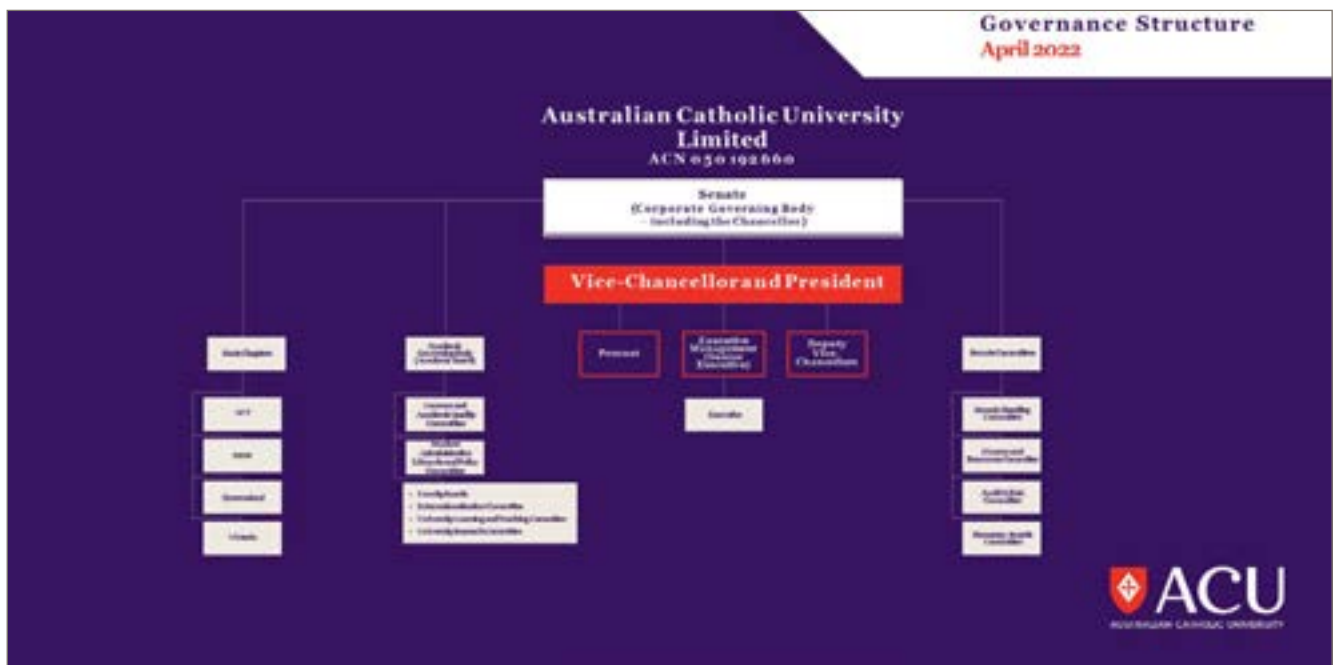
**SENATE AND BOARD ELECTIONS**

Elections are held to appoint members to the Senate and Academic Board from the university’s academic and student bodies. The Senate also holds elections to appoint a professional staff member.

For a visual representation of the governance structure of ACU, please see the governance chart below.

ACU’s Governance Directorate has a suite of policies and procedures which relate to the conduct, decision making, risk management, internal organisation and management of the university.

These are in the process of being reviewed and updated to capture anti-modern slavery initiatives.



# Our operations

ACU is a publicly funded teaching and research organisation that has four primary faculties (Education and Arts, Health Sciences, Law and Business, and Theology and Philosophy) and a corporate services division, itself made up of a number of directorates that include legal, property, human resources, finance, facilities management (campus operations), capital development, student administration and engagement, libraries, operational performance and risk management.

Students are both domestic and international.

Supplier engagement is in accordance with the Procurement Policy, which underwent substantial revision in 2014. This policy sets out how sourcing decisions may be undertaken. The policy is underpinned by a raft of procedural and reference material, which establishes minimum requirements for key suppliers. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements, which have been built into tender and contract documentation.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Contract and tender documentation are maintained in SharePoint databases and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

ACU operates across seven Australian campuses: Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield, with one international campus in Rome. ACU headquarters are in North Sydney.

The following details are provided about ACU as a university. Some of this information is in a process of change or being updated. The year the data represents is indicated where applicable.

- Approximately 2,400 staff - FTEs (2021).
- Approximately 33,000 students (2021).
- More than 119,000 alumni.
- Approximately 3,400 international students enrolled (course headcount 2022).
- More than 200 international partners.
- More than 1,000 ACU students have studied at our Rome Campus.
- One in five of our domestic bachelor's students study abroad (2021).
- First in Australia for graduate employment.

## RESEARCH EXCELLENCE

ACU's institutes, centres and faculties have internationally renowned scholars and produce world-leading research.

Excellence in Research for Australia (ERA) evaluates the quality of research produced in Australian universities against national and international benchmarks. In the latest ERA assessment, ACU ranked first or equal first for 10 fields of research in Australia:

- cardiorespiratory medicine and haematology
- clinical sciences
- cognitive sciences
- human movement and sports science
- nursing
- nutrition and dietetics
- psychology
- public health and health services
- religion and religious studies
- specialist studies in education.

## INDUSTRY PARTNERSHIPS

With a range of industry partnerships and work integrated learning options, ACU is a leader in graduate employability, as follows:

- First in Australia for graduate employment.
- Awarded five stars for full-time employment and have been recognised globally with five stars for employability.
- Second in Australia for graduate employer satisfaction.

## COMMUNITY INVOLVEMENT

ACU staff, students and graduates are committed to making a positive impact in the local and international community. The following metrics support this:

- Ranked equal 54 in the world for our positive impact on society.
- Ranked 2nd globally for good health and wellbeing (SDG 3).
- Ranked 73 globally for quality education (SDG 4).
- Ranked 26 globally for gender equality (SDG 5).
- Ranked 67 globally for peace, justice and strong institutions (SDG 16)

## GENDER EQUALITY

- Announced in 2021, ACU's commitments to championing gender equality have been publicly recognised in being named as an Employer of Choice for Gender Equality (EOCGE) for the 10th consecutive year by the Workplace Gender Equality Agency (WGEA).

*\*Times Higher Education (THE) Impact Rankings 2022, based on United Nations Sustainable Development Goals (SDGs)*

# Our strategic plan

Modern slavery has been included as an important objective in the [ACU Strategic Plan 2020-2023](#), under the headings:

- **1. All our endeavours, grounded in mission**  
1.8. Strengthen our leadership role in creating and sustaining child-safe organisations and the prevention of harm to children, through education, research and industry partnerships.
- **6. Service, stewardship and sustainability**  
6.8. Take bold and decisive action on environmental, social and economic sustainability, and the eradication of modern slavery.

ACU has a [Strategy Execution Framework](#) which underpins its approach to strategy implementation, performance reporting and analysis. Detailed performance reports are provided bi-annually to the ACU Senate against ACU's suite of KPIs.

# Our supply chain

ACU's annual consolidated revenue in 2021 was \$565,904,000, with 77.4% of this revenue derived from government grants.

ACU has over 3,500 suppliers in its supply chain of Goods and Services. However, just over 200 of these suppliers represent the top 80% of spend. Based on an overall supplier spend of approximately \$A210 million in 2021, the major spend categories that represent the top 80% of spend are as follows:

LEVEL 1 SPEND CATEGORY	2021 APPROX.SPEND \$'000
Building and construction	\$77,665
Information technology – equipment and services	\$19,302
Student placements	\$16,887
Property and realty services	\$16,178
Facilities management	\$12,154
Consulting services	\$6,066
Marketing and communication services	\$5,605
Utilities	\$4,849
Other office and workplace supplies	\$4,803
Cleaning	\$4,244
Student recruitment – international	\$3,834
Plant and equipment	\$3,586
Security services	\$3,192
Insurance premiums	\$2,443
Travel and accommodation	\$2,176
Library books, systems and services	\$1,370

\* ACU 2021 Annual Report

# Reporting criteria 3: Modern slavery risks in operations and supply chain

ACU has submitted its data to the risk assessments platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australian University Procurement Network (AUPN).

These assessments present an overall picture of risk based on types of goods and services being procured and country of origin. Such assessments assist ACU in focusing its attention towards what are generically regarded as high inherent risk activities.

## Operational risks

Since key operational activities are performed by Tier 1 suppliers, the potential for operational risk is the risk posed with respect to the provision of services.

These risks are therefore being addressed under supplier risk categorisation and action.

Otherwise, measures to address operational risks are by assessment of the extent to which internal processes and practices are sufficiently updated to reflect necessary requirements. Please refer to the Modern Slavery Gap Analysis later in this section.

ACU's commitment to the principles of eradicating modern slavery is demonstrated by its inclusion for risk assessment, focus and action within ACU's Operational Risk Registers and that we have mitigating control measures in place to ensure ACU meets and complies with Australian Federal and State Anti-Slavery reporting compliances.

### A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOL

Both ACAN and the AUPN developed risk categorisation systems based on various aspects of the supply chain. For example, the type of good or services, where services are provided or made, etc.

ACU has submitted its data and spend to the AUPN with further analysis being undertaken to categorise risk for key areas of spend.

The purpose of the 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. This 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 tool via portal access.
- To collate suppliers' actions.
- To enable suppliers to provide a sector-wide response. To be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

# Sourcing of goods and services

Activities from the various areas referred to in **Reporting Criteria 1 and 2 – Our supply chain** involve working with supply chains from many different sectors. Goods and services may be sourced from overseas, as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in its 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. ACU, through its finance division, also engages in investment activities.

ACU uses a spend categorisation system and this system best explains the variety of goods and services procured across ACU to meet its many operational demands.

Therefore, goods and services may be sourced in any of the following categories, which have been simplified and amalgamated for this report:

- architectural design services
- audio visual equipment and services
- building and construction – supplies, fitouts, demolition, services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional, general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening, security
- financial services including valuation services
- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printer and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables
- library – books, periodical, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, re-location 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 India, China and the Philippines, as examples.

Equipment, commodity and clothing items will generally be sourced from overseas, mainly China and South East Asia, once again via Tier 1 suppliers located in Australia.

ACU, through its membership with Supply Nation, is looking to increase sourcing from locally based indigenous suppliers, who may nevertheless source some of the items from overseas manufacturers.



## Our people

ACU has a diversified workforce of nationalities, ethnicities and gender.

There is a large suite of Human Resources policies designed to assist staff in all aspects of their work at ACU.

These are documented and available on the ACU website. These policies are reviewed and updated in accordance with quality review protocols on a scheduled basis and as needed.

Included is a policy relating to protected disclosures.

ACU has a solid foundation of policies and processes, including an Enterprise Agreement that sets out conditions of employment including entitlements and remuneration. Staff are remunerated based on a classification methodology which is transparent and equitable.

New staff are inducted when they start and follow an onboarding process which enables them to perform their roles safely, effectively and responsibly.



## In development for 2022

ACU is currently bargaining with unions and staff representatives to develop a new enterprise agreement that is consistent with the mission and values of the university informed by current industrial legislative requirements and our strategic objectives. We are focused on the dignity of the person and protecting the rights of individuals.

When recruiting staff through third party recruitment agencies, ACU has a preferred supplier panel which has been through a rigorous procurement process. A review of this panel is scheduled for 2022.

A People Strategy is currently being developed that will promote and support a diverse workforce and a culture of inclusiveness.

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

[ACU Annual Report 2021](#)



# Modern slavery gap analysis

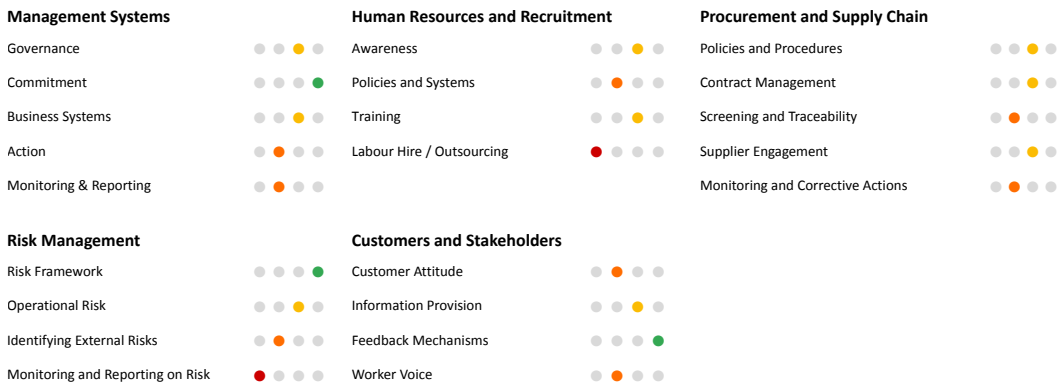
To assess the level of maturity required across all areas of ACU, a self-assessment has been performed. The result for ACU is as follows:

## GAP ANALYSIS REPORT



Based on your answers in the questionnaire, the following heat map has been generated. This is based on your responses (available later in this report), and it serves to indicate where the gaps are in your organisation. Further in-depth review and analysis may be needed, but if the responses are accurate this is a good representation of the gaps.

### Heat Map



Disclaimer: This Modern Slavery Gap Analysis Report has been automatically generated. It is based on the respondents interpretation of the questions and the choice of /and between possible answers. The outcome is indicative and further validation is recommended. Responsibility for the answers and actions taken on the basis of this report is entirely that of the respondent and the entity analysed.

The preliminary assessment has been shared across all affected areas within ACU will be subject to ongoing review to track activity aimed at continuous improvement.

# Supply chain risks

## SPEND RISK ASSESSMENT

The following graphical representations below indicate the relative raw risk categorisation of ACU spend. These risk assessments were provided by risk assessment platforms developed for, and provided to ACU by, the AUPN.

Further detailed breakdown of this expenditure and the suppliers that make-up the various risk categorisations is available to ACU via these platforms and helps to inform

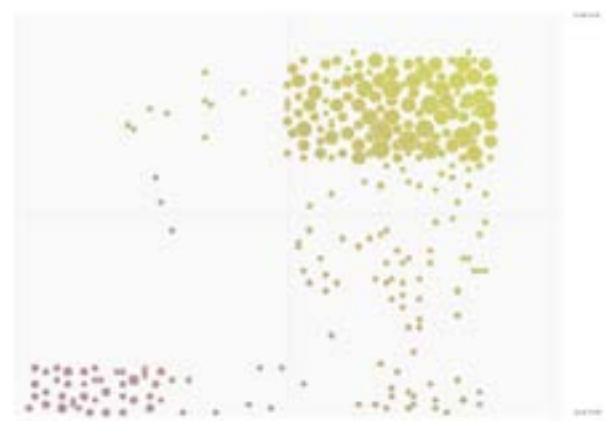
ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means.

The data upon which this analysis is based is subject to review and may be regarded as not fully complete in this preliminary assessment, but it forms an excellent basis for developing ongoing planned activities.

## INDUSTRY RISK

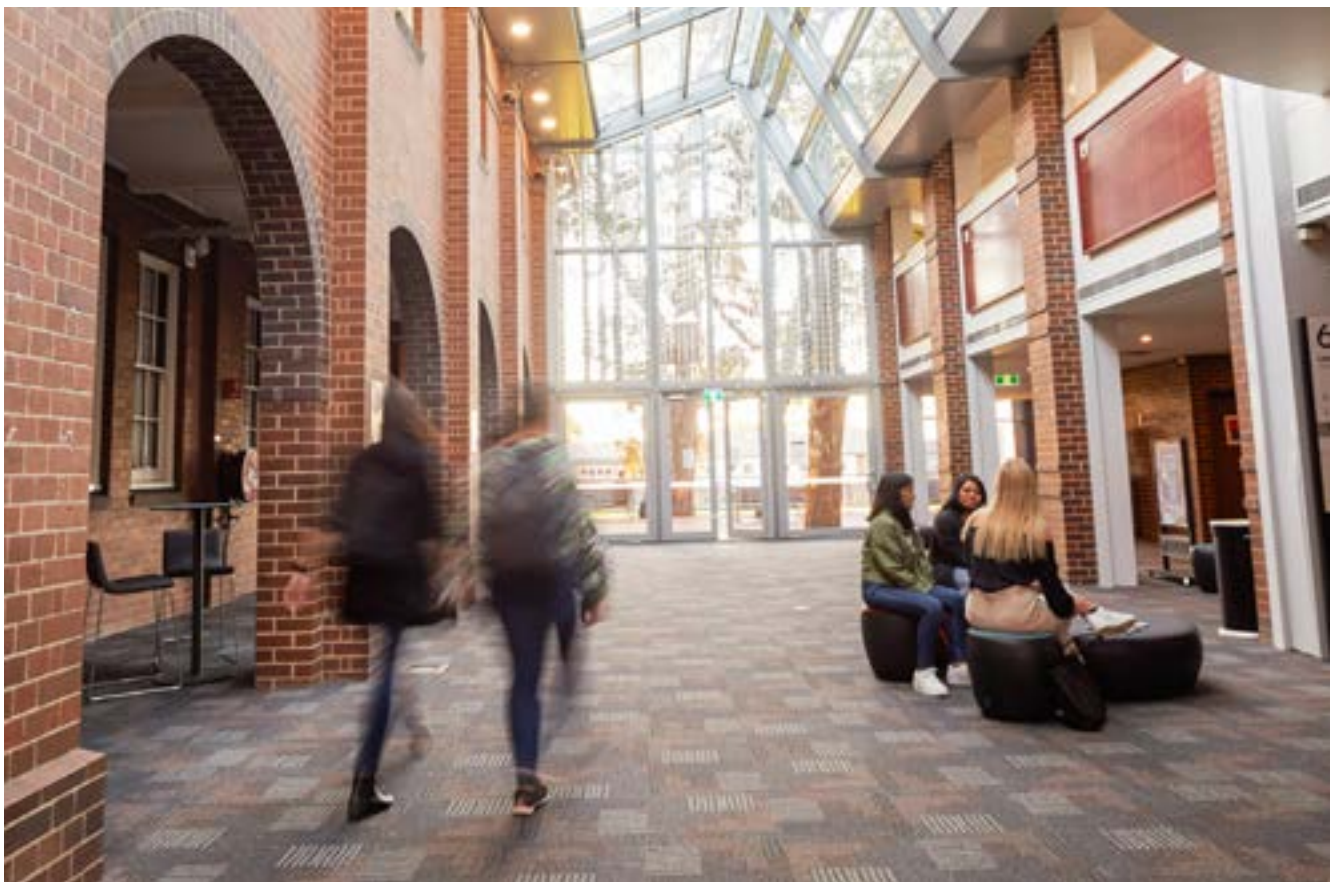


## SUPPLIER RISK ANALYSIS



## COUNTRY RISK

● HIGH RISK      ● MODERATE RISK      ● LOW RISK



# Reporting criteria 4: Actions taken to assess and address risk

## SUMMARY OF ACTIONS TAKEN

Below is a summary of some of the actions taken by ACU to-date. NB: Some items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN working groups to assess compliance requirements and risk, including the participation in the ACAN year two modern slavery risk management program.
- Collation and submission of spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
- Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
- Discussions with key suppliers in identified high risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
- Implementation planned of additional reporting and compliance requirements through use of the ACU Tender Portal.
- A vendor category of Fair Trade has been created in the vendor master of the ACU's purchasing system. This allows certified Fair Traders to be identified for future purchasing activity.

Specifically, the following actions are in progress or planned:

- a) To continue to use toolsets created by both ACAN and the AUPN to gather information about Modern Slavery, Anti-Modern Slavery activity and legislative requirements.
- b) Further engagement with ACU's national and state-based managers to re-enforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
- c) To deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- d) To continue to use the gap analysis to monitor continuous improvement across impacted areas of ACU.
- e) To develop aspects of The ACU Tender Portal to allow it to be used as a due diligence tool to help the education of suppliers and to monitor supplier compliance activity in relation to anti modern slavery measures.
- f) Continue the engagement with key suppliers in areas of high risk.
- g) Deployment of a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.

The area of Facilities Management is a recognised area of high risk.

To this end, the Properties directorate has undertaken a number of measures to mitigate this risk, as follows:

- All national tenders have a mandatory Q&A field in relation to this issue with respect to:
  - o Supply chain management.
  - o Wages, salaries, benefits and sub-contracting.
- In 2021 to audit and retain documentation of three levels of supply chain for selected high-risk items, being ACU then the Tier 1 supplier (ie the engaged service provider) and then the Tier 2 supplier (ie Tier 1's sourcing supplier).
- For all engaged service contracts, to annually seek a statutory declaration from the vendor, and/or their staff, confirming for each member of staff engaged to provided services to ACU:
  - o Their name; and
  - o That they are a direct employee of the engaged contractor (vendor) with ACU; and
  - o That they are employed at the specified ACU Campus; and
  - o That they are paid in accordance with the modern award stated in the service agreement; and
  - o That they receive all their salary benefits, including insurance, superannuation and leave entitlements; and
  - o That 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 process.

## ACU SOURCING PROCESSES, TENDER AND RELATED DOCUMENTATION UPDATED

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in its 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.

ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain. To this end specific Anti-Modern Slavery statement clauses have been built into the suite of ACU Tender and Contract template

documentation. An excerpt from existing templates is provided below as an example:

#### **Modern Slavery ACU Terms and Conditions Clause**

1. *In performing its obligations under this Agreement, the Contractor shall and shall ensure all of its agents, contractors and sub-contractors:*
  - a. *comply with all applicable Laws, statutes or regulations in force from time to time, including but not limited to the Modern Slavery Act; and*
  - b. *take reasonable steps to ensure that there is no Modern Slavery in the supply chains of the Contractor's agents, contractors and/or sub-contractors or in any part of their respective businesses or dealings.*
2. *The Contractor represents and warrants that:*
  - a. *it conducts its business in a manner that is consistent with the principles of the Modern Slavery Act; and*
  - b. *neither the Contractor, nor any of its officers, employees or other persons associated with the Contractor:*
    - i. ....; and
    - ii. ....
3. *The Contractor shall implement due diligence*  
.....

An example of a clause used in an apparel contract is as follows:

- o *“As evidence of commitment to ethical sourcing, you are required to complete (at a minimum) a six (6) monthly review of your facilities and provide a compliance report to ACU.”*

#### **MODERN SLAVERY – STAFF TRAINING**

ACU has used 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 HR worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel.

Directors and managers were advised that while all staff would have the option to elect to complete the training modules (as also communicated in the Staff Bulletin), it was a mandatory requirement for certain staff groups (as follows), including those that make purchasing and procurement decisions as part of their role, including:

1. Group 1. Management Levels 5 and 6 including National and State Managers.
2. Group 2. Faculty Finance Managers, Finance Portfolio Management Accountants, Finance Procurement personnel, Properties Facilities Managers at site or state level and Properties Capital Development and Project Managers, if not at Levels 5 or 6.
3. Group 3. Designated purchasing staff within a Faculty or Directorate as nominated by Management Level 6 or higher.

In 2021, a total of 240 staff (including directors and managers) completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'. Another three modules are in development.

#### **ACU Membership of key affiliated associations**

- **ACAN Anti-Modern Slavery Working group.** 11 ACAN monthly Modern Slavery Liaison Officer Teleconference meetings, attended by ACU representative(s), were held in 2021; and
- **AUPN Modern Slavery Working group.** 8 meetings were held in 2021.

ACU's Eradicating Modern Slavery (EMS) Working Group was established in the latter part of 2020 and three meetings were held in 2021. The EMS Working Group comprises members of the ACU senior executive, other key ACU personnel and representatives from the Anti-slavery Taskforce, Catholic Archdiocese of Sydney. Its objectives are to:

- o provide input and advice to the university on issues related to modern slavery
- o actively support the development and implementation of ACU's modern slavery action plan
- o assist ACU determine priority actions to be undertaken and establish annual goals and targets
- o monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness
- o ensure ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- o to raise consciousness across all of ACU including students and professional and academic staff.

# ACU's general framework for addressing the potential for modern slavery

A planned response and the adoption of anti-slavery measures to aid the eradication of modern slavery in supply chains.

## The ACU five AMS pillars of support

Throughout its anti-slavery initiatives, ACU will consider and consolidate into its actions the five fundamental pillars of support as required to assist in the elimination of slavery in supply chains (and detailed below) as they related to ACU.

For a number of years ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the Australian Universities Procurement Network (AUPN).

A number of the actions required to give effect to the following five pillars of support are joint endeavours being managed either by ACAN or the AUPN whilst some are ACU's specific responses.

These actions are detailed as follows under each **AMS Pillar of Support**.

### PILLAR 1: A PURCHASING COMMITMENT

A definitive statement on the position of ACU in having sourcing arrangements with suppliers which have identified slavery practices in their supply chains:

- It is the policy of the ACU not to have supply arrangements with suppliers where it is established that slavery practices are identified as existing within 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 that an existing supply arrangement has 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 that an existing supply arrangement has slavery practices within the supply chain of a supplier, then to the extent that the identified practice is at "arm's length" from the immediate supplier and that the immediate supplier is not directly responsible for this practice then the immediate supplier will be given a time- frame, to be negotiated, but generally not greater than 12 months, to take the actions necessary to eliminate or mitigate the identified slavery practices from its supply chain, that is able to be verified by the participating university.

- Where modern slavery practices are understood to exist within global supply chains and which are not readily amenable to corrective actions, or where taking such action may severely impact those personnel 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 involved.
- This commitment extends to illegal, unethical, unfair and exploitative behaviours in relation to the engagement of workers in the supply chain, where they are able to be established, and the same responses as detailed above shall apply.

**ACTION:** ACU has anti-modern slavery requirements built into all its template contract and tender documents. These are subject to ongoing review.

### PILLAR 2: ONGOING TRAINING AND EDUCATION

To use both sector-based resources and ACU specific resources to help educate both ACU employees and suppliers in the existence of modern slavery; how it may be identified; what they can do to take action 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 available to it 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 from across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN.
- ACU HR worked with ACAN to add the training modules developed by ACAN (via its consultancy agency) to the suite of training modules available to all ACU personnel. Two have been rolled out and another three are in development.

- 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 Gap Analysis has been completed for ACU (in 2019, 2021 and again in 2022) in a rudimentary fashion and will be used to further garner the involvement of the various impacted departments of ACU.
- The ACU Tender Portal will continue to be used to provide information to suppliers on modern slavery, anti-modern slavery activity, legal requirements, and seek to have suppliers provide a response to the awareness they have, and measures they have or are taking, to address this issue to the extent their supply chains may be impacted.
- Key suppliers to ACU have been contacted directly, or been asked to participate in online education forums, about modern slavery, the risks in their particular industry, and what they need to be doing to address them. This includes ACU's key apparel provider for health sciences uniforms and key construction and facilities maintenance suppliers.

### **PILLAR 3: A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOL**

Both ACAN and the AUPN have developed a risk categorisation system based on various aspects of the supply chain. Eg the type of good or services, where services are provided or made, etc.

ACU will continue to provide data and spend to identify relevant risk categorisations

The supporting software tools will be utilised to further analyse the data and used as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations. This 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 tool via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response. To be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

### **PILLAR 4: REMEDIAL ACTION**

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

- Supplier Relationship Management response consistent with Pillar 1 – Purchasing Commitment.
- Use of specialist organisations (when selected) to help both identify modern slavery practices in exiting supply chains and to advise or assist with remedial action.
- To adopt the Remedy Plan of Domus 8.7 as promoted by ACAN.

**ACTION:** To implement the above.

### **PILLAR 5: REPORTING CONSISTENCY**

Reporting needs to meet legislative requirements and be consistent with the reporting format of the organisation, or organisations, with which ACU is participating in producing a consolidated report, where that may occur.

**ACTION:**

- ACU will continue to participate with ACAN to submit a consolidated report.
- ACU key personnel responsible for generating the ACU report have attended ACAN report writing workshops.
- ACU is using the template provided by ACAN to create its report.

# Minimum requirements for suppliers

Since 2014 ACU had adopted a supplier requirements code for major tenders and key supplier initiatives, known as the “Minimum Requirements for Suppliers”.

These require that suppliers must be able to demonstrate they can comply with meeting the requirements of the four (4) “Pillars of Success” as outlined below.

These Pillars of Success represent the supporting pillars that will underpin a supplier’s ability to supply goods or services to ACU in a manner that is efficacious, sustainable, cost effective and aligned with ACU’s ethos.

These are:

- Quality of goods or services provided
- Effectiveness of the supply chain or service provision process
- The supplier’s ability to manage costs and price
- The supplier’s prganisational excellence.

Specifically in relation to anti modern slavery measures, within these Pillars of Success, the following requirements are stated:

## COMMITMENT TO ETHICAL SOURCING

Please describe your organisation’s commitment to ethical sourcing (including, but not limited to, anti-slavery, fair and safe working conditions, anti-corruption, human rights and environmental sustainability) and how this commitment informs your organisation’s business practices, to safeguard the wellbeing of all the people working along your supply chain.

Please specify the steps you specifically take to verify compliance with the above requirements of your supply chain from source to delivery to customer.

A positive response to this requirement is considered mandatory.





# Modern slavery action plan and road map

## ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY IN RESPONSE TO BRIDGE THE GAP ANALYSIS (REFER REPORTING CRITERIA 3)

The roadmap below is based on the Bridge the Gap assessment and indicated the key areas of activity required to be implemented. It summarises ACU's current position and indicates additional undertakings are required.

The columns below represent the five categories of the Bridge the Gap analysis.

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 awareness of modern slavery is across ACU. Further involvement through planned training platforms will extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. These to be reviewed and updated as necessary.	MS risks have been captured in ACU formal Risk Management System. The documented risks to be periodically reviewed and actioned as required under the risk management protocols of ACU.	ACU's customers are students and shareholders, which 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 its activity in this area.
Further integration into business processes required.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	A more formalised mechanism to assess MS risks to be considered for inclusion into sourcing and contracting activities.	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, in critical facilities services, such as cleaning and security and in key commodity supplies such as apparel and computers, including computer re-cycling and e-waste services. Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of its supply chain.	ACU is keen to openly make known its AMS activities through various publicly available fora. This includes this report, the ACU Tender Portal when developed, The Catholic Archdiocese Newsletters and other publicly available media. In doing so, it is careful to avoid naming suppliers or confidential information and respects the privacy or entities with which it has dealings.
Further action is required to educate and verify (AMS) initiatives with suppliers.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves. Two of a series of five training modules developed with ACAN were made available to all staff and made mandatory for certain groups including managers and those that make purchasing and procurement decisions. The remaining modules are expected to be rolled out to relevant staff by the end of 2022.	ACAN and AUPN tools, in conjunction with other data analysis tools, 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 to develop a more formalised mechanism to receive feedback about MS issues from both suppliers and internally.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	AMS initiatives are made known during recruitment and use of agencies. This to be reviewed to ensure existing practices are adequate.	Tools are in the process of being developed to enable MS initiatives and requirements to be made readily available to all suppliers to ACU.	Reporting of MS risks is by the ACU Risk Management System. Other reporting mechanisms will be considered for development.	ACU 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.
		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.		

# Reporting criteria 5: Effectiveness assessment

The following measures are either already in use or in development to assess effectiveness of anti-modern slavery measures and requirements with respect to both Tier 1 suppliers and other suppliers further along in the overall supply chain:

- Contract review meetings and measurement of performance be against key performance indicators.
- 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 for this purpose.
- 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 apply to all ACU campuses and operational personnel. The National and State Managers are responsible for all campuses in Australia.

# Reporting criteria 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.

# Reporting criteria 7: Other – modern slavery related initiatives, projects and programs

## ACU CORE CURRICULUM AND SESU SCHOLARSHIP PROJECT 'DOMUS LINKS: MODERN ANTI-SLAVERY TRAINING FOR THE FUTURE WORKFORCE'

- ACU Engagement champions community-engaged, mission-focussed scholarship and research. We invite academics to deepen their commitment to the ACU mission by establishing deep, mutually-beneficial, non-hierarchical partnerships with community for the common good. Involving community in the research design is imperative to address key areas of social, cultural and economic need. The Stakeholder Engaged Scholarship Unit (SESU) is ACU Engagement's flagship initiative, established in 2020, to equip the university with a centralised avenue for initiating and activating partner-led scholarship.
- The SESU provides a unique offering to partners of the university to propose, co-design and deliver scholarship and research projects. We specifically prioritise projects in service to communities experiencing disadvantage or marginalisation and which advance the Catholic tradition.
- In 2021, ACU activated a scholarship project in partnership with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney. Anti-Slavery Taskforce is committed to increasing awareness of modern slavery across professional sectors, especially the education, health and social work sectors. The project entitled, 'Domus Links: Modern Anti-slavery Training for the Future Workforce', introduces the topic of modern slavery to young people before they embark on their professional journeys. Through the production of training resources, this project enables future professionals to identify and respond to modern slavery in the workforce. The efficacy of the modules will be measured through a pilot in 2022 with ACU undergraduate students enrolled in the Core Curriculum, a key part of every ACU student's education. Two of the Core Curriculum units (UNCC100 and UNCC300) focus specifically on applying the principles of Catholic social thought. These principles include:
  - o the dignity of the human person: every person has value, is worthy of great respect and must be free from slavery, manipulation and exploitation.
- Each semester, around 1,000 students undertake UNCC300, a third-year level Core Curriculum unit on Justice and Change in a Global World. These students will soon be equipped with a greater understanding of modern slavery, including the Modern Slavery Act. Importantly, they will have an understanding of modern slavery as it relates to their personal and professional selves and

their community responsibilities. The materials aim to build students' capacity to identify and safely respond to people impacted by severe forms of exploitation and slavery-related crimes; imperative knowledge as they graduate from university as professionals ready to join the workforce in 2023. Following the pilot, it is intended that modern slavery remain as a topic of study in the ACU Core Curriculum.

- The project has been wholly collaborative, with a recognition of the expertise of all project team members. ACU's academics from the National School of Theology have been working closely with the Anti-Slavery Taskforce to plan this project, develop a literature review and the content for the training materials.

## ACU ENROLLED IN SEVEN-YEAR JOURNEY TO IMPLEMENT THE SEVEN GOALS OF THE LAUDATO SI' ACTION PLATFORM

ACU Executive Dean for the Faculty of Theology and Philosophy Professor Dermot Nestor and *Laudato Si'* Consultant at ACU Jacqui Rémond are among the university's representatives on the Vatican's University Working Group, established by the Dicastery for Promoting Integral Human Development to encourage the higher education sector to enter the platform.

As part of their work, Professor Nestor and Ms Rémond co-designed a webinar series on *Laudato Si'* for the Strategic Alliance of Catholic Research Universities (SACRU).

Professor Nestor said ACU was honoured to be the first university in Australia to take up the challenge since Pope Francis announced the platform in May 2021. "ACU is now officially committed to Pope Francis's call for all areas of the Church, including universities, to go on a journey towards integral ecology," he said. "We are proud to lead the Australian higher education sector in taking proactive measures over the next seven years to reduce our ecological impact and heal the earth, as the Pope has called all of us to do."

To support universities who are interested in registering for the platform, the Vatican launched University Pathways, an online guide for colleges and universities which are considering taking up the global initiative.

Ahead of the official enrolment in the global platform, ACU celebrated its commitment towards sustainability at an online event hosted by the Strategic Alliance of Catholic Universities (SACRU). That event brought together 26 doctoral students from eight Catholic universities around the world to present their research on sustainability.

ACU doctoral student Judith Pridmore presented her research on the “relational space” between a primary school leader and that school’s leadership team, to illustrate how sustainability could be understood in an education setting. Judith said there was no empirical evidence that addressed the connectedness between educational leaders, and how this translates to better outcomes in a school environment.

Through studying the relationship between a primary school leader and that school’s leadership team, Judith identified “nine themes that they were constantly building and creating together as they undertook their leadership activity”.

“When we think of education, we instantly thinking of teaching and learning, and that’s vital, that is our role, but sometimes we forget that the quality needs to sustain mutual human flourishing, investing in the people because they’re people,” she said. “This is the beauty of *Laudato Si’* – it enables us to see that it’s not just about the physical world, but it’s about the connectedness of people and the world together.

*Laudato Si’* is a powerful call to action to stop the commodification of people and the planet. It recognises that climate change and environmental destruction are inextricably linked.

Climate change has made millions vulnerable to modern slavery especially in regions where people are already living in poverty, do not have access to a social safety net, cannot exercise their workers’ rights or whose livelihoods depend on a stable climate. Displacement and migration because of climate change creates a nexus of harm that pushes people to accept work that actively contributes to environmental destruction of forests, fisheries, waterways and land. Weak regulation and enforcement, corruption, a lack of political will and the lure of profits combined with vulnerability of people creates a vicious circle of opportunity for forced labour, child labour, debt bondage and slavery.

Addressing the UN Sustainable Development Goal (SDG) 8.7 to end modern slavery, and the environmental SDGs, will require those with expertise in modern slavery and the environment to urgently combine their efforts. This joint work will be crucial for the development of impactful interventions by governments, academics, faith leaders, communities, NGOs, workers and business. ACU will take the following steps to facilitate the inclusion and recognition of modern slavery in relation to its own *Laudato Si’* commitments:

- Consult modern slavery experts from the Archdiocese of Sydney Anti-slavery Taskforce in relation to ACU actions (Pillar 7)
- Co-sponsor a 2022 webinar on Modern Slavery, Climate Change and Environmental Destruction (Pillar 2 & 5)
- Pilot modern slavery learning with students via collaboration with the Archdiocese of Sydney Anti-slavery Taskforce in 2022 (Pillars 3,4 & 5)
- Mainstream modern slavery learning in the ACU Core Curriculum to reach 15,000 ACU students each year beginning in 2023 (Pillars 2,3,4,5).

### ACU SUSTAINABILITY WEEK

ACU’s Sustainability Week was held 3-9 October 2021 with events held on all campuses, highlighting the impacts of modern slavery, climate change, ethical investment, sustainable travel and social justice.

### SERIES OF ONLINE DISCUSSIONS ON ISSUES RELATED TO OF MODERN SLAVERY

In 2021, ACU’s Office of the Vice President partnered with the [Catholic Archdiocese of Sydney](#) to co-present a series of online discussions on issues related to of modern slavery, with the [Anti-Slavery Taskforce](#).

### SAINT JOSEPHINE BAKHITA – PATRON SAINT OF ACU BLACKTOWN CAMPUS - SPECIAL MASS

Saint Josephine Bakhita, the patron saint of modern slavery victims and human trafficking, is the patron saint of ACU’s Blacktown Campus. Saint Josephine Bakhita herself was sold into slavery as a child. The ACU Blacktown Campus welcomed its first students in 2021. On 8 February 2021, an ACU event took place and was reported in *CathNews* 11 February 2021:

“Catholics engaged in the fight against modern slavery joined members of western Sydney’s South Sudanese community for a special Mass to honour Saint Josephine Bakhita, the patron saint of slavery victims, in Blacktown, for the feast day Mass. A visible example of the anti-slavery work of Catholic organisations was the purple t-shirts depicting Saint Josephine Bakhita worn by the Sudanese congregation, which were supplied by the Australian Catholic University (ACU). The T-shirts, like all ACU clothing and uniforms, are manufactured by Andrews Clothing and certified by Ethical Clothing Australia – a certification which provides an assurance that the garment workers are treated fairly and are not exploited.”







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

1 January 2021 – 31 December 2021





CATHOLIC ARCHDIOCESE  
OF MELBOURNE



# Modern Slavery Statement 2021



#### Disclosure Note

This Modern Slavery Statement (Statement) has been produced on behalf of The Catholic Archdiocese of Melbourne (CAM). This Statement covers entities owned or controlled by The Catholic Archdiocese of Melbourne (ABN 64 047 619 369) and The Roman Catholic Trusts Corporation for the Diocese of Melbourne (ABN 52 768 159 282), including the Melbourne Archdiocese Catholic Schools (ABN 18 643 442 371), the Archdiocese of Melbourne Catholic Development Fund (ABN 15 274 943 760).

In the Statement we will refer to the "Catholic Archdiocese of Melbourne (CAM)", as a single name reference to include agencies. This statement does not cover Villa Maria Catholic Homes (VMCH). VMCH have produced a separate Modern Slavery Statements for 2021.

This statement was approved by the Most Rev Peter A Comensoli, Archbishop of Melbourne on 22 June 2022.  
The Catholic Archdiocese of Melbourne, 383 Albert Street, East Melbourne (ABN 64 047 619 369)  
[www.melbournecatholic.org](http://www.melbournecatholic.org)



CATHOLIC ARCHDIOCESE  
OF MELBOURNE



CATHOLIC DEVELOPMENT FUND



MELBOURNE  
ARCHDIOCESE  
CATHOLIC SCHOOLS

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Statement from

## Most Rev Peter A Comensoli, Archbishop of Melbourne



The eradication of modern slavery in the Archdiocese's operations and supply chain is an extension of our mission identity and Catholic Social Teaching which emphasise respect for the human dignity of the person.

This Statement will again be included as part of the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern Slavery Statements. The Compendium is an important record of the collaboration that has taken place across the Church in Australia to provide practical ways that we can work together on this issue. The Compendium is the collective record of the work undertaken so far but most importantly, it shows us how much work there is still to do.

The Catholic Archdiocese of Melbourne will continue to drive best practice and take action in our agencies to end modern slavery in our generation.

I thank the Modern Slavery Liaison Officers for the work undertaken over the last 12 months and the decision to consolidate reporting into a joint Modern Slavery Statement.

### **Endorsement**

This Modern Slavery Statement was approved by Archbishop Comensoli the Catholic Archdiocese of Melbourne as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 June 2022.

A handwritten signature in black ink, appearing to read 'Peter A Comensoli', with a small cross symbol to the left.

**Most Rev Peter A Comensoli**  
ARCHBISHOP OF MELBOURNE

Statement from

## Gerard Dalbosco, Chair, Melbourne Archdiocese Catholic Schools



We are pleased to endorse this joint Modern Slavery Statement of the Catholic Archdiocese of Melbourne covering Melbourne Archdiocese Catholic Schools (MACS).

We have taken steps in assessing, addressing and setting up initiatives in our first Modern Slavery Statement. As operating a business during the COVID-19 pandemic continues to evolve, we are committed to continuous improvement and reducing any modern slavery risks arising from our supply chain.

Our efforts have centred on improving the visibility and understanding of our supply chain and ethical procurement practices as we focus on creating a more sustainable supply chain.

Our focus for the year 2021 has been to develop a risk framework and tools to identify and manage the risks of modern slavery in our operations and supply chain. To help us do this, we have actively engaged with the Australian Catholic Anti-Slavery Network (ACAN) and worked collaboratively with the Archdiocese of Melbourne to assist with prioritising and assessing supplier risks.

While we are encouraged by the progress that has been made in our first reporting year as MACS, we know more needs to be done and we will continue to refine our tools to address modern slavery risks as we work to deliver great outcomes. This also includes the continued awareness of schools within MACS. We are also cognisant that dealing with modern slavery will require ongoing focus in collaboration with industry, the community and other stakeholders.

### **Endorsement**

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the MACS Board on 22 June 2022.

### **Gerard Dalbosco**

CHAIR, MELBOURNE ARCHDIOCESE CATHOLIC SCHOOLS  
JAMES GOOLD HOUSE  
228 VICTORIA PARADE EAST MELBOURNE VICTORIA 3002

CRITERIA 1 & 2

# About the Catholic Archdiocese of Melbourne (CAM)

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 around 1.1 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 209 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 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.

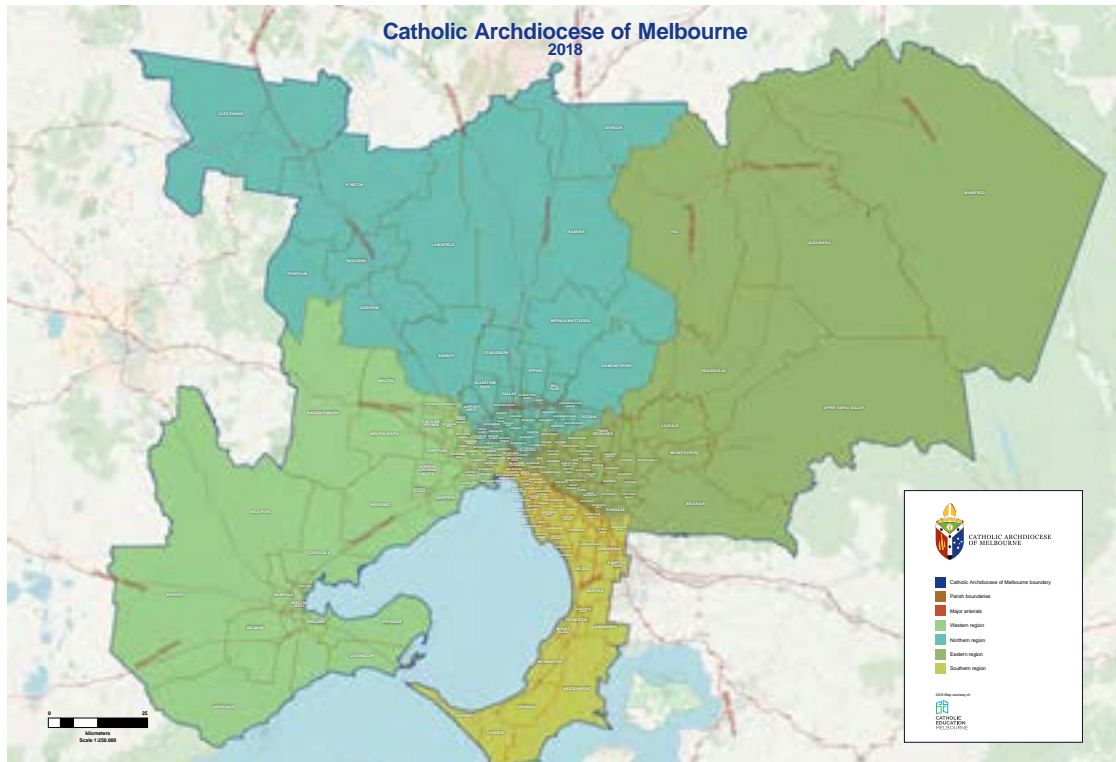
We draw strength from our parish communities and a wide range of organisations and agencies – where we care for one another – and in the deep love of God. One of our key priorities is to support the poor, the broken, the abused, the marginalised and those living with disability. This informs and animates 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 over 300 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.

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.

Operations commenced on 1 January 2021, including Catholic Education Melbourne ceasing and becoming part of MACS with 290 schools. 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.



## Agencies

Archdiocesan entities covered by this Modern Slavery Statement:

- Melbourne Archdiocese Catholic Schools (ABN 18 643 442 371), James Gould House, 228 Victoria Parade East Melbourne Victoria 3002 [www.macs.vic.edu.au](http://www.macs.vic.edu.au)
- The Archdiocese of Melbourne Catholic Development Fund (ABN 15 274 943 760), St Patrick's Centre, 486 Albert Street East Melbourne Victoria 3002 [www.catholicdevelopmentfund.org.au](http://www.catholicdevelopmentfund.org.au)

## Mission

*'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.'* — Archbishop Comensoli

Our vision is for an outstanding Catholic education that equips young people with the knowledge, skills, hope and optimism to live meaningful lives and shape and enrich the world around them.

Our schools make it a priority to create an environment where all parents and families feel welcomed, valued and supported.

Our schools recognise that every child is special and unique – and make every effort to cater for individual learning needs.

Our schools actively promote the faith development of students in an environment where prayer and sacramental celebrations are structured into the school's day-

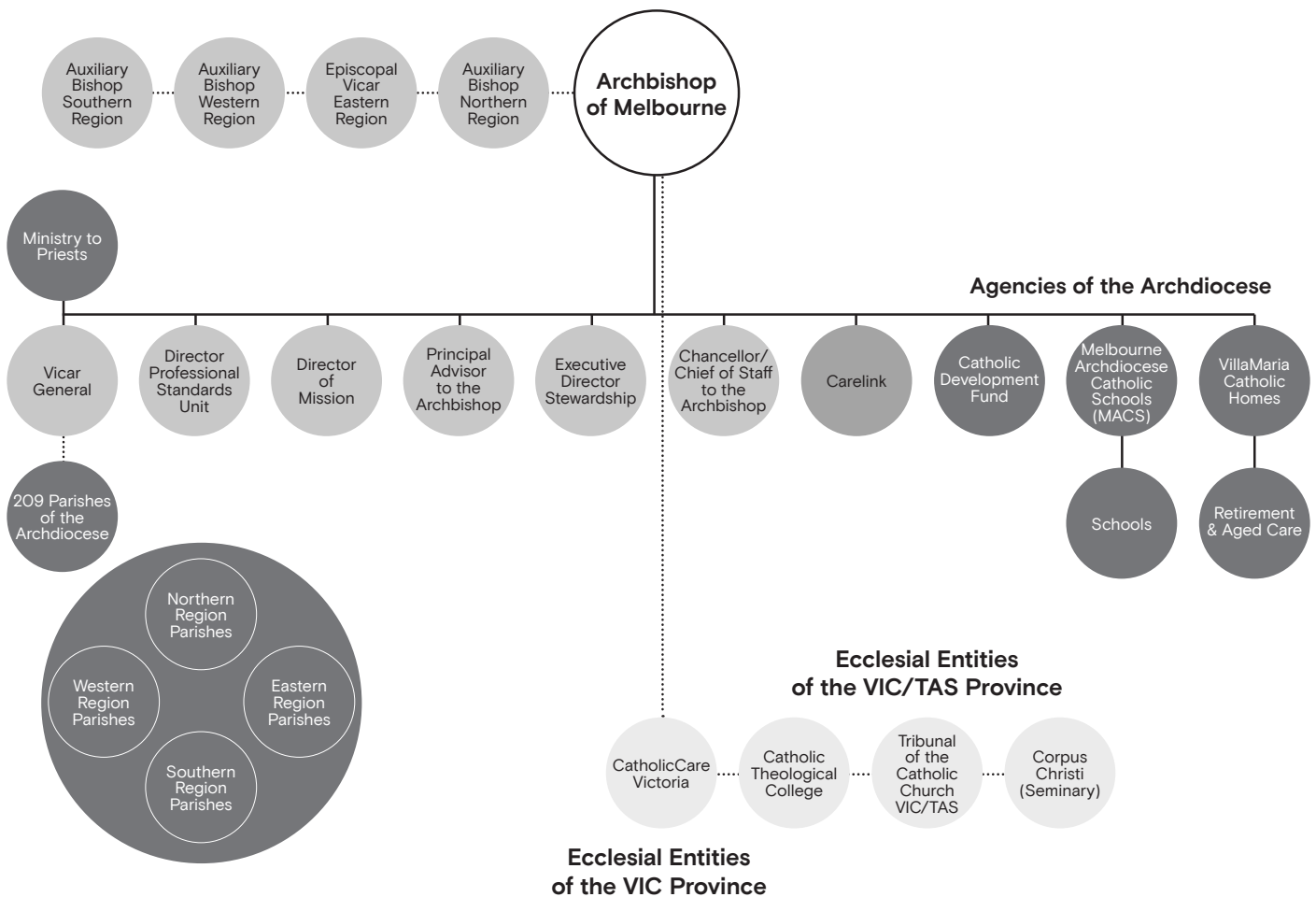
to-day activities. They provide religious education programs which make students knowledgeable about their faith.

Our schools have high expectations and priority is placed on service to the community, with a firm commitment to nurturing school communities that not only encourage and celebrate intellectual achievement and academic excellence but also participation, leadership and achievement in other fields – sports, the arts, and citizenship activities.

### Organisational Structure

The organisational structure of Catholic Archdiocese of Melbourne is displayed in the figure below. Our work is organised into different entities and agencies. This structure provides clear responsibilities and accountabilities and it also dictates our governance structure.

## CATHOLIC ARCHDIOCESE OF MELBOURNE



## MELBOURNE ARCHDIOCESE CATHOLIC SCHOOLS (MACS)

MACS was established in 2020 by the Archbishop of Melbourne, Most Rev Peter A Comensoli. The Archbishop of Melbourne is the sole member of MACS.

Archbishop Comensoli appoints the eleven members of the MACS board. Following an extensive consultation process and recommendations from the School Governance Steering Committee formed to look into education governance, Archbishop Comensoli established MACS to assume the governance and operation of Catholic schools, and appointed Gerard Dalbosco as the inaugural Chair of MACS.

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.



### Governance Framework

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.

The board holds the Executive Director and Executive Leadership Team accountable for managing and delivering MACS objectives and implementing policies. The MACS board guides and monitors the business of MACS and is responsible for the overall corporate governance including:

- overseeing regulatory compliance
- ensuring that MACS upholds Church laws
- ensuring that appropriate, adequate and effective systems of risk management and internal control are established and maintained
- charting the overall strategy and direction of MACS – including setting, monitoring and reviewing strategic, financial and operational plans and determining matters relating to policy and practice.



The Board includes various committees that report to them, such as Child Safety & Risk Compliance and Finance & Audit Committee.

## Agency profiles

### *Melbourne Archdiocese Catholic Schools*

MACS works in partnership with families, parishes, religious institutes and the community to deliver a safe environment and high-quality Catholic education that is inclusive of all who seek it.

MACS provides quality Catholic education to more than 112,000 students at over 290 parish primary schools and regional and archdiocesan secondary colleges across the Archdiocese of Melbourne. This makes MACS the second largest proprietor of schooling in Victoria and the largest Catholic education provider within a diocese in Australia. MACS' head office is located in East Melbourne. It is supported by four regional offices in the north, south, east and west of Melbourne, along with a Catholic Leadership Centre. Melbourne Archdiocese Catholic Schools employs close to 500 staff in Melbourne.

MACS assumed the governance and operation of Catholic schools in the Archdiocese of Melbourne from 1 January 2021. The change in governance arrangements resulted in 290 schools owned by the Archdiocese, its parishes or associations of parishes in the Archdiocese of Melbourne being transferred to MACS.

It needs to be acknowledged with MACS governance changes and operation in Victoria during 2021 that 2020 was the most disrupted of school years. It is time to take stock of the impact of the pandemic on student learning and well-being. Although the 2021 year ended with high vaccination rates, outdoor activities, and face-to-face teaching access, it was, as a whole, perhaps the most challenging for MACS' operations, educators and students in its history of Catholic Education celebrating 200 years in this nation.

The MACS 2021 financial report will be included in its Annual Report when published on its website [www.macs.vic.edu.au](http://www.macs.vic.edu.au). The 2021 financial report will be published during July 2022 on the Australian Charities and Not-for-profits Commission (ACNC) website.

MACS revenue for 290 schools was \$2.0B, the main expenditure being \$1.4B on the salaries of over 15,000 employees. Throughout the reporting period MACS engaged with over 1,000 suppliers and the main categories of expenditure were:

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

### *Archdiocese of Melbourne Catholic Development Fund*

CDF, in support of the mission of the Catholic Church, provides capital funding for the establishment and operation of Catholic Parishes, Primary and Secondary schools, and Catholic Hospitals and Aged Care. CDF supports a range of Catholic organisations across a multitude of sectors that impact the broader community at an enormous scale, including:

- 1 in 4 School Students in Victoria
- 30% of Private Hospital Care in Australia
- 12% of Aged Care in Australia
- 22 Development Funds Across Australia

The CDF is governed by Archdiocese of Melbourne as an undertaking of the Archbishop and has an advisory board to the Archbishop.

The CDF has an annual revenue \$52.1M and expenditure of approximately \$15.0M excluding the salaries of its 52 staff. In its operations, the CDF engages principally with other Catholic entities and banks.

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.

#### **Summary of 2021 activities and next steps for 2022**

The CAM continued participation in the Australian Catholic Anti-Slavery Network (ACAN) modern slavery risk management program. The program provided CAM and MACS staff access to monthly webinars and e-newsletters, tools and templates, guidance materials and expert advisory. During 2021, awareness raising continued with key staff undertaking the ACAN e-learning modules "Modern Slavery 101" and "Business Relevance".

MACS in its first year of operation, has taken a series of steps towards achieving practical outcomes from our ethical procurement initiatives, such as:

- Introduction to Sedex involving suppliers used by MACS Office
- New MACS Modern Slavery policy
- Replacing all the tea, coffee and drinking chocolate with a fair-trade brand
- Providing regular updates to schools on using fair-trade sports goods, uniforms etc.
- Including a modern slavery clause in all tenders

This implementation aims to gain greater visibility of procurement and integrate ethical sourcing practices more broadly into these areas in the future.

Modern slavery is a multifaceted issue that requires a multifaceted approach. Melbourne Archdiocese Catholic Schools has put into place the following work streams in our targeted approach to ethical procurement supply chain mapping and spend analysis:

#### **Plans for 2022 and beyond:**

1. Conduct ACAN action planning workshops
2. Schedule regular Modern Slavery Liaison Officer Sub Committee meetings

3. Create a new role, General Manager of Procurement to enhance capacity for MACS
4. Create a process to embed Sedex as part of procurement practices
5. Initiate supplier engagement strategy specific to labour related services
6. Enhance reporting capabilities and develop Key Performance Indicators (KPIs)
7. Deploy ACAN e-learning modules onto the MACS Learning Management System (LMS).

### Criteria 3

## Modern slavery risks in operations and supply chains

### **CAM Supply Chains**

The Catholic Archdiocese of Melbourne does not have any staff provided by external providers or labour hire companies. Our 206 staff assist our parishes with shared services e.g., in:

- Procurement
- Planning & Building
- Property & Facilities maintenance
- Accounting & Finance
- People & Culture
- Information Communications & Technology
- Work Health & Safety
- Government Relations
- Communications & Engagement
- Pastoral Support
- Banking services

When engaging suppliers to deliver operational services, we endeavour to create and maintain long term relationships and to build trust and transparency with our suppliers.

The majority of MACS' significant suppliers are based in Australia. The top 50 suppliers used by MACS Office operations were considered for this analysis and the percentage breakup of those is shown in the chart below. In future years this will be expanded to include school operations arising from the current migration of all MACS schools to the one financial reporting platform as part of the ICON Project.

The details are available in the financial report and can be found at The Australian Charities and Not-for-profits Commission (ACNC) website when it will be available in July 2022.

It also needs to be noted that MACS' major operating expense (almost 80% of total operating expenses excluding depreciation) is salaries and employee expenses of teaching and non-teaching staff within schools and the MACS Office.

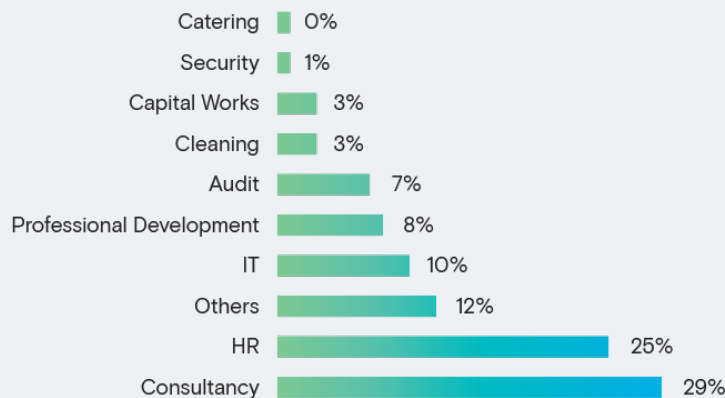
ACAN will help us understand the entities we partner with for our operational activities and those involved in our supply chains. In addition, we have established an ongoing monitoring system of our suppliers by commodity. Should there be any changes to our

risk profile, or a credible report of one of our suppliers engaging in human trafficking or other prohibited activities, we will be notified promptly and take the appropriate follow up actions.

The highest risk areas identified are as follows:

1. Cleaning services – as highlighted last year in Catholic Education Melbourne’s Modern Slavery statement, a new tender took place that included modern slavery clauses.
2. Facilities management – this includes maintenance services such as plumbing, handyman services, minor repairing etc. There are no current contracts with MACS although purchase orders have a modern slavery clause as part of the terms and condition.
3. ICT hardware – these goods may be manufactured using conflict minerals (e.g. cobalt used in lithium-ion batteries, which is common to most mobile phones throughout the world and/or forced labour by entities in earlier stages of their supply chains.) Over time, our understanding of supply chains will improve working with the Australian Catholic Anti-Slavery Network.

### Percentage of Spend of Top 50 Suppliers



### MACS Spend Analysis 2021



## Supply chain risks

- Industry sector – specific industry sectors deemed as high risk in international and national guidance documentation.
- Commodity/product – specific products and commodities deemed high risk by the United States 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 outlined in the 2018 GSI. While MACS predominantly uses Australian suppliers, it is recognised that goods and services may come from countries other than those of the suppliers’ headquarters.
- Workforce profile – In undertaking MACS Office’s supplier analysis, we considered the type of labour involved in producing 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 MACS Office’s profile, 77% of the spending was considered as no risk, with 14% as high risk, as shown in the graph below.

The following categories were considered to be high risk: cleaning services, catering/food and beverage, facility management and ICT hardware. The growing risk arising from new MACS governance will be school based capital infrastructure projects.



## Our COVID-19 response

We recognise that the economic impacts of the global COVID-19 pandemic may increase the prospect of exploitation in certain jurisdictions. While the full ramifications of the pandemic on social and economic standards worldwide are not currently known, we will utilise the monitoring system outlined above and continue to work with our supply chain resilience solutions partner.

However, with lockdowns, there was a ceasing of onsite operations during periods of the year and some reduction of expenditure that may contain modern slavery risks. Additionally, the impact needs to be closely monitored in future years, along with the economic climate as pressures on the supply chains, especially relying on overseas sources continue.

As stated above, MACS governance changes and operation in Victoria during 2021 was one of the most disrupted school years in the history of Catholic Education in Australia. The harm inflicted by the worldwide pandemic goes beyond just schooling. Students didn’t just face different academic and faith learning during the pandemic. Some lost family members; others had parents or guardians who lost their employment or impact on sources of income; and many experienced social isolation.

## Criteria 4

# Actions Taken to Assess and Address Risk

Key personnel include the Modern Slavery Liaison Officer (MSLO) whose role is to lead the coordination and implementation of modern slavery risk management initiatives and liaise with ACAN. The CAM Modern Slavery Liaison Officer Sub Committee, which has members from Catholic Archdiocese of Melbourne, Villa Maria Catholic Homes, Melbourne Archdiocese Catholic Schools and the Catholic Development Fund, meets regularly and report to their respective executive and board structures.

For the 2021 reporting period, MACS undertook initial actions to address the modern slavery risks in its operations. Commencing with its membership in the ACAN, MACS along with the Catholic Archdiocese of Melbourne (CAM) and the Catholic Education Commission of Victoria (CECV), has assessed its operations and subsequently commenced actions to manage the existing and ongoing risk exposure.

The following actions have been taken throughout the reporting period:

1. Created a Modern Slavery Policy – MACS has developed a Modern Slavery Policy with the overarching purpose of preventing modern slavery by managing and mitigating the modern slavery risk within our business operations and supply chains. This policy MACS to ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Modern Slavery Act 2018. MACS adopted this policy in 2021.
2. Provided slavery-free tea, coffee and drinking chocolate – MACS Office’s preferred vendor for office supplies is Complete Office Solutions (COS), the preferred vendor for the Catholic Archdiocese of Sydney. Therefore, we have changed all our tea, coffee and drinking chocolate to Sprout, the preferred brand for slavery-free products.
3. Communication with schools – all Catholic schools in the Archdiocese of Melbourne were given updates on modern slavery, especially high-risk categories such as sporting goods, uniforms, cleaning services etc.
4. Undertook modern slavery awareness training – at least one staff member in all MACS Office business groups has undertaken modern slavery awareness training and supplier engagement training. Supplier awareness training will be rolled out by HR to all staff across the organisation.
5. Undertook supplier risk assessments – MACS has undertaken a risk assessment of corporate office suppliers and service providers and categorised them into risk-rated cohorts and spend volume. This risk assessment has identified the areas where the risk of modern slavery exposure is elevated. Therefore MACS will focus its preventative and mitigation compliance activities throughout the next reporting periods.
6. Commenced supplier engagement – MACS has commenced its supplier engagement strategy by introducing modern slavery clauses in the terms and conditions of purchase orders. This communicate is the first of many steps related to building supplier awareness. Subsequent action and compliance will be taken to reduce modern slavery risk from MACS’ immediate supply chain.

7. Added contractual clauses – working closely with our legal team, all new supplier contracts include modern slavery clauses to ensure suppliers take all reasonable steps to remove modern slavery from their supply chains. Moreover, minimum entitlement clauses for supplier employees have been included in MACS supplier contracts.

Both CAM and MACS 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.

CAM and MACS intend that Sedex will be utilised to:

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

Sedex helps us with the supply chain visibility to know the full extent of our supply chain, from raw material harvesting and transport of goods to finalised products and services in the forms they are provided to us. Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. The aim is to be aware of every supplier in the chain and to hold key information on them, including where all suppliers through the whole value chain are located – including the suppliers to direct suppliers, and their suppliers etc and the inherent risks to human and environmental rights associated with the countries, industries, and activities of each supplier.

CAM and MACS used the ACAN Risk taxonomy to select 50 high risk and high volume suppliers for on-boarding to the Sedex. Once invited to join the platform, suppliers are required to fill in a self-assessment questionnaire (SAQ), and a risk score is produced (site characteristics risk score).

## **E-learning**

E-learning provides an important framework and foundation for the ACAN modern slavery risk management program. The four modules are delivered online and the Learning Management System provides transparency of reporting on staff participation. The MSLOs determine which staff should be required to complete the modules, based on roles and responsibilities.

In 2022, MACS plans to incorporate the ACAN e-learning into the 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)* – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. This module shares insights about slavery in all stages of the supply chain relating to the production of goods, from raw materials, to the manufacturing, and various stages of transport and logistics. Modern slavery risks in the labour services industry, particularly the sectors of cleaning, security and hospitality are also explored.

*Module 2: Business Relevance* – provides a business perspective on modern slavery risks. This module explains the responsibilities of businesses to respect human rights through enhanced corporate due diligence, and the key economic, legislative and stakeholder drivers to manage risks. A review of relevant modern slavery case studies and key reporting requirements of the Act are covered.

*Module 3: Implementing a Modern Slavery Risk Management Program* – provides a comprehensive overview on how to develop and implement a modern slavery risk management program through:

- Commitment – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities
- Business State of Play – understanding gaps, developing a modern slavery action plan and monitoring progress
- Supplier Risk – prioritising suppliers according to risk and spend and conducting supplier due diligence
- Engage, Educate, Respond – ensuring staff, contractors and suppliers are trained and educated on modern slavery risks and that mechanisms to mitigate risks are in place

*Module 4: Grievance Mechanisms and Remedy* – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery, in alignment with the UN Guiding Principles on Business and Human Rights and Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. The module also includes extracts from the UN Global Compact Network Australia's publication on Implementing Effective Modern Slavery Grievance Mechanisms, and case studies about initiatives, such as the Cleaning Accountability Framework (CAF).

## Remediation

When instances of Modern Slavery are suspected, the first port of call is the Modern Slavery Liaison Officer Sub Committee, which will assess suspected cases and escalate if appropriate. This committee also assess initiatives and actions and advise on appropriate steps forward.

Our escalation path is highlighted below.



Both CAM and MACS 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 CAM or MACS are found to have caused or contributed to modern slavery. Due to the complexity of remediation, specialist resources are required to ensure the best outcomes for people impacted by modern



slavery. To this end, CAM and MACS 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 CAM and MACS 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.

Both the CAM and MACS 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

### *CAM and MACS 2021 – 2023 Action Plan*

Both CAM and MACS are in a strong strategic position, as many fundamental activities and actions have been implemented. The next steps are to continue implementation to further address modern slavery risks.

ACTION	TIMEFRAME
<b>Management Systems</b>	
Continue to develop policies, principles and processes, and integrate these into management tools.	2021
Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs.	2022
<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.	2021
Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.	2022-23
<b>Procurement and Supply Chains</b>	
Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021
Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.	2022-23
<b>Develop protocols for reviewing suppliers and for following up on adverse findings</b>	
Roll out updated contract clauses, supplier code of conduct and tender requirements.	2021-23
<b>Human Resources &amp; Recruitment</b>	
Activate all five ACAN e-learning modules and make available to staff, boards and senior management.	2022

In order to support the Modern Slavery Act within the organisation, MACS plans to undertake the following steps:

- A modern slavery plan to support the implementation of the governance structures, policies, processes and risk registers needed to underpin a successful modern slavery framework
- Advice on implementing a modern slavery policy including schools
- A modern slavery risk register to capture and address the key modern slavery risks that an education service might cause, contribute or be directly linked to
- A modern slavery fact sheet to facilitate staff training; and
- Supplier contract considerations, including the addition of modern slavery clauses in contracts.

The rollout and implementation of the above points will support the organisation in conducting its own risk assessment, due diligence and remediation activities.

MACS is confident that the steps taken to date will continue to build a strong foundation for a robust modern slavery framework. However, we recognise there is more to do across all MACS schools.

From 2022, we are committed to continually improving our approach, partnering with our stakeholders, and working to reduce modern slavery.

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

### *Management Systems*

- Continue to develop policies, principles and processes, and integrate these into management tools.
- Work to integrate anti-slavery into governance structure and define metrics to measure, manage, enhance reporting capabilities and develop KPIs.

### *Risk Management*

- Continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.
- Develop a process to periodically review and update the risk management framework, as understanding of modern slavery risk matures.

### *Procurement and Supply Chains*

- Inform suppliers of anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.
- Undertake supplier engagement via ACAN e-learning and on-boarding to Sedex, monitor and report on Sedex SAQ results.
- Develop protocols for reviewing suppliers and for following up on adverse findings.
- Roll out updated contract clauses, supplier code of conduct and tender requirements.

### *Human Resources and Recruitment*

- Activate all five ACAN e-learning modules and make available to staff, boards and senior management.

## Criteria 5

# Effectiveness Assessment

### Gap Analysis

Addressing criteria four and five of the reporting criteria, CAM developed an action plan based on the outcome of the ACAN Gap Analysis. The focus has been on internal processes including training, risk management, supply chain management and recruitment. These efforts have been somewhat impacted as a result of COVID-19.

In 2021 we are focused in the following foundational areas:

- Take our supplier engagement up a level;
- Roll out additional training modules;
- Update our Policies and Systems to cover Modern Slavery;
- Enhance our Governance frameworks;
- Improve our risk identification; and
- Finally improve on our contract management process.

MACS completed a gap analysis in 2021. The ACAN tool reviewed the following five categories related to MACS' operations:

- Management Systems
- Human Resources and Recruitment
- Procurement and Supply Chain
- Risk Management
- Customers and Stakeholders

### Future measures of effectiveness

In the future, CAM and MACS will 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 eliminate any risk of being directly linked to modern slavery, dramatically lowering the risk of directly causing modern slavery, and diminishing 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 MSLO sub-committee. To support the development of KPIs, the following baseline metrics have been developed to begin assessing the effectiveness of activities and initiatives:

STAKEHOLDER	ACTIVITY	Total
Staff	e-learning modules completed	475
MSLO sub-committee	number of meetings	12
Suppliers	total number of suppliers	29,282
	e-learning modules completed by suppliers	0
	suppliers invited to join Sedex	100
	suppliers registered with Sedex	11

## Review Process

MACS will undertake regular reviews of its modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists of five stages:

1. *Annual review of the modern slavery framework* – this annual review will be undertaken to assess the effectiveness of the existing framework and identify areas for improvement. As MACS is still in the process of building and strengthening its current controls, the existing tools utilised, such as the ACAN Gap Analysis self-assessment tool, will be a key driver for areas requiring further attention and action.
2. *Regular check of the risk review process* – this stage will be utilised to further assess the existing risk identification methodology against suppliers. Over time it will endeavour to ensure that supplier data is captured and gain further insight into the supply chain map.
3. *Supplier and engagement feedback process* – ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step towards eliminating risk. A dedicated member of staff will provide 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 exposure. Utilising this tool will assist in 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.

Looking ahead, we plan to progress through MACS with the following actions:

### *Building our understanding and capabilities*

- Develop and deliver a broader training program for our office and school based employees to increase understanding and awareness of modern slavery risks within our operations and supply chains.
- Continue to educate and support providers in understanding their obligations under the Modern Slavery Act 2018 and our supplier statement.
- Continue to develop response plans that are monitored and managed for continuous improvement with identified suppliers.
- Second line review processes to be defined and implemented to ensure independent oversight of the modern slavery framework.

### *Improve our processes*

- Further embed due diligence processes within the first line of defence and adapted learnings.
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Uplift our compliance obligations framework.
- Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks.

- Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
- Leverage the ICON platform to identify key suppliers and risks across all schools in MACS.
- Embed ethical procurement in our processes, including developing and rolling out ethical procurement guidelines for employees.

#### *Enhance engagement with suppliers*

- Endeavour to engage with highest-risk suppliers to assess their modern slavery practices.
- Continue to assess risks within our operations and supply chains, expanding the scope to include our schools.
- Continue to participate in the ACAN Forum for alignment in approach.
- Obtain greater visibility of the risks of modern slavery in our supply chains beyond tier one.
- Introduce vendor terms and conditions project to embed ethical sourcing for all new vendors.
- Disseminate our supplier Code of Conduct and enhance direct supplier engagement with certain high priority suppliers.



## Criteria 6

# Process of consultation with key Archdiocesan entities

At CAM we anticipate that our consultation process will continue to develop in future reporting periods.

MACS consulted with different departments, such as Procurement, Legal, Marketing and Finance teams, when preparing this statement.





Archdiocese  
of Hobart

# Modern Slavery Statement 2021



## Disclosure Note

This statement has been made 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.**

ABN 24 097 986 470

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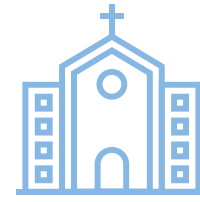
# About us

The Catholic Church has been serving the people of Tasmania since the arrival of Fr Philip Conolly in 1821. Over the next 30 years the ministry of Fr Conolly and other pioneering priests, the Sisters of Charity and the first Bishop of Hobart, Robert Willson, was largely dedicated to helping the male and female convicts living across Tasmania. In 1842, the Diocese of Hobart was established and was latter elevated to an Archdiocese in 1888.

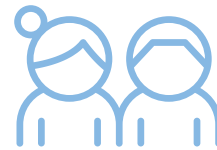
The Archdiocese seeks to make Jesus Christ the centre of all that it does. All works and agencies of the Archdiocese give expression to their Catholic identity and seek to serve the broader mission of the Church. The Archdiocese and its agencies also endeavour to embody the principles of Catholic Social Teaching including respect for the dignity of the human person. All those employed within the Archdiocese are encouraged to reciprocate and demonstrate respect, truthfulness, integrity, hospitality, forgiveness and justice towards each other, and those that they serve in their respective roles. The eradication of modern slavery in the Archdiocese's operations and supply chains is an extension of the Archdiocese's mission and Catholic identity which it seeks to reflect in its operations and supplier relationships.



## The Archdiocese's current activities include:



- A wide network of parishes that provide places of worship and centres of pastoral outreach.



- A comprehensive primary and secondary school system that dates back to the 1840's.



- Welfare and social services that began with the establishment of an orphanage by the Sisters of Charity in the 1870's. This tradition has been continued by CatholicCare Tasmania and Centacare Evolve Housing.



- Two social enterprises: The Blueline Laundry Inc. and St Joseph Affordable Homes Inc. provide employment opportunities for disadvantaged groups as well as delivering commercial services in the laundry and housing construction sectors respectively.

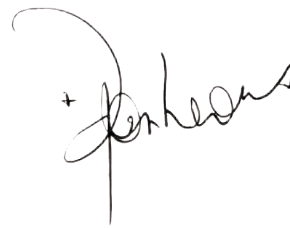
# Statement from Archbishop Julian Porteous

On the occasion of the World Day of Prayer and Reflection against Human Trafficking on February 8, 2022, Pope Francis said that: *"To everyone I express my gratitude*



*and encouragement: let us go forward in the fight against human trafficking and all forms of slavery and exploitation. I invite you all to keep the indignation alive - keep the indignation alive! - and every day to find the strength to commit yourselves with determination on this front. Do not be afraid in the face of the arrogance of violence, no; do not surrender to the corruption of money and power."* I would like to echo Pope Francis' words in encouraging all the Archdiocese's priests, religious, staff, students, school parents, parishioners and volunteers to continue the fight against modern slavery in Tasmania and across the globe. I am pleased to see that the Archdiocesan modern slavery prevention program is laying a firm foundation

for the Archdiocese, it's agencies and controlled entities to continue their work on this issue into the future. It is important for us all to remember that this work is ultimately aimed at freeing people trapped in modern slavery like conditions and minimising the risk that the excellent work that is performed by the Catholic Church in Tasmania through all its agencies and controlled entities is not contributing to modern slavery. By continuing this work we become champions of human dignity and expand the social impact of our work beyond the borders of our state and even our nation to help make a better world for the glory of Jesus Christ.

A handwritten signature in black ink, reading "Julian Porteous" with a cross symbol above the first letter.

**Archbishop Julian Porteous**  
Archbishop of Hobart

# Statement from Chris Ryan

In 2021, Agencies within the Archdiocese of Hobart continued to implement systems and processes to address Modern Slavery. They have a clear focus - to ensure modern slavery does not exist in operations and supply chain. Whilst this may be an audacious goal, it is our collective focus and Heads of Agency participate collaboratively with this shared understanding. This year saw a focus on staff awareness through an expanded online learning program, education

sessions and discussion groups. We still have much to do and will continue embed modern slavery awareness at all levels within the Archdiocese of Hobart.

A handwritten signature in black ink, reading "Chris Ryan" in a cursive style.

**Chris Ryan**  
Executive Director, Administration & Finance



# 2021 Modern Slavery Risk Management Initiatives

In 2021, the Archdiocese published its first Modern Slavery Statement that helped to increase awareness across the organisation. The Archdiocese also approved its Modern Slavery Prevention Policy that covers all of the Archdiocese, its agencies and controlled entities. The adoption of this policy became an opportunity to initiate or continue the Archdiocese supplier engagement program especially with the suppliers of school uniforms and our building and construction suppliers. Modern Slavery clauses were included in some of the building and construction supplier contracts for St Joseph Affordable Homes.

The Archdiocese also commenced a broad-based e-learning program with an introductory module on modern slavery. Other more specialised modules were completed by members of the Archdiocesan Modern Slavery Act Compliance Committee.

Modern Slavery awareness was boosted in the Archdiocese through various presentations to school students, teachers and staff of the Archdiocese. A novel awareness raising event was organised by the Archdiocese in collaboration with the Australian Catholic Anti-Slavery Network (ACAN) on the occasion of the International Day for the Abolition of Slavery that attracted participation from Archdiocesan staff and people from all over Australia.

## Our Plans for 2022

The plan of action for 2022 builds on the foundation laid in 2020 and 2021. The supplier engagement program will focus on getting suppliers in both high spend and high risk categories to complete a Self-Assessment Questionnaire (SAQ). Furthermore modern slavery clauses will be incorporated into all tender contracts involving high risk suppliers.

The education of staff, senior managers, members of leadership teams and board members will be expanded to include further e-learning using ACAN modules.

Promoting awareness of modern slavery will be expanded through the distribution of a resource for parishes in the Archdiocese on modern slavery and through the celebration of three events throughout the Archdiocese and its agencies:

- International Day of Prayer & Awareness Against Human Trafficking (February 8)
- World Day Against Trafficking in Persons (July 30)
- International Day for the Abolition of Slavery (December 2)

## Our Plans Beyond 2022

The future plans for the Archdiocese's modern slavery prevention program in 2023 and beyond involve using the data generated from the SAQ process to fine tune the modern slavery risk associated with our suppliers. SAQs will be sent to particular groups of suppliers to generate more data to help guide the supplier engagement program. It will help guide the e-learning plan that will be developed for suppliers based on the risk associated with their operations and supply chains. Supplier engagement systems will be reviewed and implemented to ensure that supplier education, due diligence activities, corrective actions and other issues can be tracked and monitored.

Supply chain mapping will be initiated in key areas of building and construction and also for our school uniform suppliers.

Further e-learning will be rolled out to build awareness with key staff in the area of remediation.

Resources for school communities will be developed for all levels including resources for Principal, Business Managers, teachers, students and school parents.

Supplier relationship management software will be investigated to identify a more streamlined approach for monitoring supplier compliance with Archdiocesan policies.

## **Reporting Criteria 1 & 2: About the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart**

### **Our Organisational Structure**

The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart, 'The Trust', is a body corporate constituted under section 4 of the *Roman Catholic Church Property Act 1932* and is the legal entity under the *Corporation Act (2001)*. Functional agencies and operations of The Trust include:

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

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

- Centacare Evolve Housing Ltd.
- The Blueline Laundry Inc.
- St Joseph Affordable Homes Inc.

The three entities listed above are registered charities governed by their own Rules. These rules are ratified by the members of the Association who are supported by a separate Board of Directors.

Established in accordance with Canon Law and not engaged in the day-to-day financial administration of the diocese, the Diocesan Finance Council (DFC) is a council of vigilance which exists to assist the Archbishop in his role as steward and administrator of the temporal goods of the diocese. It is an obligatory consultative body in the diocese established by the diocesan Archbishop.

Its objective is to ensure that the stewardship and administration of diocesan resources (including agencies and enterprises) is consistent with the spirit of the gospel, the teaching of the church and provisions of Canon Law.

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.

The Archbishop has given a specific mandate to each of the various agencies and entities through the development of organisation Charters, as well as approving governance policies for each.

# Governance Chart

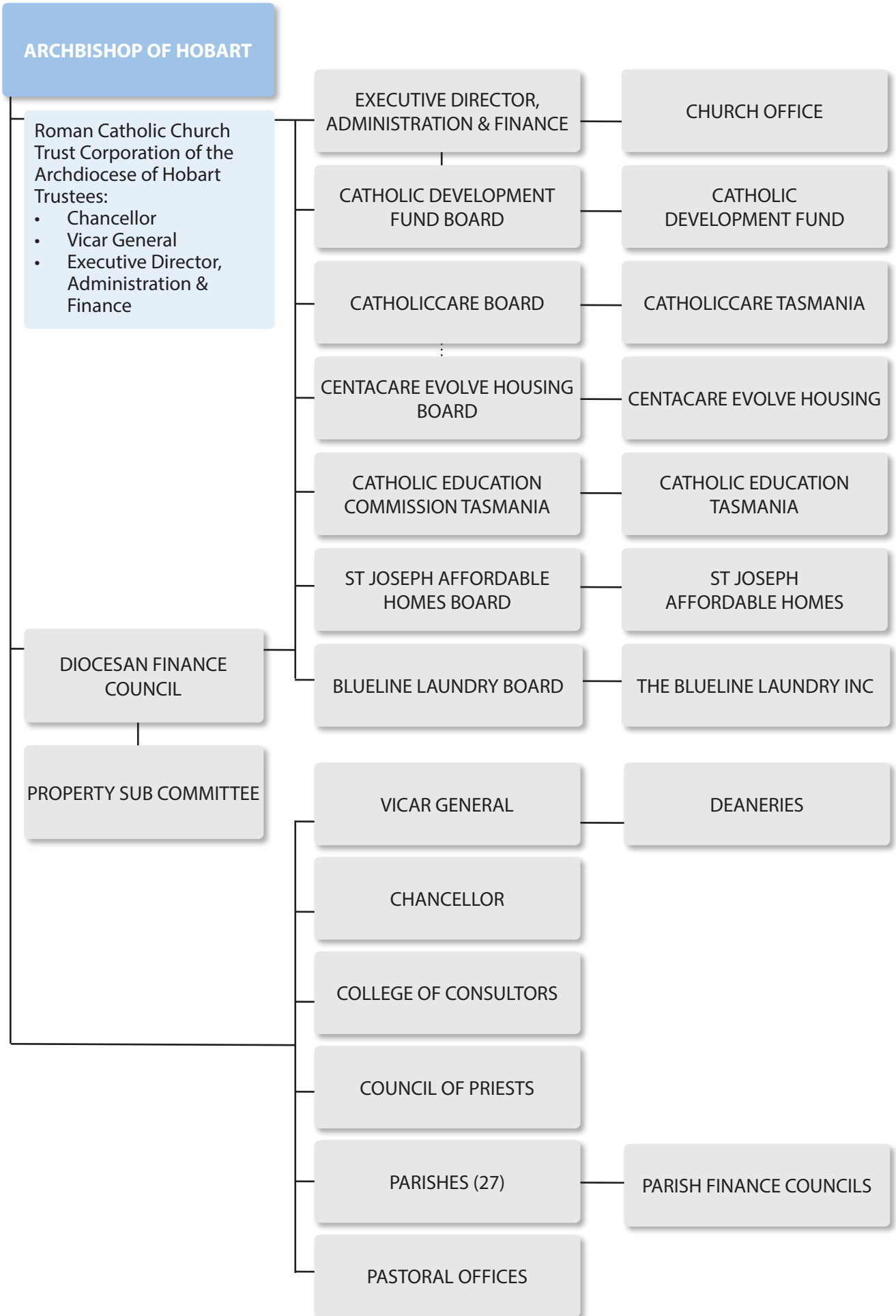


Figure 1 Displays the governance structure of Archdiocese of Hobart.

# Our Governance Framework

In Tasmania, the Church operates in the civil law through the *Roman Catholic Church Property Act 1932*. This Act of the Tasmanian Parliament, amended in 2005 provides for 'The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart' (Church Trust Corporation) to be the employer as appropriate, and to provide an agency with a Common Law status to more readily facilitate dealings with Federal and State governments with regard to contractual and grant obligations. The Act provides for functional agencies and operations of The Trust including:

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

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, The Blueline Laundry Incorporated and Centacare Evolve Housing Limited are also subject to the Archdiocese of Hobart Board Code of Conduct and associated Tier 1 policies.

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

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

The Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) was formed in the 2019. It comprises representatives from key Archdiocesan agencies and entities and reports to the Executive Director, Administration & Finance. Its roles include:

- Developing and maintaining the Archdiocese Modern Slavery Prevention Policy and Principles
- Preparing Modern Slavery Statements for the Department of Home Affairs.
- Providing education and awareness resources to staff, boards and volunteers
- Overseeing efforts of AoH Agencies and entities to educate suppliers and stakeholders on Modern Slavery Compliance and
- Developing a 3-year Modern Slavery Prevention Roadmap.



# Our Operations

## Catholic Parishes

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

## 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 56 staff. The Church Office has a number of long-term suppliers in the areas of professional services, fleet management, property and maintenance services, food and beverage, cleaning services and ICT systems. It has few short-term suppliers.

## Catholic Education Tasmania (CET)

CET runs 38 Catholic schools and colleges that offer early learning, kindergarten, primary school, high school, and senior secondary education for 16,333 students across Tasmania. In 2021, CET had 2,511 staff who are based at its head office located at New Town, Tasmania 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 a few other areas.

## CatholicCare Tasmania (CCT)

CCT has been the primary social services agency of the Archdiocese across Tasmania since 1960. They have 470 employees located across the state and offer a variety of programs and projects across key areas: children's services, 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, Devonport and Burnie, and a number of outreach centres. CCT has a number of long term suppliers in the area of professional services. They have short term supply arrangements in place in the food and beverage area.





## **Centacare Evolve Housing (CEH)**

CEH was formed in 2014 from a joint venture between the Trust and Evolve Housing Ltd. Its mission is to provide secure and stable social housing and community development programs. Their housing stock of over 2000 homes is primarily located in the Brighton/Bridgewater area of Tasmania. Its head office and most of its 24 employees are based at Bridgewater. CEH has a range of long-term suppliers in the area of building, construction and maintenance. It has a total of 150 suppliers and contractors.

## **Catholic Development Fund (CDF)**

CDF functions as a treasury and a source of finance and credit for capital and other expenditure of the Archdiocese. It provides high level financial management services to the Archdiocese, parishes and other church entities based in Tasmania. Its offices are based at New Town, Tasmania and it has 2 employees. It has a number of long-term supply arrangements in place in the area of professional services and financial services.



## **St Joseph Affordable Homes Inc. (SJAH)**

SJAH is a building and construction social enterprise established in July 2020 to improve life and employment outcomes (including apprenticeships) for disengaged young Tasmanians. In its first year of operation, the construction of 106 homes were commenced in Southern Tasmania for CCT and CEH with 52 homes being completed. An in-house apprenticeship scheme for 11 young people was initiated across a range of trades: carpentry, plumbing, painting, bricklaying and carpet laying. It has established a supply chain involving 55 long-term suppliers for key building materials and trade services.



## **Blueline Laundry Inc (BLL)**

BLL is a registered Charity with a long and proud history of service for the people of Tasmania. Commencing operations in 1893 as BayView Laundry, the service was developed by the Sisters of the Good Shepherd to provide employment for disadvantaged women and girls. Since then Blueline Laundry has evolved to a fully commercial and competitive laundry. BLL enhances people's lives and helps build resilience by providing rewarding career opportunities, training and personal development for people who are marginalised from mainstream employment through the operation of commercial laundries in Launceston and Hobart. Blueline Laundry maintains a focus toward supporting people with a disability, migrants, and people who have experienced trauma. Its head office is located at New Town, Tasmania. BLL has 240 employees with 35% working with a disability and an additional 35% being from a culturally or linguistically diverse background. BLL has long-term supply arrangements in place in the area of laundry chemicals, linen supplies and utilities.



# 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
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, office supplies, food and beverage, utilities, ICT services and fleet management	Australia	Unknown
CEH	professional services, insurance, building and construction, 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
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

Table 1 Provides and overview of the supply chain across the Archdiocese.

# Reporting Criteria 3:

## Modern slavery risks in operations and supply chain

The Archdiocese is continuing to build on its previous work in 2019 and 2020 in terms of analysing modern slavery risks in its supply chain and operations. The use of a Risk Taxonomy developed by ACAN has been employed to categorise the risks for modern slavery in the Archdiocese's supply chain in terms of high, medium and low risk.

## Operational Risks

### Our COVID-19 Response

- CCT's emergency relief funding was distributed to individuals and families in need through supermarket vouchers and the payment of utilities, rent and medical bills. Some of this funding went to people impacted by COVID-19.
- Senior Management and the advisory Boards for the Archdiocese and its agencies devoted a regular amount of time to dealing with managing COVID-19 risks. Despite the disruptions that resulted from COVID-19 around the country and the world, the Archdiocese and almost all of its entities were able to substantially maintain their operations and supply chains. Consequently, the negative impacts of modern slavery were negligible.
- Construction projects initiated by SJAH were minimally impacted by any COVID-19 induced supply chain disruption from both a lead time and cost perspective.
- After a major business disruption due to the pandemic in 2020, BLL embraced innovation to successfully adapt to the new business environment in which it operated in 2021. The scope of the business innovations were two-fold:
  - Firstly, BLL redefined its service offering from being a cleaner of dirty laundry to being the supplier of an essential service: the cleaning and disinfection of COVID-19 infected linen for major hospitals, aged care homes and quarantine hotels. As part of this innovation, BLL also provided advice to public health and the hospitality sector on how to adapt their operations to become more COVID-19 safe and how to convert hotel accommodation for tourists into isolation facilities. They also insourced a sewing team of 6 workers with disabilities from one of its peer organisations to manufacture alginate bags, a medical grade laundry product used to transport infectious linen, to provide a reliable supply to its customers.
  - Secondly, BLL took a new approach to staff wellbeing. They conducted their first staff feedback survey and improved communications with a regular staff newsletter. The staff survey helped inform a number of wellbeing initiatives to protect their vulnerable employees physical and psychological wellbeing at work and at home. The physical protection of staff was achieved with new safety protocols and appropriate PPE. The mental wellbeing of staff was assisted by the establishment of a crisis fund for employees to access emergency resources and provide financial support for at-risk employees. BLL prioritised retaining temporary migrant workers who were excluded from mainstream social welfare due to their visa status and redeployed migrant workers to higher duties when they discovered a number of talented staff whose tertiary qualifications were underutilised. Finally, they nurtured a culture of inclusion and respect with new categories in their employee awards program. The quality of these new initiatives was recognised by the following awards: *Excellence in a workplace response to COVID-19 in large*

*business - Worksafe Tasmania Awards 2021, Business Innovation Award – Tasmanian Community Achievement Awards 2021, and the Creating Inclusive Environments Award – Tasmanian Disability Festival Awards 2021.*



*Figure 2: Grant Coker-Williams, Blueline Laundry's People, Quality & Systems Manager accepts the Excellence in a workplace response to COVID-19 in large business - Worksafe Tasmania Award 2021 from Tasmanian Attorney General, Elise Archer MP.*

## Our People

The Archdiocese employs 3,335 staff across all its agencies. The demographic composition of our employees is unknown as this information is optional when it is captured. Most of our employees are Australian citizens or permanent residents. A small proportion are employed under various working visa programs.

The Archdiocese has a full suite of People & Culture policies & procedures in place including a Whistle-blower Policy which are updated on a regular basis. CET operates under the Archdiocesan whistle-blowers framework and policies with regards to complaints and grievances. A policy development framework involves the review and updating of policies on a regular basis.

All personnel files are maintained and payroll systems are supported by payroll teams and finance professionals. All employment is compliant with the National Employment Standards and relevant employment law (which covers immigration law compliance).

A learning management system is used to provide compliance training that is updated with any new legislative changes. Each manager receives a report on a monthly basis on employee training progress.

A People & Culture & WHS report is tabled at each of the Archdiocesan agency board meetings on a regular basis.

# Modern Slavery Gap Analysis

The Archdiocese has been measuring its progress in terms of systems and processes using a gap analysis tool that was initially used in June 2019, December 2020 and then again in December 2021. The results of this analysis are displayed in the table 2 in relation to five categories.

In terms of the management systems category, progress has been made in the area of governance with the approval of a Tier 1 Modern Slavery Prevention policy covering all agencies and controlled entities. The level of commitment within the Archdiocese was enhanced through the process of developing the first AoH Modern Slavery Statement and the subsequent distribution to Executive Directors, Board members and staff. The Archdiocese joined Sedex to identify supplier risk and is in the early stages of using this business system. The Archdiocese's first modern slavery statement has helped to build awareness of the level of risk inherent in the construction and maintenance supply chain associated with the CET, CCT, CEH and SJAH building program.

In terms of risk management, due diligence was performed on the operational risk associated with Multicultural Services Programs - Safe Haven Hub. The program is involved in the placement of refugees and immigrants in seasonal work or other low skilled roles. It was established that each potential employer was carefully screened for any potential modern slavery risk. The managers for this training have benefitted from Red Cross training to aid them in their assessments. A new Archdiocesan Manager of Risk, Compliance and Governance, who was closely involved with CCT, CEH and SJAH, joined the Archdiocesan Modern Slavery Act Compliance Committee during 2021. This change of personnel ensured that modern slavery risks were being considered by someone with a good working knowledge of our building and construction activities.

Progress in the procurement and supply chain category was made with the inclusion of modern slavery clauses in SJAH's supplier contracts. Furthermore, the top 5 uniform suppliers for CET were engaged to provide information about the Archdiocesan modern slavery prevention policy and about their due diligence activities to reduce the risks of modern slavery in their operations and supply chain.

In terms of the human resource and recruitment category, further awareness of modern slavery was created with an article in the Archdiocesan newspaper, an event held on the International Day for the Abolition of slavery, a professional development presentation for CCT/CEH/SJAH and Church Office staff and a number of CET students and staff attended seminars and in service days focussed on this issue. The Tier 1 policy was finalised and approved during 2021 and a copy of the policy and a set of Anti-Slavery Principles for supplier were sent to all staff in CCT/CDF/CEH/SJAH and the Church Office. One aspect of the Anti-Slavery Principles deals with the issue of the use of Labour hire firms. It requires that Archdiocesan Agencies and their suppliers ensure that they use labour hire firms that are certified or licenced by a competent body. Staff training was also increased during 2021 with the roll out of a Modern Slavery 101 e-learning module to all staff in Q4. There were a number of staff members who completed this module by the end of 2021 but there still remained a significant percentage of staff that are due to complete the module in 2022.

The progress made in terms of the customer and stakeholder category was solid. The promotion of a Slavery Free Easter egg campaign in parishes and an article in the Archdiocesan newspaper helped build awareness of modern slavery with parishioners. Furthermore, school-based seminars on modern slavery further increased awareness in the student body and for staff about the issue. The staff survey conducted by BLL gave workers the chance to voice their concerns and ideas that helped to drive changes in the way BLL approached its employees with a migrant and refugee background. This feedback helped BLL on its journey of transforming its business model to put people management, especially those from a disadvantaged background at the core of its business focus.

Category	Topic	Result 2019	Result 2020	Result 2021	Change
Management Systems	Governance	No Progress	Starting Out	Making Progress	—
	Commitment	Starting Out	Making Progress	Making Progress	^
	Business Systems	No Progress	Starting Out	Making Progress	^
	Action	Starting Out	Making Progress	Making Progress	—
	Monitor/Report	No Progress	Starting Out	Making Progress	^
Risk Management	Risk Framework	Starting Out	Making Progress	Making Progress	^
	Operational Risk	Starting Out	Making Progress	Making Progress	^
	Identifying External Risks	Starting Out	Making Progress	Making Progress	
	Monitoring and Reporting Risk	No Progress	Starting Out	Starting Out	
Procurement & Supply Chain	Policy & Procedures	No Progress	Starting Out	Making Progress	
	Contract Management	No Progress	No Progress	Starting Out	^
	Screening and Traceability	Starting Out	Making Progress	Making Progress	
	Supplier Engagement	No Progress	Starting Out	Making Progress	^
	Monitoring and Corrective Action	No Progress	No Progress	No Progress	
Human Resource & Recruitment	Awareness	No Progress	Starting Out	Making Progress	^
	Policies and Systems	No Progress	No Progress	Making Progress	^
	Training	No Progress	Starting Out	Making Progress	^
	Labour Hire/Outsourcing	No Progress	No Progress	Making Progress	^
Customer & Stakeholders	Customer Attitudes	Starting Out	Starting Out	Starting Out	—
	Information Provision	No Progress	No Progress	Making Progress	^
	Feedback Mechanisms	No Progress	No Progress	Starting Out	^
	Worker Voice	No Progress	No Progress	Starting Out	^





Legend	
No Progress	
Starting Out	
Making Progress	
Leading Practice	

Table 2: Displays the progress of the Modern Slavery Prevention compliance program across different dimensions of the Archdiocese.

# Supply Chain Risks

A risk analysis exercise was performed in 2019 by reviewing the top 100 suppliers by category of the Archdiocese. Each of these suppliers was grouped into 15 spend categories. Each spend category was allocated a risk rating of either high, medium or low as defined by a risk taxonomy.

The key insight that this analysis highlighted was that over 71% of the total spend was in the area of Building and Construction. This result is shown in Figure 2

## Top 10 spend categories by percentage spend

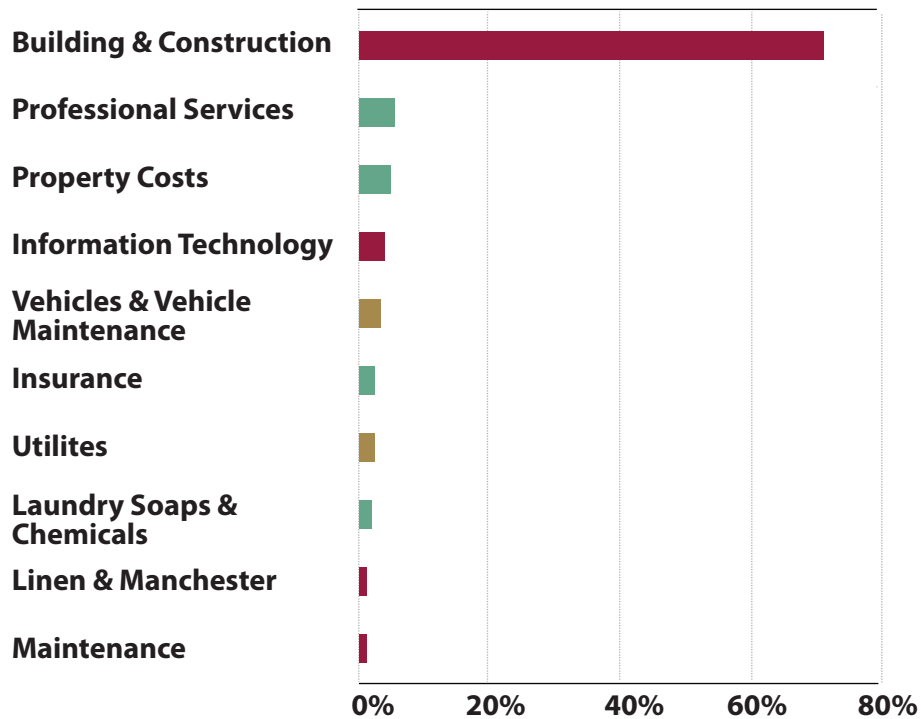


Figure 3: Displays the percentage spend and risk associated with the top ten spend categories. **Red** indicates high risk, **yellow** indicates medium risk and **green** indicates low risk.

This exercise was not repeated in 2021 as there was no major change in the nature of the business operations of Archdiocesan agencies. However, the growth on SJAH did change the structure of the supply chain in the building and construction area. SJAH became the major supplier of home construction for CCT and CEH in 2021. The increased vertical integration that has emerged for the home building activities of Archdiocesan agencies has ensured that the main suppliers for this activity are now trade contractors and building materials companies. This change has increased supplier visibility with respect to modern slavery risk.

The publication of the first round of modern slavery statements on the Australian Government’s Online Register for Modern Slavery Statements has also provided an avenue for getting an appreciation of the due diligence being undertaken by our suppliers with a consolidated revenue above \$100M. Some of these measures have included: modern slavery policies, new contract terms, supply chain mapping and employee learning programs.



# Reporting Criteria 4:

## Actions taken to assess and address risk

### Modern slavery Actions in CY2021

Action	Action Status	Comments
Finalise Tier 1 Modern Slavery Prevention Policy and its associated Anti-Slavery Guiding Principles.	Completed	The policy provides a clear statement of intent and covers all the agencies and controlled entities of the Archdiocese and their suppliers.
Contact the top 5 school uniform supplier to communicate the Archdiocesan modern slavery policy.	Completed	This action has provided information about the control measures that our uniform suppliers have taken in respect to modern slavery.
Renew membership of ACAN.	Completed	ACAN continued to provide valuable support, training and resources for the continuance of the Archdiocese's compliance program.
Provide modern slavery update to all Archdiocesan agency boards once Modern Slavery policy is approved.	Work in Progress	The policy was communicated across all agencies and controlled entities. Further e-learning initiatives will help boards gain a greater understanding of their role in respect to this issue.
Initiate supplier engagement activities with suppliers in high risk categories.	Work in Progress	There were a number of supplier engagement activities with high risk supplier that will be more structured in 2022.
Incorporate modern slavery clauses in building and construction supply contracts.	Work in Progress	This has been initiated for suppliers to SJAH. Staff changes in CET slowed the progress of this activity that will be actioned in 2022.
Circulate ACAN Modern Slavery 101 e-learning module for all staff and members of Archdiocesan boards.	Work in Progress	This action was commenced for staff but not for board members.
Develop CET Modern Slavery School kit for implementation in 2022.	Work in Progress	This action was commenced but was not finalised. It will be carried over to 2022.
Develop systems for monitoring modern slavery actions and risk.	Work in Progress	A number of discussions with potential vendors in regards to contractor management. However, no decision was made to proceed with a supplier management system.

Action	Action Status	Comments
Conduct a comprehensive review of all high-risk Tier 1 suppliers across the supply chain of the Archdiocese and its agencies.	Work in Progress	Desktop reviews were performed to identify suppliers who submitted Modern Slavery Statements to the Border Force website and these statements were downloaded. Other high- risk suppliers were reviewed using the Dunn & Bradstreet database to ascertain their revenue and head count.
Modern Slavery Agency Action Management plans developed and implemented.	Not Commenced	This action was postponed to 2022.
Circulate ACAN Business Relevance e-learning module for all Archdiocesan Boards.	Not Commenced	No e-learning distributed to Boards in 2021. In 2022 Board Members will be required to complete an introduction to modern slavery course and a course on Implementing a Modern Slavery Risk Management Program.

## Other actions taken to assess and address risk: CatholicCare Tasmania

CatholicCare Tasmania's Multicultural Service Program (MSP) team provides support to people from migrant and refugee backgrounds as they settle into their new lives in Tasmania. They are at increased risk of experiencing forms of modern slavery due to challenges such as low literacy, education or English language skills; visa requirements; lack of awareness of work rights or safe work conditions; limited support networks; lack of access to reliable information; and due to racism and discrimination.

As a team we are committed to the prevention of modern slavery and ensuring that those who may have experienced forms of slavery here in Australia or abroad receive the support, care and information they need to thrive and live safely in the community.

- in the past 12 months, the MSP team supported 350 people from migrant and refugee background through their programs
- The MSP team have 4 frontline staff who work actively with this vulnerable cohort. With qualifications and expertise in Social Work, Teaching, Business and Training
- 4 staff members have participated in various networks and training activities on this topic

Some of the areas the MSP team have been providing support and education over the past 12 months include:

- **Forced marriage** – referrals to services such as My Blue Sky, discussions with young people around definition and signs of forced marriage, Women's Community Reference Group meeting discussing women's issues including forced marriage.
- **The effects of child marriage** – referrals to services such as Phoenix Centre and health services
- **Worker rights education** – supporting clients understand their rights and responsibilities as employees in Australia
- **Domestic servitude** – supporting clients after experiencing domestic servitude and helping to rebuild their lives and navigate legal pathways

The MSP team is a member of the Tasmanian Anti-Trafficking Network Meeting facilitated by the Australian Red Cross. This meeting that is held bi-monthly discusses issues of Modern Slavery, anti-trafficking, forced marriage and labour exploitation. It is a platform to assist educate one another, share important information and develop strategies on the identification, prevention and support for people who experience modern slavery.

The MSP team continues to support the work of Be Hers, a local charity who raise money and awareness about the issues of human trafficking both locally and globally. In past years the MSP team supported the organisation develop their social enterprise, The *Be Hers Sewing Centre* in Hobart, which employs women from migrant backgrounds to be seamstresses creating their Dream Free range and facilitating the alterations centre.

The MSP team's Safe Haven Hub provides employment support to people who may be at risk of labour exploitation or where there might be indications of poor work conditions. MSP caseworker ensure their clients are aware of their rights and responsibilities as an employee including minimum wage and safe work conditions. Clients are referred to the Fair Work Ombudsman for more in depth information and support regarding their individual circumstances when required.

Additionally, the MSP team has participated in the following network meetings, stakeholder consultations and training programs including:

- Stakeholder consult on *Labour Exploitation in Tasmania* which will inform the development of an online platform called the Work Rights Hub facilitated by the Australian Red Cross
- Contributed to Anti-Slavery Australia's research project *Speak Now* through focus group discussions which aims to prevent forced marriage and other forms of modern slavery in the home
- Caseworkers attended the *Forced Marriage in Australia* workshop held by Anti-Slavery Australia and My Blue Sky and are trained to identify forced marriage, understand the causes and risk factors and how to provide support to someone at risk of or who has experienced forced marriage.

## Catholic Education Tasmania

- Supplier Engagement with Uniform suppliers.
- ACAN's Introduction to Modern Slavery e-learning modules was sent to all staff.
- A number of student groups and their teachers were addressed on the topic of modern slavery at three senior schools across the Archdiocese.
- Two school staff development days were delivered with a strong focus on modern slavery. Ethical purchasing of staff room supplies, school uniforms and sporting equipment were considered.





Figure 4: Shows some Tasmanian Catholic school staff in attendance at professional development days on modern slavery.

## Other Activities conducted in the Archdiocese

### Awareness Raising

- Slavery Free Easter Eggs March/April 2021 promoted in Church Office and to Parishes
- An article was published in the July 2021 edition of the Catholic Standard on Modern Slavery
- A presentation was delivered at an inhouse professional development seminar in November 2021 on modern slavery.
- The Archdiocese of Hobart organised an International Day for the Abolition of Slavery event in collaboration with ACAN on December 2. The event was a webinar on the topic: How to tackle modern slavery. The webinar featured a conversation between Joel Coward (ex-BHP), Ben Smith (Archdiocese of Hobart) and Trisha Striker (Australian University Procurement Network) about Joel's experience in implementing BHP's modern slavery strategy. Six Archdiocesan staff members joined with 34 external participants from across Australia to attend the webinar.

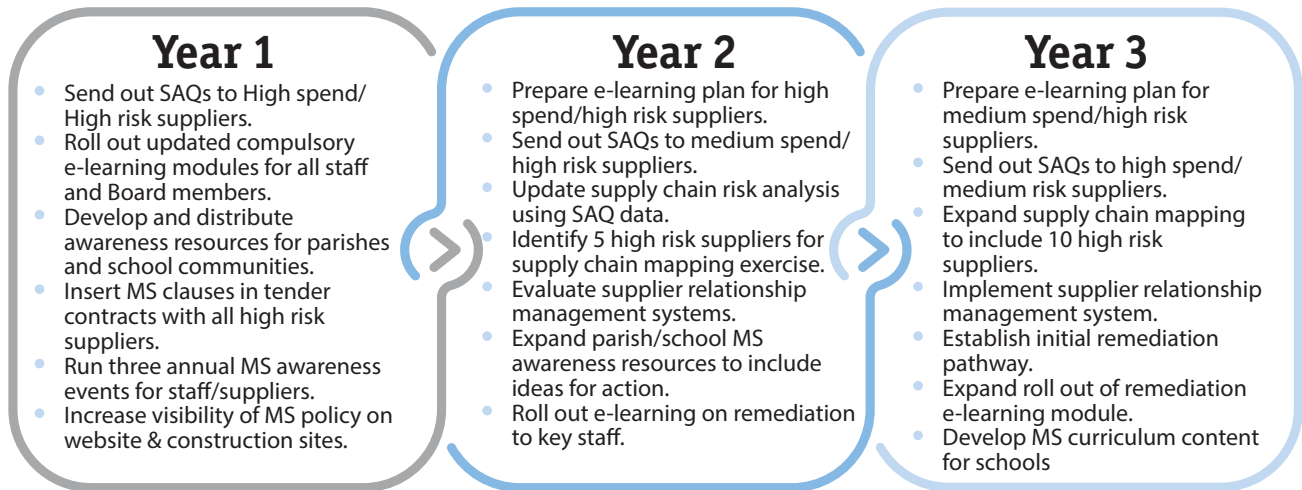
### Networking

- The Modern Slavery Prevention Manager attended regular meetings with the Victoria-Tasmania Catholic Modern Slavery Taskforce.
- Modern Slavery Prevention Manager meet with Trisha Striker, Modern Slavery Program Coordinator, Australian Universities Procurement Network on November 1 in Hobart to discuss ways of collaborating.
- The Modern Slavery Prevention Manager participated in the following seminars:
  - Modern Slavery: Moving Forward, Looking Back - ACAN/ACU Webinar – May 27
  - Modern Slavery: What's the plan? – ACU Webinar – August 26
  - UTas Masterclass entitled 'Modern Slavery and Organisational Accountability'– September 10
  - ACAN Construction Seminar – September 14
  - Equipping Boards to Effectively Address Australia's Modern Slavery Act Webinar – Oct 13
  - Tackling Modern Slavery: Sharing Learnings from Australian and UK Businesses – Nov 3

# Modern slavery action plan for 2022

Action	Responsible Agencies
<b>Training:</b> All clergy, seminarians, deacons, staff and Board Members are required to completed the ACAN approved Modern Slavery 101 online training program.	All
<b>Supplier Due Diligence:</b> At agency level, distribute a self-assessment questionnaire (SAQ) to all high risk suppliers that supply goods and services over the value of \$250,000 per annum that aren't submitting a Modern Slavery Statement to Border Force.	All
<b>Modern Slavery tender contract clauses:</b> Insert Modern Slavery prevention clauses in all new tender contracts with high risk suppliers.	All
<b>Develop Modern Slavery Prevention booklet for Parishes and information for use in Schools:</b> Booklets will be prepared to provide resources for prayer, awareness and action on modern slavery prevention relevant for the needs of parish and schools.	Church Office, CET
<b>Modern Slavery Awareness Events:</b> Run three annual Modern Slavery Awareness events for staff and/or suppliers: The dates of these events are: <ul style="list-style-type: none"> <li>• February 8: International Day of Prayer &amp; Awareness for Human Trafficking,</li> <li>• July 30: UN World Day against the Trafficking in Persons,</li> <li>• December 2: UN World Day for the Abolition of Slavery.</li> </ul>	All
<b>Staff and Board Induction processes:</b> Include modern slavery awareness content in induction training for all staff and Board members of AoH Agencies and controlled entities.	All
<b>Establish Website Visibility:</b> Include the AoH Modern Slavery Prevention Policy and copies of the AoH Modern Slavery Statements on the AoH website.	Church Office
<b>Caseworker training:</b> Expand training for relevant caseworker staff on the nature and warning signs for the following types of modern slavery: domestic servitude, forced marriage and forced labour.	CET
<b>Establish Signage on Construction sites:</b> Display "Are you Alright?" ACAN Building Links signage on all construction sites managed by AoH agencies and controlled entities.	All

# 3 year Roadmap



## The Remediation of Modern Slavery

The Archdiocese is committed to ensuring it provides appropriate and timely remediation of 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.

Due to the complexity of remediation, there is a need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery. The Archdiocese is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. The Archdiocese's remediation efforts will be enhanced in the future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders.

By partnering with Domus 8.7, the Archdiocese can help people harmed by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

If 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. Remediation obligations and expectations will be 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.

The Archdiocese is a consortium partner to the Building Links Program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will be required to contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

The Archdiocese has funded a "Remediation Pathways" module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2022.

Additional information about Domus 8.7 and the process applied can be found on [www.acan.org.au/domus87](http://www.acan.org.au/domus87)

# Reporting Criteria 5: Effectiveness Assessment

Modern slavery has now become a part of the risk register of the Archdiocese and the risk registers of each of the Archdiocesan Agencies. This initiative will ensure that there will be an annual senior management and board review performed.

The approval of the Modern Slavery Prevention Policy and the associated Anti-Slavery Principles provide a solid platform to educate staff and suppliers.

Some specific measures of effectiveness of the Archdiocese's modern slavery compliance conducted in 2021 are evidenced by:

- The ACAN Modern Slavery 101 E-learning module was completed by 252 members of staff in 2021.
- Members of AMSACC completed a number of different ACAN training modules during the year:
  - Business Relevance: 4 members
  - Grievance Mechanism and Remedy: 2 members
  - Implementing a Modern Slavery Risk Management Program: 1 member
  - Modern Slavery Risk Management for Suppliers: 1 member
  - Building Links - "Who do you see on site?": 1 member
- Over 100 staff have attended modern slavery awareness sessions.
- 600 students attended a modern slavery presentation.
- 26 SJAH trade contractors out of 55 have signed a period trade contract that included a modern slavery clause. The remainder are due to sign the new contract in 2022.
- CEH Compliance & Risk Coordinator attended the ACAN Building Links seminar in December 2020.
- ACAN's monthly newsletter is being sent to 13 members of AoH staff.
- AMSACC held 3 meetings during the year.
- The Modern Slavery Prevention Manager attended 9 ACAN monthly teleconferences.

## **Reporting Criteria 6: Process of consultation with entities owned or controlled**

The modern slavery policy framework that has been implemented by the Archdiocese will cover all of its Trust entities and the three incorporated entities that it controls through its exclusive membership of their associations.

The Archdiocesan Modern Slavery Act Compliance Committee is comprised of representatives from BLL, CET, CCT, CEH, SJAH and the Church Office. Each of these entities are involved in actions that assess and address the risks of modern slavery in their operations and supply chain.

## **Reporting Criteria 7: Other**

The Modern Slavery Prevention Manager continued their dialogue with Madeleine Ogilvie, a Cabinet Minister with multiple portfolios and a Member of the Tasmanian House of Assembly for the seat of Clark, on the Supply Chains (Modern Slavery) Bill 2020 that she introduced into the Tasmanian Parliament on 30 April, 2020. Discussions concerning the passing of the NSW Modern Slavery Amendment Act 2021 were had. She also attended the International Day for Abolition of Slavery Webinar that was organised by the Archdiocese of Hobart and ACAN.

The Modern Slavery Prevention Manager was a panellist for two Modern Slavery training seminars for St John of God Health Care.



# MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

## Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of

as defined by the *Modern Slavery Act 2018* (Cth)<sup>1</sup> (“the Act”) on

## Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of

as defined by the Act<sup>2</sup>:




## 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.	
b) Describe the reporting entity’s structure, operations and supply chains.	
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.	
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.	
e) Describe how the reporting entity assesses the effectiveness of these actions.	
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).*	
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.

- 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.
- 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.



Archdiocese  
of Hobart

# Modern Slavery Statement 2021

CATHOLIC DIOCESE OF MAITLAND-NEWCASTLE

1 JANUARY 2021 – 31 DECEMBER 2021

## **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

We might presume that slavery as we have known it through history has ended. The idea of men, women and children in chains indentured out of third and fourth world countries abhorrent but a concept relegated to the past.

It may come as a shock that slavery in the modern era is a 150-billion-dollar business and is often a hidden contributor to the economy of many countries, our own Australia included. Factors that create vulnerable and susceptible people as we know include poverty, lack of education, disempowerment of women and a desire for a better life in another country.

The clothing you are wearing could well have been in some part produced by a modern slave working long hours, underaged, coerced into an exorbitant debt with no other way of paying it off, stolen from a poor village, a young girl or boy sold by family or friends to the unscrupulous, a person uneducated and living well below the poverty line.

Actual numbers of people living in slavery is almost impossible to gauge but estimates place the numbers in the millions and reflect people of every race and culture. We know that there are slaves trafficked into Australia working as indentured labourers or in the sex trade, without visas or protection, identity, or future.

Our [Modern Slavery policy](#) assists this Diocese in working with other Catholic entities and community organisations here and abroad to fulfil a common goal of ending modern slavery. It is a global problem that needs a global solution to eradicate.

We expect all our employees, contractors, and suppliers to comply with all aspects of our policy and strive to protect and respect the freedom and dignity of people everywhere. It is a commitment we make to be stewards of our world and witnesses to the Gospel.

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 9 June 2022.

This Modern Slavery Statement is signed by a responsible member of Diocese of Maitland-Newcastle as defined by the Act.

Gregory Barker, Diocesan Administrator,  
Diocese of Maitland-Newcastle – May 2022

# About Us

The Diocese of Maitland-Newcastle represents the Catholic Church in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi. A diocese is simply a community of Christ's faithful – it represents a portion of the people of God in a particular area, which is entrusted to a bishop.

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 154,000 Catholics. Through its parishes, pastoral groups, and its agencies including Catholic Schools, Catholic Development Fund, CatholicCare Social Services, and St Nicholas Early Education and OOSH the Diocese provides pastoral, educational, social welfare, and community development. The Diocese employs approximately 4,400 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: \$451,500,000.

## Our services

**58** schools with over **20,100** students

**35** St Nicholas OOSH services  
with **5,400+** students enrolled

**11** St Nicholas Early Education centres  
serving more than **1,400+** children

Training by the Office of Safeguarding  
provided to over **1,100** staff

**190+** children and young people in care  
supported through CatholicCare

**9,400+** counselling and assessment sessions  
provided by CatholicCare



**154,481**

Catholics in the region  
(2016 census)



**4,400+**

Employees in our  
Diocese



**38**

Parishes in our  
Diocese



**10**

Deacons

**39**

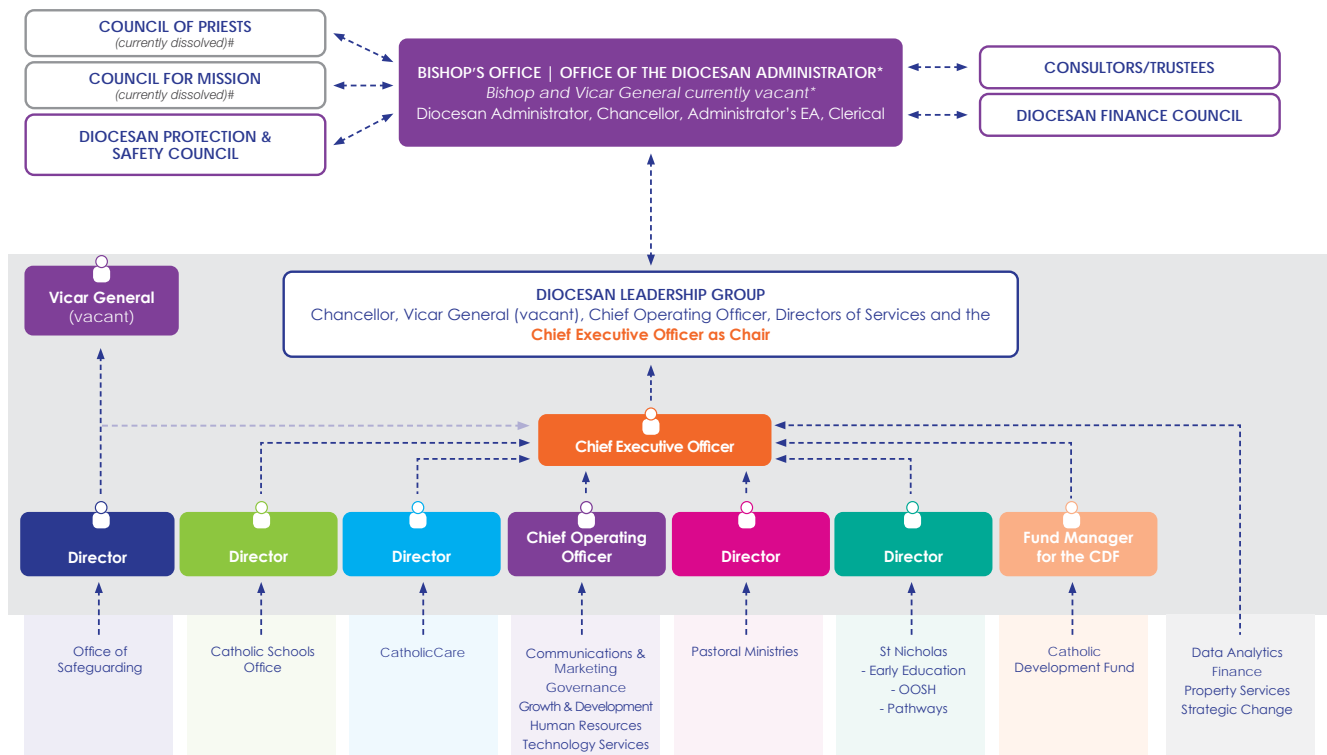
priests



**5,900+**

volunteers

# Organisational overview



\*Bishop Bill Wright died in November 2021. Fr. Greg Barker has been appointed as Diocesan Administrator until a new bishop is appointed by the Holy Father, Pope Francis. The Vicar General role also remains vacant until a new bishop is appointed. \*Councils will be elected following the appointment of a new bishop.

## Workforce data:

Agency	FTE	Part time/Casual/ Fixed-term employees	Volunteers
Diocese including St Nicholas and the Catholic Development Fund	323	561	1430
CatholicCare	89	83	280
CSO	1036	2390	4191
<b>Total</b>	<b>1448</b>	<b>3034</b>	<b>5901</b>

## Workforce composition (estimated):

Agency	% female	% male
Diocese including St Nicholas and the Catholic Development Fund	81%	19%
CatholicCare	83%	17%
CSO	80%	20%
<b>Total</b>	<b>82%</b>	<b>18%</b>

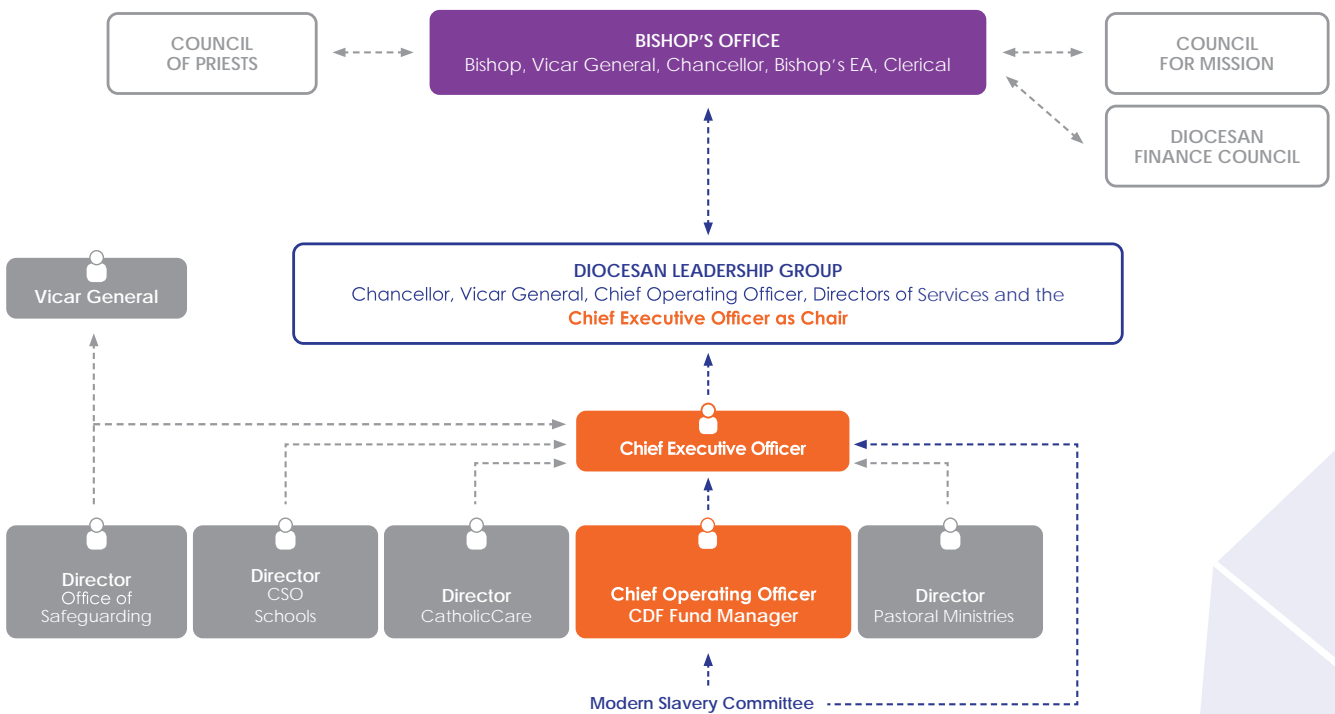


# Governance framework

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 our Modern Slavery Liaison Committee, a committee attended by senior stakeholders from across the Diocese.

The Modern Slavery Liaison Committee acts as an advisory committee to the Diocese of Maitland-Newcastle; it is accountable to the Chief Operating Officer for its performance with progress on operations and activities reported to the Diocesan Leadership Group.



# Our operations

The Diocese of Maitland-Newcastle serves the Hunter and Manning regions which have a population of more than 154,000 Catholics.

The Diocese provides pastoral, educational, social welfare, and community development services. We have various agencies providing these services in a region extending from Lake Macquarie to Taree and as far inland as Merriwa and Murrurundi, including:

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**Pastoral Ministries**, supporting the work of our parishes including youth and children's ministries, faith formation and education, social justice, chaplaincy; and supporting the missionary outreach of the church in the Diocese.

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**Catholic Schools Office**, educating more than 20,000 students in our 58 schools.

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**CatholicCare Social Services Hunter-Manning**, providing care, counselling, clinical and support services along with community food and refugee programs to support children and vulnerable people.

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**Office of Safeguarding**, promoting the safety, well-being of children and vulnerable adults in our Diocese as well as overseeing the safeguarding standards of those in our agencies.

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**St Nicholas Early Education**, providing high-quality care and education for children aged up to five years across 11 locations.

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**St Nicholas OOSH**, 29 services providing out-of-school-hours care for children aged five to twelve years.

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**Catholic Development Fund**, assisting with the management of Diocesan finances and providing retail clients a small range of investment products

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The Diocese employs more than 4,400 people and is supported through a central shared services team providing support in the following areas:

Administration Support	Governance
Communications and Marketing	Human Resources
Data and Analytics	Property
Enterprise Portfolio Management Office	Technology Services
Finance and Payroll	

# Our supply chain

The Diocese 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, furniture and office supplies, ICT hardware, food and beverage, events and entertainment, and waste management sectors.





**CRITERION THREE**

# Operational modern slavery risks

The Diocese has taken several steps to identify the Modern Slavery risks in its operations and supply chains. Our operations primarily occur in the context of education, social services, and pastoral ministries; each classified as a low-risk sector.

Our Human Resources functions including recruitment are supported by systems that are compliant with labour, employment, and immigration laws. Given the baseline standard of our HR processes and systems our immediate focus on modern slavery action has been management systems, risk assessment, staff training and supplier engagement.

We have processes in place to ensure our employees are fairly recruited and appropriately remunerated. The Diocese engages an independent and anonymous whistleblower service and has an ongoing internal audit program to the effectiveness of our risk management controls.

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, textile, cleaning and furniture and office supplies.

# Supply chain risks

The diversity of our agencies means we procure a variety of goods and services from a wide range of industries. Supplier analysis of more than 1,150 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

High	Building & Construction	Furniture & Office Supplies
	Cleaning & Security Services	ICT hardware
	Events & Entertainment	Uniforms & PPE
	Facility Management & Property Management	Waste Management
	Finance & Investments	Government & Agency Fees
	Food & Catering Services	Professional Services
Medium	Advertising & Marketing	Print/ Mail Provider
	Community & Home Care Services	Travel & Accommodation
	Fleet Management, Consumables and Maintenance	Utilities
	ICT software, network services	
Low	Financial Expenses	



## 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.	59.03%
<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.	1.01%
<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.	0.54%
<b>Facility Management &amp; Property Management</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.	1.73%
<b>Finance &amp; Investments</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit, and bond rating agencies.	3.30%
<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.	0.77%
<b>Furniture &amp; 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.	1.34%
<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>	0.49%
<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.).	0.03%
<b>Waste Management</b>	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing.	0.05%



## Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
<b>Advertising &amp; Marketing</b>	Advertising services, campaigns, branding, media collateral, outsourced business operations.	0.23%
<b>Community &amp; Home Care Services</b>	Allied health services, home nursing, home care and social support.	0.39%
<b>Fleet Management, Consumables and Maintenance</b>	Vehicle, components, consumables, mechanical and crash repairs, 2.21% servicing, waste disposal (e.g., tyres, oil).	2.21%
<b>ICT software, network services</b>	Software and application development, support services, call centres (offshore).	4.75%
<b>Print/ Mail Provider</b>	Printing services, printers, ink, paper, other printing consumables.	0.64%
<b>Travel &amp; Accommodation</b>	Travel booking services, hotels, accommodation. Orphanage trafficking/voluntourism.	0.22%
<b>Utilities</b>	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk).	2.02%



## Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
<b>Financial Expenses</b>	Other	1.90%
<b>Government &amp; Agency Fees</b>	Other	6.57%
<b>Professional Services</b>	Other	12.78%

# Actions taken to manage risk

Our effort for 2021 has been in enhancing organisation understanding of potential modern slavery risks in our operations and supply chain, and organisation commitment to address these risks.

The Catholic Diocese of Maitland-Newcastle (“the Diocese”) is an active member of the [Australian Catholic Anti-Slavery Network \(ACAN\)](#). The ACAN network currently comprises of more than 36 Catholic entities nationally including dioceses, schools and universities, and organisations across the finance and investment, health, aged care, and welfare sectors.

The Diocese source a diverse range and significant amount of goods and services, ranging from stationery to uniforms, furniture and office supplies, construction and building equipment.

We have continued our effort to recognize the potential risk of modern slavery in our supply chains for the 2021 reporting period. We have undertaken expenditure

analysis and developed risk profiles of all current active suppliers. We have further identified our top 50 high-risk suppliers for a high-level engagement via SEDEX. We are aiming to progressively extend this program as we continue to develop a deeper understanding of our supply chains.

Modern Slavery contract provisions have been consistently included for all new contract negotiations and supplier engagements. The diversity of our services can potentially expose the Diocese to a wide range of risks, and we are committed to a systematic approach to mitigate risk, particularly in our procurement processes and supplier engagement.

Our Diocesan leadership groups have received on-going Modern Slavery updates. We have rolled out modern slavery training targeting our educational teaching staff and plan to offer the training to all staff via our recently deployed Human Resources platform once it is fully commissioned.

**Steps we have taken to understand, assess and mitigate the risk of modern slavery in our supply chain during this reporting period include:**

	<b>ACTIONS</b>
<b>Diocesan leadership on Modern Slavery</b>	<p>Widened membership base of the Modern Slavery Liaison Committee to obtain comprehensive knowledge of and spread awareness of modern slavery risks. Current committee membership comprises Director of CatholicCare, CSO Assistant Director, Head of Data and Analytics, Head of Communications, Senior Finance Business Partner – Property and Projects, Talent and Volunteer Manager, Manager Strategic Assets, Manager – Mission and Outreach, Risk and Resolution Business Partner. Five meetings convened in 2021.</p> <p>Regular updates to the Diocesan Leadership Group</p>
<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 presented at various staff meetings.</p> <p>Modern Slavery intranet page and Policy available to all staff.</p> <p>E-Learning MS 101 is available to staff of the Catholic Schools Office.</p> <p>Continued training on Modern Slavery targeting educational teaching staff.</p>
<b>Governance and policy</b>	<p>Incorporating modern slavery clause into all new contract negotiations during 2021.</p>
<b>Analysis and assessment</b>	<p>Analysis of expenditure for whole of Diocese to prioritise suppliers for Modern Slavery engagement.</p>





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## ACTIONS

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### Stakeholder and engagement collaboration

Engagement with ACAN to identify common suppliers with others in the network.  
 High-level Supplier Engagement Strategy developed for the top 50 suppliers and high-risk suppliers via SEDEX.  
 Modern Slavery questionnaire targeting suppliers in the building and construction is to be rolled out.  
 ACAN modern slavery modules completed by staff  
 Invited Building and construction suppliers to Building Links webinar.  
 Provided Building Links resources to suppliers.

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### Capacity building

Members of the Modern Slavery Committee:

- Joined 10 ACAN/ MSLO teleconferences
- Attended ACAN workshops
- Collaborated with ACAN members

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## The Diocese of Maitland-Newcastle has access to the ACAN Modern Slavery Course which is comprised of the following 5 modules targeting leadership, executives, staff, suppliers and business partners:

**Modern Slavery 101** – provides a comprehensive overview of modern slavery practices – who is vulnerable, how and why it occurs. The vast number of goods linked to modern slavery through harvesting, processing or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including cleaning, security and hospitality sectors.

**Business relevance** – provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018* (Cth) are included.

**Implementing a Modern Slavery Risk Management Program** – provides a comprehensive overview on how to develop and implement a modern slavery risk management program using ACAN tools and resources:

1. **Commitment** – setting direction, gaining leadership support, policy documentation and defining roles and responsibilities.
2. **Business State of Play** – understand gaps, develop a modern slavery action plan and monitor progress.

3. **Supplier Risk** – prioritise suppliers according to risk and spend and conduct supplier due diligence.

4. **Engage, Educate, Respond** – to ensure staff, contractors and suppliers are trained and educated on modern slavery risks and that documented response mechanisms are in place.

**Grievance Mechanisms & Remedy** – provides an overview of grievance mechanisms, remedy obligations and remedy pathways in relation to modern slavery in alignment with the *UN Guiding Principles on Business and Human Rights and Commonwealth Guidance for Modern Slavery Act Reporting Entities*. The module also highlights guidance and resources produced by the UN Global Compact Australia and a case study highlighting the Cleaning Accountability Framework.

### Modern Slavery Risk Management for Suppliers

– Assists suppliers to develop a modern slavery risk management program that meets contractual requirements for the supply of ethical goods and services and aligns with the values of respecting and protecting the rights of all workers. Expectations that suppliers will effectively manage modern slavery risks and the potential implications of enhanced supplier due diligence are outlined and examples provided.

# Modern slavery action plan

The Diocese of Maitland-Newcastle has continued its modern slavery maturity journey by focusing on management systems, risk assessment, staff training and supplier engagement. External factors such as economic, geopolitical, and environmental have considerably impacted the pathway. Internally, the Diocese has approved establishing a centralised Procurement System which, once implemented, will significantly elevate our supplier engagement and assessment plans.

In 2022 we intend to review our achievements and identify future opportunities in the following areas:

1. Monitoring and reporting external risk (Assurance)
2. Enhancing our modern slavery activities in HR and recruitment (HR practices)
3. Engaging with customers and stakeholders including small-scale rural regional and remote suppliers (Stakeholder dialogue).

PRIORITIES	ACTIVITIES
<b>Assurance</b> (1-3 years)	<ul style="list-style-type: none"> <li>• Establish targets and assign responsibilities for managing modern slavery risk.</li> <li>• Explore and establish performance measures to assess the effectiveness of controls related to modern slavery risk.</li> <li>• Integrate modern slavery risk management controls into existing business systems e.g., supplier review process, data management.</li> <li>• Monitor the effectiveness of modern slavery risk controls.</li> </ul>
<b>HR practices</b> (1-3 years)	<ul style="list-style-type: none"> <li>• Incorporate relevant modern slavery KPIs and risk management activities in to all new and updated position descriptions.</li> <li>• Identify training needs; develop and provide relevant training for staff, including provision to external contractors as required.</li> <li>• Assess and incorporate ways to measure and manage modern slavery risks in labour hire contractors and outsourcing programs.</li> <li>• Promote and encourage zero tolerance approach to modern slavery among all staff and contractors.</li> <li>• Regular review and update hiring and onboarding processes</li> </ul>
<b>Stakeholder dialogue</b> (1-2 years)	<ul style="list-style-type: none"> <li>• Engage relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains.</li> <li>• Continue and broaden 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>

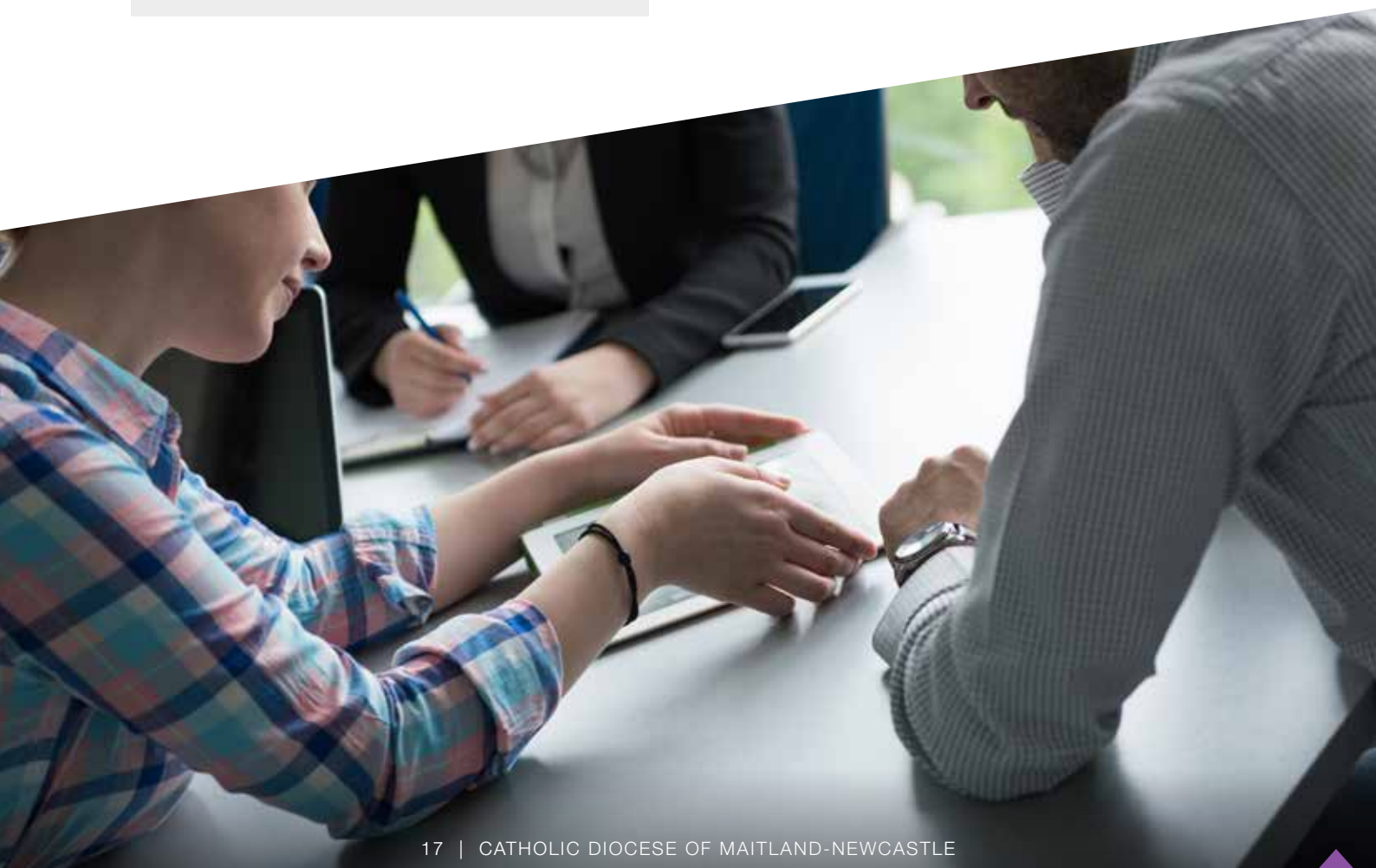
# Remediation

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.

Remediation is complex to support people impacted by modern slavery. Due to this complexity, the Diocese is partnering with Domus 8.7, an independent program initiative by the Catholic Archdiocese of Sydney to provide advisory services to workers impacted by modern slavery, businesses and industry bodies, government agencies and ACAN participants.

Domus 8.7 provides:

- Confidential telephone assessment, advice, and action planning for businesses with modern slavery concerns
- Practical support, advice and referrals including for people impacted by modern slavery and/or their families
- Guidance and advice for businesses who identify modern slavery in their operations or supply chains
- Coordination with government agencies, social services, support organisations and others
- Help businesses develop internal capabilities to manage modern slavery risk
- Advocate for improved responses to modern slavery in Australia.



# Beyond 2022

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 2022:

<b>WORKSTREAM</b>	<b>ACTIVITY</b>
<b>Governance</b>	Our Leadership and Senior Management teams are highly engaged with the issue, specified targets and KPIs for managing modern slavery risk are set, and the Diocese performance in implementing our Modern Slavery program is tracked and reported on.
<b>Commitment</b>	Our Leadership and Senior Management teams drive our program and are engaged with its implementation.
<b>Business Systems</b>	Managing modern slavery risk is reflected in all parts of our business systems, policy, strategy, and supply chain
<b>Action</b>	Goals, targets, KPIs and minimum standards have been set to address modern slavery risks and progress is regularly reported to senior management
<b>Monitor and Report</b>	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
<b>Awareness</b>	Key managers and staff are aware of modern slavery issues, understand our policy and know they are responsible for taking action to address risks.
<b>Policies and Systems</b>	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.
<b>Training</b>	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.
<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>WORKSTREAM</b>	<b>ACTIVITY</b>
<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>	<p>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.</p> <p>All existing and new suppliers are screened using both our internal audit/ compliance team and third-party auditors to ensure traceability.</p>
<b>Supplier Engagement</b>	<p>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.</p> <p>Open and transparent communication is maintained with suppliers to help them eliminate modern slavery from their own supply chains.</p>
<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>

**CRITERION FIVE**

# Measuring effectiveness

The Diocese undertook an initial assessment of its approach to Modern Slavery risks in 2019 against which generated a gap analysis in the areas of: management systems; risk management; human resources; customers and stakeholders; and, procurement and supply chains.

Throughout the reporting period, the Diocese has made modest improvements over the past 12 months, with improvements across most indicators.

Although progress has been made, there is still significant work needed to be undertaken across the Diocese's Modern Slavery management framework. Our progress against our modern slavery action plan and initiatives is monitored by the Modern Slavery Committee. We will continue to explore mechanisms to assess the effectiveness of actions we undertake to mitigate modern slavery risk and will complete a second gap analysis in 2022 to measure change.

<b>MODERN SLAVERY MITIGATION IMPLEMENTATION CATEGORY</b>	<b>2019</b>					<b>2020</b>					<b>2021</b>				
Management Systems	Red	Orange	Yellow	Green	Grey	Red	Orange	Yellow	Green	Grey	Red	Orange	Yellow	Green	
Governance	Red				Grey		Orange			Grey		Orange			
Commitment							Orange					Orange			
Business Systems	Red						Orange						Yellow		
Action	Red						Orange						Yellow		
Monitor / Report	Red						Orange					Orange			
<b>Risk Management</b>															
Risk Framework	Red				Grey		Orange			Grey			Yellow		
Operational Risk							Orange					Orange			
Identifying External Risks	Red					Red					Red				
Monitoring & Reporting Risk	Red					Red					Red				
<b>Human Resource &amp; Recruitment</b>															
Awareness	Red				Grey	Red				Grey			Yellow		
Policies & Systems	Red					Red						Orange			
Training	Red						Orange						Yellow		
Labour Hire / Outsourcing	Red					Red							Yellow		
<b>Customer &amp; Stakeholders</b>															
Customer Awareness	Red				Grey	Red				Grey		Orange			
Information Provision	Red					Red							Yellow		
Feedback Mechanisms	Red					Red								Green	
Worker Voice	Red					Red						Orange			
<b>Procurement &amp; Supply Chain</b>															
Policies & Procedures	Red				Grey		Orange			Grey		Orange			
Contract Management	Red						Orange					Orange			
Screening & Traceability	Red						Orange					Orange			
Supplier Engagement	Red						Orange					Orange			
Monitoring & Corrective Action	Red						Orange					Orange			

● At the starting line    
 ● Starting out    
 ● Making progress    
 ● Leading practice

## CRITERION SIX

# Process of **consultation** with entities owned or controlled by the Diocese

The Diocese has established a Modern Slavery Liaison Committee to oversee the development and implementation of a 5-year Modern Slavery Action Plan to support our commitment towards ending modern slavery.

The Diocese Modern Slavery Liaison Committee met five times in 2021 with senior representatives from Pastoral Ministries, Diocesan Shared Services, Catholic Schools and CatholicCare Social Services.

Through the work of this committee the entire Diocese is engaged in activities to promote awareness of and improve practices to manage modern slavery risks.

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## CRITERION SEVEN

# Other

There is no other relevant information to report.







CATHOLIC DIOCESE  
OF ROCKHAMPTON

# 2021 Modern Slavery Statement



## Disclosure Note

This statement has been made on behalf of *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*. This statement covers all entities owned and controlled by *The Roman Catholic Trust Corporation for the Diocese of Rockhampton*.

## Statement from our Bishop



Many of us think of slavery as a thing of the past. However, millions of people around the world continue to be affected by slavery through its modern manifestations, such as human trafficking, debt bondage and forced labour.

The Catholic Church in Australia, as the largest employer and procurer of goods and services in the country outside the public sector, has an obligation to do its part to eradicate modern slavery.

The Catholic Diocese of Rockhampton, as one part of the Church, takes seriously its responsibility to act; work that Pope Francis reminds us will require courage, patience and perseverance.

I commit the Diocese to continuing its efforts to eradicate modern slavery from its operations and supply chains.



**Most Rev. Michael McCarthy**  
**Bishop of Rockhampton**  
**8<sup>th</sup> June 2022**

## 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 8<sup>th</sup> June 2022.



**Most Rev. Michael McCarthy**  
**Bishop of Rockhampton**

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# About us

The Roman Catholic Diocese of Rockhampton ('Diocese'), established in 1882, is a suffragan Latin Church diocese located in central Queensland, covering an area of 414,400 square kilometres from Bundaberg in the south to Mackay in the north and west to the Northern Territory border.

'The Roman Catholic Trust Corporation for the Diocese of Rockhampton' ('RCTC') was incorporated by Letters Patent on 8<sup>th</sup> July 1915 under the now-repealed *Religious Educational and Charitable Institutions Act 1861 (Qld)* but it is still in force by virtue of the *Roman Catholic Church (Incorporation of Church Entities) Act 1994*. The RCTC is the civil legal entity under which the Diocese operates.

## Our Vision Statement

The Diocese's Vision Statement is:

*As a community of disciples of the Risen Christ, we live out the call of Baptism through personal faith in Jesus, witnessing together to the Good News of the Kingdom, co-responsible for the mission.*



## Our Values

The values of the Diocese reflect Catholic Social Teaching. These include:

### **The Dignity of the Human Person**

Every human being is created in God's image and likeness and therefore has inherent dignity. No person should have their dignity or freedom compromised.

### **The Common Good**

Every person should have access to the goods and resources of society so that they can live fulfilling lives. The common good is reached when we work together to improve the wellbeing of people in our society and the wider world.

### **Subsidiarity and Participation**

Everyone has the right to participate in decisions that affect their lives.

### **Solidarity**

Everyone belongs to one human family, regardless of their national, religious, ethnic, economic, political and ideological differences. We are called by the principle of solidarity to take the parable of the Good Samaritan to heart (Luke 10:29-37), and to express this in how we interact with others.

### **Preferential Option for the Poor**

Preferential care should be shown to poor and vulnerable people. Jesus taught that God asks each of us what we are doing to help the poor and needy: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." (Matthew 25:40).

### **Economic Justice**

Everyone capable should be involved in economic activity and should be able to provide for themselves and their family.

### **Stewardship of Creation**

We must all respect, care for and share the resources of the earth, which are vital for the common good of all living beings.

### **Promotion of Peace**

Peace is more than just the absence of war. It is a positive movement towards equality and justice between all people, regardless of differences.

## **2021 Modern Slavery Risk Management Initiatives**

### **Modern slavery working group**

A working group made up of representatives from Diocesan Offices & Parishes, Catholic Education – Diocese of Rockhampton ('CEDR') and CatholicCare Central Queensland ('CatholicCareCQ'), met regularly to plan the implementation of modern slavery initiatives across the Diocese.

### **Modern slavery policy**

The Diocese is in the final stages of consultation on its draft Modern Slavery Policy, the purpose of which is to document the Diocese's commitment to the eradication of modern slavery from its operations and supply chains.

### **Operational gap analysis**

A gap analysis was performed in 2019 to provide a baseline for modern slavery risk management in the Diocese. The Diocese conducted a further gap analysis in 2021 to determine its progress and will continue to do so at regular intervals to evaluate progress over time.

### **Supplier risk identification and prioritisation**

The Diocese has identified those of its suppliers at highest risk of modern slavery across the following three organisational groupings:

- Diocesan Offices & Parishes
- CEDR
- CatholicCareCQ

### **Education**

The Diocese's Pastoral Council, Education Council, CatholicCare Council, Finance Council, and Council of Priests have each been given a presentation explaining what modern slavery is and how the Diocese aims to combat it.

### **Australian Catholic Anti-slavery Network ('ACAN')**

The Diocese's Modern Slavery Liaison Officer ('MSLO') has participated in monthly videoconferences organised by ACAN to network with other MSLOs and to hear updates about the latest modern slavery resources available to members.

## Our Plans for 2022

### **Embedding anti-slavery in organisational governance**

The Diocese is still in the process of updating the terms of reference for its various governance bodies to include anti-slavery as a key consideration in organisational decision-making.

### **Supplier engagement**

The Diocese has subscribed to Sedex, an online platform for managing and improving working conditions in global supply chains. It provides practical tools to help companies improve their business practices and source responsibly. The Diocese is still in the early stages of using Sedex to engage with suppliers. The Diocese's leading priority for modern slavery risk management in 2022 is supplier engagement.

### **Capability building**

Modern slavery risk management training will continue to be delivered to Diocesan personnel at every opportunity.

### **Ongoing due diligence**

Modern slavery contract clauses will be incorporated into existing and new contracts. In addition, modern slavery risk management will be embedded into existing operational systems and due diligence processes to ensure that suppliers are meeting their contractual obligations.

### **Transition Working Group to permanent committee**

Consultation has been undertaken on terms of reference for a permanent Modern Slavery Working Group. These are ready to be signed off by the Bishop.

### **ACAN Program**

The Diocese will continue its membership of ACAN to continue to build on its modern slavery risk management efforts and to take advantage of the resources made available by ACAN.

## Our Plans Beyond 2022

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

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, the Diocese, is a founding partner of *Domus 8.7* - an independent program to provide remedy to people impacted by modern slavery. The Diocese's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with *Domus 8.7* and other civil society stakeholders. By partnering with *Domus 8.7*, the Diocese can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

The Diocese is a consortium partner to the *Building Links* program, a modern slavery grant funded by the Australian Government. *Building Links* targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels and a person is in immediate danger, staff will contact relevant law enforcement agencies. If staff have concerns or identify any issues and need expert advice, the matter will be referred through *Domus 8.7* for an assessment, investigation, action planning and implementation of a remediation process.

The Diocese has funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders.

Additional information about *Domus 8.7* and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au).



# Reporting Criteria 1 & 2: About the Catholic Diocese of Rockhampton

## Our Organisational Structure

The RCTC is the legal entity under which the Diocese and all its ministries and parishes operate. The Diocese holds five ABNs as follows:

### **ABN: 50 979 741 889**

A number of entities with distinct identities in canon (Catholic Church) law operate under this ABN, including:

- The Diocesan Offices, based at 170 William Street, Rockhampton QLD 4700, headed by the Bishop of Rockhampton and encompassing ministry activities, administration, and the practise and propagation of the Catholic faith; and
- 30 parishes (communities of the faithful with defined geographic areas within the Catholic Diocese of Rockhampton, whose pastoral care is entrusted to parish priests by the Bishop), each of which conduct their own ministry activities, administration, and practise and propagation of the Catholic faith.

In addition, the following entities operate under this ABN:

- 'The Haven', a retreat, conference and accommodation facility at Emu Park QLD 4710
- the Rockhampton Clergy Support Foundation, a Deductible Gift Recipient fund established to provide such social welfare, maintenance, necessities of life and relief from poverty as priests may need in infirmity, sickness, incapacity, old age or other necessitous circumstances'; and
- the Diocese of Religious Education Fund, a Deductible Gift Recipient fund established 'to provide religious instruction in government schools in Australia'.

### **ABN: 21 528 592 597**

CEDR has its head office at 143 West Street, Rockhampton QLD 4700, and employs approximately 3400 people. It operates kindergartens, primary and secondary schools and Outside School Hours Care services across the Diocese, as well as providing faith education for adults and children in state schools. CEDR educates approximately 17,100 students in its:

- 31 primary schools
- 9 colleges
- 10 kindergartens, and
- 16 Outside Schools Hours Care services

### **ABN: 90 507 529 241**

CatholicCareCQ has headquarters at 16 Bolsover Street, Rockhampton QLD 4700. It employs approximately 400 people and provides a broad range of services in communities across the Diocese, including aged care and disability support, counselling, and family and community support and education.

### **ABN: 94 424 754 630**

Stella Maris Seafarers' Centre, based in Brisbane Street, Mackay QLD 4740, operates under this ABN and is a ministry of the Catholic Diocese of Rockhampton whose object is to pursue the following charitable purposes:

- (a) Provide contact and counselling and crisis counselling for seafarers and their families;
- (b) Provide a visitation service to seafarers, including hospital visits;
- (c) Provide pastoral services and chaplaincy to seafarers;

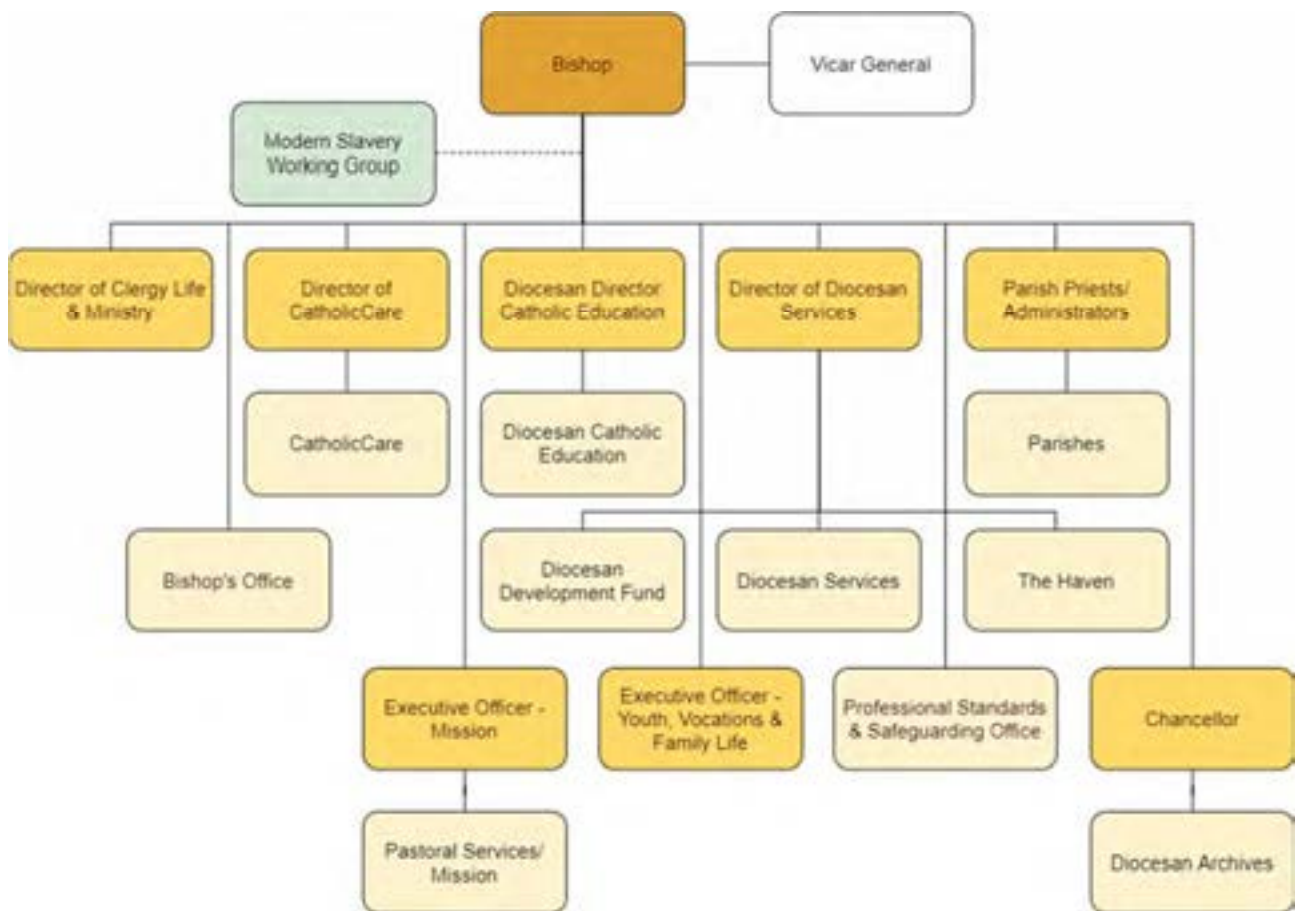
- (d) Provide stress-relieving recreational activities and services for seafarers;
- (e) Promote the physical, intellectual, emotional, psychological and spiritual development and wellbeing of seafarers, guided by Christian moral principles.

It services the shipping ports of Mackay and Hay Point.

**ABN: 64 786 814 301**

The Diocese of Rockhampton Trust Fund operates under this ABN and is a public ancillary fund whose object is 'to provide money, property, or benefits to or for funds, authorities, or institutions referred to and for the purposes (if any) referred to (if any) of the items in the tables in sub-section 7B(4) of the *Income Tax Assessment Act 1936*'.

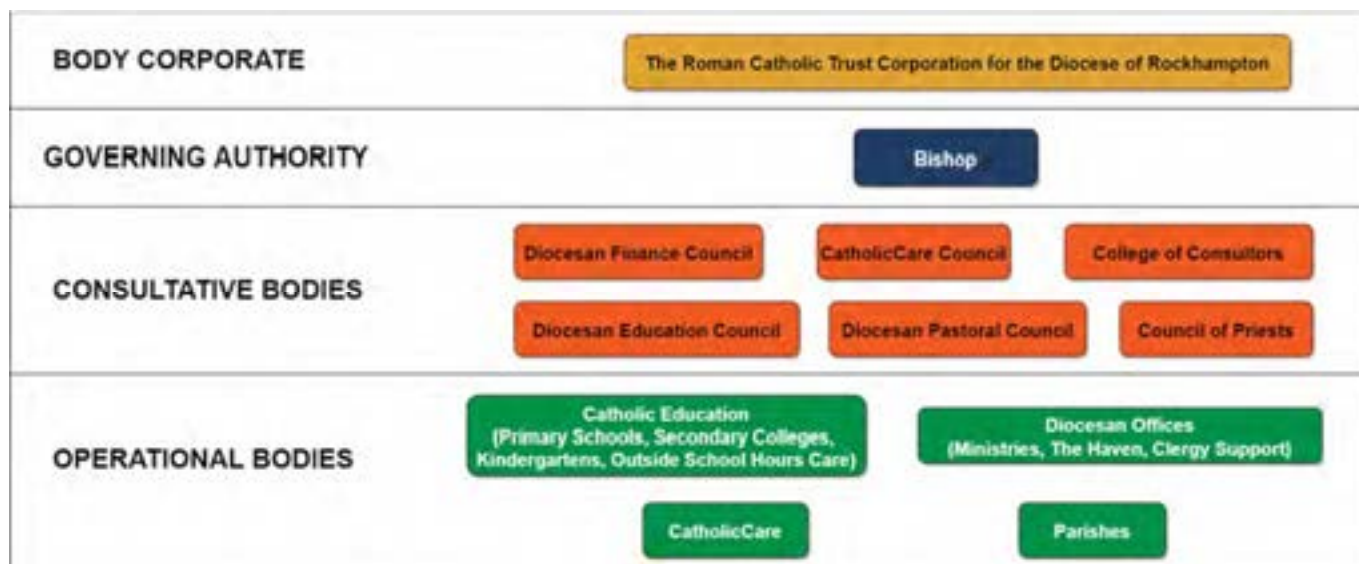
Following is a high-level organisation chart of the Diocese:



## Our Governance Framework

The Bishop of Rockhampton is the sole trustee of the RCTC and is also the governing authority of the Diocese under canon law. A requirement of canon law is for the Diocese to have a 'finance council' and a 'council of priests' to assist and advise the Bishop in the exercise of his governance. The Bishop of Rockhampton also chooses to have an additional three councils to assist him with governance in different areas, namely the:

- Diocesan Pastoral Council
- Diocesan Education Council
- CatholicCare Council



Apart from the Council of Priests and the College of Consultors, the meetings of each other council are chaired by lay persons.

The Bishop delegates certain responsibilities to Diocesan personnel to assist him in discharging his obligations under a Delegations Policy, whereas certain other responsibilities are entrusted to particular roles under canon law, most notably the Vicar General, the Chancellor, the Financial Administrator, and Parish Priests.

The terms of reference of the Diocesan Finance Council include responsibilities in relation to risk management.

## Our Operations

The Diocese's operations are conducted within its borders, as defined in the *About Us* section above, other than travel by its constituents elsewhere for Church purposes.

The Diocese employs more than 4560 people in total across the organisation. The Diocese's turnover in 2021 was approximately \$399 million. The total procurement spend was approximately \$126.8 million across more than 11000 suppliers. 87% of procurement spend was in the area of CEDR.

Long-term relationships are in place with the majority of suppliers. Other than suppliers, the Diocese has no other business relationships.

The Diocese's operations are described as follows:

### Diocesan Offices

#### Bishop's Office

The Bishop's Office supports the Bishop as the "chief shepherd" (spiritual leader) of the Diocese in his responsibilities of *teaching*, *sanctifying* and *governing*. This involves oversight of the preaching of the Gospel, Catholic education, the administration of the sacraments of the Catholic Church, and canon law matters. The Bishop's Office provides administrative support to the Bishop, and includes the Chancery, Archives, Professional Standards & Safeguarding, Pastoral Services, and Clergy Support.

### Diocesan Services

Diocesan Services provides corporate services and advice to the organisation in the areas of finance, human resources, facilities and property, community engagement, information and communications technology, and administration.

### Diocesan Development Fund (DDF)

The DDF provides a source of finance and credit for capital expenditure in the works of the Catholic Church and provides funds to support the Bishop of Rockhampton in exercising his duties of governance, teaching and sanctification across the Diocese. The DDF also provides investment services and financial services to diocesan agencies, ministries, parishes and schools.

The DDF Committee, a sub-committee of the Diocesan Finance Council, ensures that the activities of the DDF comply with all relevant laws, regulations and statutes and that those activities maintain the highest standards of ethical and commercial practice. The responsibilities of the Committee include setting and monitoring strategies; monitoring risks of the DDF; approval and recommendation of new loans; review and monitoring of compliance with policies and the review of the annual performance of the DDF.

### **Catholic Education – Diocese of Rockhampton ('CEDR')**

CEDR is a comprehensive educational ministry that embraces and promotes lifelong faith learning. In accordance with Canon Law:

*"Catholic education is an expression of Christ's mission entrusted to the Church to proclaim the Good News of Jesus Christ. Catholic education in the diocese is united around the bishop as leader and teacher. The bishop has responsibility for developing policies regarding Catholic education in the Diocese, regulating it and watching over it." (Canon 804.1)*

CEDR educates approximately 17,100 students in its 31 primary schools, 9 colleges, 10 kindergartens, and 16 Outside Schools Hours Care services located across the Diocese.

The Bishop has a Diocesan Education Council to provide advice in establishing the broad direction for Catholic education and faith formation. This Council assists the Bishop in his responsibility for approving policies regarding Catholic religious formation and education in the Diocese. All agencies providing educational services in the Diocese are represented on the Council as well as parents, parish representatives from all regions of the diocese and other individuals.

### **CatholicCareCQ**

From its seven offices across the Diocese, CatholicCareCQ works to encourage and strengthen individuals, couples and families through a broad range of services, which include aged care and disability support, counselling, and family and community support and education. CatholicCareCQ serves all people, without regard to religion, race, age, economic circumstance or ethnic background.

The CatholicCare Council is an advisory body to the Bishop in matters pertaining to the works of CatholicCareCQ. The Council makes recommendations to the Bishop as to the role, development and management of CatholicCareCQ.

## Parishes

The Diocese's 30 parishes are its worshipping communities occupying individual geographic regions in the Diocese. The Bishop appoints a parish priest to each parish community to provide pastoral care.

Each parish is required under canon law to have a parish finance council to advise the parish priest/administrator in the governance of the parish.

## Our Supply Chain

The Diocese has a decentralised procurement model. The various operations of the Diocese support local businesses wherever feasible. All supplies are procured from Australian-domiciled suppliers. The types of goods and services procured include:

- Advertising and marketing
- Building and construction
- Cleaning and security services
- Events and event management
- Facility management and property maintenance
- Finance and investment
- Financial expenses
- Fleet management, consumables and maintenance
- Food and catering services
- Furniture and office supplies
- Government and agency fees
- ICT Hardware
- ICT Software and network services
- Labour Hire
- Licence/membership fees
- Linen, laundry and textile products
- Medical devices and supplies
- Printing
- Professional services
- Travel and accommodation
- Uniforms and PPE
- Utilities
- Waste management services

At this stage, the Diocese has not identified the source countries for the goods and services it procures, other than identifying the potential risks associated with various categories of goods and services.

# Reporting Criteria 3: Modern slavery risks in operations and supply chain

The Diocese is a member organisation of the Australian Catholic Anti-Slavery Network ('ACAN'). As part of ACAN, the Diocese's Modern Slavery Liaison Officer (MSLO) and Modern Slavery Working Group use information and resources provided by ACAN to monitor and address the risks of modern slavery in its own operations and supply chain.

## Operational Risks

### Our COVID-19 Response

The Diocese is cognisant of the impact COVID-19 may have on workers in relevant supply chains. Following guidance from the Australian Border Force, the Diocese is maintaining its relationships with all its current suppliers.

The Diocese is identifying best practice approaches to protect vulnerable workers. The organisation is able to work with suppliers and to use its contacts with peak bodies to identify any weaknesses in the supply chains.

The impacts of COVID-19 may increase the vulnerability of workers in our supply chains to modern slavery, including in Australia. Factory shutdowns, order cancellations, workforce reductions, and sudden changes to supply chain structures can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation.

There are a variety of reasons why some workers may be more vulnerable to modern slavery. These include loss of income or fear of loss of income, low awareness of workplace rights, requirement to work excessive overtime to cover capacity gaps, increased demand due to supply chain shortages or the inability to safely return to home countries.

### Our People

The Diocese employs approximately 4560 people. The Directors of CEDR, CatholicCareCQ, Clergy Life & Ministry, and Diocesan Services are responsible for ensuring compliance by the Diocese with labour, employment, immigration and whistleblower laws to the extent that they are applicable. The Diocese and its two major ministries, CEDR and CatholicCareCQ, each employ professionally-qualified persons to manage human resource matters and to ensure compliance with relevant industrial instruments and legislation.

Other than the requirements of canon law for certain ecclesiastical positions to be occupied by persons of a specific gender, all other appointments are based on merit and are not gender specific.

Only a very small percentage of Diocesan personnel do not have permanent residency in Australia. Non-residents are only engaged in instances where particular skills shortages exist in Australia. Where non-residents are employed or contracted, they live in Australia for the duration of their engagement and they are paid at or higher than minimum rates applicable under Australian law.

The Diocese maintains codes of conduct and policies and procedures to require high standards of behaviour and to ensure procedural fairness.

## Modern Slavery Gap Analysis

In July 2019, the Diocese undertook a Modern Slavery Gap Analysis using a gap analysis tool provided by ACAN. The results of this and subsequent analyses serve as benchmarks against which the Diocese can measure itself from time to time to ascertain progress in managing its modern slavery risks. The following heat map shows the results of the gap analyses performed to date:

Category	Topic	Result 2019	Result 2021	Change
Management Systems	Governance	Red	Red	-
	Commitment	Orange	Yellow	↑
	Business Systems	Red	Yellow	↑
	Action	Red	Yellow	↑
	Monitor/Report	Red	Red	-
Risk Management	Risk Framework	Red	Red	-
	Operational Risk	Orange	Yellow	↑
	Identifying External Risks	Red	Red	-
	Monitoring and Reporting Risk	Red	Orange	↑
Human Resources and Recruitment	Awareness	Red	Yellow	↑
	Policies and Systems	Red	Red	-
	Training	Red	Yellow	↑
	Labour Hire/Outsourcing	Red	Orange	↑
Customers and Stakeholders	Customer Attitude	Orange	Orange	-
	Information Provision	Red	Orange	↑
	Feedback Mechanisms	Red	Red	-
	Worker Voice	Red	Red	-
Procurement and Supply Chain	Policy and Procedures	Red	Orange	↑
	Contract Management	Red	Red	-
	Screening and Traceability	Red	Orange	↑
	Supplier Engagement	Red	Yellow	↑
	Monitoring and Corrective Action	Red	Red	-

As can be seen from the heat map, the Diocese has improved in a number of areas but there is still much to be done.

The Diocese will perform gap analyses at least annually to ascertain progress made and where ongoing efforts should be focused.

## Supply Chain Risks

The Diocese examined its 2021 supplier expenditure to determine potential modern slavery risks. The following indicators were used:

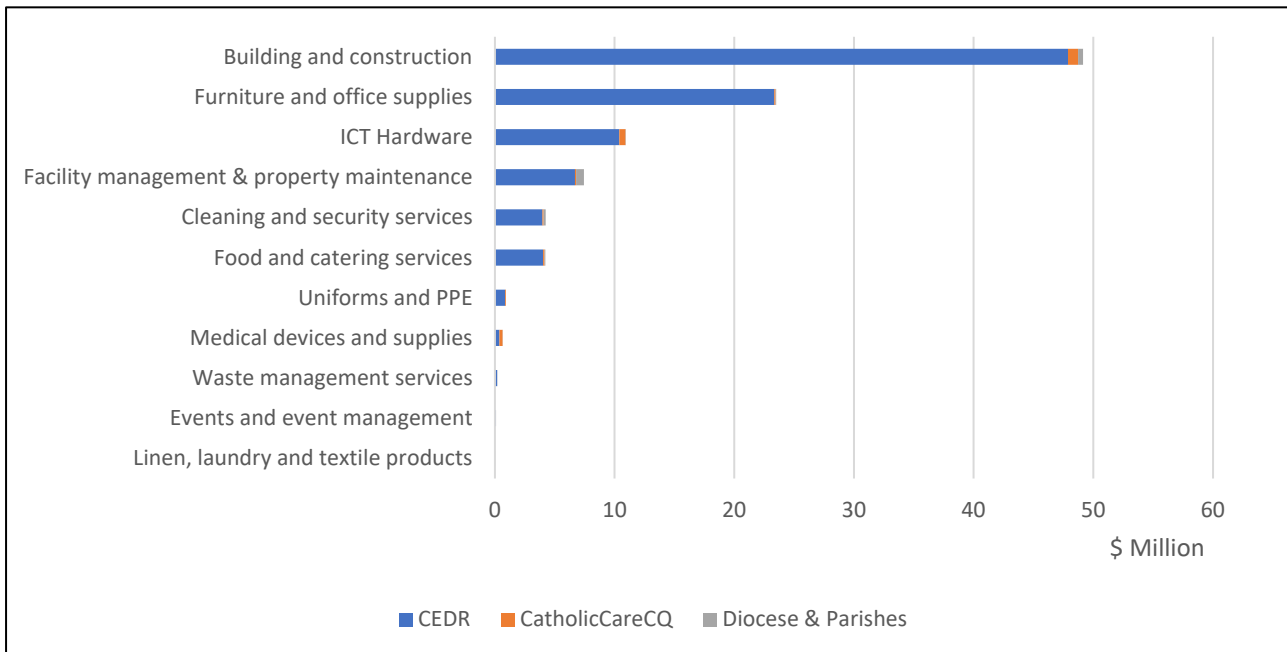
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.

- **Geographic location** – Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

Based on these indicators, the following high-risk expenditure categories were identified:

- Building and construction
- Cleaning and security services
- Events and event management
- Facility management & property maintenance
- Food and catering services
- Furniture and office supplies
- ICT Hardware
- Linen, laundry and textile products
- Medical devices and supplies
- Uniforms and PPE
- Waste management services

In 2021, the Catholic Diocese of Rockhampton spent approximately \$101 million, 80% of its total annual procurement spend, in high risk categories. 97% of high risk expenditure was in the area of CEDR. The highest level of expenditure for CEDR in high risk categories was in ‘Building and construction’, ‘Furniture and office supplies’, and ‘ICT Hardware’. The following graph illustrates the level of expenditure in each high risk category, by entity.





## Reporting Criteria 4: Actions taken to assess and address risk

The Diocese's focus in 2021 was on better understanding potential modern slavery risks and on where these might exist in its operations and supply chain. The Diocese achieved this through the following initiatives.

### ACAN Membership

The Diocese continued its membership of the Australian Catholic Anti-Slavery Network (ACAN) in 2021. One of ACAN's purposes is to share resources and experiences with network members, and to identify and manage modern slavery risks in Catholic supply chains. ACAN also provides a range of tools that can be adapted to meet the needs of each participating entity such as policies, contract templates, codes of conduct, and reporting tools. These help to embed modern slavery risk management in systems and processes and enable ACAN participants to have a consistent approach.

### Modern slavery working group

The Diocese's Modern Slavery Working Group included the following representatives in 2021:

- Mr Dean Smith, Director of Diocesan Services & Diocesan Financial Administrator (Chair)
- Mr Mark Effenev, Assistant Director Administration, Catholic Education Office
- Mr John Kennedy, Administration and Governance Co-ordinator, Catholic Education Office
- Ms Samantha Graham, Purchasing & Plan Management Services Coordinator, CatholicCareCQ
- Ms Janet Brosnan, Finance Manager, CatholicCareCQ
- Mrs Louise Hill, Senior Financial Accountant, Catholic Education Office
- Mr Chris Brosnan, Financial Accountant, Diocesan Services
- Mr John McDevitt, Finance Manager, Catholic Education Office
- Miss Krista Abraham, Graduate Accountant, Diocesan Services

The Working Group met five times in 2021 to consider how ACAN tools could best be adapted for deployment in the Diocese and to work on the preparation of the Diocese's first Modern Slavery Statement. The group will be formed into a permanent committee in 2022 and will continue to provide advice on the management of modern slavery risks and build an awareness of modern slavery throughout the organisation.

### Operational gap analysis

With the help of ACAN, the Diocese performed its second gap analysis in 2021 to gauge its progress on modern slavery risk management in the Diocese. The Diocese will revisit this exercise at least annually and compare subsequent gap analyses to determine progress made and where efforts should be focused to achieve change.

### Supplier risk identification and prioritisation

Organisational supplier spend was examined and the highest risk supplier categories were identified. Efforts will now be directed towards engaging with those suppliers to help them to understand the importance we place on eradicating modern slavery from our supply chains.

## Supplier engagement

In 2021, ACAN hosted three webinars for supplier. 9 suppliers in the categories of Information & Communications Technology (ICT), office supplies and uniforms participated in these webinars. The webinars presented information on the risks of modern slavery, outlined expectations of suppliers in regard to joining Sedex, completing the Self-Assessment Questionnaire (SAQ), and sharing results with the Diocese.

## Education

The Diocese has delivered information sessions to its various governance bodies and some staff gatherings to grow awareness of Modern Slavery among its personnel. Five staff members completed the ACAN *Business Relevance* e-learning module in 2021. The *Business Relevance* module outlines responsibilities of businesses to respect human rights and the key economic, legislative and stakeholder drivers to manage risk. The module also includes a review of relevant modern slavery criminal offences and key reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

## Modern Slavery Action Plan

OBJECTIVE	PROPOSED ACTION
<b>Commitment</b>	
Engage top-level management and set direction	<ul style="list-style-type: none"> <li>• Deliver modern slavery awareness presentation to all five Diocesan Councils</li> </ul>
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> <li>• Develop and promulgate Modern Slavery Policy</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>
Modern slavery roles and responsibilities defined	<ul style="list-style-type: none"> <li>• Embed modern slavery roles and responsibilities into position descriptions where applicable</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>
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>• Perform ACAN Gap Analysis at least annually</li> </ul>
<b>Supplier Risk</b>	
Prioritise suppliers based on potential risk and spend	<ul style="list-style-type: none"> <li>• Analyse supplier data at least annually to determine highest risk</li> </ul>
Seek responses from suppliers on their modern slavery actions	<ul style="list-style-type: none"> <li>• Implement Sedex and use it to engage with high risk suppliers</li> </ul>
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> <li>• Write to high risk suppliers, outlining the importance that the Diocese places on the eradication of Modern Slavery</li> <li>• Develop and promulgate Supplier Code of Conduct</li> <li>• Embed modern slavery clause(s) in supplier contracts</li> </ul>

OBJECTIVE	PROPOSED ACTION
<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 all staff and contractors and volunteers involved in procurement</li> <li>• Raise awareness of modern slavery through social media</li> </ul>
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> <li>• Implement Sedex and use it to engage with high risk suppliers</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>Our Plans Beyond 2022</i> section above</li> <li>• Develop and implement Whistleblower Policy</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>
Collaborate with ACAN participants	<ul style="list-style-type: none"> <li>• Regularly participate in ACAN meetings</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>

# Reporting Criteria 5: Effectiveness Assessment

The Diocese uses its Modern Slavery Action Plan to assess its progress in the eradication of modern slavery from its operations and supply:

OBJECTIVE	CURRENT STATUS
<b>Commitment</b>	
Engage top-level management and set direction	<ul style="list-style-type: none"> <li>Modern slavery awareness presentation delivered to all five Diocesan Councils</li> </ul>
Adopt Modern Slavery Policy	<ul style="list-style-type: none"> <li>Modern Slavery Policy drafted</li> <li>Consultation on draft policy undertaken with CEDR and CatholicCareCQ</li> <li>Policy ready for sign off by Bishop</li> </ul>
Establish a Modern Slavery Working Group	<ul style="list-style-type: none"> <li>Informal Working Group meets regularly</li> <li>Working Group Terms of Reference drafted</li> <li>Consultation on draft Terms of Reference undertaken with CEDR and CatholicCareCQ</li> <li>Terms of Reference ready for sign off</li> </ul>
Modern slavery roles and responsibilities defined	<ul style="list-style-type: none"> <li>Modern slavery roles or responsibilities yet to be embedded in position descriptions</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>Working Group meets regularly to develop and monitor strategies for addressing gaps</li> </ul>
Monitor progress and ensure continual improvement	<ul style="list-style-type: none"> <li>Working Group discusses progress and opportunities for improvement</li> <li>ACAN Gap Analysis performed at least annually to produce heat map and visualise progress</li> </ul>
<b>Supplier Risk</b>	
Prioritise suppliers based on potential risk and spend	<ul style="list-style-type: none"> <li>Data is gathered and analysed annually to determine highest risk suppliers</li> </ul>
Seek responses from suppliers on their modern slavery actions	<ul style="list-style-type: none"> <li>Working Group members participated in Sedex Webinar for Beginners</li> <li>High risk suppliers will be invited to join Sedex</li> </ul>
Clearly outline expectations to suppliers	<ul style="list-style-type: none"> <li>Letters to be sent to high risk suppliers, outlining the importance that the Diocese places on the eradication of Modern Slavery</li> </ul>
<b>Engage, Educate &amp; Respond</b>	
Engage and train management, employees and contractors	<ul style="list-style-type: none"> <li>Diocesan Councils and some leadership positions have received awareness presentation</li> </ul>
Engage and educate highest priority suppliers	<ul style="list-style-type: none"> <li>Yet to commence</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>Our Plans Beyond 2022</i> section above</li> <li>Whistleblower Policy yet to be developed</li> </ul>

OBJECTIVE	CURRENT STATUS
<b>Modern Slavery Statement</b>	
Prepare and submit annual Modern Slavery Statements	<ul style="list-style-type: none"> <li>This is the Diocese's second annual Modern Slavery Statement</li> </ul>
Collaborate with ACAN participants	<ul style="list-style-type: none"> <li>MSLO participates in regular ACAN meetings</li> </ul>
Publish Modern Slavery Statement on website	<ul style="list-style-type: none"> <li>2021 Modern Slavery Statement will be published on Diocesan website once lodged with Australian Border Force</li> </ul>

The Diocese also uses the following performance indicators to measure its progress in the eradication of modern slavery:

STAKEHOLDER	ACTIVITY	2021	2020
Staff	e-learning modules completed	5	20
	Number of employees who participated in modern slavery activities, other training, presentations, meetings, webinars, conferences, workshops or events related to modern slavery	2349	
	Total number of hours spent working on modern slavery risk management program	1137	
Modern Slavery Working Group	Number of meetings	5	1
Suppliers	Total number of suppliers	11083	
	e-learning modules completed	0	0
	Contracts including Modern Slavery clause	0	0
	Suppliers engaged on Modern Slavery	3	0
	Suppliers invited to join Sedex	15	
	Suppliers joined Sedex	3	
	Suppliers shared Sedex Self-Assessment Questionnaire (SAQ) results	0	
	Sedex Members Ethical Trade Audit (SMETA) audits	0	
	Corrective actions	0	0

## Reporting Criteria 6: Process of consultation with entities owned or controlled

The Diocese has approached the task of addressing its Modern Slavery risks in collaboration with representatives from each of the entities it owns. The Modern Slavery working group has been comprised of representatives from CEDR, CatholicCareCQ and the Diocesan Offices (on behalf of parishes). The entire organisation has therefore had the opportunity to be a part of the Diocese's journey of understanding and addressing modern slavery risks.

## Reporting Criteria 7: Other

There is no other relevant information to report.



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# Modern Slavery Statement 2021



**CATHOLIC EDUCATION**  
DIOCESE OF WOLLONGONG



**This Modern Slavery Statement has been reviewed and approved by the Head of Finance, Facilities, ICLT and Planning on 1 June 2022.**

**Bede Ritchie**

*Head of Finance, Facilities, ICLT and Planning  
Catholic Education Diocese of Wollongong*

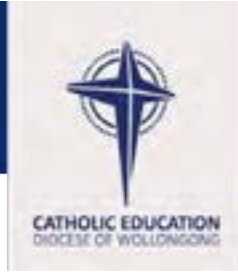
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**Disclosure Note**

This Statement has been made on behalf of Catholic Education Diocese of Wollongong. This Statement covers all entities owned or controlled by Catholic Education Diocese of Wollongong for the period 1 January 2021 to 31 December 2021.

Catholic Education Diocese of Wollongong acknowledges the traditional custodians of the lands upon which our Catholic schools are built; the indigenous people of the Dharawal, Tharawal, 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.

**ABN: 67 786 923 62 Catholic Education Diocese of Wollongong**



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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.

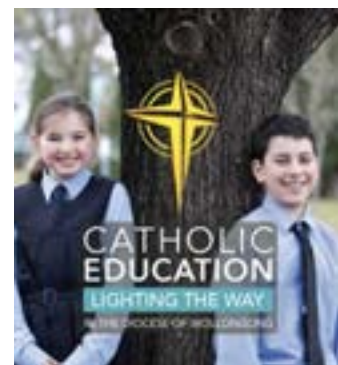
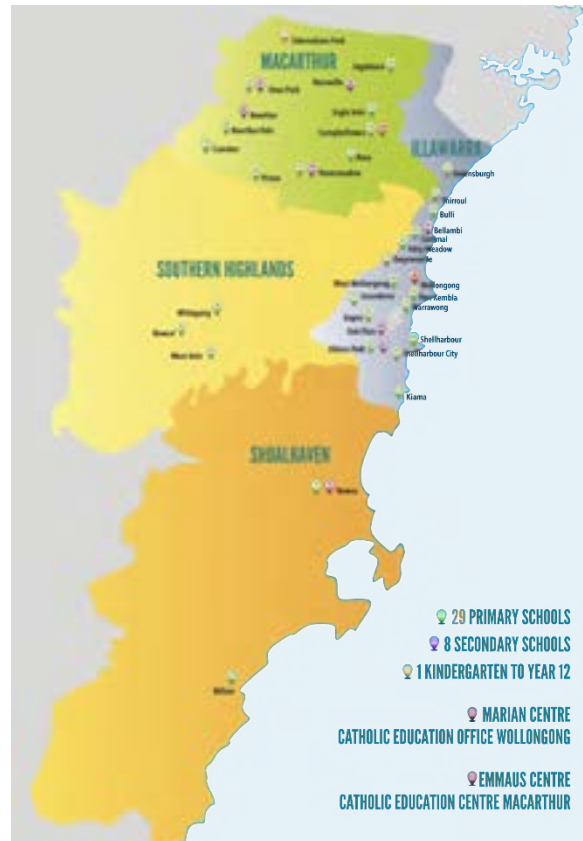
Catholic Education Diocese of Wollongong (CEDoW) was established in 1952 and serves Catholic systemic school communities across the four regions of the Illawarra, Macarthur, Southern Highlands and Shoalhaven. Many parishes and schools have much longer histories, with some dating back to the early days of European settlement. Stories abound of wonderful lay people, clergy and religious who helped build the foundations of the vibrant Catholic school system we now enjoy.

CEDoW, as an agency of the Catholic Church in the Diocese of Wollongong, exists to exercise the evangelising mission of the Church in education by leading and managing the system of Catholic schools on behalf of the Bishop of Wollongong and 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

The shared mission of CEDoW is 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”.

[\(Lighting the Way Vision and Strategic Direction 2019-2022, p16\)](#)



## 2021 Modern Slavery Risk Management Initiatives

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In 2019, CEDoW became a member of the Australian Catholic Anti-Slavery Network (ACAN) with the objective of ensuring the school system complies with the requirements of the *Modern Slavery Act 2018* (Cth). ACAN membership currently exceeds 40 Catholic entities across Australia.

During the reporting period, CEDoW extended its membership with ACAN to June 2023.

CEDoW utilises the ACAN resources to identify its high-risk areas and has continued to engage its key suppliers on the issue of modern slavery and its obligations in this area.



## Our Plans for 2022 and Beyond

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CEDoW acknowledges this process will take time and requires continual improvement over many years in order to fully mitigate the risk of modern slavery practices existing within its supply chains. CEDoW's planned actions in the next reporting period are as follows:

- Activate the five ACAN staff training modules on CEDoW's internal Learning Management System. Of these, the *Modern Slavery 101* module is to be made a mandatory part of new staff inductions, whilst the full five modules will be made available to all existing staff to increase awareness of modern slavery issues.
- Embed the ACAN tender and contract clauses, including a Supplier Code of Conduct, in CEDoW's centralised Building and Construction and ICT Hardware agreements. These have already been included in the direct school high-risk contracts for services such as cleaning, grounds maintenance, uniform services and canteen operations.
- Continue to engage key suppliers providing high-risk goods and services and encourage them to register with *Sedex* to assess the risk of modern slavery practices in their supply chains.
- Continue to share approved ACAN resources, including webinars, with key suppliers in order to increase their awareness of modern slavery risks in their own supply chains.
- Improve procurement practices and increase centralisation of purchases to both obtain better financial outcomes and reduce the number of suppliers being engaged to better manage modern slavery risks across the school system.
- Allocate the ACAN risk categories to all suppliers in the accounts payable system to automate future reporting of high-risk spending and identify the high-spend suppliers in that category.



## Brief Statement from our Director of Schools

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More women, men and children are trapped in slavery today than at any other time in history. Recent figures suggest more than 40 million people are severely exploited for the personal or commercial gain of others. Modern slavery is systemic and relies on people just like you and me benefiting from goods and services, without questioning how they were produced or who may have been exploited in the process.

Pope Francis made clear that, “the hands of those who engage in human trafficking are stained with the blood of countless victims whose lives and dignity were sacrificed”. But we must not think of this as a remote or isolated issue. Each day, the decisions we make about what we buy and use, have a significant impact on the lives of many unique and inherently valuable people and communities across the globe.

The dignity of the human person and the right to fair work are central truths of the Gospel message of Jesus. This same message has been enshrined in Catholic Social Teaching and reflected in encyclicals like *Rerum Novarum* by Pope Leo XIII in 1891, where it is stated that

“Workers are not to be treated as slaves; justice demands that the dignity of human personality be respected in them...” (#31).

For all of us committed to the Gospel and the mission of the Catholic Church, the mandate could not be clearer: we must increase our awareness and do all we can to ensure the eradication of modern slavery from our world.

Catholic Education Diocese of Wollongong is committed to this responsibility, and we have been working diligently to revise our procurement processes to work towards the goal of ensuring our operations, at every tier of the supply chain, are not enabled by the exploitation of others.

With one in five Australian children educated in Catholic schools, we have an obligation to lead with courage and set an example for the students we serve. We will continue to work with the Australian Catholic Anti-Slavery Network to ensure our supply chain vendors uphold the rights and dignity of every person they engage.

On behalf of Catholic Education Diocese of Wollongong, I commend and endorse this second Modern Slavery Statement for the work it does in attempting to confront and eliminate modern slavery practices.

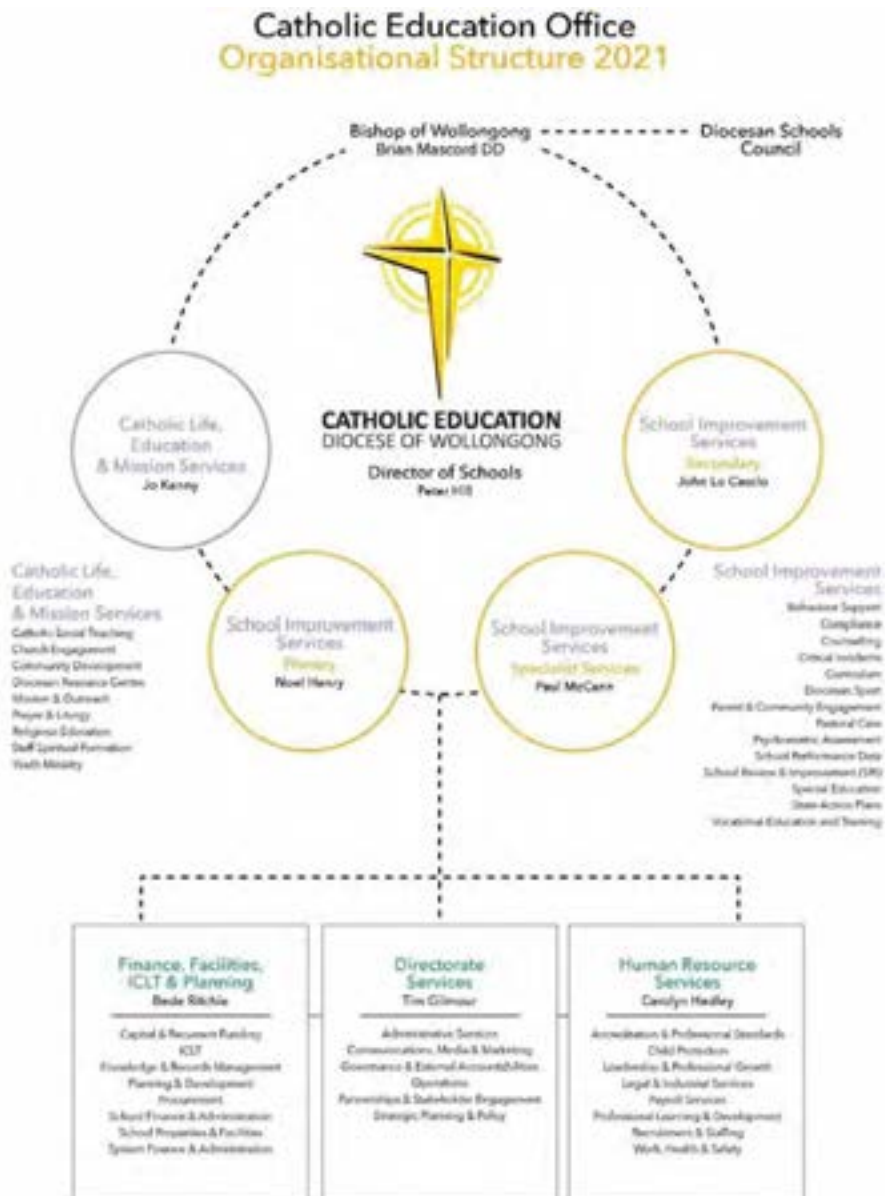
**Peter Hill**  
Director of Schools  
Catholic Education Diocese of Wollongong  
27 April 2022

# Reporting Criteria 1 and 2: About Catholic Education Diocese of Wollongong

## Our Organisational Structure

CEDoW is a not-for-profit unincorporated organisation operating as an agency of the Diocese of Wollongong. It is the only agency in the diocese required to report on its supply chains under the *Modern Slavery Act 2018* (Cth).

An overview of CEDoW's organisation structure in 2021 is shown below:





## Our Governance Structure

The Director of Schools is delegated by the Bishop of Wollongong, on behalf of the Trustees of the Roman Catholic Church for the Diocese of Wollongong, as the Head of Agency for Catholic Education. The Director of Schools has responsibility for the delivery of Catholic education through the diocesan system of schools. The Bishop of Wollongong has established a Diocesan Schools Council to advise him on matters related to the delivery of Catholic education. The Director of Schools is the Executive Officer of the Council. The Council 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; and
- Local community representatives.

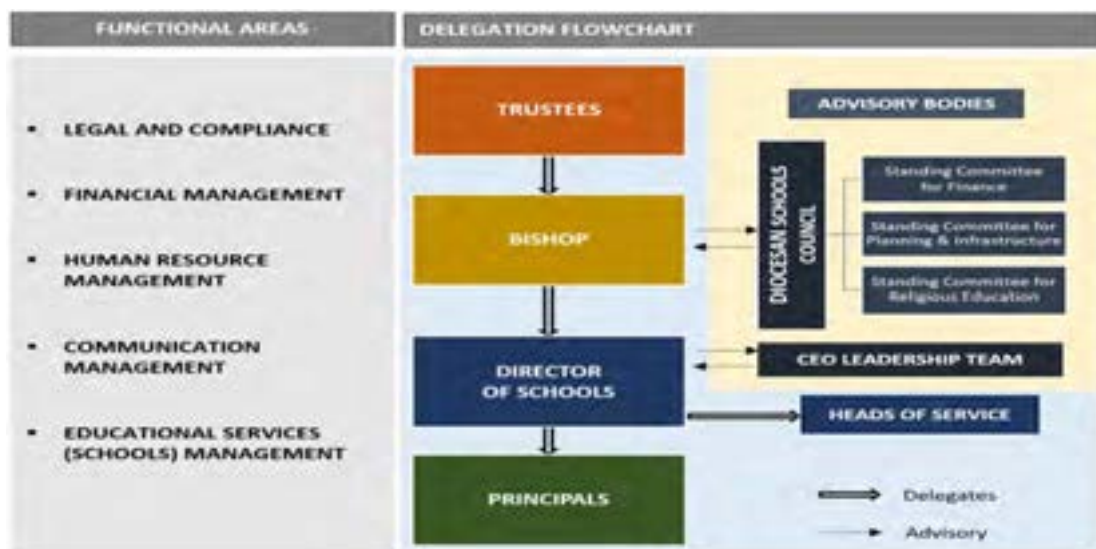
The council is assisted by three advisory boards. They are:

- Standing Committee for Religious Education;
- Standing Committee for Finance; and
- Standing Committee for Planning and Infrastructure.

Within the CEO, the Director of Schools has established a Leadership Team and delegates authority to Heads of Service 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
- Directorate Services
- Finance, Facilities, ICLT and Planning
- People and Culture (previously Human Resource Services)
- School Improvement – Primary, Secondary and Specialist Support.

The responsibility for compliance with the *Modern Slavery Act 2018* (Cth) lies within the Finance, Facilities, ICLT & Planning Service area. It is separately noted and monitored via the CEDoW Enterprise Risk Register.







## 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, eight Catholic co-educational secondary schools, one K-12 Catholic college and three Catholic Education Office (CEO) sites. These schools and offices are located in the Illawarra, Macarthur, Southern Highlands and Shoalhaven regions of NSW. As of the August 2021 School Census, the diocese educated some 19,470 students and employed 2,291 teaching and support staff. The Leadership Team and most of the head office teams are located in the Marian Centre, located at 86-88 Market Street, Wollongong NSW 2500.

Annual turnover for the school system in 2021 was approximately \$334M.

In order 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 \$5,000. Supplier service agreements can only be undertaken for a period of three years before further market testing is required. There are some arrangements that extend to five years, such as uniform, canteen and photocopier agreements, but these are the exceptions. Most purchasing 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.



Our community of schools – 2021 Snapshot

## Our People

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At the August 2021 Census, CEDoW employed some 2,291 staff of whom 39 identified themselves as Indigenous. Of these staff members, some 80% were female and 20% male employees. Overall, the numbers equated to an FTE of 1,663.

All employees are engaged under an individual contract or Enterprise Agreement that guarantees statutory and employee specific entitlements per the *Fair Work Act 2009* (Cth) for the duration of their employment. Migrant workers must have the appropriate working visa before they are engaged by CEDoW. Where an employee has issues around their conditions of employment, they can approach their Principal, Head of Service or the CEDoW Senior Employment and Industrial Officer. If needed, staff can also utilise the CEDoW [Complaints](#) and [Whistleblowing](#) policies and are protected under these policies.

Compliance updates and legislative changes are delivered to all staff via a Learning Management System (LMS). A People and Culture report is provided annually to the Diocese of Wollongong, Diocesan Schools Council.



## Our Supply Chain

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CEDoW engaged the services of some 2,500 third party suppliers during the reporting period. The services these suppliers provided ranged from multi million-dollar school construction projects to minor consumable purchases. Whilst some contracts are undertaken centrally by the CEO, the majority of purchases are made directly by schools. They retain autonomy to engage suppliers, after the appropriate market testing process, to meet their operational needs. Therefore, the majority of purchasing decisions effectively remains in the hands of the school Principal.

In general terms, CEDoW's purchasing is derived from two sources:

- Centralised CEO contracts and purchasing – these are usually high-cost building and construction projects, ICLT purchases and diocesan utility service agreements. In 2021, cleaning contracts and some uniform services contracts were also managed centrally; and
- School contracts and purchasing – these are usually single site agreements or acquisitions for an individual school such as for grounds and general maintenance, waste, educational supplies, photocopying services, security, canteens, etc.

In order to obtain commercially attractive pricing, schools and Head Office sites are encouraged to use buying groups such as Procurement Australia and approved Government suppliers as CEDoW is entitled to request Government contract pricing as a not-for-profit organisation.

CEDoW is looking to centralise more purchasing across the 41 sites in the coming years, similar to other Catholic dioceses, for both commercial reasons and to reduce the number of suppliers used. The type of goods and services that lend themselves to centralisation include areas such as waste services, furniture, educational resources, photocopying services and facilities maintenance.

Virtually all CEDoW's suppliers are based in Australia, but with limited manufacturing located in this country, many source their goods from regions overseas that include countries deemed at high risk of modern slavery practices.



## Reporting 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 operations is low. This is supported by the labour practices employed in the diocese as noted under the section *Our People* on page 10.

### Supply Chain Risks

CEDoW has identified its high-risk suppliers by spend during the reporting period using the ACAN category risk taxonomy and the risk levels associated with those categories.

The analysis is based on 540 third party suppliers that CEDoW spent more than \$10k (including GST) with during the reporting year. These suppliers accounted for some 95% of the \$90M in expenditure on goods and services during 2021. This spend excludes any payroll related outgoings or payments made within the school system.

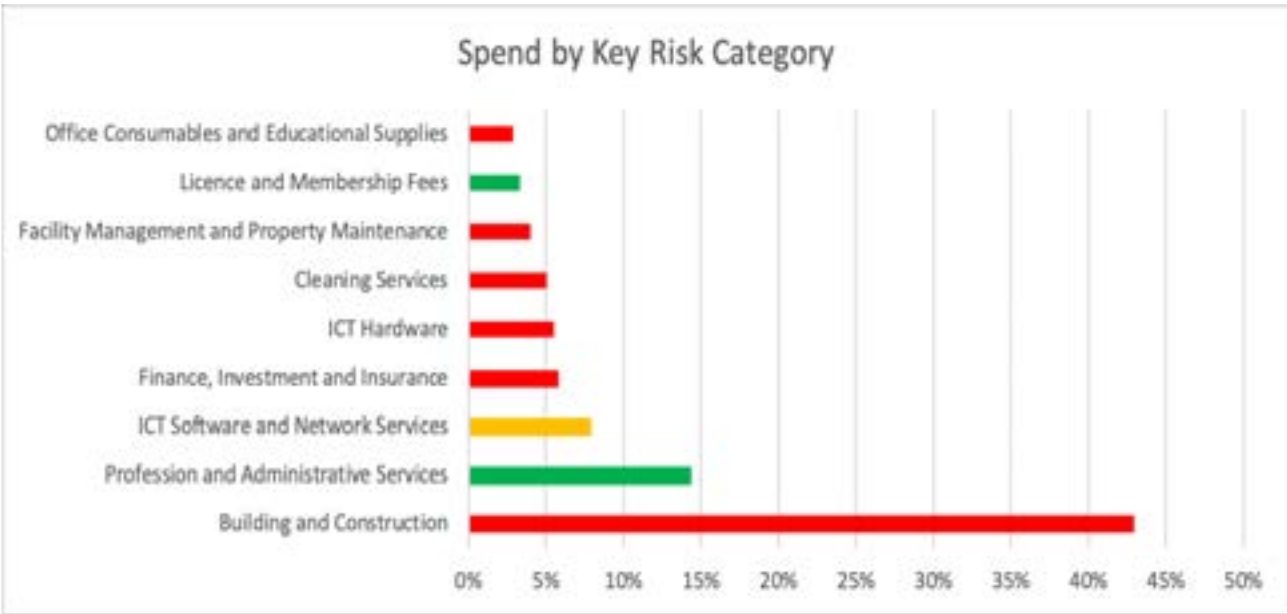
Based on these indicators, the majority of CEDoW's actual spend is on goods and services (and suppliers) considered at high risk in terms of modern slavery practices. The key risk industries supplying the diocese include building and construction, ICT hardware, cleaning, furniture, office supplies and facility management.

In both the graphs and the table below, High risk categories are indicated by *red*, medium risk categories are indicated by *yellow* and low risk categories are indicated by *green*.



**As a result of this analysis, CEDoW's Supplier Engagement program has continued to focus on the high value/high risk suppliers as a starting point.**

The key spending categories for the reporting period are shown in the graph below. As in 2020, this demonstrates the majority of spending remains in potentially high-risk areas:



## Our COVID-19 Response

---

CEDoW acknowledges the impact COVID-19 may have had on vulnerable workers within the community and our supply chains during the reporting period. CEDoW took a number of steps to ensure those at risk were not disadvantaged as the result of the economic downturn:

- As in 2020, all 38 schools were kept open last year, regardless of the number of students attending.
- CEDoW's operational and capital spending did not vary greatly to that of previous years and in some high-risk areas, such as building and construction, spending actually increased;
- Fee support and concessions were offered to those families in need; and
- Concessions in payment trading terms were granted to the small number of suppliers who sought support as a result of the impact of the pandemic on their operations.

Unlike 2020, however, there appeared to be limited disruptions to purchasing during the reporting period though it was noted some uniform service providers were out of specific stock lines at various times due to shipping delays from overseas. Similarly, during the lockdown period, tender site visits were once again suspended.





## Reporting Criteria 4: Actions taken to assess and address risk

### Actions Taken to Mitigate Risk

---

CEDoW undertook a number of initiatives in the reporting period to mitigate the risk of modern slavery practices existing in its supply chains. The key actions undertaken are summarised below:

- The CEDoW [Modern Slavery Policy](#) was approved by the Leadership Team and placed on its website in March 2021. The [2020 Modern Slavery Statement](#) was also published on the website in July 2021.
- The *Modern Slavery Working Group* (MSWG) was formed in 2020 and met several times during the reporting period. The MSWG comprises the Modern Slavery Liaison Officer (MSLO), the Governance and Accountability officer, the In-house Legal Counsel and an administrative officer. Part of the MSWG's responsibilities include investigating claims by staff or suppliers of any potential non-compliance with CEDoW's [Modern Slavery Policy](#). None were reported during 2021.
- The MSLO continued to update the school contract templates in 2021 to ensure they have clear references to both the *Fair Work Act 2009* (Cth) and *Modern Slavery Act 2018* (Cth). The ACAN contract clauses were placed in the four key school-centric contracts: cleaning, grounds maintenance, canteen services and uniform services.
- Through ACAN, CEDoW registered with Sedex. Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. Sedex provides practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.
- The MSLO contacted its top 60 high risk suppliers in August to advise their contact details would be passed to Sedex that month. As key suppliers, CEDoW's expectation was they register with Sedex and conduct the self-assessment tools provided in that platform to address modern slavery issues in their supply chains. Some 26 of those suppliers registered by the end of the reporting period.
- The top 60 high risk suppliers were invited to the three ACAN webinars conducted during September and October re modern slavery risks in building and construction, ICT and general industry. All suppliers were subsequently emailed the recording of these webinars in December, so if they did not attend, they had access to the programs.
- The top 60 high risk suppliers were emailed a link to the ACAN website's Supplier Resources page to provide further information on modern slavery.
- The five ACAN staff e-learning modules were uploaded to CEDoW's Gateway Learning Management Systems and will be accessible to all staff from 2022. The plan is for the *Modern Slavery 101* module to be part of the staff induction process, whilst all five modules will be

available to existing staff to undertake voluntarily. A further option is to make it compulsory for staff involved in procurement at both the CEO and school level to undertake all modules.

## Remediation Process

---

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, *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 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 – an independent program to provide remedy to people impacted by modern slavery. CEDoW's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7, CEDoW can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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

CEDoW is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practices come to our attention through whistleblowing or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

CEDoW has funded a “Remedy Pathways” module in its Modern Slavery eLearning course that will be available to staff, and other stakeholders.





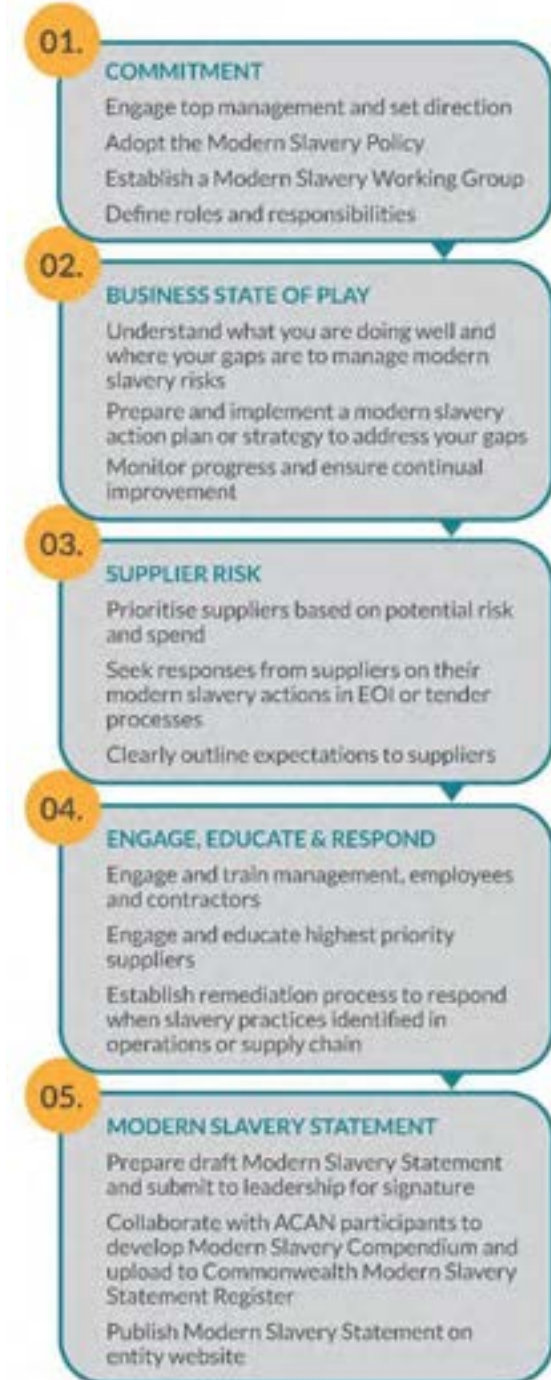
## Modern slavery action plan and road map

CEDoW is essentially following the five-step action plan suggested by ACAN (in the table at right) to identify and address modern slavery practices in its supply chain.

Although good progress was made in the reporting year and elements of all of the five steps have been achieved, much remains to be done going forward.

The key challenge in 2021 remained Supplier Engagement. Although CEDoW reached out to our top 60 high-risk suppliers in an effort for them to register with Sedex, many have not done so. As a result, there are gaps in CEDoW's knowledge of important areas such as the countries from which its key suppliers source their products and whether they have assessed modern slavery practices exist in their supply chains.

**Increased Supplier Engagement will be a key objective for CEDoW in 2022.**



## Reporting Criteria 5: Effectiveness Assessment

CEDoW appreciates the importance of assessing the effectiveness of the actions taken to address modern slavery risks in its supply chains. As an identified risk in CEDoW's Enterprise Risk Register, progress in this area is assessed by the following methods:

- completing an annual gap analysis of progress in key modern slavery categories against the prior year; and
- recording a series of metrics re staff, MSWG and supplier actions against the prior year.

The gap analysis below indicates only modest progress being made in the reporting year in most areas with more to be done in the coming periods.

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Starting out	Making progress	▲
	Commitment	Starting out	Starting out	-
	Business Systems	Starting out	Making progress	▲
	Action	Starting out	Making progress	▲
	Monitoring & Reporting	At the starting line	Starting out	▲
Risk Management	Risk Framework	Starting out	Making progress	▲
	Operational Risk	Starting out	Making progress	▲
	Identifying External Risks	Starting out	Starting out	-
	Monitoring and Reporting on Risk	At the starting line	Starting out	▲
Human Resources and Recruitment	Awareness	At the starting line	Starting out	▲
	Policies and Systems	At the starting line	Making progress	▲
	Training	Starting out	Making progress	▲
	Labour Hire / Outsourcing	Starting out	Making progress	▲
Customers and Stakeholders	Customer Attitude	Starting out	Starting out	-
	Information Provision	At the starting line	Making progress	▲
	Feedback Mechanisms	Starting out	Starting out	▲
	Worker Voice	Starting out	Making progress	▲
Procurement and Supply Chain	Policies and Procedures	Starting out	Making progress	▲
	Contract Management	Starting out	Making progress	▲
	Screening and Traceability	Starting out	Starting out	-
	Supplier Engagement	Starting out	Making progress	▲
	Monitoring and Corrective Actions	At the starting line	Starting out	▲

### Legend

At the starting line ■ Starting out ■ Making progress ■ Leading practice ■

The key statistics around modern slavery actions for the reporting period are shown below:

Stakeholder	Activity	2021
Staff	e-learning modules completed	4
MSWG	Number of meetings	3
Suppliers	Total number of suppliers	2,500
	e-learning modules completed by suppliers	0
	Contracts include MS clauses	15
	Suppliers engaged on MS	60
	Suppliers invited to join Sedex	60
	Suppliers joined Sedex	26
	Suppliers shared Sedex SAQ results	0
	Social audits	0
	Corrective actions	0

## Reporting Criteria 6: Consultation with entities owned or controlled

CEDoW is managing the compliance around modern slavery centrally through the MSWG. At this stage, little action is required at school level other than using suggested suppliers, standard contract templates that include the ACAN modern slavery clauses and advising the MSWG where they become aware of a potential breach in the CEDoW [Modern Slavery Policy](#). Where this occurs, the school is to follow the CEDoW [Modern Slavery Non-Compliance Procedure](#).





## Reporting Criteria 7: Other

The MSLO has requested, through the Bishop's Office, that the Parishes in the diocese offer a Mass for the patron saint of modern slavery, Josephine Bakhita, on her feast day of 8<sup>th</sup> February each year.

CEDoW school and office locations are encouraged to source Fair Trade products when the opportunities arise, and a reminder is broadcast in May each year to recognise World Fairtrade Day.



CEDoW has nothing further to report on regarding modern slavery during this reporting period.

# **Catholic Education Canberra Goulburn**

## **Modern Slavery Statement 2021**

ABN: 478 2412 7996

55 Franklin Street Manuka ACT 2603

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

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## About Us

Extending from Pambula on the south coast, to Crookwell in the North, through to the western point of Lake Cargelligo, the Archdiocese of Canberra and Goulburn covers both the ACT and NSW, a total of 88,000 square kilometres. There are 56 System Schools and 8 Catholic Early Learning Centres in the Archdiocese:

### ACT

- 24 Primary Schools
- 5 Secondary Colleges
- 8 Catholic Early Learning Centres

### NSW

- 19 Primary Schools
- 3 Secondary Colleges
- 4 K – 10 Schools (Central Schools)
- 1 K – 12 School

Our Catholic School System educates over 22,000 students. We have 3,858 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.”*

\*22,095 Students as at Aug 2021, Staff count as at Oct 2021

## 2021 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.

CECG has undertaken considerable efforts to identify and reduce the risk of modern slavery from our supply chains. We have identified our high-risk suppliers and communicated to over 2000 of our suppliers and service providers with respect to modern slavery obligations and identification. In addition we have written directly to our high risk suppliers who have agreed to comply with our Supplier Code of Conduct.

Modern Slavery staff awareness training has also continued for its 3800+ employees whilst the procurement division is now well placed to identify modern slavery risks, supported by contractual clauses for all new supplier engagements.

A number of CECG schools have already undertaken steps to remove the risk of modern slavery in their supply chains. Students have assisted in the charge against the scourge of modern slavery by researching where their school uniforms are sourced, and changing suppliers to ensure this risk is materially decreased or eliminated.

CECG is continuing to undertake a concerted effort across the organisation to eliminate modern slavery from its supply chains.

## Our Plans for 2022 and Beyond

CECG is planning initiatives to expand its efforts to remove the potential risk of modern slavery in its supply chains throughout 2021 and beyond. These include:

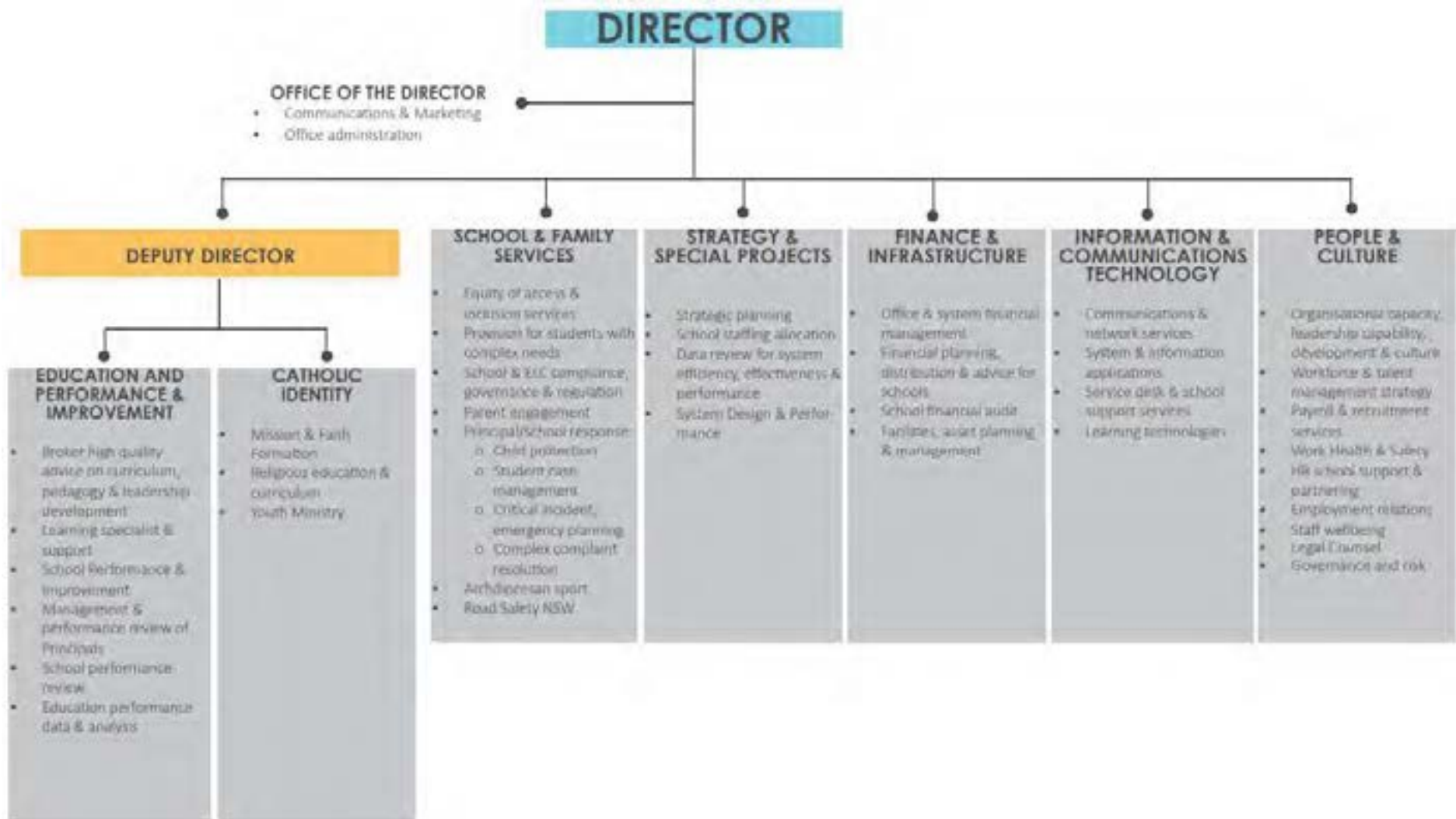
- Undertaking awareness training with CECG's highest risk suppliers
- Expand our due diligence program for all Tier 1 suppliers
- Increase our engagement levels and education with CECG's 56 schools to identify and mitigate modern slavery risk
- Continue the process of centralising procurement processes to ensure greater supervision and mitigation of its Modern Slavery risk exposure

CECG's aspirational goal is to eliminate all risks associated with modern slavery from all our service providers and suppliers within the multi-layered supply chains across all the industries CECG engages with to deliver educational services to the community.



# Catholic Education Canberra Goulburn

## Organisational Overview



## Our Workforce Profile

# 3,858

Total headcount including casual employees.

# 2,347

FTE excluding casuals

Workforce cohort	FTE	Headcount
<b>CEO</b>		
CEO	155	161
Casual	-	8
<b>ACT SCHOOLS</b>		
Teacher	1048	1175
Learning Support	133	229
Other	159	195
Casual Teacher	-	267
<b>NSW SCHOOLS</b>		
Teacher	576	666
Learning Support	89	162
Other	90	146
Casual Teacher	-	284
<b>EARLY LEARNING CENTRES (ELC)</b>		
ELCs	97	125
ELC Casual	-	134
<b>CECG SYSTEM</b>		
General Casual system wide	-	306
<b>TOTAL</b>	<b>2,347</b>	<b>3,858</b>

\*Data as at Oct 2021

## Our Governance Framework

The Archbishop of Canberra and Goulburn is the President of the Catholic Education Commission (CEC). All CEC members are appointed by the Archbishop for a four year term with an option for a further four years by invitation of the Archbishop. The Archbishop appoints a Chair as an ex-officio member of the Commission.

CEC members are drawn from key stakeholder groups in the Archdiocese including:

- Clergy
- Parents (NSW and ACT)
- Principals (NSW/ACT and Primary/Secondary and Congregational)
- Catholic Agencies
- Australian Catholic University

The ex-officio members are Mr Ross Fox (Director of the Catholic Education Office of the Archdiocese of Canberra and Goulburn) who is the Executive Officer and Mrs Tiffany Wallace (Executive Secretary).

The Catholic Education Commission (CEC) has two standing committees: the CEC Finance, Audit and Risk Committee and the Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG). The CEC establishes working parties on a needs basis. Members of the CEC working parties are chosen in terms of their experience and expertise in a particular area.

### Finance, Audit and Risk Committee

Objectives of the Finance, Audit and Risk Committee are to:

- Assist the Commission in discharging its responsibilities in relation to financial reporting practices, financial and accounting policies and procedures, management and internal controls and risk management.
- Provide a forum for communication between the Commission, CEO staff and auditors
- Ensure the integrity of CEO financial systems and internal controls.

### Catholic School Parents Archdiocese of Canberra and Goulburn

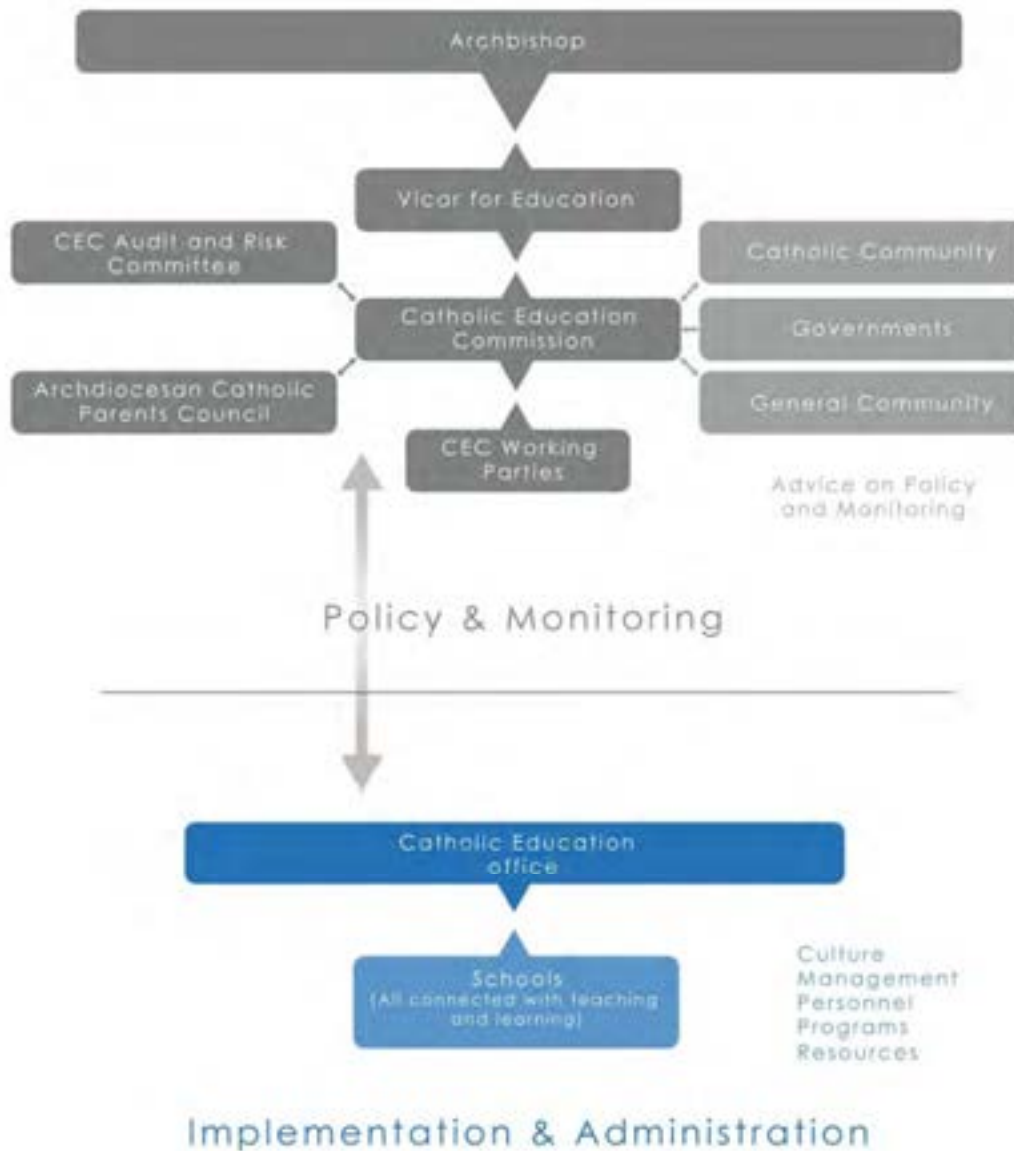
Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG) was formally launched on the 21 February 2014. CSPACG is the peak body representing the interests of all Catholic school parents in the Archdiocese of Canberra and Goulburn and is the largest non-government school parent body in the ACT.

CSPACG is the body officially recognised by the Archbishop and the CEC to represent the interests of families of children in all Catholic schools across the Archdiocese.

CSPACG is represented on the CEC and through it has significant access to and involvement in, mainstream education issues as well as input into policy and financial decisions. The Catholic school parent voice was sought by government and was invited to participate as a member of the steering committee leading a project exploring parental engagement.

## Membership and Organisational Structure

Membership of CSPACG includes every systemic Catholic school and the group of Catholic congregational schools. CSPACG structure is made up of representatives from each of the recognised regions of the Archdiocese. Alternative representatives from each region may also attend meetings and act for the representative in their absence but there is only one authorised representative acting for the region at each meeting. A Chairperson, an expert representative and an executive officer also form part of CSPACG.



## Our Operations

CECG's core function is to provide education to its 22,000 students across 56 schools and 8 Early Learning Centres supported by 3,858 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 4901 suppliers throughout the reporting period. CECG has some centralised procurement functions and work is ongoing to bring the majority of procurement processes to the centralised office. CECG has a higher proportion of short term, changeable contracts. These contracts may exist at the school level or system level depending on the type of contract.

- Contracts with higher value and strategic alignment tend to exist at the system level and are managed by the central office (i.e. design, construction, consulting contracts).
- Contracts with lower value and lower strategic alignment tend to exist at the school level (i.e. waste removal, basic maintenance, etc.)

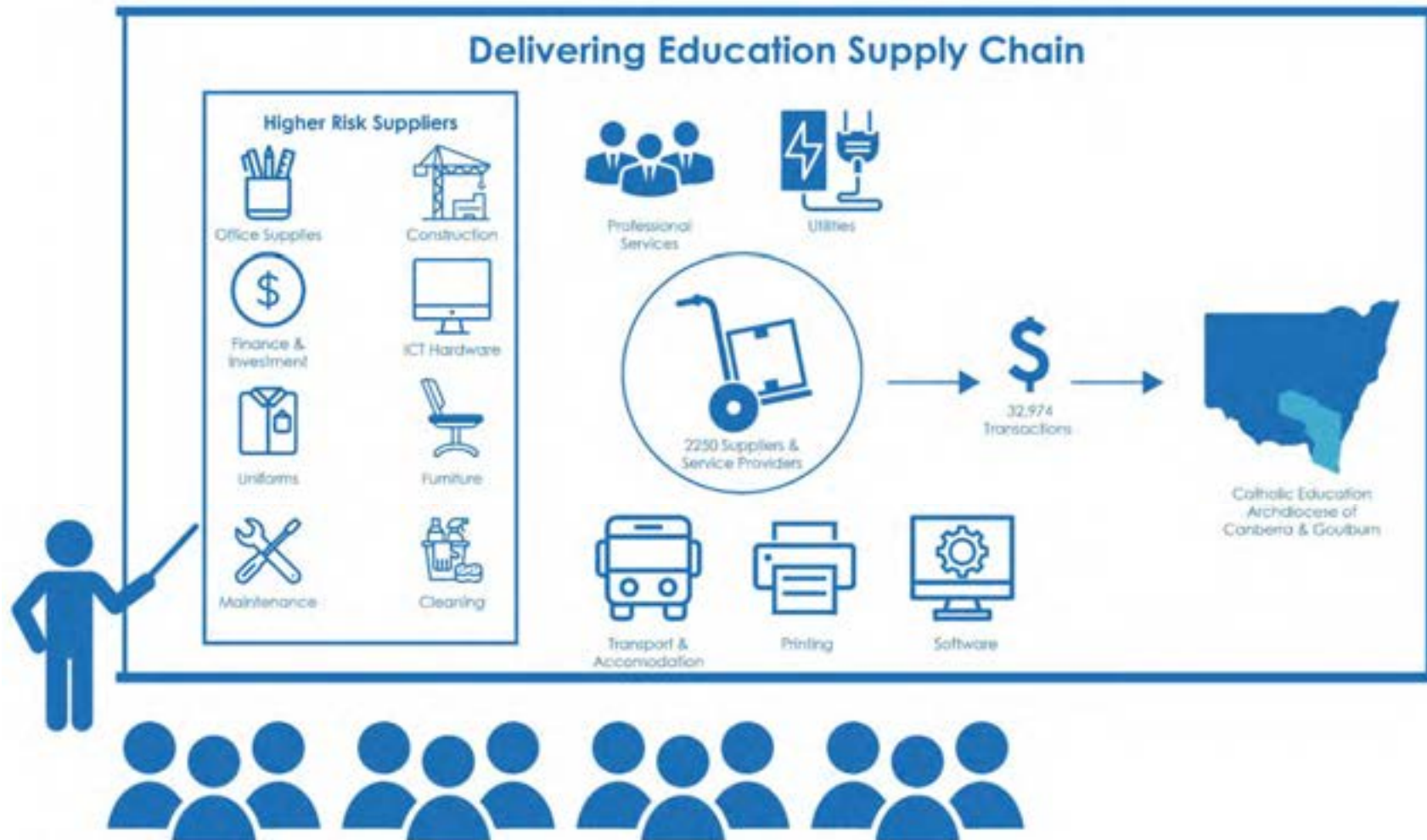
Across the CECG system, schools have a high level of autonomy in deciding which suppliers to work with for short term, low value contracts. This provides schools with the strategic flexibility required to support their communities and service their schools the way they see fit. Additionally, system wide contracts that require subcontractors in regional and remote areas may increase the risk of modern slavery issues.

However, as there are only minor variations in the goods and services procured by CECG schools, CECG is exploring additionally categories that may benefit through increased coordination. Some examples include furniture, ICT devices and stationary.

Schools may benefit from system level contracts in these categories through reduced distractions, reduced modern slavery risks, and reduced costs. Some categories that are already coordinated across the system and managed through the central office include electricity supply, security services and fire compliance.

In 2021 CECG has engaged dedicated procurement resources who will assist in the streamlining of supply chain risks and actively involved in CECG's Modern Slavery Working Group.

# Modern slavery risks in operations and supply chain



CECG has taken a number of steps to identify its Modern Slavery risks in its operations and address its highest risk suppliers. In the delivery of educational services across our school system, CECG procures goods and services from a large number of industries, and engages in a broad range of activities to achieve its strategic objectives.

CECG has identified and assessed the risk exposure within CECG’s supply chains. The key areas of potential risk are highlighted below which are utilised in the delivery of educational services:

- Building & Construction
- Events & Event Management
- Finance & Investment
- Furniture & Office Supplies
- Labour Hire
- Waste Management
- ICT Software and Network Services
- Travel & Accommodation
- Professional Services
- Financial Expenses
- Licence & Membership Fees
- Cleaning & Security Services
- Facility Management & Maintenance
- Food & Catering Services
- ICT Hardware
- Uniforms
- Marketing & Advertising Services
- Utilities
- Printing / Mail Services
- Government & Agency Fees

The areas of risk noted above have been assessed against percentage of annual spend and respective Modern Slavery potential risk exposure. In 2021, CECG has focused on engaging our highest risk business being those in Building & Construction and Cleaning.

The category risk taxonomy has been specifically developed for ACAN based entities based on analysis of participating entity supplier datasets. It includes 11 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted CECG assess potential risk so it can prioritise engagement activities with suppliers.

## Risk Taxonomy

The data in the table below is a breakdown of the total value of payments as a percentage to CECG’s high risk suppliers.

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.	<b>HIGH</b>	<b>18.22%</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>HIGH</b>	<b>11.37%</b>

<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	<b>HIGH</b>	<b>&gt;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>HIGH</b>	<b>5.78%</b>
<b>Finance and Investment</b>	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	<b>HIGH</b>	<b>3.71%</b>
<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, lunches, events etc and hospitality services.	<b>HIGH</b>	<b>3.14%</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>HIGH</b>	<b>1.96%</b>
<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>	<b>HIGH</b>	<b>6.51%</b>
<b>Labour Hire</b>	Wide range of traditional low-skilled / low paid work	<b>HIGH</b>	<b>&gt;1%</b>
<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)	<b>HIGH</b>	<b>3.15%</b>
<b>Waste management services</b>	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	<b>HIGH</b>	<b>2.21%</b>

\*Data as at Dec 2021



## Actions taken to manage risk:

Throughout the reporting period, CECG has undertaken a substantial volume of actions to address the Modern Slavery risks in its operations. Supported by its commitment to ongoing ACAN membership for three more years, 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 2021 and has 5 active members.

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. *Created a Supplier Modern Slavery Code of Conduct*

CECG has encouraged its high risk suppliers to commit to its Supplier Code of Conduct. The Code of Conduct intention is to ensure suppliers agree to adhere to a number of underlying principles in the fight against Modern Slavery. These include:

- 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 to people impacted by modern slavery in suppliers' supply chains or any parts of the suppliers' business are identified, assessed, remedied and eliminated.
- Comply with all applicable local and national laws, statutes, acts, rules, codes, standards, guidelines and regulations of the jurisdictions in which the supplier is conducting business.
- Comply with all applicable State, Australian and international anti-slavery and human trafficking laws, statutes, regulations and codes.

### 3. *High Risk Suppliers Completed Modern Slavery Questionnaire*

The Modern Slavery Questionnaire is an additional tool within CECG's educational library to assist suppliers in identifying and undertaking actions to reduce Modern Slavery risk. The questionnaire further built an understanding and insights into the risks within our supply chain, and help identify areas whereby CECG can provide further assistance to suppliers in managing their potential risk exposure. The questionnaire provided insights specifically on:

- Modern Slavery awareness
- Supplier structure, operations and supply chains;
- Risks of modern slavery practices in its operations and supply chains;
- Mitigation / actions taken to assess and address those risks;
- Source countries
- Subcontracting to individuals and businesses and associated due diligence
- Payment of staff in relation to Fair Work Australia's defined thresholds

Through supplier questionnaires, training and other due diligence measures, CECG will ensure that regulatory obligations are met and help suppliers to also comply. This also provided CECG greater understanding of the implications and management of risk of modern slavery across extended supply chains.

### 4. *High Risk Suppliers Engagement*

In 2020 CECG wrote to its 2250 suppliers as an initial step of supplier engagement. Throughout 2021 CECG engaged its high risk suppliers in building and construction, and the cleaning companies engaged both at its head office and its 56 schools. Twenty high risk suppliers to CECG participated in ACAN webinars for ICT, general, constructions and facilities management in 2021.

High risk suppliers were offered the opportunity to complete our Modern Slavery survey and commit to signing the new Modern Slavery Code of Conduct. Although COVID-19 materially impacted our supplier engagement action plan in 2021, of those suppliers engaged, the majority of respondents have already taken significant steps in actively mitigating their Modern Slavery supply chain risk including identifying and mitigating potential risk.

### 5. *Subscription to Sedex*

During the reporting period CECG commenced its subscription to Sedex. Sedex provides insights to suppliers, their supply chains and locations. Moreover, these insights assist in the identification of risks to human and environmental rights associated with the countries, industries and activities of each supplier. CECG considers the Sedex tool as an effective tool in providing supply chain visibility.

## Responding to COVID-19

CECG understands that COVID-19 has increased the risk of Modern Slavery across supply chains in both local and global operations. CECG undertook a number of steps to ensure that families at risk were not further disadvantaged throughout the crisis including:

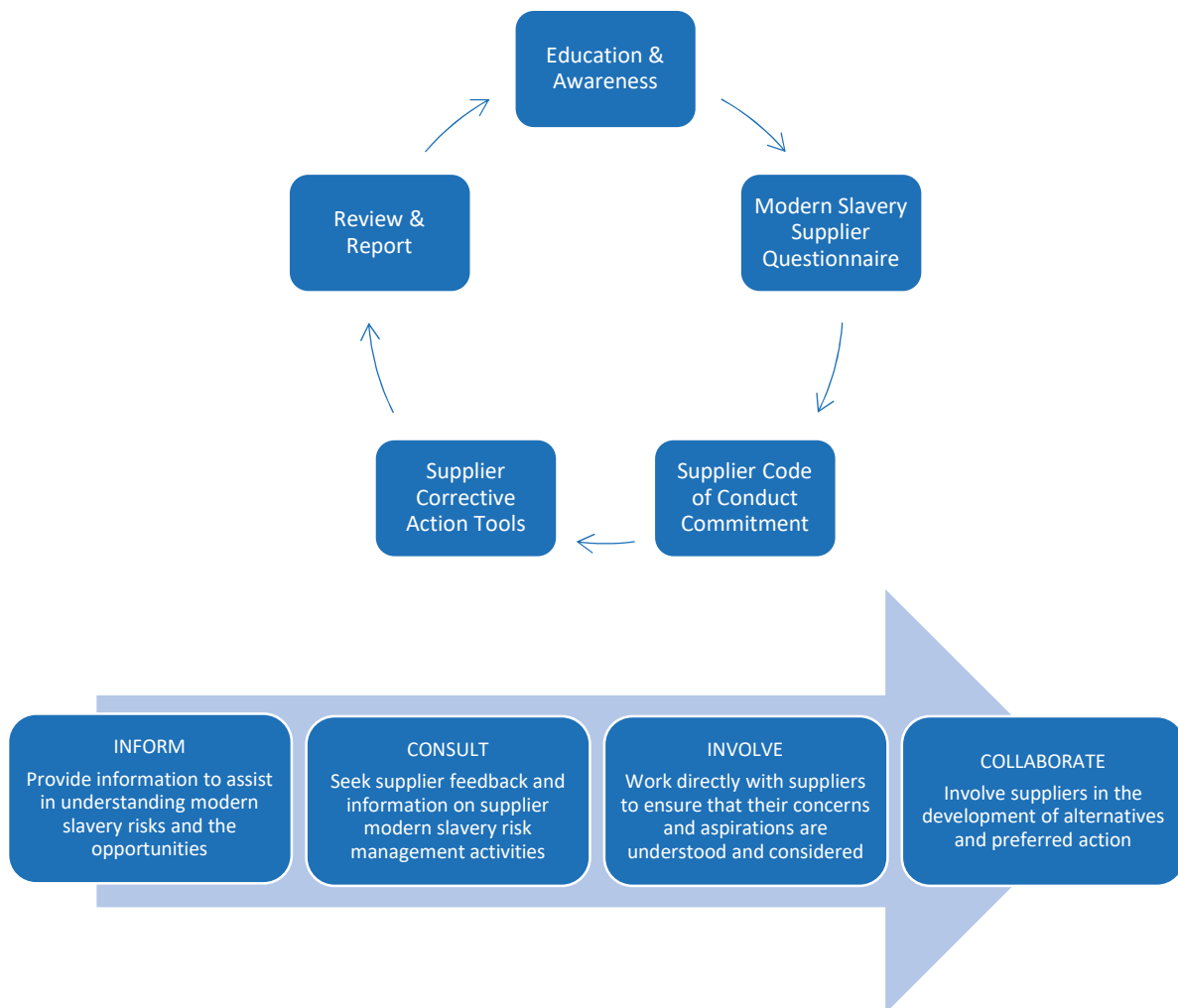
- CECG kept all 56 schools operating throughout the COVID-19 pandemic. Keeping all schools open, regardless of how few students were attending was crucial to ensure vulnerable and essential workers could maintain their obligations to attend employment.
- Upon request creditors were given financial concessions to ensure the financial and social impact of the pandemic was reduced.

## Modern Slavery Action Plan

CECG planned to focus efforts in 2021 on implementing our Supplier Engagement Action Plan outlined in our 2020 Statement, however the pandemic has materially impacted resourcing in this space. As such, 54% of high risk suppliers were introduced to the supplier engagement action plan

CECG maintains that a robust supplier engagement plan is the cornerstone of risk mitigation to eliminate Modern Slavery from our supply chains. In 2022 we will continue to execute the plan to all high risk suppliers.

### SUPPLIER ENGAGEMENT ACTION PLAN 2021



## Education & Awareness

Throughout 2022 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.

## Reporting

CECG's has developed its annual attestation for suppliers to complete with respect to their Modern Slavery actions for the previous reporting period (2021-22) to provide CECG comfort that each supplier has undertaken the necessary steps to identify and mitigate their Modern Slavery risks. It is envisioned that attestation numbers will be reported in the 2022 Modern Slavery Statement.

## Measuring Effectiveness:

CECG undertook an initial assessment of its approach to addressing Modern Slavery risks in 2019 and 2020 against a series of mitigation implementation categories created via SD Strategies "Bridge the Gap" tool. This included the overarching areas of management systems, risk management, human resources, customers and stakeholders, and procurement and supply chains. In 2021 CECG utilised an ACAN Gap Analysis assessment tool to assess our approach to Modern Slavery Risks against the same criteria.

Throughout the reporting period, CECG has made modest improvements over the past 12 months, with improvements across the majority of indicators.

The heat map below provides a snapshot of CECG is currently tracking in its approach to managing modern slavery risks. Although progress has been made, there is still significant work needed to be undertaken across its Modern Slavery management framework.

Key: At the starting line ■ Starting out: ■ Making progress: ■ Leading practice: ■

Modern Slavery Mitigation Implementation Category	2019	2020	2021
<b>Management Systems</b>			
Governance	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>
Commitment	<span style="color: orange;">■</span>		<span style="color: orange;">■</span>
Business Systems	<span style="color: red;">■</span>	<span style="color: yellow;">■</span>	<span style="color: yellow;">■</span>
Action	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: orange;">■</span>
Monitor / Report	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: orange;">■</span>
<b>Risk Management</b>			
Risk Framework	<span style="color: red;">■</span>	<span style="color: yellow;">■</span>	<span style="color: green;">■</span>
Operational Risk	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>	<span style="color: green;">■</span>
Identifying External Risks	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>
Monitoring & Reporting Risk	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>
<b>Human Resource &amp; Recruitment</b>			
Awareness	<span style="color: red;">■</span>		<span style="color: green;">■</span>
Policies & Systems	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>
Training	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>
Labour Hire / Outsourcing	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: green;">■</span>
<b>Customer &amp; Stakeholders</b>			
Customer Awareness	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: green;">■</span>
Information Provision	<span style="color: red;">■</span>	<span style="color: red;">■</span>	<span style="color: green;">■</span>
Feedback Mechanisms	<span style="color: red;">■</span>	<span style="color: yellow;">■</span>	<span style="color: yellow;">■</span>
Worker Voice	<span style="color: red;">■</span>	<span style="color: red;">■</span>	<span style="color: yellow;">■</span>
<b>Procurement &amp; Supply Chain</b>			
Policies & Procedures	<span style="color: red;">■</span>	<span style="color: orange;">■</span>	<span style="color: yellow;">■</span>

Contract Management	Red							Yellow					Yellow	
Screening & Traceability		Orange					Orange						Yellow	
Supplier Engagement	Red						Orange							Green
Monitoring & Corrective Action	Red						Orange						Yellow	

Over the last three years CECG has made significant progress in the development of its Modern Slavery risk mitigation program. Throughout 2021 made progress against 15 of the 28 categories, CECG recognises that its management systems still require significant progress and work will be undertaken in the next reporting period to progress this.

## Our Review Process

CECG planned to undertake regular reviews of our Modern Slavery action plan at regular appropriate intervals to ensure the ongoing actions remain relevant and effective. The pandemic has slowed our progress, however in 2022 CECG plans to accelerate our review process consisting of five stages which include:



### 1. Annual review of Modern Slavery Framework

The annual review will be undertaken to assess the effectiveness of the existing framework and identify areas of improvement. As CECG is still in the process of building and strengthening its current controls, the existing tools utilised such as the ACAN assessment tool will be a key driver for areas requiring further attention and action.

### 2. Regular check of the risk review process

This stage will be utilised to undertake a further assessment of existing risk identification methodology against CECG suppliers. Specifically, CECG will endeavour 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 of staff will provide 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.

## 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.

CECG is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies if there is immediate danger to a person or Domus 8.7 for an independent assessment, investigation, action planning and implementation of a remediation process.

CECG has made available the ACAN "Remedy Pathways" module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders.

Additional information about Domus 8.7 and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au)

## Criteria 6

CECG does not own or control any other entities.

## Approval

This Modern Slavery Statement is approved and adopted for Catholic Education Canberra Goulburn.

A handwritten signature in blue ink, appearing to read "Ross Fox", is written over a faint horizontal line.

Ross Fox

Director

Catholic Education Canberra Goulburn

6 June 2022



[cg.catholic.edu.au](http://cg.catholic.edu.au)







# Mercy Education

## Modern Slavery Statement

1 January 2021 – 31 December 2021

MERCY EDUCATION LIMITED

ABN: 69 154 531 870

## **DISCLOSURE NOTE**

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 is a stand-alone legal entity. Mercy Education Limited is the sole member of Emmanuel College Foundation Limited.

The National Office of Mercy Education Ltd is located at 720 Heidelberg Rd, Alphington, Victoria.

This Modern Slavery Statement has been reviewed by and is published under the authority of the Mercy Education Ltd Board, per special resolution of the Board dated 10 JUNE 2022.

This Statement covers the thirteen colleges that Mercy Education directly governed in 2021:

### **WESTERN AUSTRALIA**

Mercedes College, Perth  
Santa Maria College, Attadale  
St Brigid's College, Lesmurdie

### **SOUTH AUSTRALIA**

St Aloysius College, Adelaide

### **VICTORIA**

Academy of Mary Immaculate, Fitzroy  
Catherine McAuley College, Bendigo  
Emmanuel College, Warrnambool  
Mount Lilydale Mercy College, Lilydale  
Our Lady of Mercy College, Heidelberg  
Sacred Heart College, Geelong  
Sacred Heart College, Kyneton  
St Aloysius College, North Melbourne  
St Joseph's College, Mildura

ABN 69 154 531 870

ACN 154 531 870

This statement does not cover other schools that choose to *affiliate* with Mercy Education Ltd to receive support and professional development in operating schools 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.

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# Statement, Approval and Signature



## Statement from our Board Chair

The ongoing implementation of the reporting obligations of the *Modern Slavery Act 2018* has required Mercy Education and its governed schools to move into a more robust and active framework for understanding, documenting and managing these risks at the corporate level.

Mercy Education continues to meet this challenge, acknowledging that it is equally a demand of our own Christian, Catholic and Mercy values.

We will continue to build awareness and educate ourselves and our staff on these issues. We commit to developing a much deeper understanding of our supply chain and its associated risks in order to implement meaningful changes to our operations. Finally, and importantly we will explore how our anti-modern slavery education and resources can be embedded into school curricula and enhance the learning for our students.

A handwritten signature in black ink that reads "Sylvia Williams". The signature is written in a cursive, flowing style.

**Sr Sylvia Williams RSM ■ BOARD CHAIR**

This Modern Slavery Statement was approved by the principal governing body of Mercy Education Limited as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 10 June 2022. This Modern Slavery Statement is signed by a responsible member of Mercy Education Limited as defined by the Act.

# Reporting Criterion 1: About Mercy Education



Mercy Education Limited is a single legal entity (company limited by guarantee) that operates 13 Catholic secondary schools across three states. Our canonical (Church Law) governor is Mercy Ministry Companions (MMC).

The vision of Mercy Education is the development and support of a dynamic network of Catholic Colleges united by

- a commitment to the Gospel of Jesus
- fidelity to the tradition and spirit of Mercy and the mission of Catherine McAuley
- the provision of innovative, stimulating and inclusive educational programs
- a passion for social justice



## MERCY EDUCATION VALUES

An education in the Mercy tradition invites us to take up a challenge – one that encourages us to develop fully our own God-given talents. At the same time, it ignites within us a desire to assist others, so they too “*may have life, and have it to the full*”. (John 10:10)

The six core values of Mercy Education are *Compassion, Justice, Respect, Hospitality, Service & Courage*.

## Mercy Education Strategic Plan

Mercy Education launched its Strategic Plan (2022 – 2025) in 2021. The first two goals address the commitment of Mercy Education to its mission, corporate governance and its responsibilities under the Modern Slavery Act.

Goal 1: To ensure that Catherine McAuley’s vision of the lived Gospel is at the heart of each education community.

Goal 2: To function effectively as a corporate and legal entity and to exercise prudent stewardship that protects the communities, cultures and resources of our Colleges in order to ensure the continuation of our mission.



## 2021 Modern Slavery Initiatives

In respect of the 2021 reporting year, Mercy Education:

- had two National office representatives attend the Australian Catholic Anti-Modern Slavery Network (ACAN) as network members
- continued to meet with its Anti-Modern Slavery Working Party (AMSWP), consisting of representatives from each of the 13 schools governed by Mercy Education
- continued to provide training modules in Anti-Modern Slavery to each of the school representatives in the AMSWP
- collected data on major suppliers and procurement categories across our schools
- focussed on an audit of supplier risk based upon our understanding of key supply chain risks
- continued to include Anti-Modern Slavery language in reviews of key policies.

## Our Plans in 2022

In 2022, Mercy Education's goals are to:

- provide detailed training (via both online courses and face-to-face discussions) to Board Directors, Principals, Business Managers and all staff involved in procurement at the national office and school level
- prepare and publish a Mercy Education policy on Anti-Modern Slavery
- develop and implement specific strategies for managing modern slavery risks in our four highest risk procurement sectors: construction, computer hardware, cleaning and textiles (uniforms).
- review cleaning and catering arrangements at all school sites to ensure that contractor employment arrangements are transparent and compliant with Commonwealth and State employment legislation
- undertake a detailed review of all procurement activity to develop a more sophisticated understanding of our supplier profile and associated risks. It is noted that Mercy Education schools operate a range of different accounting and administration software systems which are not centrally accessible – making this task significantly more complex
- conduct an audit of current curriculum offerings and resources available related to Anti-Modern Slavery issues
- implement a Supplier Code of Conduct and procurement contract templates
- continue to work with suppliers to understand their supply chain risks in greater detail. This will include the use of research and audit tools and may also involve a program of supplier rationalisation.

## Our Plans Beyond 2022

In 2023, Mercy Education aims to:

- implement construction project protocols and templates
- implement and publicise a remedy framework via the Domus 8.7 service offered through ACAN
- move Mercy Education's focus from education of Board Directors and leadership staff to education of all staff
- ensure that Anti-Modern Slavery education is a consideration for each school when developing curriculum and that resources are available for teaching staff and students.

# Reporting Criterion 2: Operations and Supply Chain

## Our Organisational Structure

Mercy Education Ltd is a company limited by guarantee. It is not a subsidiary of any other organisation, nor does it operate any subsidiaries of its own. Mercy Education is a member of the Emmanuel College Foundation.

In 2021, Mercy Education operated 13 Catholic secondary schools in Victoria, South Australia and Western Australia. Most of these schools are over 100 years old and all were founded by local Australian congregations of the Sisters of Mercy.

The nine directors that comprised our Board during 2021 have full responsibility for all civil governance matters. To assist with this oversight, the Board maintains standing committees in respect of Finance and Audit, Risk and Compliance, Education Standards and Effectiveness, Governance and Mission and Mercy Identity.

The National Office based in Alphington, Victoria provides executive level support to both the Board and to our senior school leaders – Principals, Deputy Principals and Business Managers. This support is focused on strategic and structural matters relating to mission, quality, finance, governance and risk.

Operational decision-making at each of the thirteen schools is the responsibility of the College Principal, who reports directly to the Chief Executive.



## Our Governance Framework

The supervision of Mercy Education's responsibilities under the Act 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 will also be of particular significance for the Mission and Mercy Identity Committee (in respect of our moral and ethical obligations as people of Mercy).

For these reasons, the Board of Mercy Education will continue to maintain active supervision of our efforts and progress in respect of anti-modern slavery.

## Our Operations

The following datapoints provide a snapshot of Mercy Education operations in 2021:

- 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 also 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
- three of our schools in Western Australia offer boarding facilities
- at census, 13,831 students were educated in Mercy Education schools in 2021
- in 2021, our youngest school was 84 years old and our oldest school was 175 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 2021 operations:

- approximately 1,620 staff worked in full-time or part-time employment across Mercy Education schools
- a further 500 staff were employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles
- in many of the schools, maintenance, groundskeeping, catering, IT and cleaning services are outsourced – these staff are not directly employed by Mercy Education. This category includes an estimated 45 workers.





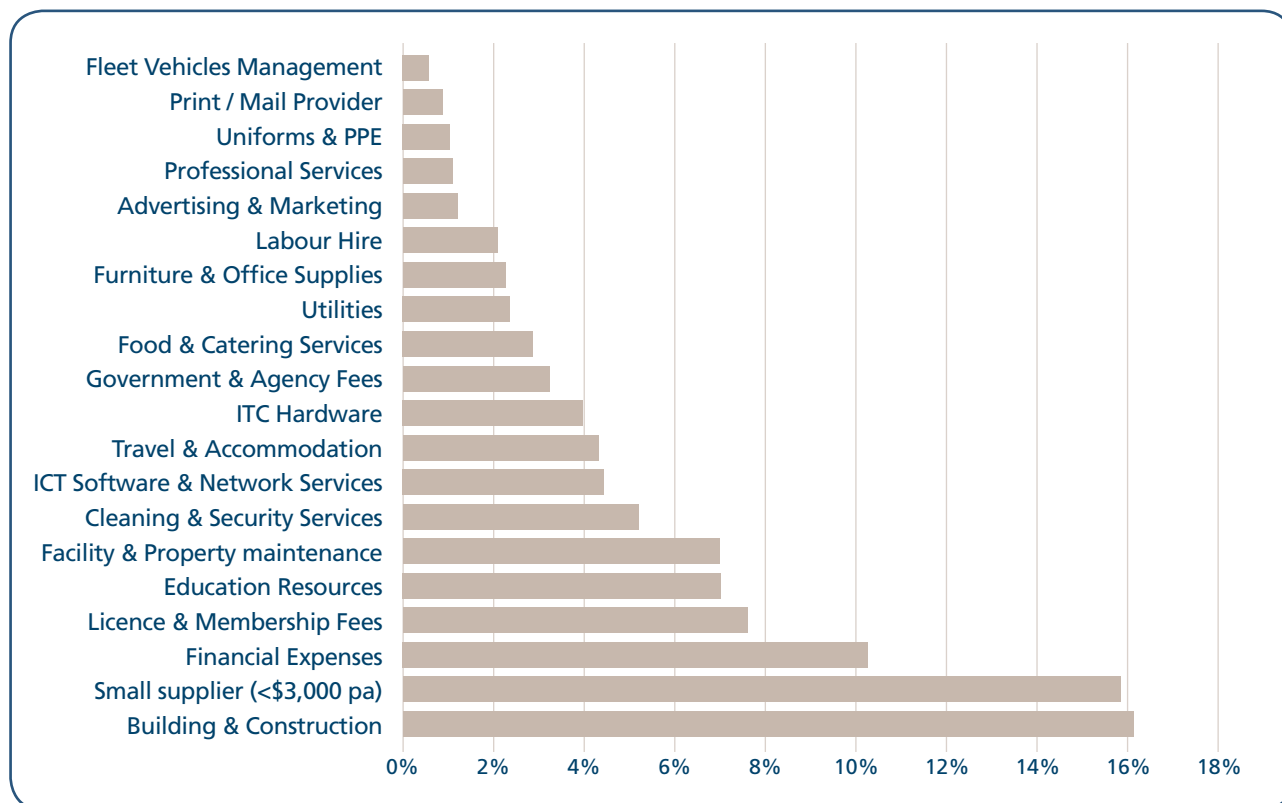
## Our Supply Chain, Goods and Services

In 2021, Mercy Education had a total operational turnover of \$297m. As an educational institution, the key element of our expenditure is teaching and support staff whose salaries and employment related costs represented 63.9% of our turnover.

In terms of non-staffing expenditure, in 2021, Mercy Education spent \$58.8m on recurrent expenditure and an additional \$21m on capital expenditure (predominantly buildings \$14m and computer hardware \$6m).

In 2021, detailed supplier analysis was undertaken, identifying that Mercy Education works with over 6,600 individual suppliers annually. A breakdown of total expenditure by our schools in each supplier category is included below.

### SUPPLIER TOTAL SPEND PER CATEGORY 2021



A detailed discussion of the group's supply chain investigations is contained within this Statement. Mercy Education currently has limited data regarding specific supplier procurement practices but preliminary investigations suggest potential risks in respect of China and South East Asia.

Risk is reflected in the following areas:

- Construction (Materials and Imported Labour)
- Computer Hardware
- Clothing & Textiles
- Cleaning and Security Services
- Education Resources.

In 2022, Mercy Education will commence discussions with our potential high risk, high spend suppliers regarding strategies for compliance.

# Reporting Criterion 3: Modern Slavery Risks

Mercy Education has commenced assessing modern slavery risks as part of corporate risk processes and has gained some understanding of risks and vulnerabilities in our supply chain. We will continue to work on our capacity to manage these identified risks and implement effective actions and improved reporting processes.

## Corporate Risk

The corporate risk to Mercy Education was considered and existing controls were documented:

### Existing Controls in 2021

- Risk and Compliance (RISKCOM) Board subcommittee
- Anti-Modern Slavery Working Party (stakeholder consultation)
- Anti- Modern Slavery Liaison Officers appointed in each school
- Anti-Modern Slavery Policy prepared
- Anti-Modern Slavery training provided for Board Directors, Leadership and key staff across the organisation
- Annual MEL Modern Slavery Statement 2020.

### Future controls were proposed for 2022 and beyond:

- Curriculum coverage of Anti-Modern Slavery issues in each school
- Mercy Education Supplier Code of Conduct
- Increase suppliers registered with ethical trade membership
- Contract clauses regarding Anti-Modern Slavery
- Provision of Anti-Modern Slavery information to staff, volunteers and school communities
- Detailed operational risk assessments for supply chains in key areas of procurement
- MEL remedy pathway and escalating protocols
- Curriculum offerings integrating Anti-Modern Slavery issues.

## COVID19 Impacts

COVID19 has significantly affected Mercy Education's capacity to engage with suppliers, however we do not believe COVID19 has significantly altered modern slavery risk for Mercy Education. As the schools have begun to return to normal operations, additional spend in cleaning has been maintained. Mercy Education acknowledges that COVID19 has had the largest impact on the most vulnerable populations around the world. On this basis, it would be anticipated that COVID19 has led to deteriorating conditions for those caught in modern slavery in other countries. Supply chains have been markedly affected in their capacity to provide materials and services.

## Our People Risk

In terms of employment, Mercy Education employs approximately 1,620 staff on a full-time or part-time basis. These staff are supported by an additional 500 staff employed on a casual basis – including emergency teachers, music tutors, and sports coaches. Each school subscribes to a relevant industrial agreement. These agreements cover almost all staff members at each school. All staff have access to union representation and unions are consulted in the negotiation of these agreements.

Work that requires daily attendance at the schools is generally carried out by direct employees of Mercy Education. As previously discussed, the main exceptions are cleaning, information technology (IT) and maintenance operations – in some of the schools, these tasks are carried out by employees and at others by third-party contractors. Approximately 45 contractors are engaged under such arrangements.

Mercy Education publishes a range of policies online ([www.mercy.edu.au](http://www.mercy.edu.au)) including Privacy, Complaints Management, Gender Equity, Code of Conduct, Workplace Health & Safety and a Whistleblower Policy. These policies are subject to cyclical review by the Board and are all under review to include Anti-Modern Slavery terminology.

## Modern Slavery Gap Analysis

At the start of 2020, Mercy Education had incomplete knowledge about the issues and risks pertaining to modern slavery and considered it peripheral to the work of schools. There were few structures in place to adequately assess modern slavery risk or to ensure appropriate training and responses were in place.

Since then a 'Bridge the Gap' analysis was completed at the end of both of the 2020 and 2021 years. The awareness of modern slavery risk is now significantly more sophisticated. Mercy Education has a detailed plan of its goals over the next two years.



## Key Supply Chain Risks

One of the key challenges identified by Mercy Education in undertaking a supply chain analysis is a *decentralised accounting system*. Each of the thirteen Mercy Education schools and the National Office currently use a different software package with no central interchange of data.

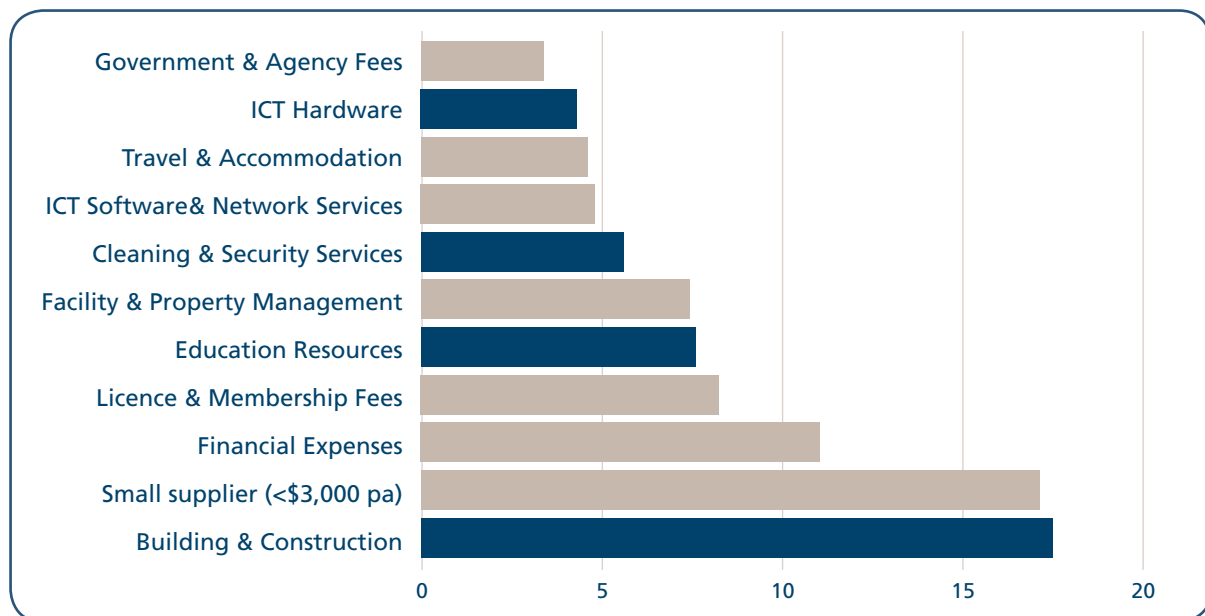
A separate survey of schools was undertaken to identify key suppliers in what Mercy Education had previously (prior to joining ACAN) considered to be the three highest risk sectors: computer hardware, school uniforms and sporting equipment. A discussion on these items is included below.

In preparing this 2021 analysis, Mercy Education has relied on the ACAN procurement category risk assessments which evaluated specific **industry sectors** deemed as high risk in international and national guidance documentation. This analysis also considered **commodity & product** risk 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).

By gaining a better understanding of supplier profiles, Mercy Education through its schools will be able to improve identification of modern slavery risks in the procurement processes including a deeper understanding of geographic location production risks. It is expected that this deeper analysis will result in a significant reduction in 'at risk' expenditure.

For 2021, the top ten procurement categories were identified as follows:

MERCY EDUCATION TOP 10 PROCUREMENT CATEGORIES \$M (IN 2021)



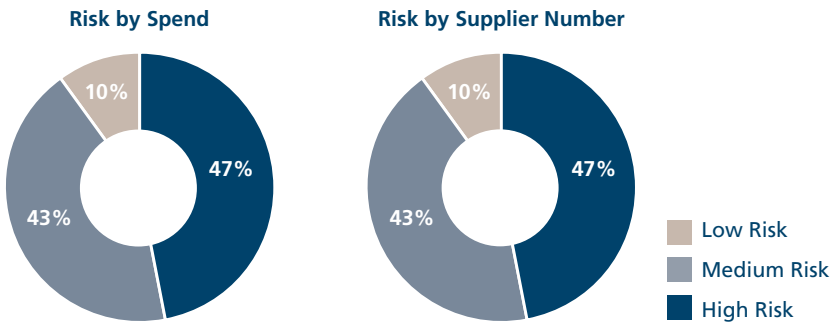
## Detailed Analysis of All Recurrent and Capital Procurement in 2021 Across Our Schools

Procurement Category	ACAN MS Risk Assessment <sup>1</sup>	Total Spend in 2021 (\$)	As % of total procurement	No. of suppliers
Building & Construction	High	17,432,713	16.1%	129
Educational Resources <sup>2</sup>	High	7,631,739	7%	1,810
Cleaning & Security Services	High	5,656,677	5.2%	87
ICT Hardware	High	4,335,465	4%	106
Facility Management	High	7,582,597	7%	573
Furniture & Office Supplies	High	2,415,415	2.2%	181
Uniforms & PPE	High	1,109,055	1%	48
Food & Catering Services	High	3,133,355	2.9%	162
Finance & Investment	High	11,135,729	10.2%	47
ICT Software & Network Services <sup>3</sup>	Medium	4,839,928	4.5%	201
Small Supplier (less than \$3Kpa)	Medium	17,184,998	15.8%	1902
Utilities	Medium	2,570,772	2.4%	70
Travel & Accommodation	Medium	4,689,627	4.3%	161
Advertising & Marketing	Medium	1,282,773	1.2%	134
Fleet Management	Medium	626,878	0.6%	61
Plant & Machinery	Medium	508,579	0.5%	30
Financial Expenses	Low	35,864	0%	2
Licence & Membership Fees	Low	8,259,683	7.6%	315
Labour Hire	Low	2,261,234	2.1%	181
Government & Agency Fees	Low	3,469,801	3.2%	26
Professional Services	Low	1,204,629	1.1%	313
Print / Mail Provider	Low	929,341	0.9%	49
Waste Management	Low	342,707	0.3%	30
<b>TOTAL 2021 RECURRENT &amp; CAPITAL PROCUREMENT</b>		<b>108,739,571</b>	<b>100%</b>	<b>6618</b>

### Notes:

1. Mercy Education has drawn upon the detailed resources and references of the ACAN network to categorise the modern slavery risk associated with each procurement category.
2. This category added by Mercy Education. Ranked as “High” due to the number of imported physical resources (stationery, books, sporting equipment, art equipment).
3. This category added by Mercy Education. Ranked as “Medium” due to the high technical capacity required for production of such items.

In 2021, Mercy Education procured \$108m of goods and services, of which 46% (\$49m) were purchases in potentially high-risk procurement categories. Mercy Education believes that by developing a better understanding of exactly what it is purchasing and from whom it is purchasing, this high-risk percentage is likely to drop significantly.

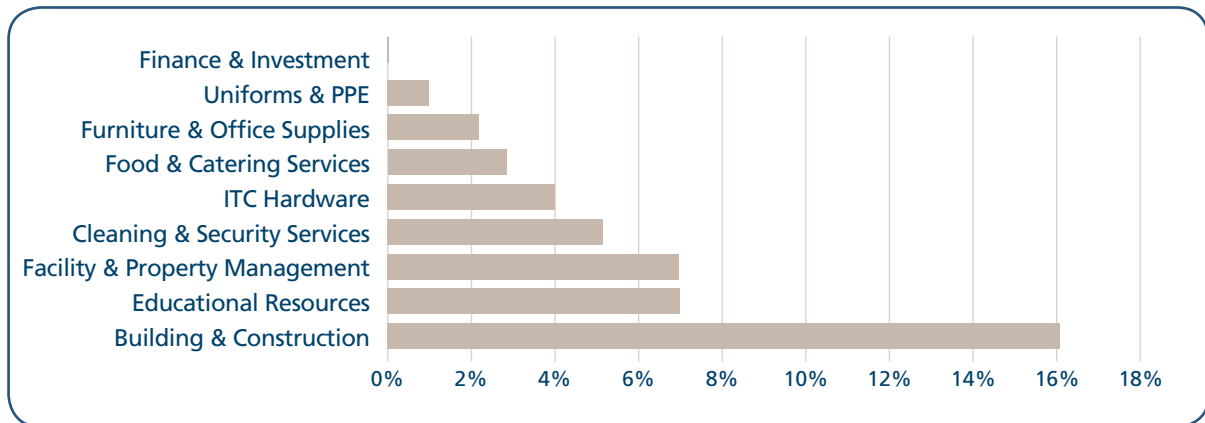


The pie charts above show that Mercy Education has a significant number of suppliers in the high-risk category. Mercy Education has provided a further analysis of this below.

## Assessment of High-Risk Procurement

In considering the nine high risk categories, Mercy Education has calculated the spend per supplier indicator to assist in prioritising initial efforts.

### 2021 MERCY EDUCATION HIGH RISK PROCUREMENT AREAS



As the chart above shows, Mercy Education will have a significantly more impact by focusing initial efforts on those procurement categories where it has high supplier spend. For this reason, in 2022 Mercy Education will focus on the top four categories:

- Building and Construction
- Educational Resources
- Facility & Property Maintenance
- Cleaning & Security Services.

A detailed analysis and response of all high-risk procurement categories follows.

## ANALYSIS OF HIGH-RISK PROCUREMENT

High Risk Procurement Category	Total Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Building & Construction	17,532,713	35%	<p>Mercy Education has not historically understood construction (within Australia) to be high risk and believes that the large proportion of the funds expended in 2021 was spent with Australian construction business and their sub-contractors applying Australian employment laws.</p> <p>Notwithstanding, we accept that there is a modern slavery risk in Australian construction, and that the large contract sizes and the detailed oversight to such contracts make it highly amenable to customer-driven controls to reduce this risk.</p> <p>Improving our understanding of this risk, and Mercy Education's response, has been flagged as a priority project for 2022.</p>
ICT Hardware	4,335,465	9%	<p>Mercy Education spends over \$4m each year on laptop devices. Currently these laptops are supplied by five main suppliers: Apple, Dell, Hewlett-Packard, Lenovo and Microsoft.</p> <p>These providers all provide annual Modern Slavery Statements. The sheer size of these suppliers and their high levels of visibility contribute to a strong public focus on their supply chains, reducing but not necessarily removing modern slavery risks.</p> <p>Mercy Education's continued involvement with these suppliers will be dependent on evaluating their credentials via third-party certification agencies and participating in sector-wide projects. This may include increasing pressure on suppliers whose responses lack significant insight or detail.</p>
Cleaning & Security Services	5,656,677	11%	<p>The majority of Mercy Education schools use contract cleaning services in their school operations.</p> <p>Whilst some of the suppliers in this area only use their own employed staff (on award wages), Mercy Education does not currently have any formal guidance for schools about expectations in this area.</p> <p>Developing such protocols will be one of the 2022 priority projects.</p>
Uniforms & PPE	1,109,055	2%	<p>During 2021, 4 of 12 Mercy Education schools operated their own uniform shops. However, Mercy Education accepts responsibility for supply chain risks where uniform sales are managed by an external provider and so the procurement figure shown includes an estimate of the total procurement spend.</p> <p>More than half of those schools that contract their uniform operations and use a single supplier.</p> <p>Mercy Education's focus in 2022 will be to extend these discussions with this supplier and confirm this via external agencies. Mercy Education may also commence discussions with other uniform suppliers as well.</p>
Finance & Investment	35,864	0%	<p>The total spend here is quite low and our investments are managed by Catholic Church Insurance (CCI) Asset Management which has an ethical screen for all of our investments. No further action is currently proposed.</p>
Facility Management & Property Maintenance	7,582,597	15%	<p>At this stage, Mercy Education does not believe its supplier profile in this area is high-risk. Services under this expenditure category tend to be supplied by either companies with a national presence and significant quality systems in place (maintenance of lifts, essential services, painting, grounds) or by small local businesses (electrical, plumbing).</p> <p>This risk level will be assessed further once Mercy Education's full supplier analysis is undertaken in 2022.</p>

High Risk Procurement Category	Total Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Food & Catering Services	3,133,355	6%	Further work needs to be done in this area to analyse the extent of providers used in this space, with a total of 162 suppliers currently in this category ranging from small to large operators.
Furniture & Office Supplies	2,415,416	5%	Further analysis of suppliers in this area will need to be considered in the 2022 action plan.
Educational Resources	7,631,739	15%	<p>Whilst this category represents a significant portion of Mercy Education's high-risk spend, there are several issues that preclude significant attention at this point:</p> <ol style="list-style-type: none"> <li>1. Due to the nature of these expenses, it is considered likely that most expenditure in this category is actually low-risk and involves sole proprietors, small businesses, professional associations and publishers operating in Australia.</li> <li>2. The sheer volume of suppliers in this category and the low average spend makes supplier engagement ineffectual.</li> </ol> <p>Mercy Education acknowledges that this expenditure area may contain actual risk vectors such as sporting goods, stationery, overseas printing. Further analysis is required in this area.</p>

## Reporting Criterion 4: Steps taken to address Modern Slavery Risk

### Mercy Education's Focus and Approach in 2021

As a school system that is committed to Mercy values, Mercy Education has strong social justice frameworks in place in each of its schools supported by an enthusiastic and engaged student and staff cohort.

Our Modern Slavery Statement is overseen at the corporate governance level, with the preparation of policies and risk considerations to ensure greater consistency of response across the organisation. In 2022, Mercy Education will continue to deploy training, review policies and implement procedures, look at reviewing supplier relationships whilst analysing curriculum offerings and accessible resources for staff and students.

### Modern Slavery Action Plan and Road Map

Mercy Education will continue to work with ACAN to increase its role in addressing modern slavery in supply chains. This includes ongoing professional development and participation in education wide action plans.

The following road map documents Mercy Education's key achievements for 2021 as well as objectives for 2022 and 2023.



Focus	2021	2022	2023
Our Governance	<ul style="list-style-type: none"> <li>■ Update procurement policies to include an assessment of modern slavery risk in nominated areas of procurement</li> <li>■ Lodge first Anti-Modern Slavery Statement (for 2020)</li> </ul>	<ul style="list-style-type: none"> <li>■ Publish Anti-Modern Slavery Policy</li> <li>■ Establish cyclical reporting framework and procedures</li> <li>■ Lodge second Modern Slavery Statement (for 2021)</li> <li>■ Provide Anti-Modern Slavery training modules to Board Directors</li> </ul>	<ul style="list-style-type: none"> <li>■ Review progress and include in evaluation of strategic plan</li> </ul>
Our Risks	<ul style="list-style-type: none"> <li>■ Establish Anti- Modern Slavery Working Group in each school</li> </ul>	<ul style="list-style-type: none"> <li>■ Work with ACAN to increase our leverage and access to quality resources</li> <li>■ Add Anti-Modern Slavery as specific risk to corporate risk register</li> </ul>	<ul style="list-style-type: none"> <li>■ Implement and publicise a remedy pathway for victims of modern slavery via the collaborative Australian Catholic project <i>Domus 8.7</i></li> </ul>
Our Suppliers	<ul style="list-style-type: none"> <li>■ Identify key suppliers in building &amp; construction, educational resources, and cleaning and security services and review their documented Anti-Modern Slavery position</li> </ul>	<ul style="list-style-type: none"> <li>■ Develop supplier analysis based on our procurement over a calendar year across all schools</li> <li>■ Undertake a review of employment conditions of third-party contract staff not directly employed by the school (i.e. cleaning, IT maintenance)</li> <li>■ Develop Supplier Code of Conduct</li> <li>■ Implement a standard supplier contract clause for significant purchases in selected procurement categories</li> <li>■ Commence discussions with suppliers in these categories</li> </ul>	<ul style="list-style-type: none"> <li>■ Undertake a review of suppliers based on membership of an ethical trade membership organisation and credentials evaluation for suppliers receiving top 50% of procurement spend</li> </ul>
Our Staff	<ul style="list-style-type: none"> <li>■ Notify school leaders about Modern Slavery risks and reporting requirements</li> </ul>	<ul style="list-style-type: none"> <li>■ Ensure school leaders and procurement staff have completed training modules on Anti-Modern Slavery risks.</li> <li>■ Survey curriculum offerings and resources related to Anti-Modern Slavery</li> </ul>	<ul style="list-style-type: none"> <li>■ School leaders to actively promote Modern Slavery risks as professional development opportunity for other staff</li> </ul>
Our Students & Families		<ul style="list-style-type: none"> <li>■ Audit and document existing student programs on Anti-Modern Slavery</li> <li>■ Establish documented curriculum coverage of Anti-Modern Slavery issues in each school</li> </ul>	<ul style="list-style-type: none"> <li>■ Produce and distribute Anti-Modern Slavery information to all families across our schools</li> </ul>

## Remediation Pathways

Mercy Education is committed to ensuring it provides an 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 with, actions to address any harm caused to people and to mitigate the root cause, if Mercy Education 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, Mercy Education is a founding partner of *Domus 8.7* – an independent program to provide remedy to people impacted by Modern Slavery.

Mercy Education’s remediation efforts will be enhanced in the future through further policy development, a documented response procedure via engagement with *Domus 8.7* and other civil society stakeholders. Where Mercy Education is directly linked to modern slavery by a business relationship, Mercy Education is committed to working with the entity to ensure remediation and mitigation of the risk of its recurrence.

# Reporting Criterion 5: Effectiveness of Steps Taken under Criterion 4

Mercy Education notes that slavery of any form is a scourge on humanity, repugnant and entirely antithetical to our value system. As Christians, Catholics are called upon and obligated to take vigorous and immediate action to defeat these societal evils.

As such, the work against Modern Slavery has been accepted as an organisational-wide priority requiring both corporate and local responses.

Mercy Education has identified, a governance oversight model for Modern Slavery as follows:

Tier	Group	Accountabilities
1	Mercy Education Board	<ol style="list-style-type: none"> <li>1. The Mercy Education Ltd Board reviews the Modern Slavery Statement before it is approved for publication.</li> <li>2. Modern Slavery will be added as a recurring agenda item for Board meetings. The Mercy Education Board will receive copies of the minutes of the Anti-Modern Slavery Working Party.</li> <li>3. The separate Risk, Finance and Mission committees of the Board will receive feedback from, and have input into, the Anti-Modern Slavery Working Party; however, the Risk committee will provide general oversight on behalf of the Board.</li> <li>4. The Mercy Education Board will publish an Anti-Modern Slavery Policy.</li> </ol>
2	Mercy Education National Executive	<ol style="list-style-type: none"> <li>5. Three members of National Executive Staff are on the Modern Slavery Working Party.</li> <li>6. The National Executive Staff will receive the minutes of the Anti-Modern Slavery Working Party.</li> <li>7. Each member of the National Executive Staff will have exposure to, and input into, our Anti-Modern Slavery response via their Board committee accountabilities.</li> </ol>
3	Anti-Modern Slavery Working Party (AMSWP)	<ol style="list-style-type: none"> <li>8. The AMSWP convened in 2021, will take primary carriage of the Modern Slavery issue, and the Mercy Education response.</li> <li>9. Membership includes representation by Principals, Teachers, Business Managers, Procurement Officers and Students.</li> <li>10. Each school has delegated a Modern Slavery Liaison officer (MSLO) who will represent their school on the Working Party and lead the discussion of these issues locally.</li> <li>11. The AMSWP will supervise the implementation, and ongoing review of the Anti-Modern Slavery Road Map outlined earlier.</li> </ol>

# Reporting Criterion 6: Internal Consultation

Mercy Education Ltd does not own or control any other entities. Mercy Education is the sole member of Emmanuel College Warrnambool Foundation Limited.

Internal consultation is currently conducted by the appointed Anti-Modern Slavery Officers in each school.

# Reporting Criterion 7: Other Information

Mercy Education believes the scope of our modern slavery response in 2021 has been comprehensively documented across the first five criteria.

## Case Study

Mercy Education continues to develop its Anti-Modern Slavery resources and has already modified the evaluation process for major construction projects to include Anti-Modern Slavery practices of the tender organisation.

In 2021, Mercy Education sought inclusion of Anti-Modern Slavery practices as part of the tender process for prospective builders. Those builders that were shortlisted for the proposed development were interviewed, with their approach and commitment to Anti Modern Slavery discussed and evaluated. We believe the successful tenderer demonstrates an understanding of Anti-Modern Slavery and their role in mitigating the risks in their own supply chain. They have identified various sector-based risks, are committed to training of their staff, remediation, and ethical practices.

Mercy Education will continue to refine its contract documentation, selection criteria and tender process for major building projects during 2022.



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The University of Notre Dame Australia

# Modern Slavery Statement 2021

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## Introduction

This is the second statement prepared by The University of Notre Dame Australia to comply with the Modern Slavery Act 2018 (Cth).

We recognise the critical importance of measuring the outcomes of our efforts and evaluating our effectiveness and long-term impact and as such the University has continued to advance its maturity in identified key areas to ensure all reasonable steps are taken to respect human rights.

This statement sets out the progress made in 2021 to identify and address modern slavery risks in our business and supply chains as well as report on our focus for the years ahead.





## About Notre Dame

The University of Notre Dame Australia (UNDA) is a national Catholic University, extending from the West Coast of Australia in the City of Fremantle to the North-West town of Broome and across the continent to the heart of Sydney. We were Australia's first Catholic university and believe in offering a unique and distinctive education experience with an emphasis on allowing all our people to be the best person they can be.

While embracing 2,000 years of the Catholic Intellectual Tradition, we welcome people of all faiths or none at all. As an academic community, we welcome open and rigorous enquiry, debate, and discussion.

Across our three campuses we are educating just under 13,000 students and offer a comprehensive range of undergraduate and postgraduate programs.

### The Objects of the University of Notre Dame Australia

The Objects are defined in Section 5 of the Act of Parliament of Western Australia which marked Notre Dame's establishment in December 1989.

#### 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.

The University's Objects are at the heart of all we do as a Catholic university.

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 thousands of students across all three campuses.



**Professor Francis Campbell**  
Vice Chancellor



**Hon. Chris Ellison**  
Chancellor

## Joint Statement from the Vice Chancellor and Chancellor

The University of Notre Dame takes its role to tackle modern slavery across the world seriously. The University opposes all forms of slavery and human trafficking and is committed to taking steps to ensure that it does not occur in its operations or in its supply chains.

The University is pleased to report on our continuing commitment to ongoing action to understand, identify and address the risk of modern slavery in our operations and supply chains for our 2021 reporting period.

We continue to pursue a risk-based, continuous improvement approach to modern slavery. Through appropriate engagement with supply partners, contractual arrangements, and procurement principles, we strive to ensure that our suppliers comply with all legislation dealing with the prevention of modern slavery or human trafficking.

In 2021 we have continued to evolve our modern slavery risk management measures across our operations and supply chain, identifying emerging risks, and increasing awareness of modern slavery within our staff and students.

The University also strives to be a thought leader and educator in the field. A suite of Modern Slavery and Human Trafficking programs were developed in 2021 in order to train the leaders of today and tomorrow in the key concepts of modern slavery.

While we have made progress by implementing new policies, procedures, and practices, we acknowledge there remains more work to do to stamp out modern slavery and human trafficking.

This Modern Slavery Statement has been endorsed and approved by the Board of Directors of The University of Notre Dame Australia.

A handwritten signature in blue ink that reads "Francis Campbell".

Vice Chancellor

A handwritten signature in blue ink that reads "Chris Ellison".

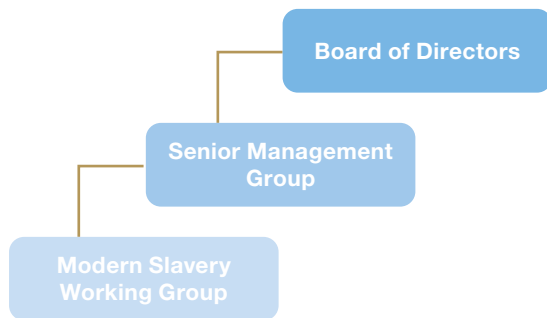
Chancellor



# Our Actions Taken in 2021

## Modern Slavery Working Group

In 2020 a cross-divisional and multidisciplinary Modern Slavery Working Group was established to design and implement foundational activities to identify, manage and address modern slavery risks within the University's operations. The initial group consisted of staff from Legal, Finance and Procurement. In 2021 the membership of the group has expanded to include representation from academic faculties, Human Resources, Information & Technology, as well as Facilities Management, which are key areas in assessing risks and providing tools for mitigation and remediation. In the current reporting period, the Working Group has focused on implementation of the Modern Slavery Road Map and continuing to increase the focus on awareness and training. The Group reports to the Board through the University's Senior Management Group.



## Collaboration

The University is part of the Australian Catholic Anti-Slavery Network (ACAN) which promotes collaboration, the sharing of resources and joint training among members.

Notre Dame will continue to be a member of ACAN, contributing and collaborating with the network. In January 2021, a representative from the Anti-slavery Taskforce, Catholic Archdiocese of Sydney presented to 140 first year medical students at the start of their university journey. The session covered how modern slavery interacts with health care from the board room to the emergency room.

The University is a member of the Australian Universities Procurement Network which allows us to collaborate, share resources and compare practices.

## Gap Analysis

As part of ACAN, we undertook a second gap analysis to assess our level of maturity in our approach to modern slavery risks across various areas. This included management systems, risk management, human resources and recruitment, customers and stakeholders and procurement and supply chain.

The results of the analysis indicate that the University has made progress in implementing processes for managing modern slavery risks, and these results will be used to inform the activities planned for 2022 and beyond.

## Supplier Engagement and Risk Assessment

Through our membership of ACAN, we have access to an online platform, tools and services provided by SEDEX (Supplier Ethical Data Exchange). We have used these tools to analyse all suppliers and operations to allocate a risk rating based on the High-Risk Sectors prescribed by SEDEX. Suppliers that fell into the High-Risk areas made up approximately 12.7% of our total supplier database, up from 9.5% in 2020 and representing 33.6% of the University's total spend.

Notre Dame is providing its Procurement team with the awareness and skills required to identify modern slavery as part of the supplier onboarding process. The process of exchanging information with our suppliers (RFx process) allows staff in these areas the opportunity to inform our potential suppliers of Notre Dame's commitment to combatting modern slavery, while also assessing suppliers for any potential modern slavery red flags. Risk assessments are conducted against High-Risk, High-Spend suppliers prior to relationship initiation and are managed throughout the contract lifecycle. The University also requires all supplier agreements to contain a Modern Slavery Clause, or side agreement, prior to execution.

We encourage our suppliers to promote better practices and continuous improvement, and we require them to comply with our minimum set standards for managing modern slavery risks.

## Education and Awareness

Key staff members from the Working Group and targeted stakeholders within the university have participated in workshops and training facilitated by ACAN. In 2021 we deployed the following E-Modules on our training platform to further increase awareness of Modern Slavery risks:

- Modern Slavery 101 which provides a comprehensive overview of modern slavery practices including who is vulnerable, how and why it occurs.
- Modern Slavery Business Relevance which provides a business perspective on modern slavery and why it is important to manage modern slavery risk.

The University now offers an undergraduate program in Social Justice, as well as specialised postgraduate programs in Modern Slavery and Human Trafficking. These programs reflect Notre Dame's ongoing commitment to promoting the study of social issues within our community, educating future professionals, and developing future leaders.

Our programs are designed to achieve the following:

- increase awareness of modern slavery, human trafficking, and the risks in the supply chain;
- increase awareness of ethical and legal obligations;
- increase knowledge and skills for design, implementation, and monitoring of ethical supply chains;
- increase knowledge and skills for statutory and public reporting;
- increase knowledge and skills for auditing, assurance, and accreditation of supply chains; and
- increase knowledge and skills for better policing of human trafficking.

## Policy Commitment

The University is committed to the ethical behaviour of staff and students. This includes acting on behaviour within UNDA or by suppliers that is illegal, unethical or that breaches human rights. This commitment starts with the Staff Code of Conduct. The code shows how our Values inspire us and guide our behaviours and actions. It defines what it means to work at and be part of UNDA, as well as our individual and collective responsibilities.

Individuals are encouraged to speak up if they see something that makes them uncomfortable or that is inconsistent with our Values. The code is a publicly available document.

## Supplier Engagement

Our Supplier on-boarding process has been updated to include modern slavery risks. Suppliers can declare their compliance with the Modern Slavery Act 2018 and provide their most recent Modern Slavery Statement.

We continue to monitor and review responses received as part of the 3-Year Roadmap.

## Remediation

If through our risk management activities or other business, the University becomes aware of indicators of people who may be experiencing modern slavery, we are committed to work with our suppliers and staff to understand the issues and where appropriate the matters will be referred to the relevant authorities for action.

The University also has a Whistleblower Policy that allows employees and contractors to raise concerns in a confidential manner including any modern slavery concerns, and the issues raised through this process are investigated accordingly.

We recognise the importance of gathering and sharing information, while ensuring confidentiality. Primary consideration must be given to safeguarding impacted people and ensuring that the impacted people are able to participate in the process.

# Our Plans for 2022 and Beyond

The Working Group of the University has developed a 3-Year Roadmap which aims to continuously improve the University's approach in respect to Modern Slavery. The importance of Modern Slavery is aligned to the strategic direction of the University which is currently finalising its new strategic plan. This is evident through the University's pursuit of Integral Human Development; encouraging students and staff to contribute to the common good of communities, and to recognise the dignity of the human person. The road map has been broken into three pillars of activity – Governance, Education and Supplier Engagement.

## Governance

### Build Internal Awareness

We will continue to drive awareness of Modern Slavery with a formalised training program for staff involved in managing parts of our operations and supply chains potentially exposed to modern slavery and human trafficking risks. We plan to incorporate modern slavery risk management training into our onboarding procedures and have also identified groups for whom training will be mandatory in line with their responsibilities. Our internal training modules will be kept under regular review to ensure they remain consistent with best practice in risk mitigation.

We will also continue to provide training opportunities for our suppliers.

### Policy Commitment

We will review existing policies and procedures to identify opportunities to strengthen our commitment through policy.

In 2022, we plan to develop and implement a Supplier Code of Conduct which outlines our minimum ethical standards, reporting requirements, and corrective action processes.

### Monitoring Effectiveness

We will develop metrics that will enable the University to evaluate the progress we are making with respect to addressing modern slavery and human trafficking.

## Education

### Developing Future Ethical Leaders

We will continue promotion of the University's programs in Modern Slavery and Human Trafficking as part of the continued desire to develop future ethical leaders.

### Collaboration

We will collaborate and engage with international foundations, human rights groups, and other university partners through our Modern Slavery and Human Trafficking programs, ensuring our students receive a global perspective. Close collaboration with industry will enable students to apply their knowledge and skills immediately and ensure that the community will benefit from the expertise and training they have acquired.

## Supplier Engagement

We will continue to increase our knowledge of our supply chains and implement a supplier compliance framework which includes:

- pre-screening for on-boarding new suppliers;
- regular evaluations for existing suppliers;
- auditing high-risk suppliers; and
- investigations as per whistleblower policy.

We will implement a risk-based approach to assessing and monitoring suppliers within our supply chain. In continuing to evolve our approach to risk-assessing our suppliers, we will focus on areas of highest potential risk to people in our supplier categories.

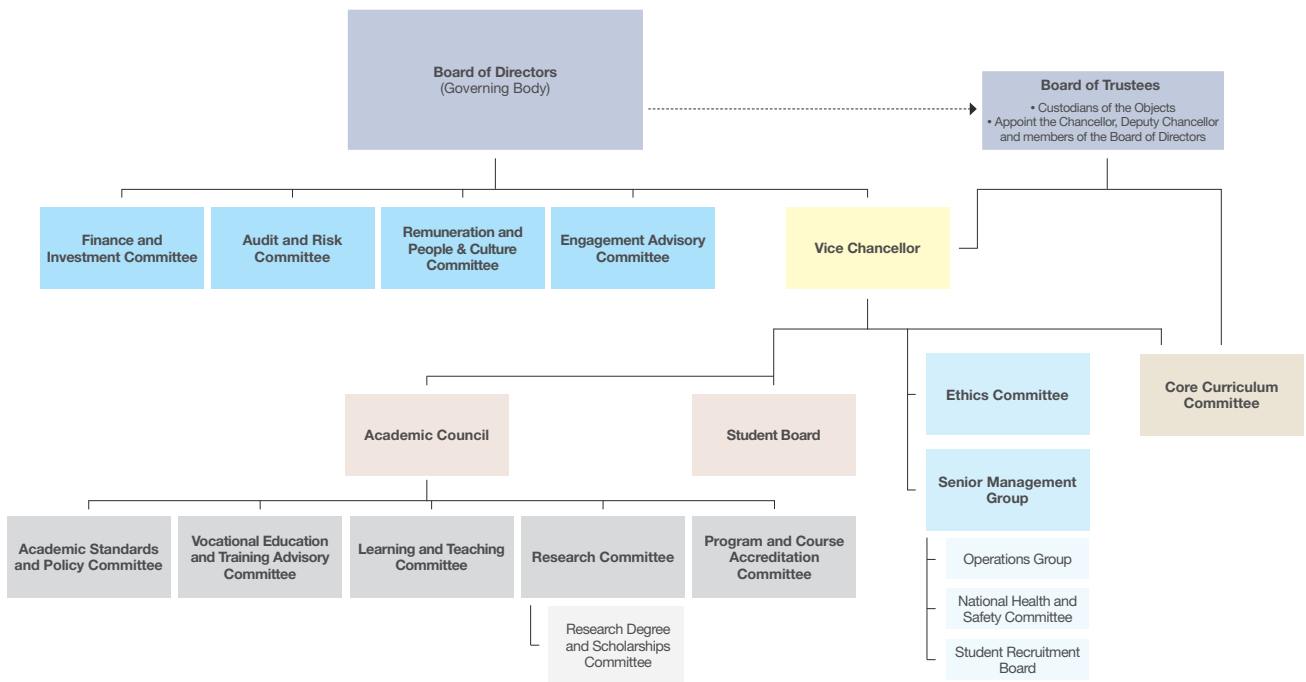
Where appropriate, we will deepen conversations with relationship owners of key suppliers in the areas identified as greater risk: facilities management and hospitality services, international suppliers and contingent workforce. We will analyse the supplier spend in these categories and where necessary engage in meaningful conversations with the suppliers about how they manage modern slavery risks in their supply chain.

# More about Notre Dame

## Our Organisational Structure

The governance structure of Notre Dame is determined by, and stems from, its Act of Parliament and Statutes. These specify the source, role and functions of its Trustees, Board of Directors and Board of Governors, and the Principal Officers and academic leaders of the University.

The Board of Directors is the governing body of the University and has control over management of the affairs and concerns of the University.



## Governance and Policies

Notre Dame is committed to a high standard in governance, compliance and ethical behaviour. Notre Dame has established codes, policies and procedures which guide the management and operations of the University. Our relevant policies include:

Code of Conduct: Staff, Students & Research	Workplace Bullying Policy
Procurement Policy	Work, Health and Safety Policy
Risk Management Policy	Misconduct Policy
Academic Integrity Policy: Staff, Students & Research	Staff Grievance Resolution Policy
Ethics Approval for Research Involving Human Participants Policy	Ethics Approval for the Use of Animals for Scientific Purposes Policy
Whistleblower Protection Policy	

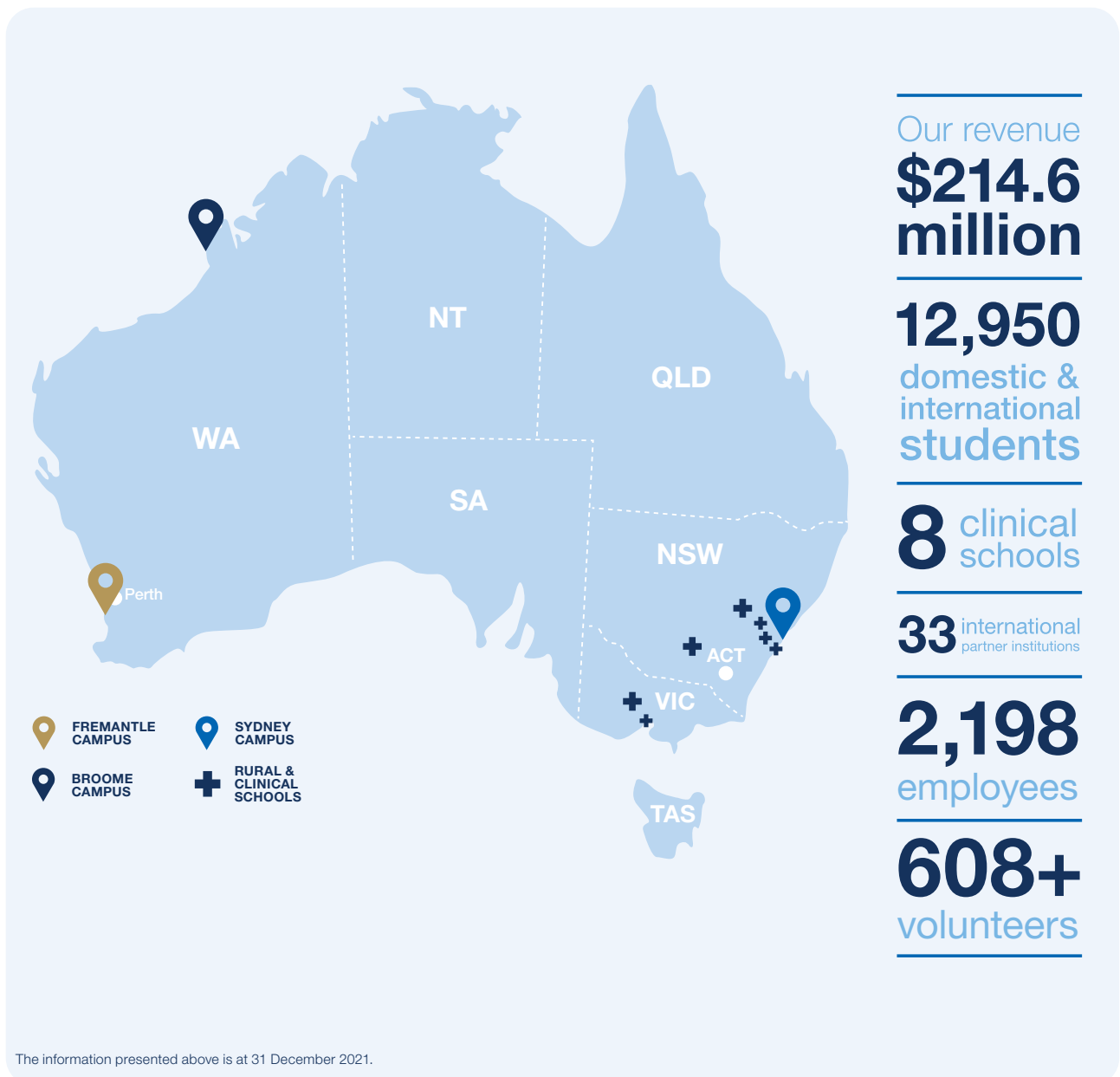
## Our Operations

The University of Notre Dame Australia is a tertiary education institution, offering undergraduate, postgraduate and VET courses across our three campuses. The University undertakes high quality, high impact scholarship and research aligned to the University's Objects and Mission, making a positive contribution to local, national and international communities.

The University also has contractual arrangements with a range of suppliers of goods and services that enable it to conduct its business. The arrangements vary in form and length, depending on the goods and services being provided. Service contracts (e.g. cleaning, security, etc.) generally extend across multiple years, while suppliers of goods may be one-off purchases or under agreement spanning multiple years.

The University has strong relationships with industry, in particular the professions of business, health, education, law, medicine and architecture. The majority of our students undertake industry placements relevant to their course of study while studying for their degree.

Our partnerships include universities from around the world, allowing our students the opportunity to enjoy the experience of studying abroad. These policies enable staff engagement in cross-institutional collaborative research.



# Modern Slavery Risks in Operations and Supply Chain

The University has undertaken a modern slavery risk review investigating its operations, suppliers and business relationships to identify and document modern slavery risks. The review has identified high risk areas and has helped guide initiatives to address modern slavery.

## Operational Risks

At Notre Dame, we are committed to a strategic and structured organisation-wide approach to risk management. Our approach supports the regular identification, management and reporting of risks and is aligned to the risk appetite prescribed by the Board.

Our dedicated risk and assurance team is accountable for the development and implementation of the organisation's approach to risk management as well as establishing the internal audit function. Internal audit plans are established and agreed upon each year. On completion of each internal audit engagement, the results are conveyed to management which in turn develops responses to the risks identified with an action plan. This is summarised and reported to the Audit & Risk Committee to ensure the risks are monitored for effectiveness and appropriately implemented.

## Human Resources

Since its foundation, the University has sought to create an environment where staff and students feel part of a community, welcoming people from all backgrounds, regardless of their faith. As a Catholic university, Notre Dame is committed to the pastoral care of staff and students.

Our staff are encouraged to participate in religious, academic and social events hosted throughout the year, creating a strong Christian intellectual life on our three campuses. There are also opportunities to engage with members of the broader community through events such as public lectures, debates and presentations hosted by the University.

Notre Dame has 2,198 employees and over 600 volunteers nationally.

The University's Enterprise Agreement (EA) is negotiated between its employees and their representatives (National Tertiary Education Union). The EA outlines the agreed terms and conditions of employment. This is approved by the Fair Work Commission, ensuring the employees' rights are fair, reasonable, and legally acceptable.

Despite this, there is a constant need to be diligent when recruiting our staff. Notre Dame recruits employees both directly and with the assistance of recruitment agencies. The University has spent approximately \$0.5 million on contract and agency workers in 2021.

Prior to engaging any person to work at the University, their working rights are checked. The University engages a migration lawyer to support the process of obtaining sponsorship or a visa for a potential overseas employee. These steps are designed to ensure that the University avoids the exploitation of labor.

## Impact of COVID-19

In 2021 the University continued to manage the impacts of COVID-19 similar to the rest of the higher education sector.

We recognise that the COVID-19 pandemic has exacerbated existing vulnerabilities faced by already at-risk groups, as a result of loss of income or fear of loss of income, as well as requirements to work excessive hours to cover capacity gaps and increased demand due to supply chain shortages. Our students are also vulnerable to the COVID-19 pressures and related financial hardships and in recognition of this, we have in 2021, continued to provide emergency financial support through the Financial Hardship Fund that was launched through the generosity of our benefactors.

We also recognise that COVID-19 continues to impact the ability of our suppliers to manage the supply chains and maintain good practices. This can increase the risk of slavery to vulnerable individuals in our operations and supply chain, as suppliers battle to deliver on pandemic requirements including masks, sanitisers and higher frequency cleaning. Whilst we have not identified any specific instances of modern slavery harm, we continue to consider the ongoing impacts of COVID-19 on the global supply chains as well as continuing to engage with our suppliers in reviewing and improving our supplier on-boarding processes to reduce this risk.

## Our Suppliers

Notre Dame has over 4,400 suppliers of which approximately 200 represent 80% of our spending.

In 2021, 97.79% of the University's total spend with suppliers was within Australia, with the USA (1.41%), the United Kingdom (0.21%), Singapore (0.45%) and Germany (0.31%) being the main countries of origin of supplier spend outside the country.

The top five industry sectors used to supply the University in 2021 were service-driven and include Construction, Technical Business Services, Information Technology, Education and Health Care.

Goods and services include cleaning, IT consulting, IT hardware, construction and facilities maintenance, medical equipment and consumables, stationery supplies, waste disposal and professional and education services.

## Supplier Risks

To identify modern slavery risks, we consider the following risk factors or indicators:

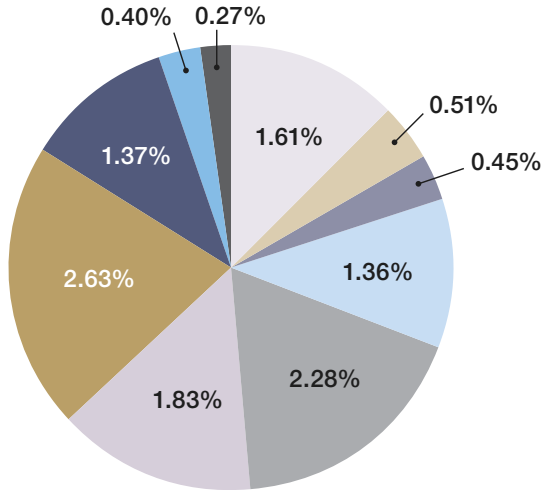
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by ACAN's Modern Slavery Category Risk Taxonomy, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** – The original source of goods and services that are procured from Australian Companies and the use of the 2018 GSI to estimate the prevalence of modern slavery in that location.
- **Workforce profile** – 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).

Identifying modern slavery risk in our own supply chain is fundamental to our risk management program. While we have found no evidence of this to date, we are adopting a proactive approach and will continue to work with our suppliers over time to ensure any risks are uncovered and addressed.

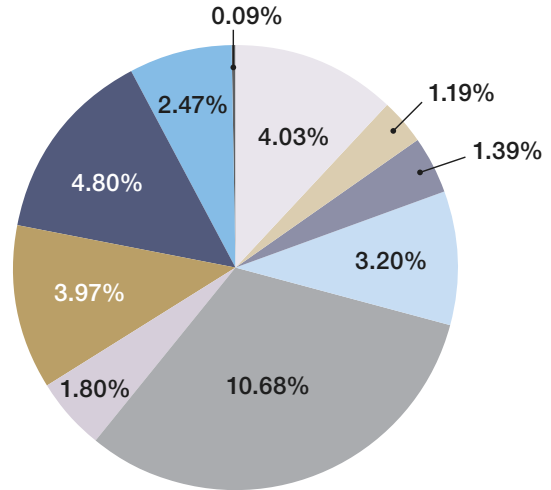
From a total of 4,483 suppliers, 12.7% have been identified as high risk and categorised by number and percentage in the charts below:

CATEGORY	NO OF SUPPLIERS	%
<b>Total number of suppliers</b>	<b>4,483</b>	<b>100.00</b>
Building and Construction	72	1.61
Cleaning Services	23	0.51
Security Services	20	0.45
Facility Management	61	1.36
Information & Communications Technology	102	2.28
Educational Supplies	82	1.83
Retail	118	2.63
Food and Beverage	61	1.37
Waste Services	18	0.40
Office Supplies	12	0.27
<b>Total in high risk categories</b>	<b>569</b>	<b>12.7</b>

**Percentage of Suppliers in the High Risk Category (12.7%)**



**Percentage of Total Spend in the High Risk Category (33.6%)**



**Key**

- Building and Construction
- Information & Communications Technology
- Food and Beverage
- Cleaning Services
- Educational Supplies
- Waste Services
- Security Services
- Office Supplies
- Facility Management
- Retail

## Effectiveness Assessment

The University is committed to assessing the outcomes of its efforts in order to evaluate effectiveness and long-term impact of modern slavery risk management initiatives and processes.

We have reviewed and taken measures to strengthen our internal processes to ensure we make progress against the goals defined in the last financial year. Our governance model includes the Modern Slavery Working Group, which meets monthly and reviews our actions and progress in the implementation of our 3-Year Roadmap. We will continue to evaluate our internal strategy and the implementation of the roadmap on an ongoing basis.

In 2021, the University continued to focus its resources on identifying areas of modern slavery risks and formalising our Modern Slavery Risk Management Initiatives roadmap, which provides guidance around reporting and corrective actions to be taken, as well as improving our internal processes for assessing the effectiveness of our initiatives.

We have developed and implemented specialised programs in Modern Slavery and Human Trafficking to promote the study of social issues within our community, educating future professionals and developing future leaders. In 2022 we are looking to further develop awareness and improve accessibility to modern slavery information by creating a dedicated website where users can access information and receive updates on the University's efforts to manage modern slavery risk.

In the current reporting period, we continued to engage with our suppliers to assess and manage our modern slavery risks, and this work includes amending agreements or terms and conditions for modern slavery clauses in our top 200 suppliers.

The University also engaged with ACAN on the implementation of the following:

- 1) Additional training modules for University students and employees; and
- 2) Targeted audits of suppliers deemed as high risk (through engagement of an external third party).





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## **Catholic Education Diocese of Bathurst Modern Slavery Statement 2021**



This Modern Slavery Statement 2021 is for  
**Catholic Education Diocese of Bathurst**  
**Gilmour Street Bathurst NSW 2795**

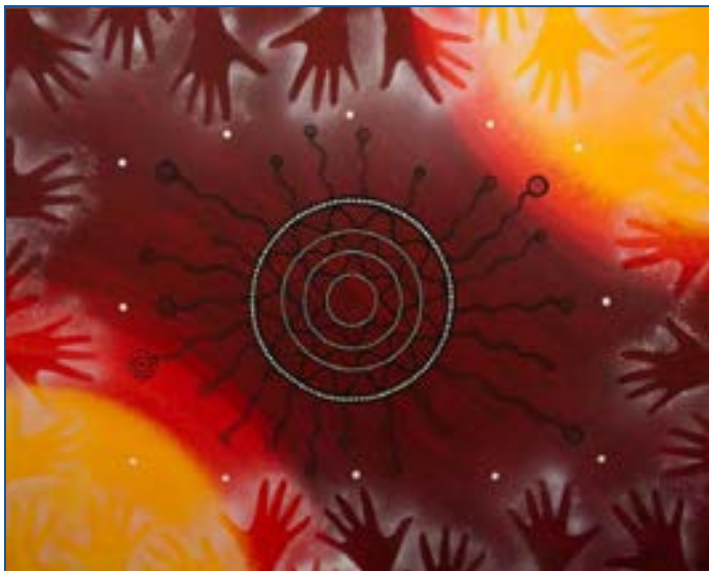
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## Catholic Education Diocese of Bathurst

Catholic Education in the Diocese of Bathurst (CEDB) provides a diverse range of educational options, from small primary schools to large secondary schools. More than 9000 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.



*Ngumba-dal-ngila-nha  
mawang, bangamalanha,  
yuranha mawang*

*Unite together, share with  
each other, grow together*

*Artist: Tirikee*

*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.*

# About Catholic Education in the Diocese of Bathurst

## **OUR MISSION**

Excellence in education within a Christ-centred environment in which all flourish

## **OUR 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 of school communities of faith, inclusion and missionary discipleship
- LEARNING:** Learning that engages students as lifelong learners and creative and critical thinkers  
A proactive focus on wellbeing that supports the learning of all students  
Building collaborative expertise of all teachers to continually improve their practice
- STEWARDSHIP:** Building leadership capacity for a sustainable future  
The effective use of data to support system priorities and drive system and school improvement  
Systems are streamlined, aligned and effective



**This Modern Slavery Statement and Endorsement was approved by Mrs Christina Trimble, the Executive Director of Schools Bathurst Diocese, and Responsible Person as defined by the Act, on behalf of the governing body - Catholic Education Diocese of Bathurst on 31st May 2022.**

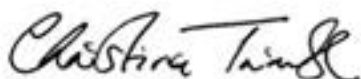
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*Action against modern slavery is fundamental to Catholic Social Teaching. As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain 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  
31st May 2022



**This Modern Slavery Statement and Endorsement was approved by Bishop Michael McKenna, the Bishop of the Diocese of Bathurst, and Responsible Person as defined by the Act, on behalf of the governing body - The Trustees for the Diocese of Bathurst on 5th June 2022**

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*Those of us who have responsibility for the stewardship of goods need to develop a practical alertness to supply chains that may be compromised by links to modern slavery and human trafficking. Our Diocese and schools are committed to this vigilance and the responsible practices that it leads us to adopt. Pope Francis has written powerfully, on a number of occasions, about the scourge of modern slavery.*

“Today, as in the past, slavery is rooted in a notion of the human person which allows him or her to be treated as an object. Whenever sin corrupts the human heart and distances us from our Creator and our neighbours, the latter are no longer regarded as beings of equal dignity, as brothers or sisters sharing a common humanity, but rather as objects. Whether by coercion or deception, or by physical or psychological duress, human persons created in the image and likeness of God are deprived of their freedom, sold and reduced to being the property of others. They are treated as means to an end.”  
Pope Francis

+ Michael McKenna  
Bishop of Bathurst  
5th June 2022

## Disclosure Note

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This statement has been made on behalf of *Catholic Education Diocese of Bathurst*. This Statement covers all entities owned or controlled by *Catholic Education Diocese of Bathurst*.

**ABN 73 470 086 952**

## 2021 Modern Slavery Risk Management Initiatives

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Initiatives implemented in 2021 were:

- continued contact with Australian Catholic Anti-Slavery Network
- communicated Modern Slavery Policy to Principals and CEDB Staff
- attendance of Modern Slavery Working Group at professional development opportunities
- participation in the (ACAN) Risk Management program
- establish foundations for a Modern Slavery Gap Analysis
- joined Sedex for engagement with suppliers

## Plans for 2022

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Implementation strategies for 2022 are:

- development of a cross sectoral working group at CEDB to plan, implement and oversee Modern Slavery actions and initiatives - Modern Slavery Working Group (MSWG)
- communication of this policy and procedures to tier 1 business partners
- on-going assessment of modern slavery risks within our operations and supply chains especially through analysis of the Modern Slavery risk analysis by category
- engage suppliers via Sedex to commence assessment of specific modern slavery risks in high spend categories
- the development of a Risk Framework with effective, efficient and transparent controls to manage and mitigate risks
- integration of modern slavery requirements into tenders and contracts
- integration of modern slavery requirements into HR processes and procedures



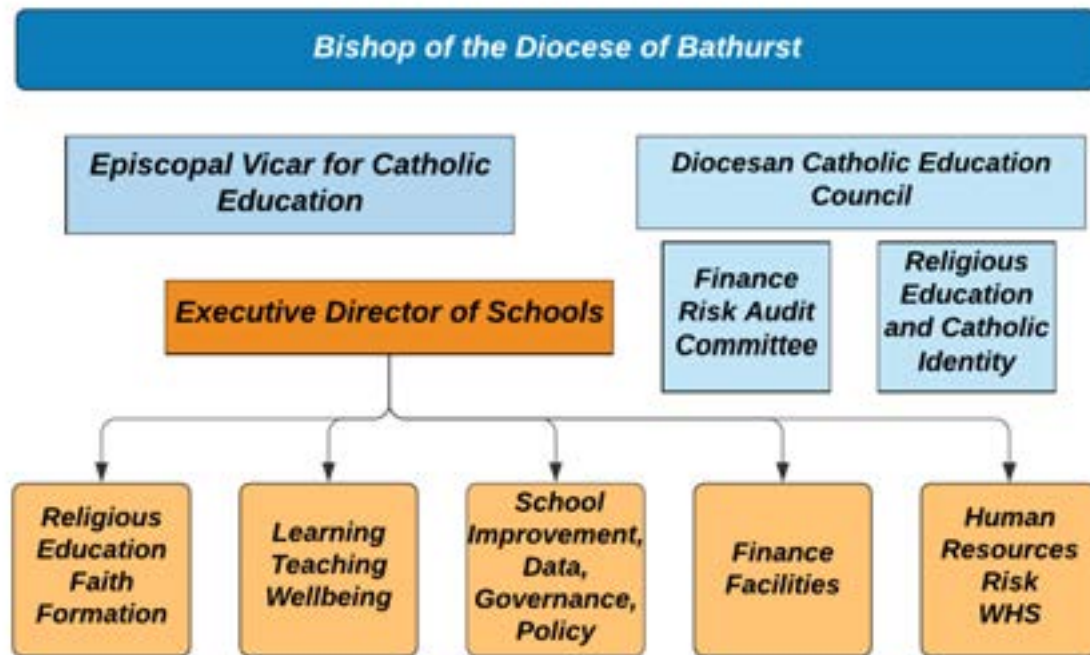
## Plans Beyond 2022

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Beyond 2022 Catholic Education Diocese of Bathurst (CEDB) plans are to implement:

- pre-engagement due diligence checks on potential suppliers and business partners
- a communication strategy to convey CEDB expectations to suppliers and business partners
- raise awareness about modern slavery with staff and key stakeholders
- an analysis of country of origin sourcing for goods and services
- use Sedex as a resource to gain insight into tier two suppliers in high risk categories
- protocols and mitigation processes to ensure human rights impacts caused by our activities, are effectively addressed

## Our Organisational Structure



## Our Governance Framework

Catholic Education Diocese of Bathurst at all levels of management, are committed to maintaining and enhancing strong governance. Our Governance Risk Structure underpins our vision to provide high quality Catholic Education in the Diocese of Bathurst.

The Leadership Team, who oversee the governance and review of activities in the areas of Faith, Learning and Teaching, Stewardship, and School Improvement, also reviews anti-slavery initiatives.

In relation to modern slavery risk management the Leadership Team:

- reviews policy and procedures
- monitors the effectiveness of the management system and risk framework
- maintains knowledge of risks relevant to modern slavery
- ensures appropriate training is undertaken throughout the system
- requests suppliers use diligence in addressing modern slavery procurement
- share the Self Assessment Questionnaire results with CEDB, DCEC and FRAC and RECI as required
- reports to the Bishop on the effective management of modern slavery initiatives

The Modern Slavery Working Group operates across a number of teams but they are mainly located in Human Resources/Risk/WHS, and Finance/Facilities teams.



## Our People

The staff employed through Catholic Education Diocese of Bathurst come from a wide range of backgrounds, nationalities and experiences. They live in small communities, remote locations, rural areas, and large cities. They range from those newly graduated to those preparing for retirement after a lifetime of service.

The staff headcount is just under 1300 with these being composed of approximately 900 permanent employees and 400 temporary employees. The Diocese also employs a large number of casual staff who are not included in these figures.

The staff gender balance is approximately 80% female and 20% male. Staff are also employed who are immigrants, disabled, and/or indigenous.

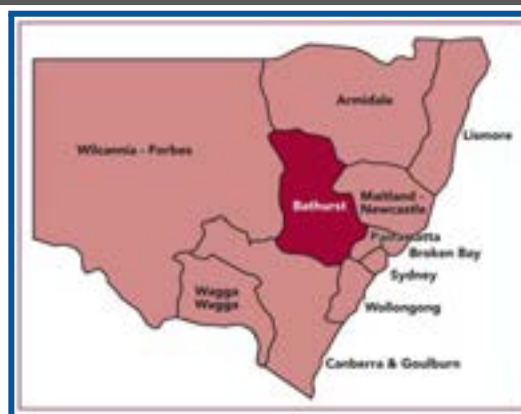
All staff are employed under the current applicable award conditions.

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

Bathurst Diocese 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 centres such as Cowra, Wellington, Lithgow; and small, rural and isolated communities with populations down to 400 people.



## Our Operations

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Catholic Education Diocese of Bathurst is engaged in providing high quality Catholic education to students from Kindergarten to Year 12 in the Bathurst Diocese.

The Diocese has 33 schools which are either Primary schools - Kindergarten to Year Six; Central Schools - Kindergarten to Year Ten, or Kindergarten to Year Twelve; or Secondary Schools - Year Seven to Year Twelve.

Catholic Education Diocese of Bathurst permanently employs approximately 1300 staff and educates over 9000 students. The diocese caters for families in 17 parish centres.

Historically the diocese has had a wide variety of arrangements for the supply of goods and services to schools and the two CEDB offices. These arrangements had been developed to address the needs of school communities and often involved local purchasing and arrangements which maintained supplies and employment in the local community. 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.

## Our Expenditure

---

CEDB has an annual turnover of over \$130 million.

The major areas of expenditure are in

- wages and employment costs 60%
- buildings, construction and fabrication services 23%
- ICT hardware and infrastructure 1%
- maintenance of property and facilities 2%
- teaching and learning supplies 5%



## Modern Slavery Risks in Operations and Supply Chain

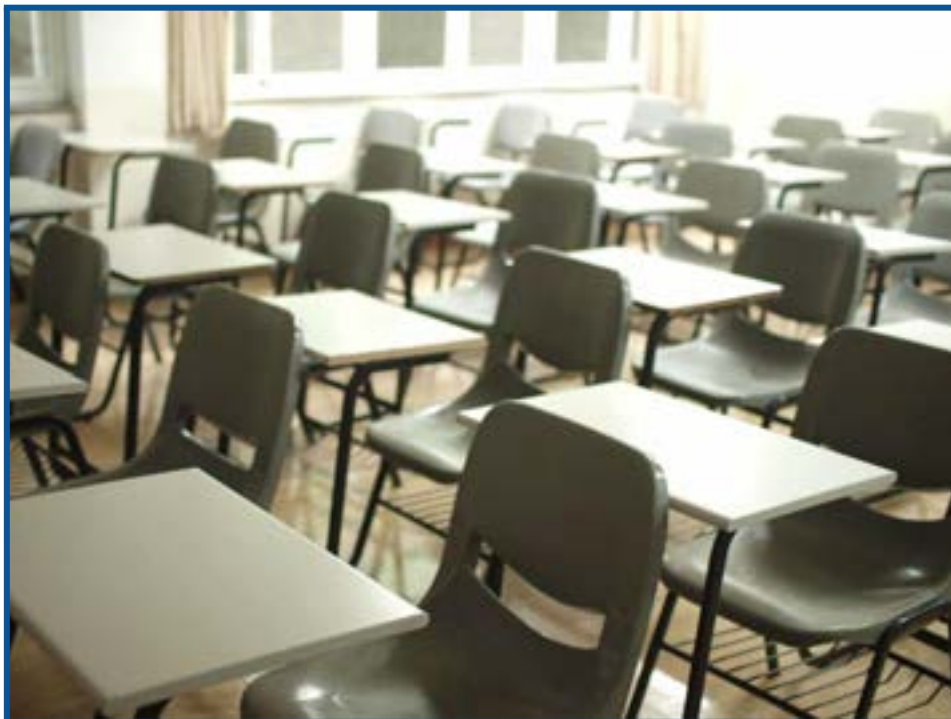
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CEDB relies upon a range of networks to meet the needs of communities, schools and CEDB offices. It is important to identify risks and take action to mitigate or rectify these risks. CEDB, as a business, is responsible for ensuring that risks are addressed in operations, in supply chains, and throughout the CEDB communities.

CEDB as a business assesses risk in all its activities, but specific focus is placed upon higher-risk activities, operations, supply chains and contractor engagement. These include:

- **Sector and industry risks:** Specific sectors and industries have higher modern slavery risks because of their characteristics, products and processes
- **Product and services risks:** Specific products and services have higher modern slavery risks because of the way they are produced, provided or used
- **Geographic risks:** Specific countries have higher risks of modern slavery, due to poor governance, weak laws, conflict, migration flows and socio economic conditions
- **Entity risks:** Some entities have particular modern slavery risks because they have poor governance structures, historically treat workers poorly or a record of human rights violations

Although assessing risk is a useful tool, modern slavery risks can also occur in areas that seem low risk. Continually reviewing risks to identify changes is a vital component to addressing and eradicating Modern Slavery.



## Addressing Operational Risks through the Gap Analysis

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Catholic Education Diocese of Bathurst recognises that as a business we can have profound impacts upon the vulnerability of workers, including in Australia and overseas. The undertaking annually, of the Gap analysis, is the first step in reflecting upon our actions and reactions in relation to addressing Modern Slavery.

The Gap analysis was completed in December 2020 and again in November 2021 in conjunction with ACAN as a component to further developing Modern Slavery processes, risk assessments and plans for future development.

The results of the Gap indicate that CEDB is at the earliest stages of the process and has plenty of scope for development and addressing the issues.

## Our Supply Chain

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CEDB procures goods and services for the education industry. These generally would include the following fields:

- Building, Construction and Fabrication Services
- ICT and Electronic Equipment, Components and Supplies
- Property and Facilities Maintenance Services
- Office, Building and Teaching Supplies and Services
- Building and Engineering Materials, Fittings and Consumables

CEDB suppliers are usually located in Australia. It is not common practice to source goods and services directly from overseas suppliers. However, CEDB's Australian suppliers may source goods and materials from overseas suppliers. An in-depth analysis of country of origin sourcing has not as yet been undertaken.

No disclosures have been made to CEDB regarding the source or identity of suppliers or their sourcing of goods and services.

## Addressing Supply Chain Risks

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The 2021 Modern Slavery Gap Analysis highlighted the CEDB highest risk suppliers. These high risk suppliers fall into the following categories:

- **Sector and Industry Supply Chain** – specific sectors and industries deemed as high risk
- **Commodity/product and Services Supply Chain** – specific products and commodities deemed as high risk
- **Geographic location** – goods and services may come from countries which are deemed high risk
- **Workforce profile** – the type of labour involved in the production of goods and services



CEDB has taken some steps to understand the modern slavery risks in the operations and supply chain. While the DCEC and CEDB Leadership Team acknowledge that modern slavery may occur in the business sector, the current approach to identifying and managing modern slavery risks remains ad hoc. Modern slavery risk management processes have not been integrated into existing business systems. There are opportunities to take more action.



CEDB has not incorporated modern slavery issues into employee or contractor training or awareness programs. Current employment and onboarding processes do not reference modern slavery risk management. Current labour hire and outsourcing practices do not identify modern slavery risk areas.

Modern slavery risks have begun to be considered with a focus upon major suppliers and contractors. Supply contracts do not yet refer to modern slavery risks and the supply chain has not been mapped to assist to understand priority suppliers or risk categories. CEDB has started the process of engaging suppliers with modern slavery risks and opportunities.



Modern slavery is not currently considered in the CEDB business risk framework. Currently there are no systems or processes in place to assess or manage potential modern slavery risks in the operations, supply chain, business partnerships or industry sector.

CEDB has limited understanding of customer or stakeholder expectations around modern slavery risk management and does not currently elicit feedback from them on this issue. Communications mechanisms need to be incorporated for customers, stakeholders and workers in supply chains. Information on modern slavery risks needs to be made publicly available.



## Change Analysis 2020 - 2021

Based upon the Gap Analysis, a review has been undertaken and a Change Analysis Heat Map has been developed. It is a reflective tool which forms part of the ongoing analysis, discussion and implementation of Modern Slavery initiatives at CEDB.

It indicates 6 areas where improvement has begun

1. business systems
2. risk framework
3. customer attitude
4. information provision
5. feedback mechanisms
6. worker voice

It indicates 14 areas of no change

It indicates 2 area where negative effect has been noted

1. monitoring and reporting
2. identifying external risks

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	Red	Red	-
	Commitment	Red	Red	-
	Business Systems	Red	Yellow	▲
	Action	Red	Red	-
	Monitoring & Reporting	Red	Red	▼
Risk Management	Risk Framework	Red	Red	▲
	Operational Risk	Red	Red	-
	Identifying External Risks	Red	Red	▼
	Monitoring and Reporting on Risk	Red	Red	-
Human Resources and Recruitment	Awareness	Red	Red	-
	Policies and Systems	Red	Red	-
	Training	Red	Red	-
	Labour Hire / Outsourcing	Red	Red	-
Customers and Stakeholders	Customer Attitude	Red	Red	▲
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Red	▲
	Worker Voice	Red	Red	▲
Procurement and Supply Chain	Policies and Procedures	Red	Red	-
	Contract Management	Red	Red	-
	Screening and Traceability	Red	Red	-
	Supplier Engagement	Red	Red	-
	Monitoring and Corrective Actions	Red	Red	-

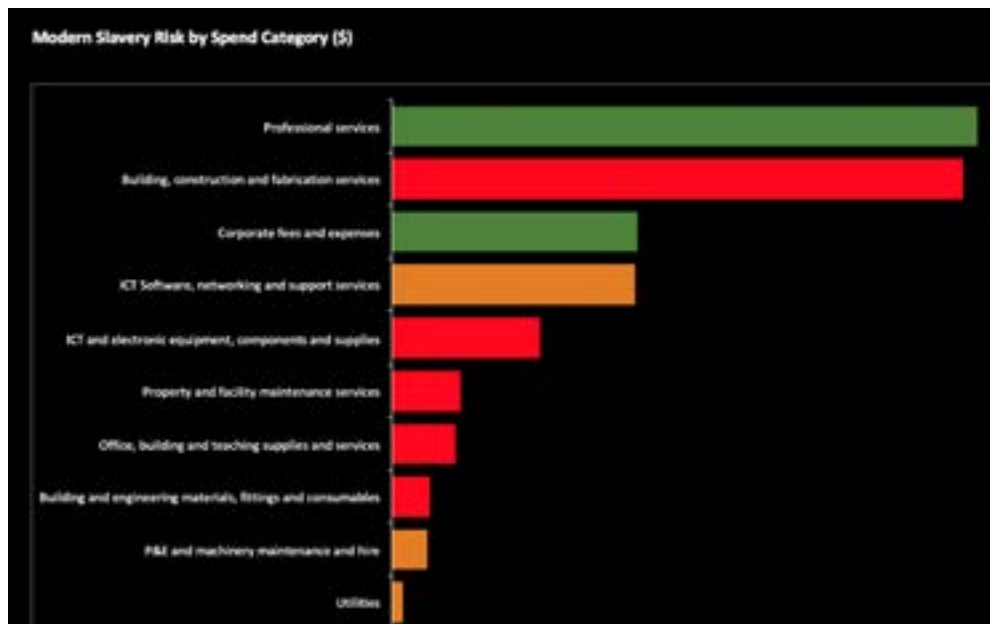
## Top 10 Categories of CEDB expenditure

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It is identified that in the top 10 Categories of CEDB expenditure there are 5 spend categories of high risk:

- Building, Construction and Fabrication Services
- ICT and Electronic Equipment, Components and Supplies
- Property and Facilities, Maintenance Services
- Office, Building and Teaching Supplies and Services
- Building and Engineering Materials, Fittings and Consumables

These 5 Spend Categories will form the basis of CEDB ongoing focus to ensure processes are developed to address Modern Slavery in the companies the CEDB deals with.



## Top 13 Companies for CEDB expenditure

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It is identified that in the top 13 Companies which CEDB expenditure was greatest with in 2021, 7 are companies of high risk.

These 7 Companies will form the basis of CEDB focus in 2022 to ensure processes are developed to address Modern Slavery in these companies.

In order to address the issues of Modern Slavery with these companies and the broader community CEDB will in 2021 and beyond

- implement a Modern Slavery Committee at CEDB to oversee and guide the work of the CEDB
- develop a supplier code of conduct
- develop ongoing processes and documentation to guide the work of modern slavery
- develop supplier contracts which include modern slavery principles
- based on risk profile of suppliers onboarded to Sedex develop a supplier on-boarding process for modern slavery risk
- continue and broaden participation in modern slavery training, workshops and/or meetings
- develop a road map been developed to improve how modern slavery is addressed
- develop and begin monitoring processes for suppliers signing up to join Sedex
- collect data and metrics upon which to base analysis and plan progress

## Modern Slavery Action Plan

Based upon the the Gap analysis, an Action Plan has been developed for the 5 areas of focus. The Action Plan lists

- the 5 areas to address
- the actions to undertake
- priority of the work - **highest priority** or **already begun**. No colour indicates future focus areas.

Management Systems						
Topics	Actions					
Governance	Educate Diocesan Catholic Education Council (including FRAC and RECI) on modern slavery risks and legislative requirements	Establish governance framework for managing modern slavery risks	Update Leadership Team on the modern slavery program and ensure responsibilities are understood			
Commitment	Educate staff on modern slavery risks and legislative requirements	Assign responsibilities for managing modern slavery risks	Showcase the actions taken to address modern slavery risks	Annual Statement of commitment from the diocese		
Business Systems	Review existing business systems against the requirements of modern slavery legislation	Integrate modern slavery risk management into existing business systems	Integrate modern slavery risk management into supplier review processes	Engage key internal stakeholders to review existing business processes	Ensure elements of modern slavery risk management systems are reflected across the business	
Actions Taken	Engage key business areas and stakeholders to implement priority actions	Risk based focus -security and cleaning -uniforms -canteen -IT & outsourcing -construction	Establish modern slavery working group to oversee and implement the action plan	Develop a detailed action plan for addressing modern slavery risks	Establish goals, targets and KPIs to effectively address modern slavery risks	Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations and supply chain
Monitor & Report	Undertake a review of modern slavery risks	Expand data collection process	Integrate modern slavery risk findings into management reports	Identify opportunities for leadership on modern slavery data collection and reporting processes	Continuous improvement - Adapt	



Human Resources and Recruitment						
Topics	Actions					
Awareness	Share internal modern slavery awareness program	Incorporate modern slavery information into induction programs				
Policies & Systems	Develop and promote modern slavery policy internally and externally	Incorporate modern slavery risk management specific responsibilities into position descriptions	Encourage lowering tolerance approach to modern slavery among all staff and contractors			
Training	Incorporate modern slavery awareness training into induction programs	Create instructional materials	Identify opportunities for sharing information and training resources across			
Labour Hire & Outsourcing	Regularly review and update hiring and on-boarding processes	Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts	Deliver modern slavery training to priority labour hire companies and contractors @tendering process (monitor sub-contracting)	Assess labour hire contractors and outsourcing programs for modern slavery risk - Schools - HR and Facilities		

Customers and Stakeholders						
Topics	Actions					
Attitude	Develop customer and stakeholder communication strategy	Develop awareness raising programs for customers and stakeholders	Develop curriculum appropriate to the issue - Parent - Teacher - Student			
Information	Publicly state the organisation's position on modern slavery	Develop Modern Slavery Policy/ Processes and Employee/Supplier Code of Conduct and publish on website	Develop targeted information for key stakeholders			
Feedback Mechanisms	Train staff and stakeholders on modern slavery feedback/reporting systems	Establish stand-alone confidential modern slavery hotline for staff and contractors	Establish systems and processes to evaluate and take immediate action on feedback	Engage external third-party labour-rights auditors to validate worker voice data		

			received			
Worker Voice	Implement worker voice data collection and reporting system	Review worker voice data collection options for at-risk workers in the supply chain	Run pilot project worker voice program for high risk suppliers	Develop a comprehensive modern slavery remediation program that is well resourced and supported		

Risk Management Actions						
Topics	Actions					
Risk Framework	Incorporate modern slavery risk assessment into existing risk framework	Educate stakeholders in the concepts of Modern Slavery and how it impacts upon work	Include modern slavery risk review into risk management policies and procedures	Develop team and process to commence action planning	Establish systems and processes to evaluate and take immediate action on identified risks	
Operational Risk	Map operations against potential risks of modern slavery or exploitation	Develop action plan to address risks of modern slavery in internal operations	Enhance internal capacity to identify and manage operational risks	Implement actions to mitigate or eliminate operational risks	Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks	
External Risk	Develop risk management plan to address modern slavery risks among priority suppliers	Undertake modern slavery risk review of priority direct suppliers	Assign resources to identify, prioritise and manage operational and supply chain risks	Map modern slavery risks and vulnerabilities along extended supply chain	Develop and monitor implementation of corrective action plans	

Procurement and Supply Chain Actions						
Topics	Actions					
Policies and Procedures	Incorporate modern slavery requirements into existing policies and procedures	Include general clauses on modern slavery in all supplier contracts				
Contract Management	Incorporate performance standards and contract evaluation criteria for high risk contracts	Conduct desktop review of high-risk suppliers				
Screening and Traceability	Identify and document direct suppliers	Undertake mapping of suppliers	Undertake gap analysis of procurement policies and			

			procedures			
Supplier Engagement	Engage all selected suppliers in modern slavery awareness programs	Develop targeted communications & engagement programs for high risk suppliers				
Monitor & Corrective Action	Establish a supplier monitoring program	Develop a monitoring system to assess ongoing performance	Develop corrective action plans to address modern slavery risks among high risk suppliers	Work with suppliers to identify gaps and address barriers to implementation		

## Addressing 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.

Where CEDB is directly linked to modern slavery by a business relationship, CEDB is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are being developed for inclusion in contracts with high-risk suppliers who must notify and consult with CEDB to ensure victim centred remediation processes are implemented to the satisfaction of CEDB.

When suspicions of modern slavery practises come to CEDB attention, staff will contact relevant law enforcement agencies for an assessment, investigation, action planning and implementation of a remediation process. When a person is in immediate danger, staff will contact law enforcement. In situations where people are potentially at immediate risk, CEDB staff will contact DOMUS 8.7 - the independent modern slavery advisory service founded by ACAN. CEDB staff will be able to access guidance and expertise in regard to case assessment investigation, corrective action, mediation and remedy.

## Effectiveness Assessment

CEDB joined ACAN and began addressing Modern Slavery in 2020. Currently there is little data to report upon but the following is evident and indicates that the process has begun.

- Modern slavery elearning modules have been completed voluntarily by CEDB staff.
- 7 companies have identified as having a working relationship with CEDB, through the Sedex site. This means they have completed the first phase of implementing modern slavery processes and practices into their company by joining Sedex as suppliers. The next step is to complete the Self Assessment Questionnaire and share with CEDB
- These companies have identified in the following categories
  - 2 = Apparel and textiles (uniforms, footwear, workwear, linens)
  - 4 = Construction/Project management/Architecture/Property developer
  - 5 = Information and Communications Technology (ICT)
  - 2 = Office, educational supplies
  - 1 = Professional and administrative services and supplies, including legal, consulting and accounting services

## Consultation with Entities Owned or Controlled

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CEDB does not control or own other entities and thus does not report on this.

## Other Areas

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### COVID Impact

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CEDB recognises that the global and local impact of COVID-19 will:

- create new risks and abuses for vulnerable people
- create economic disruption resulting in increased risks for the poorest people
- worsen discrimination, especially to vulnerable individuals
- increase risk, especially to migrant workers in vulnerable situations
- disrupt efforts to assist individuals in vulnerable situations
- continue to impact vulnerable people for many years to come

As a result of COVID-19, CEDB will need to:

- build community knowledge and capacity to develop resilience to slavery and exploitation
- prevent the continuation of financial conditions that lead to slavery and exploitation
- enlist our suppliers and contractors to respect the rights of vulnerable individuals in the supply chain

### Staff Shortages

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CEDB recognises that staff shortages, may impact locally by:

- increasing pressure upon labour hire companies to employ vulnerable individuals
- creating new risks and abuses for vulnerable people
- increasing risk, especially to migrant workers in vulnerable situations
- continuing to impact vulnerable people for many years to come

As a result of staff shortages, CEDB will need to:

- build community knowledge and capacity to develop resilience to slavery and exploitation
- implement processes to prevent the continuation of staff shortages that lead to slavery and exploitation
- enlist our suppliers and contractors to respect the rights of vulnerable individuals in the supply chain

End of Statement 2021

# Modern Slavery Statement

1 January – 31 December 2021



DIOCESE OF  
**LISMORE**  
CATHOLIC SCHOOLS LIMITED

**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**



Mr Adam Spencer

Chair – DLCSL Board of Directors

The DLCSL Board is committed to the task of reducing Modern Slavery in our supply chain and over time as our governance model continues to evolve working toward elimination.

The Board understands that this will require a long term effort and the DLCSL views appropriate diligence on this risk as a very important component of our social responsibility and human rights obligations.

The Board endorsed our Modern Slavery Statement on 24 May 2022.

A handwritten signature in black ink, appearing to read 'a. Spencer', written in a cursive style.



Mrs Jenny Allen

Acting Director of Catholic Schools/Chief Executive Officer

The DLCSL in consultation with other likeminded Catholic entities have formed a working group, Australian Catholic Anti-Slavery Network (ACAN) who continue to be instrumental in delivering subject matter expertise to enable a framework to systematically identify and mitigate risks.

We recognise that the efforts and measures described in our statement form the early steps of our targeted approach and over our road map will make a positive step forward in addressing Modern Slavery in our supply chain.

I look forward to bringing these important initiatives to life in our vibrant education environment.

A handwritten signature in black ink, appearing to read 'J Allen', written in a cursive style.

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# Reporting Criteria 1 & 2:

## About us

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In July 2020, the Diocese of Lismore Catholic Schools Limited (DLCSL) was established, and this signalled the largest organisational change in Catholic education in the Diocese of Lismore since the establishment of the systemic model in the 1970s to assist parish schools with the delivery of curriculum and catechetical programs, administration and compliance. This model complemented the highly de-centralised Parish-based approach to the governance and operation of schools.

The establishment of the DLCSL has been a long and complex journey. The work to date to introduce a governance and operational model has been substantial but much of it has been behind the scenes in building the foundations that the DLCSL needs to be successful. While there are still significant elements that need to be resolved, we are now in a position that much of the work of the DLCSL needs to be operationalised. These operational changes will be instrumental in addressing Modern Slavery in our supply chain.

The Diocese of Lismore Catholic Schools Limited (DLCSL) is an ACNC registered charity, and our head office is located at 3 Dawson Street, Lismore NSW 2480.

<https://www.lism.catholic.edu.au/>

## 2021 Modern Slavery Risk Management Initiatives

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Over the course of 2021, the DLCSL has undertaken the following actions as part of its involvement with the Australian Catholic Antislavery Network (ACAN) to mitigate modern slavery. These have included:

- Staff awareness - training and presentation to a cross section of staff by the nature of their role, have a degree of influence to implement the ACAN risk management program;
- Model stakeholder questionnaire to ascertain and gauge current state;
- Model supplier engagement strategy and communication resources;
- DLCSL Modern Slavery Working Group established;
- Ongoing use of model supplier contract clauses;
- Draft Modern Slavery Policy developed;
- Modern Slavery identified as a Standing Item to the Audit and Risk Committee to ensure Board oversight and commitment to modern slavery risk across the organisation;
- Risk Management Framework endorsed by the Board;
- Key personnel identified for training and training program commenced;
- Staff participation in monthly ACAN workshops.
- DLCSL joined Sedex

## Our Plans for 2022 and Beyond

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The DLCSL will plan and implement the following actions and initiatives to ensure that its continued progress towards eradication of modern slavery from any of its activities. These are:

- Ongoing targeted training for staff via the ACAN e-learning modules
  - Modern Slavery 101
  - Business Relevance
  - Implementing a Modern Slavery Risk Management Program
  - Remedy Pathway;
- Reduce the number of suppliers through strategic procurement and the use of preferred supplier panels;
- Ensure appropriate risk assessment of suppliers, including developing a supplier risk assessment tool;
- Ensure suppliers are appropriately vetted and develop appropriate tools for vetting;
- DLCSL Modern Slavery Policy to be finalised and submitted to the Board for endorsement;
- Engage with current suppliers using the tools developed targeting those suppliers identified with significant expenditure;
- Target suppliers with high-risk categories for modern slavery – construction, cleaning and uniform supply; invite these suppliers to join Sedex and complete the Self-Assessment Questionnaire (SAQ)
- Ongoing review of existing memoranda of understanding and contracts to ensure compliance when and if renewing;
- Ongoing staff participation in monthly ACAN workshops;
- Risk Assessments – Strategic, Operational & School Level to identify modern slavery risks.

Additionally, utilise the resources from ACAN for the following actions:

- If the DLCSL becomes aware of a possible breach of the Act, and due to the complexity of remediation, we will adopt the Domus 8.7 process of remediation as developed by ACAN. Domus 8.7 covers the need for specialist resources to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery. The DLCSL remediation efforts, if required, may need to be enhanced through further policy development, detailed response procedures and engagement with Domus 8.7 and stakeholders. By utilising Domus 8.7, the DLCSL can better support people impacted by modern slavery to achieve meaningful outcomes;
- Sedex - Supplier risk management platform subscription cross referenced to our suppliers;
- Continued participation in ACAN.

This work is to be formalised and expanded with the development of the strategy to address modern slavery.

## Our Organisational Structure

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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.



The Diocese of Lismore Catholic School Limited (DLCSL) was created as a result of a resolution by the Trustees and commenced operation on 1 July 2020.



The Catholic Schools Office (CSO) is the operational arm of DLCSL and assumed control from 1 July 2020.



45 Systemic Schools

## Our Governance Framework

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In recent years there has been ever-increasing compliance and legal requirements from Governments and educational bodies to ensure the delivery of high-quality education in a safe environment for students and those who work in our schools. These complex regulations have placed significant burdens on individual parishes under the previous governance model.

Progressing the mission of Catholic education in the Diocese of Lismore is embodied in its mission and vision statement, "enabling students to achieve the fullness of life" (John 10:10) through supporting our schools to accompany students through Jesus Christ in educational centres of excellence that foster faith, learning and wellbeing outcomes where all students are cared for, respected and valued to become active members of their community.

The 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. The DLCSL has responsibility for all governance issues in schools including compliance and regulatory matters. The Diocesan Trustees have appointed a Board of Directors who take responsibility for the implementation of the new governance structure for delivering Catholic education, in accordance with the Constitution of the DLCSL.

The DLCSL Board has approved a number of key roles, teams and committees to assist the work of the Board in fulfilling its responsibilities and assist in the transition to the new model of governance. This will further enhance the DLCSL's ability to manage and mitigate a number of risks as an enterprise regarding modern slavery.

## 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. The Diocese of Lismore Catholic Schools Limited (DLCSL) provides a range of services to support approximately 2,500 staff in 45 vibrant and dynamic school communities that serve approximately 18,000 students.

The 45 systemic schools (11 secondary and 34 primary) exist as their own entities and are registered with ACNC as a charity.

The schools are St Joseph's Primary School Alstonville, St Francis Xavier Primary School Ballina, Xavier Catholic College Ballina, St James' Primary School Banora Point, St Joseph's College Banora Point, St Mary's Primary School Bellingen, St Mary's Primary School Bowraville, St Finbarr's Primary School Byron Bay, St Mary's Primary School Casino, St Mary's Catholic College Casino, St Augustine's Primary School Coffs Harbour, St John Paul College Coffs Harbour, St Joseph's Primary School Coraki, Mount St John Primary School Dorrigo, St Mary's Primary School Grafton, McAuley Catholic College Grafton, St Joseph's Primary School South Grafton, St Joseph's Primary School Kempsey, St Paul's College Kempsey, St Anthony's Primary School Kingscliff, St Brigid's Primary School Kyogle, St Joseph's Primary School Laurieton, St Carthage's Primary School Lismore, St John's College Lismore, Our Lady Help of Christians Primary School South Lismore, St Patrick's Primary School Macksville, St Joseph's Primary School Maclean, St John's Primary School Mullumbimby, Mount St Patrick Primary School Murwillumbah, Mount St Patrick College Murwillumbah, St Joseph's Primary School South Murwillumbah, St Agnes' Primary School Port Macquarie, St Joseph's Primary School Port Macquarie, St Peter's Primary School Port Macquarie, MacKillop College Port Macquarie, Newman Senior Technical College Port Macquarie, St Joseph's Regional College Port Macquarie, St Ambrose Catholic Primary School Pottsville, Mary Help of Christians Primary School Sawtell, Holy Family Catholic Primary School Skennars Head, St Joseph's Primary School Tweed Heads, St Joseph's Primary School Wauchope, St Joseph's Primary School Woodburn, St Francis Xavier Primary School Woolgoolga, St James' Primary School Yamba.

## Our Supply Chain

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Like many other large organisations, we recognise that modern slavery is pervasive across all sectors and, therefore, may exist somewhere in our supply chain and operations. We manage multiple education facilities in a large range of demographics, with dedicated funding from a variety of sources. As such, procurement has been dispersed and siloed. This has resulted in a large number of suppliers, many with low spend, who are engaged within a variety of ways.

Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty and lacks transparency. At this stage, the lack of visibility beyond tier one of suppliers is the biggest risk to the DLCSL of modern slavery. Mitigating this risk is an evolving process as we better understand our suppliers and supply chain in respect to modern slavery. Further, more staff are aware of the issue of modern slavery, it is expected that the risks will become better understood and targeted.

The DLCSL supply chain includes products and services (including labour) that contribute to and enable the DLCSL to deliver quality education to students. In 2020, procurement services completed the complex task of mapping and analysing our supplier spend. The legacy system presents some data quality issues which will be mitigated with the staged rollout of the Technology One and Supply Chain, which will provide greater categorisation and a deeper granular view of spend profiles.

Key information includes supplier names, geographic location and categorised spend. Supply chain data will now be used as a tool to not only identify modern slavery risks but to also drive better procurement outcomes.

To further enhance and extend the accuracy of spend data, Technology One will assist over time by making extraction of data and categorisation of spend simpler.

# Reporting Criteria 3: Modern slavery risks in operations and supply chain

## Operational Risks

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The work to date to introduce a governance and operational model across the DLCSL has been substantial and a change management program is being rolled out as a phased approach over a three-year period to 2023. A three-year Strategic Plan has been developed and a dedicated Transformation Team are working with staff across the DLCSL on implementing strategic initiatives at the 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.

A Risk Management Framework has been endorsed by the Board and staff are currently in the process of embedding the framework throughout its operations. As part of this framework, work is currently underway to develop Operational Risk Registers across the System and School levels. Elements of modern slavery have already been identified in the supply chain and included in draft risk registers. Risk assessment workshops will be delivered across the organisation during 2022 and Governance staff are currently working with change leaders to develop a Risk Management Framework Project Plan which will ensure that the objective of developing a risk aware culture is realised.

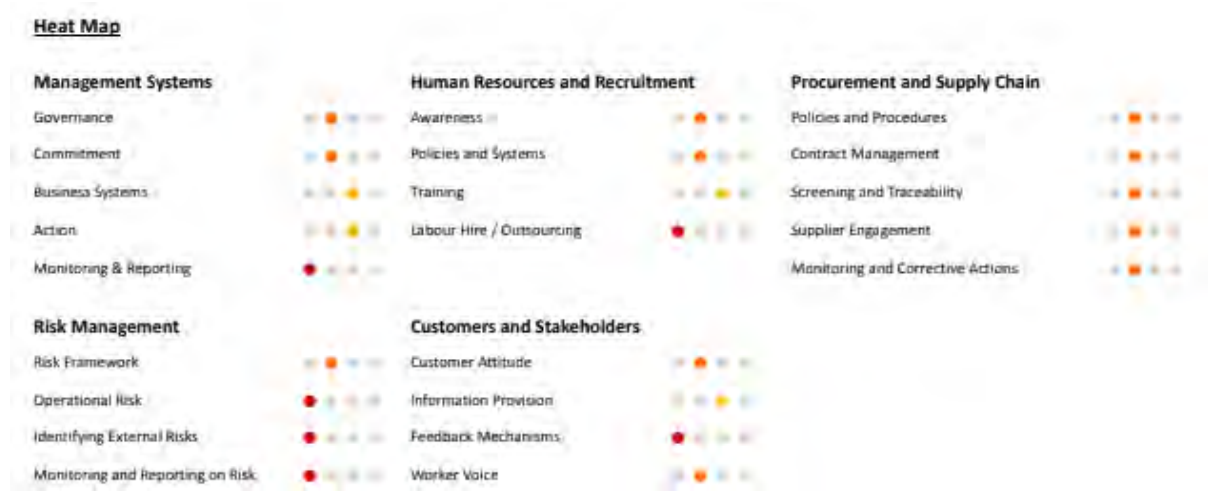
DLCSL completed the ACAN self-assessment questionnaire which generated Gap Analysis Reports for 2020 and 2021.

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;
- MSLO participation in ACAN meetings/workshops throughout the year.

Our action plan initiatives during 2021 have seen some improvement at the completion of 2021, as illustrated in the heat map in table 1 below.

**Table 1**



The Change Analysis report in Table 2 below shows improvement in 10 areas, no change in 12 areas.

**Table 2**

**Change Analysis**

Category	Topic	Result Previous Year	Result Current Year	Change
Management Systems	Governance	3	4	▲
	Commitment	3	3	-
	Business Systems	1	4	▲
	Action	1	4	▲
	Monitoring & Reporting	1	1	-
Risk Management	Risk Framework	1	3	▲
	Operational Risk	1	1	-
	Identifying External Risks	1	1	-
	Monitoring and Reporting on Risk	1	1	-
Human Resources and Recruitment	Awareness	3	3	-
	Policies and Systems	1	3	▲
	Training	3	4	▲
	Labour Hire / Outsourcing	1	1	-
Customers and Stakeholders	Customer Attitude	3	4	▲
	Information Provision	3	4	▲
	Feedback Mechanisms	1	3	▲
	Worker Voice	3	4	▲
Procurement and Supply Chain	Policies and Procedures	3	3	-
	Contract Management	3	3	-
	Screening and Traceability	3	3	-
	Supplier Engagement	3	3	-
	Monitoring and Corrective Actions	1	3	▲

## Our COVID-19 Response

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Maintaining supplier relationships and fostering open communication with suppliers about COVID-19 risks has been of key importance. Where practicable, we will maintain supplier relationships, including honouring current contracts where possible and recognising that purchasing practices such as short production windows and last-minute or short-term orders may increase modern slavery risks. Additionally, we have also engaged with suppliers to consider options to support vulnerable workers when it becomes evident. These options may include:

- Avoiding varying contracts unreasonably or seeking discounts from suppliers;
- Continuation of existing suppliers due to diligence and remediation processes and adjusting these processes where necessary to ensure risks linked to evolving supply chains and changing workforce structures are identified and addressed.

## Our People

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DLCSL employs 2500 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 65% female and 35% male.

The DLCSL Board has responsibility for the governance of the business and subsequently has established five Committees to ensure that the Board has effective mechanisms to deal with specific issues that require specialised areas of expertise.

- a) Mission and Culture Committee
- b) Education Committee
- c) Finance Committee
- d) Audit and Risk Committee
- e) Nomination and Employment Relations Committee

In 2021 a dedicated Risk Manager was recruited to develop and implement a Risk Management Framework across the organisation. In January 2022 an Internal Audit Partner was engaged to provide the Board with independent assurance on the organisation's Risk Management Framework. A three-year internal audit plan is currently being developed and will commence in 2022.

## Supply Chain Risks

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The DLCSL supply chains include products and services (including labour) that contribute and enable the DLCSL to deliver quality education to students. In 2020 procurement services undertook a review of possible supply chain risks.

This involved:

1. Analysis of procurement data,
2. A gap analysis based on a Modern Slavery risk matrix.



## Modern Slavery Gap Analysis

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The first step taken was to look at the procurement data available, identify any gaps and create a plan to fill these gaps over time. Key information includes supplier names, geographic location and categorised spending. Supply chain data is now a tool to not only identify modern slavery risks but also drive better procurement outcomes. To further enhance and extend the accuracy of our spend data, a new enterprise reporting program is being implemented (Technology One Finance and Supply Chain). This will assist over time by making the extraction of procurement data and categorisation of our spending simpler and will provide better insights and transparency across the 45 schools sites within the Diocese.

# Reporting Criteria 4: Actions taken to assess and address risk

The following actions were taken in 2021 to assess and address modern slavery risk across the organisation:

- A new finance system (Technology One) has enabled improved analysis and understanding of the suppliers we use. This has highlighted a large and complex supply chain.

(As this system is further embedded, the DLCSL will be able to better monitor modern slavery risks and implement actions to address these in our supply chain. There are currently 15 schools which have transitioned to Technology One and it is anticipated that the remaining schools will be transitioned by the end of 2023.)

- Modern Slavery Working Group was established, and the first meeting was held in quarter 4 of 2021, and Terms of Reference adopted.
- Modern Slavery was introduced as a Standing Item by the Audit and Risk Committee which was established in 2021.
- A Modern Slavery clause was developed for inclusion in all contracts and agreements for the supply of goods and services with DLCSL.
- Supplier engagement commenced with ACAN common suppliers invited to fill in a self-assessment questionnaire. The results often provide “indicators” of forced labour which acts as red flags when trying to detect instances of forced labour.

## Modern slavery action plan and road map

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The 2020 Modern Slavery Statement provided a risk dashboard to illustrate the ‘inherent risk’ of modern slavery based on commodity and industry. In 2022 we will invite our suppliers in high risk categories to participate in the self-assessment questionnaire for review by Sedex.

In 2022 we will continue to roll out training via the ACAN learning tool to raise awareness of the risks of Modern Slavery.

Training and awareness are key controls in addressing the risk of modern slavery and human trafficking with our organisation. We recognise the need to build the capability of our employees, particularly our procurement practitioners and our front-line staff, to identify potential red flags of modern slavery and human trafficking and the actions required to respond appropriately.

Over time this training and skills will allow the DLCSL senior management to develop a deeper understanding of modern slavery, identify obligations of the Modern Slavery Act,

and actions/resources available to comply with the Act's requirements. The Modern Slavery Liaison Officer (MSLO) has participated throughout the year in monthly ACAN teleconferences and has shares information and resources to the Modern Slavery Working Group as part of the DLCSL's awareness and training program.

A draft Modern Slavery Policy is under development and is anticipated to be finalised in 2022.

Suggested actions were identified by ACAN based on DLCSL's responses to the 2021 Gap Analysis questionnaire. The suggested actions will be considered when undertaking a risk assessment of the DLCSL's procurement practices in the development of the Functional Risk Register during 2022.

**Table 3**

**Suggested Actions based on 2021 Gap Analysis Questionnaire**

Category	Sub-category	Actions	
Management systems	Governance	Establish governance framework for managing modern slavery risks	
		Update senior management on the modern slavery program and ensure responsibilities are understood	
		Establish Board level targets and KPIs for modern slavery risk management	
		Ensure that staff assigned to manage the risk of modern slavery is actively using the tools and templates developed to assist with risk management	
		Develop and implement process to review adequacy and effectiveness of modern slavery risk management program	
		Commitment	Assign responsibilities for managing modern slavery risks
	Update senior management on the modern slavery program and ensure responsibilities are understood		
	Broaden the commitment base by involving mid-tier and other levels of staff to drive change		
	Showcase the actions taken to address modern slavery risks across industry networks		
	Business Systems	Obtain statements of commitment from different heads of departments, units, divisions etc.	
		Integrate modern slavery risk management into supplier slavery risks	
	Action	Ensure elements of modern slavery risk management systems are reflected across the business	
		Develop a detailed action plan for addressing modern slavery risks	
		Establish goals, targets and KPIs to effectively address modern slavery risks	
		Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations and supply chain	
		Monitoring and Reporting	Undertake a review of modern slavery risks in your industry sector
			Expand data collection process to include modern slavery data from national and international sources
			Integrate modern slavery risk findings into monthly management reports

		Develop or refine data management systems to include modern slavery related data.
		Continuous improvement - Adapt
		Identify opportunities for leadership on modern slavery data collection and reporting processes
<b>Risk Management</b>	Risk Framework	Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work
		Include modern slavery risk review into risk management policies and Procedures
		Develop team and process to commence action planning
		Establish systems and processes to evaluate and take immediate action on identified risks
	Operational Risk	Map operations against potential risks of modern slavery or exploitation
		Develop action plan to address risks of modern slavery in internal operations
		Enhance internal capacity to identify and manage operational risks
		Implement actions to mitigate or eliminate operational risks
		Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks
	Identifying External Risks	Develop risk management plan to address modern slavery risks among priority suppliers
		Undertake modern slavery risk review of priority direct (Tier 1) suppliers
		Assign resources to identify, prioritise and manage operational and supply chain risks
		Map modern slavery risks and vulnerabilities along extended supply chain
		Develop and monitor implementation of corrective action plans
	Monitoring and Reporting on Risk	Identify opportunities to monitor and report on modern slavery risks
		Develop procedures to effectively report and take action where modern slavery risks are identified
		Integrate modern slavery risk management into business evaluation and reporting processes
		Integrate modern slavery risk reporting with stakeholder feedback Mechanisms
		Transparently report on modern slavery risks- both internally and externally
<b>Human Resources and Recruitment</b>	Awareness	Incorporate modern slavery information into induction programs
	Policies and Systems	Incorporate modern slavery risk management specific responsibilities into position descriptions
		Encourage lowering tolerance approach to modern slavery among all staff and contractors
	Training	None
	Labour Hire/ Outsourcing	Regularly review and update hiring and on-boarding processes
		Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts

		Deliver modern slavery training to priority labour hire companies and contractors @tendering process (monitor sub-contracting)
		Assess labour hire contractors and outsourcing programs for modern slavery risk -Individual Schools - HR and Facilities
<b>Customers and Stakeholders</b>	Customer Attitude	Develop awareness raising programs for customers and stakeholders
		Develop curriculum appropriate to stage around the issue - Parent - Teacher
	Information provision	None
	Feedback mechanisms	Train staff and stakeholders on modern slavery feedback/reporting Systems
		Establish stand-alone confidential modern slavery hotline for staff and Contractors
		Establish systems and processes to evaluate and take immediate action on feedback received
		Engage external third-party labour-rights auditors to validate worker voice data
	Worker voice	Review worker voice data collection options for at-risk workers in the supply chain
		Run pilot project worker voice program for high risk suppliers
		Develop a comprehensive modern slavery remediation program that is well resourced and supported
<b>Procurement and Supply Chain</b>	Policies and Procedures	Incorporate modern slavery requirements into existing policies and Procedures
		Include general clauses on modern slavery in all supplier contracts
	Contract Management	Incorporate performance standards and contract evaluation criteria for high risk contracts
		Conduct desktop review of high-risk suppliers
	Screening and Traceability	Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow
		Undertake gap analysis of procurement policies and procedures
	Supplier Engagement	Develop targeted communications & engagement programs for high risk suppliers
	Monitoring and Corrective Actions	Establish a supplier monitoring program
		Develop a monitoring system to assess ongoing performance
		Develop corrective action plans to address modern slavery risks among high risk suppliers
		Work with suppliers to identify gaps and address barriers to implementation

# Reporting Criteria 5: Effectiveness Assessment

## Effectiveness

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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 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.

# Reporting Criteria 6: Process of consultation with entities owned or controlled

## Consultation via communications

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We have undertaken benchmarking of published modern slavery statements from similar organisations and worked with ACAN to submit a complying Modern Slavery Statement. This consultation with ACAN and our other entities has informed our approach to ensure it is appropriate and effectively tailored to reflect our organisational context. This has involved regular communication with:

- The Bishop and Diocese
- ACAN
- Chief Executive Officer
- Senior Executive of CSO
- Principals of each school (separate entities).

The Modern Slavery Working Group will have ongoing oversight and development of the DLCSL'S modern slavery obligations under the Act.



# Reporting Criteria 7: Any other relevant information

DLCSL does not have any controlled entities.



**THE DIOCESE OF DARWIN**  
The Catholic Church in the Northern Territory

# Catholic Education Northern Territory

## Modern Slavery Statement 2021



*Faith in their future*



## Statement from Bishop Charles Gauci of the Darwin Diocese NT.

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Modern slavery violates the rights of any human involved, and subsequently their dignity. Although abhorrent, modern slavery continues worldwide. It is perpetuated by the global supply chain, which benefits greatly off the exploitation of vulnerable people. Those trapped in the clutches of modern slavery have been stripped of their dignity.

Unfortunately, a similar loss of dignity is still experienced by Aboriginal people today. This is especially apparent in the Diocese of Darwin, where 25% of our Catholics are Aboriginal and Torres Strait Islander peoples. Over time, loss of land and culture, forced removal of children, and culturally insensitive government policy has led to this loss of dignity.

Pope Francis has said that “Modern slavery ... is a crime against humanity. Our communities of faith are called to reject, without exception, any systematic deprivation of individual freedom for the purposes of personal or commercial exploitation.” (Pope Francis, Ceremony for the signing of the Faith Leaders Universal Declaration against Slavery, 2/12/2014).

The Diocese of Darwin joins with the common effort to end modern slavery, whatever form it takes.



CATHOLIC DIOCESE OF DARWIN



Yours in Christ,

*+ Charles Gauci*



Charles Gauci  
Bishop of Darwin

## Authorisation by the Director

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Catholic Education Northern Territory acknowledges our role as a Catholic entity in making everyone aware of modern slavery and the role they can play in working towards the eradication of modern slavery practices.

Although slavery is thought to be something in the past modern slavery exist today and preys on the most vulnerable and the young. This is done through human trafficking, forced labour, child labour and the exploitation of minority groups.

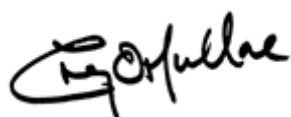
Pope Francis has described modern slavery “as an open wound on the body of contemporary society”.

Within the Diocese, Catholic Education has a clear direction in ensuring our activities are for the elimination modern slavery through our procurement processes, operations and supply chains.

Catholic Education is focused on working with our suppliers and service providers to ensure they are aware of our expectations and that they review their procurement processes to eliminate modern slavery practices from their supply chain and operations.

Catholic Education will continue to work with ACAN and other Catholic entities in the diocese, including our stakeholders, contractors and suppliers to eliminate modern slavery from the operations and supply chains.

I approve this statement as defined by the Modern Slavery Act 2018 (Cth) (“the Act”) on 22nd June 2022.



Mr Greg O'Mullane  
Director of Catholic Education

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**Authorisation by the Director Greg O'Mullane**

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## Disclosure Note

This statement has been made on behalf of *Catholic Education Northern Territory*. This Statement covers all entities owned or controlled by *Catholic Education Office* **ABN 22616685167**

<https://www.ceont.catholic.edu.au/>

17 Beaton Road, Berrimah Darwin NT 0828

# Criteria 1 & 2: About us

Catholic Education Northern Territory (CENT) supports and operates eighteen (18) schools based in Darwin urban areas, regionally in Katherine and Alice Springs and in the remote communities of Ltyentye Apurte, Bathurst Island and Wadeye. CENT schools also support and manage 9 Early Learning Centres, 9 After School Care facilities and 4 remote pre-schools. These schools service early learning, Primary, Middle and Secondary students. CENT also support a Flexi-Learning Centre in Alice Springs partnership with Edmund Rice Education Australia.

The Northern Territory has the highest Aboriginal population in Australia and education in remote communities is an important part of the diversity that is the Northern Territory.

CENT educates 1572 Indigenous students along with 45 overseas students and 3094 local students. CENT has 421 Teachers supported by 524 non-teaching and Indigenous Education Workers and 84 Early Learning staff.

CENT education office has 67 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, Marketing & Media.



**Our Vision:** *We the Catholic Education family in the Northern Territory, walk together as a community in faith, through our schools and our Parishes, reaching out to the wider community for the achievement of excellence and equity in education inspired through the Gospel of Jesus. CENT has stated “We have faith in their future”.*

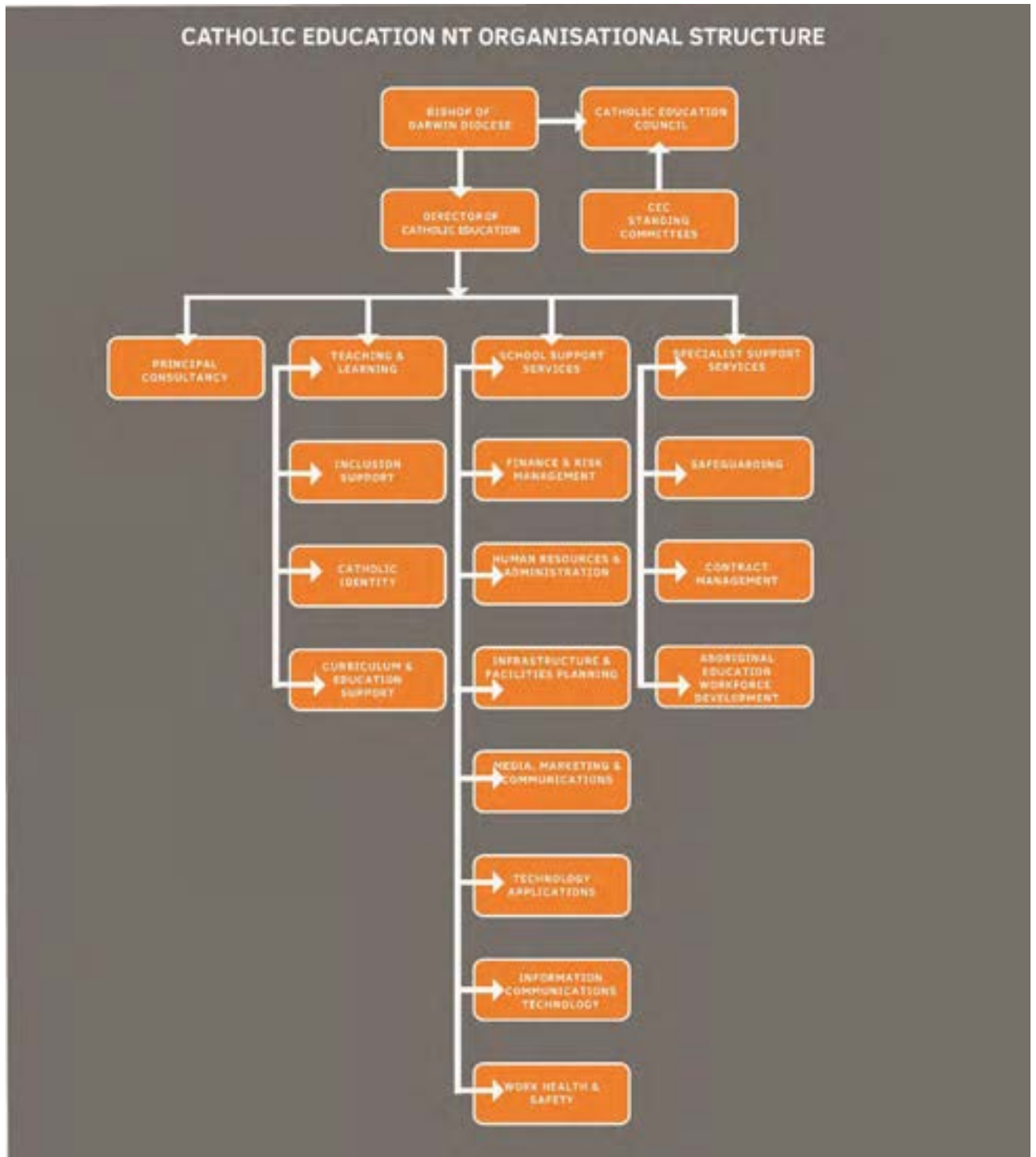
**Faith:** *we share and grow as Eucharistic community by celebrating our faith in prayer. We accompany one another in this journey in processes that are systemic, collaborative, graduated and ongoing. “*

**Service:** *We foster positive relationships based on the model of Jesus as servant leader promoting a culture of systematic informed and collaborative growth.*

**Community:** *We work together with a spirit of generosity and mutual support to build strong and inclusive Catholic communities.*

**Diversity:** *we value and use our diverse gifts, talents and experiences to shape our future.*

## CENT Organisational Structure



## Governance Framework

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The Trustees of the Roman Catholic Church for the Catholic Darwin Diocese is the registered proprietor for schools within CENT. The Bishop of the Diocese of Darwin has canonical authority for the operation of schools within the System, and ultimate responsibility for the delivery of Catholic education within the Diocese.

The Bishop of Darwin Diocese has delegated authority to the Director, Catholic Education (CENT), to assist the Bishop to discharge his canonical duties with respect to Catholic education and the Director of Catholic Education ensures all civil law responsibilities associated with systemic financial accountability, legislative compliance including safety, contract management and people management are adhered to.

In undertaking the Director's duties and fulfilling his responsibilities, the Director consults with the Bishop, and works with the Catholic Education Council in relation to matters of policy and fiscal accountability and educational compliance. The Director provides regular updates to the Bishop on matters of operational significance including Modern Slavery.

The Catholic Education Council (CEC) is established to support and advise the Bishop on his responsibilities for Catholic schools in the Diocese. The Council advises and makes recommendations to the Bishop but does not make decisions. The Council is not an incorporated body. CEC members are selected from key stakeholder groups in the Diocese-

## Our Operations

---

CENT's vision and mission is to provide Catholic Education across the NT for 4710 students across 18 schools comprising 4 secondary Colleges, 5 comprehensive colleges, 8 primary schools, 1 flexible learning centre. Within the system there are also 9 Early Learning Centres, 9 After Care facilities and 4 remote Pre Schools.

Our Operations include the management and maintenance of housing facilities in remote locations. CENT also operate a Boarding facility in Darwin and have 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



## Our Supply Chains

---

CENT procures goods and services for the education of students with procurement in areas of:

- Infrastructure, maintenance and capital planning
- ICT and consulting services
- Office supplies including teaching and learning consumables
- Fixtures, fittings and building materials
- Engagement of services through the Indigenous Land Councils
- Education and legal consulting services

CENT operates a “Territory First” supplier engagement policy with secondary suppliers selected from Australia rather than overseas.

# Criteria 3: Modern slavery risks in operations and supply chains

## OPERATIONAL RISKS

### Our COVID-19 Response

---

CENT realised COVID-19 increased the risk of Modern Slavery across supply chains in both local and global operations.

CENT undertook a number of steps to ensure that families at risk were not further disadvantaged throughout the crisis including:

- CENT recognised that maintaining their operations of the schools throughout the COVID-19 pandemic from 2020 and ongoing as crucial to ensuring vulnerable students were not disadvantaged and essential workers could maintain their obligations to attend employment, regardless of low student numbers at times.
- CENT management ensured staff and students were aware of the risks associated with COVID 19 and followed Government Health recommendations. This ensured persons employed in lower wage industries were not disadvantaged and having to take on work that may subject them to exploitation. Contractors such as cleaners and grounds personal were not disadvantaged.
- Safeguarding CENT staff and students throughout the crisis has remained paramount though challenging with changing COVID directions often daily.
- CENT provided hand sanitiser dispensers, disinfectant wipes, disinfectant sprays, and ensured regular cleaning was maintained in schools, offices and toilets. Toiletry supplies are provided for washrooms to protect staff and students. All items were sourced from reputable manufacturers and suppliers.
- Financial concessions were available to families whose employment was impacted by the pandemic.
- CENT also informed our suppliers so they are aware of the impact the pandemic would have on the most vulnerable workers in the supply chain.

### Our People

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The employee demographic in Darwin and NT in general is culturally diverse and representative of many nationalities across the globe including Africa, Europe, Asia and Oceania. With a strong Aboriginal workforce representative in all schools. CENT employee 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.

CENT gender balance favours female staff with approximately 68.95% and 31.05% male.



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 require 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 provide 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.

## Modern Slavery Risk Assessment

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CENT has taken a number of steps to assess Modern Slavery risks in its operations. In the delivery of educational services across the school system, CENT procures goods and services from a range of industries, and engages in a broad range of activities to achieve its strategic objectives.

CENT has identified and assessed the risk exposure within CENT's supply chains. The key areas of potential risk include the following:

- Building & Construction
- Facility Management & Property Maintenance
- Cleaning & Security Services
- ICT Hardware
- Labour Hire
- Waste Management
- Food & Catering Services
- Furniture & Office Supplies
- Uniforms

The areas of risk noted above have been assessed against percentage of annual expenditure and considered to be potential Modern Slavery risk exposure. The category risk taxonomy is based on analysis of participating entity supplier datasets and includes 22 high level procurement categories identified across various sectors.

The information included in the table below has assisted CENT assess potential risk so it can prioritise engagement activities with suppliers.

### Data analysis

This table indicates that 63% of the top suppliers to CENT in 2021 are in the high risk category and these suppliers and services will be invited to join Sedex in 2022.

<b>CENT RISK ASSESSMENT:</b>			
<b>Category</b>	<b>Spend Description</b>	<b>Risk</b>	<b>% of Expenditure</b>
<b>Building and Construction:</b>	Building materials (e.g. asbestos, concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	<b>HIGH</b>	20.00%
<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>HIGH</b>	7.00%
<b>Facility management and property maintenance:</b>	Services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	<b>HIGH</b>	12.00%
<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, lunches, events Etc. and hospitality services. Sea food supplies.	<b>HIGH</b>	6.00%
<b>Furniture and office supplies:</b>	General office suppliers, stationery, paper products, small office machines, (computers not included), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks Etc.), workplace suppliers (cleaning, first aid, bathroom Etc.), packaging, boxes Etc.	<b>HIGH</b>	14.00%
<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 (Asia).</p> <p>Forms of modern slavery identified by the GSI and other reports 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>HIGH</b>	1.00%
<b>Uniforms and PPE:</b>	Uniforms (work wear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks, respirators, glasses / goggles, ear muffs, safety work wear Etc.)	<b>HIGH</b>	3.00%

# Criteria 4: Actions taken to assess and address risk

## Actions taken to assess and address risk

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During the reporting period, 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. CENT recognises the importance of the MSLO role to lead implementation of the ACAN modern slavery risk management program.

Activities undertaken in the reporting period:

- Modern slavery clause incorporated into CENT contracts for high risk suppliers
- 12 ACAN e-learning modules completed by staff
- 3 suppliers participated in ACAN webinars covering:
  - modern slavery risk in construction and ICT
  - expectations of ACAN reporting entities
  - obligations for reporting entities under the Modern Slavery Act
  - process to join Sedex
- 3 suppliers invited to join Sedex

## Future actions

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In 2022 the Catholic Education Diocese of Darwin (CENT) plans to:

- Establish a Modern Slavery Working Group
- Identify a MSLO for each school
- Undertake the annual ACAN Gap Analysis
- Engage in an ACAN action planning workshop
- Develop a Modern Slavery Policy
- Invite staff to undertake ACAN e-learning modules
- Invite suppliers to join Sedex
- Expand engagement to include Diocesan executive

## Remedy

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CENT is committed to ensuring it provides an appropriate and timely response 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 harm to people and root causes to mitigate future risks.

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, CENT, will ensure as reasonably tractable to assist persons in seeking the assistance they require.

CENT'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 CENT can assist persons impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Remediation obligations and expectations have been included in contracts and high-risk suppliers must notify and consult with CENT to ensure victim centred remediation processes are implemented to the satisfaction of CENT.

When suspicions of modern slavery practices come to CENT's attention through whistle-blower or other channels, CENT will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process. Additional information about Domus 8.7 and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au)

## Criteria 5: Effectiveness Assessment

CENT's engagement in Modern Slavery and membership with ACAN is a new directive to making change in society. Modern Slavery is an evolving area of work that will continue to develop and it is too early to report on the effectiveness of any actions taken thus far. Communications indicate the message on Modern Slavery is being heard and more business operators are beginning to focus on Modern Slavery as a part of their business.

In 2022 CENT is committed to reporting the following baseline data and to develop key performance indicators in order to demonstrate effectiveness:

	activity	2021
Staff – <i>internal</i>	E-learning modules completed	12
	Sedex users	1
	Working Group meetings	0
Supplier engagement - <i>external</i>	Number of suppliers across high risk categories	18
	E-learning modules completed	0
	Suppliers engaged on MS	3
	Invited to join Sedex	3
	Sedex SAQ results shared	0
	Social audits	0
	Corrective actions	0
	Worker voice / grievance mechanism deployed	0
	Modern slavery cases identified	0
	Modern slavery cases remediated	0

## Criteria 6: Process of consultation with entities owned or controlled

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.

## Criteria 7: Other

This is the completed documentation for the CENT Modern Slavery Statement and there is no other relevant information to provide.

# Modern Slavery Statement 2021

ABN – 92 119 459 853



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## About Us

The Catholic Education Commission of Victoria Ltd (CECV) acts as the overarching, strategic planning and policy-making body for the Catholic school system in Victoria.

The CECV has a strategic role in promoting and advocating for Catholic education and acts as the representative body of Catholic schools in Victoria with Australian and state governments, and other relevant organisations and agencies.

One of the roles of the CECV is to receive government grants and distribute these funds to schools. The CECV also reports to the government on Catholic schools' use of these public funds according to legislation.



## Structure

The Archbishop of Melbourne and the Bishops of Ballarat, Sandhurst and Sale established the CECV in 1973 to support and advance Catholic education in Victoria.

The CECV was restructured and incorporated on 23 May 2006.



The Archbishop of Melbourne and the Bishops of Ballarat, Sandhurst and Sale are members of the CECV. The Board of the CECV comprises eight directors, including:

- an Auxiliary Bishop of the Archdiocese of Melbourne
- the Executive Director of Melbourne Archdiocese Catholic Schools Ltd (MACS)

- the Business Manager of the Archdiocese of Melbourne
- the directors of Catholic education offices in the dioceses of Ballarat, Sale and Sandhurst
- a Catholic priest
- a representative involved in Catholic education.

## Board and Committees

The CECV Board guides and monitors the business of the CECV and is responsible for the overall corporate governance including:

- overseeing regulatory compliance
- ensuring that the CECV upholds Church laws
- ensuring that appropriate, adequate and effective systems of risk management and internal control are established and maintained
- charting the overall strategy and direction of the CECV – including setting, monitoring and reviewing strategic, financial and operational plans and determining matters relating to policy and practice.

The following committees report to the CECV Board.

- Audit and Risk Committee
- Child Safety Working Party
- Contemporary Education Committee
- Emergency Management Working Party
- Employment Relations Committee
- Enhancing Catholic School Identity (ECSI) Steering Committee
- Grants Allocation Committee (Primary)
- Grants Allocation Committee (Secondary)
- Grants Allocation Committee (Targeted Programs)
- Integrated Catholic Online Network (ICON) Committee
- Review Body Committee
- Salary and Conditions Board

## 2021 Modern Slavery Risk Management Initiatives

The CECV has taken a series of steps toward achieving practical outcomes from our Ethical Procurement Initiative. This implementation aims to gain greater procurement visibility and integrate ethical sourcing practices more broadly into these areas in the future.

Modern slavery is a multifaceted issue that requires a multifaceted approach. The CECV has put into place the following work streams in our targeted approach to ethical procurement supply chain mapping and spend analysis:

- supplier engagement
- modern slavery risk assessment
- employee engagement and training
- embedding ethical procurement in our processes
- compliance with and reporting against the *Modern Slavery Act 2018* (Cth)
- thought leadership and advocacy: driving collaboration and best practice.

## Statement from Most Rev. Terence Curtin DD STD VG EV CECV Chair



The purpose of this Modern Slavery Statement is to reduce suffering across Australia and internationally through mobilising the power of humanity. As part of the Catholic faith and values, we are bound by our Fundamental Principles of Humanity, Impartiality, Neutrality, Independence, Solidarity, Unity and Universality. Our vision is human dignity, peace and wellbeing for all. In line with this vision, we want to see an end to all forms of modern slavery both in Australia and overseas. We are committed to recognising and responding to modern slavery not only if, and when, we encounter it in our supply chains or operations, but also as a key part of our service delivery.

Our Modern Slavery Statement outlines our efforts to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chains over the 2021 financial year. It has been prepared to meet the mandatory reporting criteria under the Modern Slavery Act 2018 (Cth).

However, we also see this Statement as an opportunity to raise awareness of modern slavery within the organisation and Australia and support those affected.

#### **Endorsement**

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the Board of CECV on 24 May 2022.

A handwritten signature in black ink that reads "+ Terence R. Curtin". The signature is written in a cursive style.

Most Rev. Terence R. Curtin STD DD STL BEd VG EV  
Auxiliary Bishop, Catholic Archdiocese of Melbourne  
383 Albert St, East Melbourne VIC 3002  
22 June 2022

## Statement from Jim Miles, Executive Director, CECV



We have completed our second Modern Slavery Statement for the CECV.

We are satisfied with our progress in assessing, addressing, and setting up initiatives in our inaugural Modern Slavery Statement. As operating a business during the COVID-19 pandemic continues to evolve, we are committed to continuous improvement and addressing any modern slavery risks arising from our supply chain. Our efforts have been centred on awareness, improving the visibility and understanding of our supply chain and ethical procurement practices.

Our focus for 2021 has been to develop a risk framework and tools to identify and manage the risks of modern slavery in our operations and supply chain. To help us do this, we have actively engaged with the Australian Catholic Anti-Slavery Network (ACAN) to develop a pilot program to assist with prioritising and assessing supplier risks.

While we have made progress during our reporting year, we know more needs to be done and we will continue to refine our tools to address modern slavery risks as we work to deliver improved outcomes. We are also cognisant that eradicating modern slavery will require ongoing focus in collaboration with the Catholic Church, industry, the community and other stakeholders.

A handwritten signature in black ink that reads "Jim Miles". The signature is written in a cursive, flowing style.

Jim Miles  
Executive Director  
Catholic Education Commission of Victoria Ltd  
James Gould House  
228 Victoria Parade East Melbourne Victoria 3002  
22 June 2022

## Our Annual Report

The CECV 2020 financial report is included in the [Annual Report](#) and can be found on the CECV website [www.cecv.catholic.edu.au/](http://www.cecv.catholic.edu.au/).

The CECV 2021 annual report will be available on the Australian Charities and Not-for-profits Commission (ACNC) website in early July 2022.

## Our Operations

The CECV acts as the overarching, strategic planning and policy-making body for the Catholic school system in Victoria.

The CECV has a strategic role in promoting and advocating for Catholic education. We act as the representative body of Catholic schools in Victoria with Australian and State governments, and other relevant organisations and agencies.

The CECV receives government grants and distributes these funds to schools. We also report to the government on Catholic schools' use of these public funds, required by legislation.

The CECV has responsibility for the education of over 211,000 students and is supported by the Catholic Education Offices of the four Dioceses: Melbourne, Ballarat, Sandhurst and Sale. Victorian Catholic schools are established under the Bishop's authority in their diocese. CECV is not a governor, proprietor, employer or operator of Victorian Catholic schools.

The CECV head office is located in East Melbourne. The CECV itself does not employ staff and operates under a Service Level Agreement with Melbourne Archdiocese Catholic Schools (MACS).

The CECV looks forward to continuing its work to promote and support the continuous delivery of a high-quality, uniquely Catholic education in 2022 and beyond.

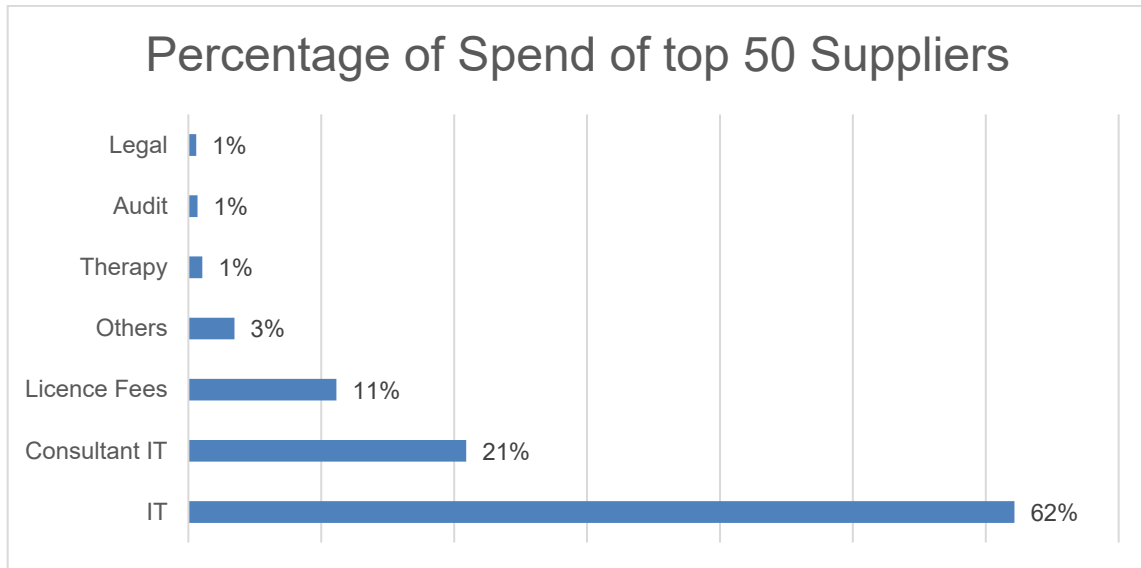
As part of its 2021 expenses of \$3.1 billion, 98.1% related to direct distributions of Government grants to systemic schools or distributions to diocesan education offices. Therefore, actual expenditure, including capital expenditure incurred of \$3.2 million with external parties, was only \$46.7 million. This only represents 1.5% of total CECV expenses.

## Our Supply Chain

The majority of CECV's major suppliers are based in Australia. The top 50 suppliers were considered for this analysis, shown in the chart below.

The turnover for the financial year ending 31 December 2021 was \$3.1 billion, with 98% being distributed as government grants to systemic schools or distributions to diocesan education offices. The details are available in the financial report and can be found on [The Australian Charities and Not-for-profits Commission \(ACNC\)](#) website

The percentage breakup of the top 50 suppliers is shown in the pie chart below:



## Modern Slavery Risks in Operations and Supply Chain

We have taken a whole-of-group approach to our due diligence by establishing a relationship with ACAN. ACAN has helped us gain insight into the entities with which we partner for our operational activities and those involved in our supply chains. We have established an ongoing monitoring system of our suppliers by commodity. Should there be any changes to our risk profile, or a credible report of one of our suppliers engaging in human trafficking or other prohibited activities, we will be notified in real time.

The highest risk area identified for CECV was ICT hardware – since these goods may be manufactured using conflict minerals (e.g. cobalt used in lithium-ion batteries) and/or forced labour by entities in earlier stages of their supply chains.

### Operational risks

#### *Our COVID-19 response*

We recognise that the economic impacts of the global COVID-19 pandemic may increase the prospect of exploitation in certain jurisdictions. While the full ramifications of the pandemic on social and economic standards worldwide are massive, we still do not know how it has impacted the CECV suppliers. We will utilise the monitoring system outlined above and continue to work with our supply chain resilience solutions partner.

#### *Supply chain risks*

- **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 United States 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** is based on the estimated prevalence of modern slavery and the government responses outlined in the 2018 GSI. While the CECV predominantly uses Australian suppliers, it is recognised that goods and services may come from countries other than those of the suppliers' headquarters.
- **Workforce profile** – in undertaking our supplier analysis the CECV considered the type of labour involved in producing 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).

Of the 1.5% of total CECV expenditure with external entities, and based on the CECV's profile, 20% of CECV spend was considered no risk, 69% as medium risk, and 11% as high risk shown in the graph below. The amount deemed to be high risk is immaterial to the overall CECV operations. Five suppliers were identified as being high risk

Only the following categories were considered to be high risk: IT and office supplies. There were three further categories with no risk and three categories with medium risk.



## Actions Taken to Assess and Address Risk

CECV undertook a number of actions to address the modern slavery risks in its operations. Commencing with its membership to the ACAN and attendance at the ACAN conference, the CECV has assessed its operations and subsequently commenced actions to manage the existing and ongoing risk exposure.

The following actions have been taken throughout the reporting period:

- a) **Signed up with Sedex for supplier assessment and supply chain visibility** – Sedex helps us with the supply chain visibility to know the full extent of our supply chain, from raw material harvesting and transport of goods to finalised products and services in the forms they are provided to us. The aim is to be aware of every supplier in the chain and to hold key information on them, including where all suppliers through the whole value chain are located – including the suppliers to direct suppliers, and their suppliers etc and the inherent risks to human and environmental rights associated with the countries, industries, and activities of each supplier.
- b) **Undertook supplier risk assessment** – the CECV has undertaken a risk assessment of its suppliers and service providers and categorised them into risk-rated cohorts and spend volume. This risk assessment has identified the areas where the risk of modern slavery exposure is elevated. The CECV will focus its preventative and mitigation compliance activities throughout the next reporting period.
- c) **Commenced supplier engagement** – the CECV has commenced its supplier engagement strategy by introducing modern slavery clauses in the terms and conditions of purchase



orders. This communique is the first of many steps related to building supplier awareness. Subsequently, action and compliance will be taken to remove modern slavery risk from the CECV's immediate supply chain.

- d) **Added contractual clauses** – working closely with our legal team, all new supplier contracts include modern slavery clauses to ensure suppliers take all reasonable steps to remove modern slavery from their supply chains. Moreover, minimum entitlement clauses for supplier employees have been included in CECV supplier contracts.

## Effectiveness Assessment

### Modern slavery gap analysis

CECV completed a Gap Analysis in 2019 and 2021. An ACAN tool reviewed the following five categories related to CECV operations:

- a) Management Systems
- b) Human Resources and Recruitment (not applicable due to no employees)
- c) Procurement and Supply Chain
- d) Risk Management
- e) Customers and Stakeholders.

This initial analysis conducted in December 2021 showed during these two years, out of the 22 areas from the above five categories, 17 areas improved and four were stable, with only one area that declined.

## Review Process

The CECV has planned to undertake reviews of our modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists of five stages:

1. **Annual review of the modern slavery framework** – this annual review will be undertaken to assess the effectiveness of the existing framework and identify areas for improvement. As the CECV is still in the process of building and strengthening its current controls, the existing tools utilised, such as the 'Bridge the Gap' assessment tool, will be a key driver for areas requiring further attention and action.
2. **Regular check of the risk review process** – this stage will be utilised further to assess existing risk identification methodology against CECV suppliers. Specifically, the CECV will endeavour to ensure that supplier data is captured and gain further insight into the supply chain map.
3. **Supplier and engagement feedback process** – ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step towards eliminating risk. Dedicated resources of staff will provide 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 the CECV to direct resources where needed most – for example, further communication or education advice concerning modern slavery.
5. **Corrective actions process** – in line with stages one through four, the corrective action process will further enhance the modern slavery framework.

## Looking Ahead to 2022

CECV is committed to ensuring it provides an 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 CECV is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources, and the need to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CECV, is a founding partner of Domus 8.7 - an independent program to provide a remedy to people impacted by modern slavery. CECV'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. Partnering with Domus 8.7 CECV can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CECV is directly linked to modern slavery by a business relationship, CECV 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 CECV to ensure victim centred remediation processes are implemented to the satisfaction of CECV.

CECV is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian government. Building Links targets modern slavery in the construction sector and includes deploying an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

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

In 2022, CECV will encourage staff and suppliers to undertake the five ACAN e-learning modules as part of the Modern Slavery E-Learning course comprising:

- Modern slavery 101
- Business Relevance
- Modern Slavery Risk Management for Suppliers
- Implementing a Modern Slavery Risk Management Program
- Remedy Pathways.

Additional information about Domus 8.7 and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au)

Ensure that the CECV has a Modern Slavery Policy to prevent modern slavery by managing and mitigating the modern slavery risk within our business operations and supply chains. This policy will enable the CECV to ensure that modern slavery does not flourish within our operations,

business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Modern Slavery Act 2018.

Looking ahead, we plan to progress the following actions in 2022 and beyond:

**Building our understanding and capabilities**

- Develop and deliver a broader training program for our employees to increase understanding and awareness of modern slavery risks within our operations and supply chains.
- Continue to educate and support providers in understanding their obligations under the *Modern Slavery Act 2018* and our supplier statement.
- Continue to develop response plans that are monitored and managed for continuous improvement to occur with identified suppliers.
- Second line review processes are to be defined and implemented to ensure independent oversight occurs of the modern slavery framework.

**Improve our processes**

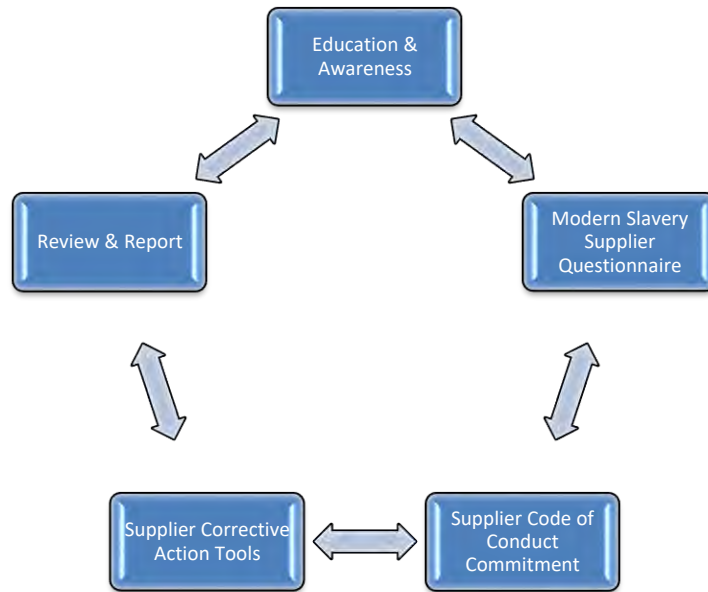
- Further embed due diligence processes within the first line of defence and adapted learnings for this first reporting period.
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Uplift our compliance obligations framework.
- Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks.
- Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
- Embed ethical procurement in our processes, including developing and rolling out ethical procurement guidelines for employees.

**Enhance engagement with suppliers**

- Engage with more high-risk suppliers to assess their modern slavery practices.
- Continue to assess risks within our operations and supply chains.
- Continue to participate in the ACAN Forum for alignment in approach.
- Obtain greater visibility of the risks of modern slavery in our supply chains beyond tier one.
- Introduce vendor terms and conditions project to embed ethical sourcing for all new vendors.
- Disseminate our supplier Code of Conduct and enhance direct supplier engagement with certain high-priority suppliers.

We will continue to prevent modern slavery and any inadvertent involvement we may have across our operations and supply chains. There is more to do, but we are always looking for new and better ways to eliminate modern slavery, always in partnership with others, knowing that no one can do so independently.

## SUPPLIER ENGAGEMENT ACTION PLAN 2022



## Internal Consultation

CECV has no controlled entities. We understand it is important for CECV to appropriately identify modern slavery risks and understand what actions they need to take to address modern slavery risks.

An internal staff conducts all procurement and sourcing for CECV and the vendors are all based in Australia. We have consulted with different departments of CECV, such as our Procurement, Legal, Marketing and Finance teams, when preparing this Statement.

We anticipate that our consultation process will continue to develop in future reporting periods.

## Any other relevant information

In order to support the Modern Slavery Act within the organisation, CECV plans to undertake the following steps

- A modern slavery plan to support the implementation of the governance structures, policies, processes and risk registers needed to underpin a successful modern slavery framework
- Advice on implementing a modern slavery policy whose draft has been prepared
- A modern slavery risk register to capture and address the key modern slavery risks that a health service might cause, contribute or be directly linked to
- A modern slavery fact sheet to facilitate staff training; and

- Supplier contract considerations, including the addition of modern slavery clauses in contracts.

The rollout and implementation of the above points will support CECV in conducting its own risk assessment, due diligence and remediation activities.

CECV is confident that this year's steps have built a strong foundation for a robust modern slavery framework. We recognise there is more to do and CECV is committed to continually improving our approach, partnering with our stakeholders and working to reduce modern slavery.

# Our statement on modern slavery 2021



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& other relevant information

## Disclosure Note

This statement has been made on behalf of *Catholic Church Insurance*. This Statement covers all entities owned or controlled by *Catholic Church Insurance*.

ABN 76 000 005 210

# About us

## CCI is one of the oldest insurance companies in Australia, set up by the Catholic Church to service the Catholic community since 1911.

Our founding principles have remained constant – to develop specialist products and services that meet the needs of the Church, to control insurance costs and to retain any surplus within the Church.

CCI operates under not-for-profit principles. When an operating surplus is achieved, a significant proportion is returned to our Catholic clients by way of dividends, distributions and grants. CCI's client distributions underpin the principle that CCI actively engages with the wider Catholic community to help support the Church's mission in pastoral, education, health and welfare work.

Catholic Church Insurance exists to serve the Catholic community as their insurer and risk partner.

Operating under mutual principles Catholic Church Insurance delivers a range of high-quality products and services from general insurance, workers compensation, managing risk, and growing wealth supported by a dedicated team of industry experts.

CCI's organisational purpose is "to safeguard and restore. Offering peace of mind for the Catholic Church, our community and organisations for care and social justice".

CCI addresses modern slavery issues by adopting the following commitments in its Catholic Values Policy that states:

### Modern Slavery and Human Rights in Supply Chains

Companies and their investors are exposed to risks arising from the exploitation and mistreatment of people as workers, contractors or suppliers.

*In Gaudium et Spes, 27 – Second Vatican Council, the Catholic Church reaffirmed its historic concern about forced labor, stating that "slavery, prostitution, the selling of women and children and disgraceful working conditions where people are treated as instruments of gain rather than free and responsible persons" are "infamies" and "an affront to fundamental values...values rooted in the very nature of the human person".*

*Where CCI directly invests, CCI seeks to identify and exclude investment in companies that do not have a risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services, as per the requirements of the Australian Modern Slavery Act 2018 (Cth).*

*Where funds are externally managed, CCI will engage with its investment partners to ensure that Modern Slavery risks are incorporated within the ESG assessment of their investment activities.*

Source: CCI Catholic Values Policy

## 2021 Modern Slavery Risk Management Initiatives

Over the course of the last three years since the enactment of the Modern Slavery Act, CCI has invested considerable time in assessing the impact of the Modern Slavery Act.

In the past year CCI has focused its building on response initiatives that are reflected below:

- ◆ Monitor staff use of MSA Contracts and templates
- ◆ Senior Leadership Team (SLT) reviewed and approved the strategy, purpose and wider resources
- ◆ CCI Board approved its initial MSA Statement, and has an annual MSA reporting and attestation approval process
- ◆ Assessment of MSA training requirements and training solutions both through ACAN and CCI's own staff training Academy
- ◆ Joining the Sydney Archdiocesan Catholic Anti-Slavery Network (ACAN)
- ◆ Ongoing assessment of risks relating to Modern Slavery including in our Investment portfolio
- ◆ Updated Procurement Policy to include Modern Slavery Requirements
- ◆ Updated Contracts templates to include Modern Slavery Requirements
- ◆ Updated supplier Pre-Qualification Form to reflect Modern Slavery Requirements
- ◆ Investigated CCI's Enterprise Risk Management (ERM) system to evaluate integrating MSA incident reporting capability
- ◆ Engaged business units within CCI to confirm risks associated with MSA including Investments and CCI Asset Management



## About us (continued)

### Our Plans for 2022

CCI has a clear roadmap of initiatives and actions planned for 2022 as follows:

- ◆ Launch of the ESG Committee in 2022
- ◆ Regular meetings of the ESG Committee
- ◆ Ongoing MSA compliance support for our trading relationships through completion of Self Assessment Questionnaires (SAQs) and audit information through the Sedex platform operated by ACAN
- ◆ MS Statement placed on CCI website and intranet
- ◆ Ongoing training of all staff involved in any MS exposures/risk management
- ◆ Annual reporting to the SLT on Modern Slavery Requirement and compliance
- ◆ Board Risk Committee annual attestation on Modern Slavery Act compliance
- ◆ Monitor MS awareness of staff such as through induction program, promotion of CCI actions on our intranet, and training where needed
- ◆ Promotion of CCI MSA risks and CCI actions on our intranet
- ◆ Sample monitoring of supplier MS compliance information given baseline compliance established in 2020 statement

- ◆ Monitor compliance of usage of all MS templates and contract terms in all new vendor relationships
- ◆ Monitor all MS incidents and resolve/record within the ERM system

### Our Plans Beyond 2022

Our focus areas beyond 2022 will be:

- ◆ Extend the MS assessment to include smallest cohort of sub-suppliers identified within the CCI supply chain
- ◆ Update CCI's risk assessment framework and Corporate Risk Register to further incorporate MS risk management
- ◆ Extend use of ERM technology to support the ongoing monitoring and measurement of MS supply chain risks
- ◆ Continuous improvement through reviews and improvement to risk management, due diligence, supplier engagement, training and processes to ensure modern slavery risks are mitigated and managed effectively
- ◆ Develop further awareness on MS principles to relevant CCI staff and suppliers/service providers through ongoing training/refresher sessions
- ◆ Ongoing education of staff through on-line training resources

### Approval and signature



I am pleased to present CCI's 2021 Modern Slavery Statement.

Our purpose is "Supporting and serving church and community". It reflects our recognition of how CCI operates, and the decisions we make alongside those with whom we partner because it affects the people, lives and communities we serve.

CCI recognises that our responsibility to eradicate modern slavery forms part of running a sustainable business.

We are committed to responsible procurement and to ensuring that social, environmental and ethical business practices are considered along with all our business decisions.

In FY2019, CCI began our assessment of modern slavery risks within our organisation. It led us to establish Supplier Code of Conduct and SAQs/Attestation processes for all of the organisation's procurement activities.

Ongoing focus has allowed us to develop system-based reports to the CCI Board via the SLT, in relation to risks and compliance arising from the Modern Slavery Act.

In FY2021, CCI has worked with experts within the Catholic Anti-Slavery Network, and has been able to drive stronger staff training, awareness, and engagement around the risk of modern slavery in our business.

Through 2021 we have continued to reinforce our strong foundations and ensure compliance with MSA obligations have been met.

CCI's enterprise risk reporting systems, both internally and through our Whistleblower policy and practice, have been enhanced to enable the proper reporting of modern slavery concerns.

We will develop a Modern Slavery Maturity Plan for the future, with clear actions, accountabilities and reporting protocols. CCI will continue to engage in discussion with peers, experts, suppliers and advisors. This will ensure our commitment to manage modern slavery risks remains central to our Catholic values.

Modern Slavery in any form is unacceptable, and I am proud of the work that CCI has done, and will continue to do, to assess and manage the risk of modern slavery in modern day business operations.

**Joan Fitzpatrick,**  
Chairman, CCI

This Modern Slavery Statement was approved by the principal governing body of Catholic Church Insurance as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 17th of June 2022. This Modern Slavery Statement is signed by a responsible member of Catholic Church Insurance as defined by the Act.

# About Catholic Church Insurance

## Our Organisational Structure

CCI is an APRA-regulated insurance company serving the Catholic and broader Christian community across the Church, aged care, healthcare, welfare and education sectors.

CCI operates under several general Workers Compensation licenses in several state/territories, as well as operating as insurer for one Workers Compensation self-insurance licence holders.

CCI operates as a separate entity, Catholic Church Insurance Asset Management (CCIAM), along with associated charitable trust structures, exclusively for investment purposes available to entities associated with the Catholic Church.

CCI operates a “white-labelled” personal insurance business in partnership with Allianz Insurance Australia.

CCI also operates a charitable foundation (CCI Giving) with its own independent trustees.

CCI’s organisational structure is reflected in Figure 1.

Figure [1] Organisational Structure



## About Catholic Church Insurance *(continued)*

### Our Governance Framework

Modern Slavery Act compliance fits within the overall Board Risk Framework, with delegation of authority/accountability to the Board Risk Committee to govern and oversee organisational response. This delegation is documented in the Board Risk Committee Terms of Reference.

Reporting of the Senior Leadership Team activity regarding Modern Slavery comes to the Board Risk Committee through the Corporate Risk function.

The Chief Risk Officer is responsible for MSA governance and oversight.

CCI's Enterprise priorities are:

- ◆ Assisting the CEO in setting general strategy relating to corporate sustainability (ESG) matters
- ◆ Developing, implementing and monitoring initiatives and policies based on the strategy
- ◆ Overseeing communications to employees, shareholders, clients and staff, and
- ◆ Monitoring and assessing developments relating to Modern Slavery and improving CCI's understanding of sustainability

### CCI's Corporate Responsibility Roadmap

CCI has a significant number of internal policies addressing human rights and employment/labour rights, and will extend this to develop a specified Human Rights Policy in 2022 through ESG activity. The policy will formally document and commit CCI to upholding legislation relating to human rights and labour rights. CCI has already set clear requirements for clients and other business partners in relation to respect for human rights. Throughout 2021 CCI has continued to decline to support business entities that systematically violate human rights.

The Human Rights policy will link CCI's objectives in this space to the Church's statement around the 'dignity of the human person' and affirm that 'Human activity, especially economic activity, must be focused on honouring and preserving human dignity'. With a view that dignity also refers to all aspects of the wellbeing of people including physical health, mental health and equality between men and women.

Modern Slavery, as a risk, will be adopted into the CCI Risk Register as part of a wider ESG compliance risk in 2022.

CCI has also established an internal Modern Slavery Working Group which reports to the Corporate Risk Team. The responsibility of the Working Group is to liaise with internal stakeholders to develop the CCI Modern Slavery Statement. Responsibility for identification and prioritisation of supply chain risks, rests with CCI's procurement activities that are lead by, and the responsibility of, individual SLT members.

### Our Operations

CCI is a General Insurance and Workers Compensation insurer, as well as an Asset Management trustee and individual entity fund manager for Catholic entities and the wider Catholic community in Australia.

CCI is located and operates exclusively in Australia with Head Office in Melbourne and state offices in Sydney, Canberra, Brisbane, Adelaide, and Perth. CCI also has mobile staff representation in Tasmania, and services the Northern Territory from its Adelaide office.

CCI employs 252 FTE Staff across its various offices.

CCI typically engages suppliers on short-term commercial arrangements including, but not limited to:

- ◆ Professional Advisory Services
- ◆ Learning and Development services
- ◆ Reinsurance
- ◆ Technology Services
- ◆ Claims Adjusters and Repairer services
- ◆ Risk Advisory Services
- ◆ Legal Services

Catholic Church Insurance's (CCI) funds under management is approximately ~A\$2 billion managed by CCI's investment department under the following:

1. Catholic Church Insurance Limited
2. CCI Asset Management:
  - (a) Catholic Values Trust and Income Trust
  - (b) Nine Individually Managed Accounts (IMAs)

The Catholic Church Insurance investment portfolio is overseen by CCI Board and CCI Asset & Liability Committee that ultimately delegates authority to CCI Management to act in accordance with daily operation of investments.

The two investment trust vehicles along with the nine individually managed accounts are designated services offered by CCI Asset Management (CCIAM) and fall under the care of CCI Asset Management Board, who have appointed Catholic Church Insurance to undertake its investment activities.

CCIAM engages asset consultant Frontier, to develop investment strategies that include traditional assets classes and derivatives for hedging purposes.

CCI's operations include the internally managed asset classes of cash, fixed income, and Australian equities that have a strong bias towards passive investing.

The remainder of the funds under management are externally managed and are considered as the supply chain. This includes externally managed asset classes in Global equities, syndicated loans and property trusts.

## About Catholic Church Insurance (continued)

### Our Supply Chain

As a provider of insurance and asset management services, we have assessed our modern slavery risk as **low**. CCI's third party spend predominantly consists of professional and IT services procured from Australian firms.

The CCI procurement team has primarily focussed on suppliers that directly provide goods or services. These suppliers are actively managed by the business and include suppliers that represent CCI's highest commercial risk and/or most significant expenditure. We understand that the risk of modern slavery is also present within our sub-suppliers. In some instances, the risks with these suppliers may be higher.

During a risk mapping exercise that was completed in consultation with the Australian Catholic Anti-Slavery Network (ACAN), some facilities categories (such as cleaning) were identified as potential risks. These services are provisioned through the landlord of our corporate tenancies and as such are not directly sourced or managed by CCI. In 2021, we have explored how we can improve the visibility of any sub suppliers providing services to CCI to ensure compliance to modern slavery legislation.

CCI intends to issue a public supplier list as part of our plans beyond 2021, and in anticipation of that has sought and confirmed documented assurance/evidence from all Tier One suppliers regarding their approach and compliance to Modern Slavery Act compliance.

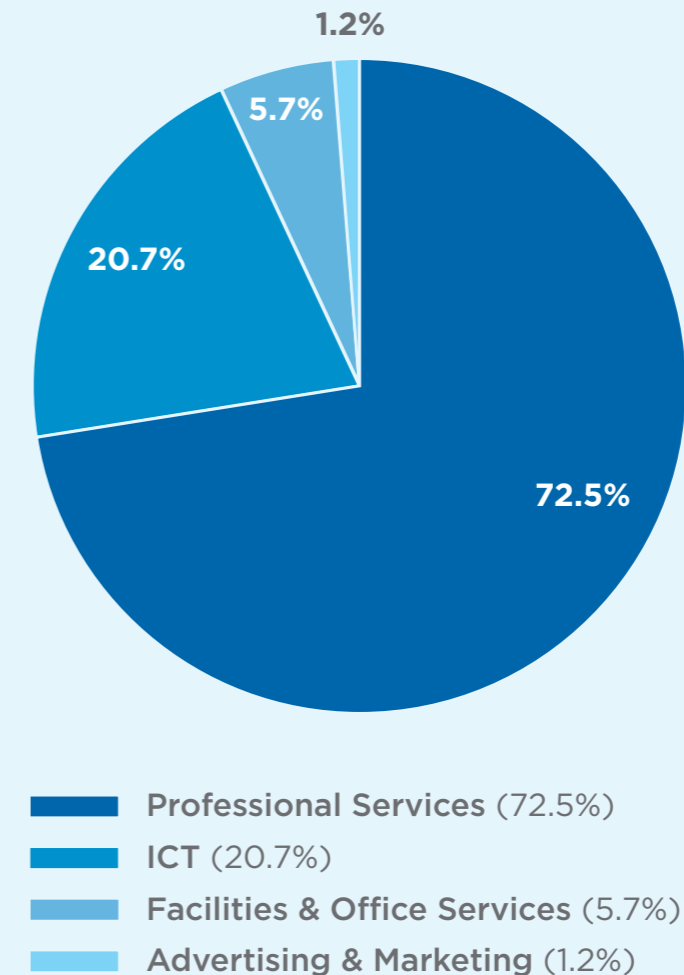
CCI's operations include the internally managed asset classes of cash, fixed income, and Australian equities that are conservatively managed with a strong bias towards passive investing.

CCI also partners with external fund managers to invest in asset classes such as global equities and property via unit trusts. Through these investment managers, CCI has exposures to various developed countries and across key sectors of the global economy where CCI have direct and indirect exposures to the underlying company's supply chains.

CCI endeavours to invest in a socially responsible manner in accordance with the Investment Policy Statement that is guided by the Catholic Values Policy (CVP). The CVP includes references to, and considerations of, the Modern Slavery Act 2018 (Cth):

- ◆ CCI Investment Policy Statement (updated annually) that includes due diligence on direct investments and externally managed funds
- ◆ CCI Catholic Values Policy (last updated Jan 2021) that stipulates negative screening of companies that do not have risk management policy that seeks to mitigate the risk of modern slavery practices that are directly linked to their operations, products or services

Figure [2] CCI Spend by Category



# Modern slavery risks in operations & supply chain

CCI recognises its obligations in respect to human rights extends beyond its own operations to suppliers and the supply chain.

We expect that all suppliers abide by the Modern Slavery Act 2018 which prohibits any form of modern slavery or forced labour. Each CCI supplier is screened as part of our supplier onboarding process. We work with suppliers by asking them to describe the risks of modern slavery practices in their operations, and what actions they take to assess and address those risks. In addition, we ask all CCI suppliers to comply to our standard contract clauses in relation to modern slavery. These include:

- (a) conduct your business in a manner that is consistent with the principles of the Modern Slavery Act 2018, and have never been convicted of any offence related to Modern Slavery;
- (b) have made all reasonable enquiries to ensure, and will continue to take all reasonable steps (including appropriate due diligence procedures) to ensure, that there is no Modern Slavery in your

own or in your sub-contractors' supply chains, or in any other part of your business (and will provide us with evidence of this upon request); and

- (c) will notify us immediately upon becoming aware of any actual or suspected Modern Slavery in any supply chain in connection with this Agreement, and will provide us with all details requested by us relating to the Modern Slavery and take all reasonable steps to mitigate any damage caused by it, at your own cost.

In 2022, we will explore using technology to introduce more advanced screening and management of our suppliers and supply chain.

## Our COVID-19 Response

CCI only operates within Australia. PPE has been purchased through our regular stationery providers and national shopping chains such as Coles and Officeworks who have their own process and statements confirming their approach and compliance with the Modern Slavery Legislation.

## Our People

Recruitment and labour hire practices are managed in line with the Banking and Finance Industry Award, recruitment & background check policies and procurement standards. All staff are employed within Australia either as a direct employee or through Australian based employment agencies. The employment agencies are engaged under contract via the procurement team.

CCI employs ~260 staff, equivalent FTE of ~245. Leadership gender diversity is reported to the SLT and Board along with other diversity metrics such as place of birth, ethnicity, religion, language spoken, disability, age and length of service. Gender diversity for leaders is currently within the acceptable range.

CCI established clear policy and process in 2019, in compliance with The Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019 (Act).

A key element of policy was the establishment and education of all CCI staff in the availability, access and reporting through our third-party managed Whistle Blower hotline. All reporting through the hotline is provided to the Chief Risk Officer and reported appropriately and where required to the CCI Board.



## Modern slavery risks in operations and supply chain *(continued)*

### Modern Slavery Gap Analysis

Considerable work has taken place within CCI since our initial 2019 Slavery Gap Analysis Assessment, to progress a large number of elements in our Modern Slavery awareness, systems, education, oversight, governance and procurement practices.

The focus of operational improvement will continue in the following areas identified in the 2020 result:

- ◆ Business Systems reporting on MS compliance
- ◆ Monitoring and reporting of MS risks to CCI Senior Leadership team and CCI Board
- ◆ Ongoing screening across our procurement process, beyond our Tier One suppliers to all entities providing products or services to CCI
- ◆ Training of key risk MS impacted leaders and wider staff training, information and education
- ◆ Stronger interaction with clients and stakeholders to promote CCI work and approach to Modern Slavery whilst also seeking to ensure this reflects in our client experience
- ◆ Staff collaboration and information provisions regarding our Modern Slavery activity through the work of the ESG Committee

Category	Topic	Rating 2021	Rating 2022	Change
<b>Management Systems</b>	Governance	Green	Green	↑
	Commitment	Yellow	Green	↑
	Business Systems	Yellow	Yellow	→
	Action	Green	Green	↑
	Monitor / Report	Yellow	Yellow	→
<b>Risk Management</b>	Risk Framework	Green	Green	→
	Operational Risk	Green	Green	→
	Identifying External Risks	Green	Green	→
	Monitoring and Reporting Risks	Yellow	Yellow	→
<b>Procurement &amp; Supply Chain</b>	Policy and Procedures	Green	Green	→
	Contract Management	Green	Green	→
	Screening and Traceability	Yellow	Yellow	→
	Supplier Engagement	Green	Green	→
	Monitoring and Correction Action	Green	Green	→
<b>HR &amp; Recruitment</b>	Awareness	Green	Green	↑
	Policies and Systems	Green	Green	↑
	Training	Yellow	Green	↑
	Labour Hire / Outsourcing	Green	Green	→
<b>Customers &amp; Stakeholders</b>	Customer Attitude	Green	Green	↑
	Information Provision	Yellow	Green	↑
	Feedback Mechanisms	Yellow	Green	↑
	Worker Voice	Yellow	Green	↑

# Actions taken to assess and address risk

The focus for CCI in 2020 was strengthening our understanding of potential modern slavery risks in operations and supply chain, joining ACAN, forming a Working Group, identifying gaps and assessing high level supplier risks (Tier 1 or Direct Suppliers).

In 2021, CCI completed the following actions in relation to managing risks of Modern Slavery:

- ◆ Consolidation of CCI Modern Slavery Working Group – including staff members from procurement, risk management, and investments, to provide a multi-disciplinary perspective on modern slavery
- ◆ Members of the Working Group attended the Supplier Engagement Workshop held by ACAN, and 8 Members also completed ACAN Modern Slavery E-Learning across 2021
- ◆ Ongoing Supplier Gap Analysis
- ◆ Progressed Modern Slavery compliance attestations confirmation/review for key professional service providers including loss adjusters, brokers, lawyers, builders working on approved panels, reinsurers. Further work is to be undertaken to

complete and mature the processes/ reporting in the next year

- ◆ General awareness training for staff (All Managers, Team Leaders, and the Senior Leadership Team through Risk deep Dive session, All Staff Snapshot and also posts on internal staff intranet
- ◆ Update supplier onboarding process to request suppliers comply to supplier code of conduct and describe any modern slavery risks within their organisation
- ◆ Updated all standard contracts to include requirements for suppliers to comply to Modern Slavery Act
- ◆ Identifying gaps and assessing high level supplier risks (Tier 1 or Direct Suppliers)

## Modern slavery action plan and road map

CCI has made a significant investment in the past two years resourcing and managing an internal project plan the details of which reflect Status at end of 2021.

The project plan reflects initial review to understand obligations, and commence an awareness building program within the organisation, as well as developing the governance environment to support CCI's response to its Modern Slavery obligations.

## Remediation

CCI 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 CCI is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CCI is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery.

CCI'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 CCI will continue to help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response. Where

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

CCI is a consortium partner to the Building Links program, a modern slavery grant funded by the Australian Government. Building Links targets modern slavery in the construction sector and includes deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practises come to our attention through whistleblower 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. CCI has funded a "Remedy Pathways" module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2022.

Additional information about Domus 8.7 and the process applied can be found on [www.domus87.org.au](http://www.domus87.org.au)

# Effectiveness assessment, consultation & other relevant information

In 2021, CCI has implemented an annual review of the progress, compliance, training and education within the business around Modern Slavery legislation through its ESG Committee.

This annual review process is supported by embedding Modern Slavery education into CCI induction programs, and through an annual presentation as part of the normal staff Snapshot program.

The ESG Committee will consider any Action Plan Implementation tracking requirements if appropriate, and quarterly reports through the Senior Leadership Team Risk Deep Dive process as necessary, as well as through Board Risk Committee reporting process.

The wider assessment of progress will also be reflected in the half-yearly CCI Risk Register Review process, undertaken by senior management and approved by the Board Risk Committee.

Corporate Risk will build a second line reporting capability through our ERM system during 2022. It will also embed obligations, attestations and reporting capability in the Enterprise Risk management system.

This capability will enable reporting and resolution monitoring of any incidents or complaints relating to Modern Slavery Act compliance, by the end of 2022.

## Criteria 6

Consultation - CCI does not own or control any other entities, therefore this criteria is not applicable.

## Criteria 7

Other Relevant Information - not applicable.





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**2021** Modern Slavery Statement  
Catholic Schools NSW Limited

## Disclosure Note

This statement has been made on behalf of Catholic Schools NSW Limited. This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.

ABN 46 619 593 369



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# STATEMENT FROM THE CHAIRMAN

In 2019, CSNSW voluntarily opted in to comply with the reporting requirements introduced by the *Modern Slavery Act 2018* (Cth) (the Act) consistent with the Catholic Church's overall commitment to prioritise and take a leading role in the eradication of modern slavery. CSNSW is committed to contributing to the collective movement to rid the world of slavery. By voluntarily opting into the reporting requirements of the Act, CSNSW seeks to promote awareness of the reality of Modern Slavery and to take practical steps to eradicate all forms of Modern Slavery from its business operations.

## **Principal Governing Body Approval**

This Modern Slavery Statement was approved by the principal governing body of Catholic Schools NSW on 25 May 2022.



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

A handwritten signature in black ink, appearing to read 'Stephen Segwick', written over a light blue circular stamp.

**Stephen Segwick AO  
Chairman**

# ABOUT US

Catholic Schools NSW Limited (CSNSW) was established in 2017 by the Bishops of New South Wales adopting the responsibilities and functions of its predecessor, the Catholic Education Commission New South Wales (CECNSW).

Our aim and mission is to support the Bishops of New South Wales in bringing to life the Catholic Church's evangelising mission through Catholic schools. To achieve this mission, we work to improve the education and faith outcomes of students in NSW Catholic schools by creating communities of faith and learning.



**As Catholics, our faith calls us:**

- to recognise the dignity of each individual human person as inviolable, to ensure that every person, especially the most disadvantaged and marginalised, have reasonable access to more than just the basic necessities of life;
- to acknowledge that our responsibilities to each other extend across national, racial, cultural, economic and ideological differences;
- to respect and promote the personal, social, economic, cultural and political rights of all peoples;
- to actively seek conditions that enhance the good of all and contribute to the achievement of a common life; and
- to take the issue of poverty beyond charitable acts and into the questioning and challenging of social values and structures.

**As an organisation we operate and fulfil our responsibilities in accordance with our values:**

Our leadership and service role is founded in the Gospels. Our service to those in Catholic education contributes to the achievement of excellence and equity.

We demonstrate our fidelity to our mission through professionalism in our work, effective stewardship, transparency and holding ourselves accountable for outcomes.



We act ethically, justly and honestly. We demonstrate that we value the dignity and worth of each individual by listening, speaking and acting respectfully towards everyone.

We value the principle of subsidiarity and work in close collaboration with others for the common good.



## Mission and Values

As an intrinsic part of our faith and our mission and values, we are committed to respecting and valuing human rights, and have zero tolerance towards any form of modern slavery in our own operations or in our supply chains.

Our Modern Slavery Statement aims to describe the work that we are doing to provide assurance that our operations and supply chains do not involve any instances of modern slavery.

# 2021 MODERN SLAVERY RISK MANAGEMENT ACTIONS AND FURTHER INITIATIVES

The following is an overview of the actions we continued to take from 2020, together with a summary of new initiatives taken during 2021.

## BOARD COMMITMENT

The Board is committed to the ongoing efforts to rid the world of modern slavery and remains vehemently opposed to modern slavery in all its forms, from slavery and servitude to forced or compulsory labour and human trafficking.

The Board has received reports on the progress of our action plan.



## ONGOING PARTICIPATION IN THE AUSTRALIAN CATHOLIC ANTI-SLAVERY NETWORK (ACAN)

ACAN supports CSNSW and other Catholic entities to identify and manage modern slavery risks in their operations and supply chains. It also assists CSNSW to report on these actions through preparation of an annual Modern Slavery Statement as required by the Act.

CSNSW continued its participation throughout 2021.

An ACAN representative has conducted an information session for all CSNSW employees on Sedex, a membership organisation that provides an online platform for companies to manage and improve working conditions in global supply chains.



## SHARING WITH OUR SCHOOLS

CSNSW takes steps to minimise the risk of modern slavery in its supply chain through its own supply chain audits and risk management tools. We have provided and continue to provide this information via relevant updates in Scholaris, our weekly e-Bulletin to schools, and via our Legal Hotline for legal assistance and support for our schools and Diocesan Catholic Schools Offices.



# OUR FUTURE PLANS

Each year we intend to publish the actions we have completed and critically consider the effectiveness of our ongoing efforts (including risk controls) to eradicate the risk of modern slavery from our supply chain.

Our future plans include:

- ongoing engagement and monitoring of our existing suppliers (including inclusion of contract reviews where required)
- only selecting suppliers that meet our criteria and commit to our zero tolerance stance towards any form of modern slavery
- continued participation in ACAN
- rollout of a Modern Slavery Policy
- partaking in future e-learning modules supplied by ACAN for all employees
- regular training of employees on modern slavery
- employee survey for all employees on their understanding of Modern Slavery



# REPORTING CRITERIA 1 AND 2: IDENTIFY THE REPORTING ENTITY AND ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## OUR ORGANISATIONAL STRUCTURE

CSNSW is a not-for-profit company limited by guarantee, incorporated and domiciled in Australia. Our members are the eleven diocesan Bishops of New South Wales. Each Bishop has responsibility for the Catholic School Office in his diocese, each of which are responsible for the operation and governance of the schools located in the respective diocese.

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 at 31 December 2021 we had 72 employees (FTE 66.9) working across our operations. All our employees are required to comply with our policies and procedures, including our Code of Conduct which describes the behaviours and standards expected of all our employees. This includes, relevantly, a requirement for our employees to behave consistently with our values such as acting honestly, lawfully and openly at all times and by valuing the dignity and worth of each individual.

We are proud that our people are committed to our values and are respectful of human rights. Our structure comprises teams which are managed by Directors who report to the Chief Executive Officer.

CSNSW operated from offices in the Polding Centre, 133 Liverpool Street, Sydney throughout 2021 with an annual consolidated revenue of \$31,245,333. This figure excludes revenue from our subsidiary company.

The Management Team is responsible for:

- leading the work programme of the Company as agreed to by the Board
- monitoring and providing expert policy advice on education policy issues such as funding, curriculum and school and system regulation including teacher accreditation
- acting as the recipient of Commonwealth and State Government recurrent funding for diocesan schools and capital targeted funding to both diocesan and Religious Institutes and Ministerial Public Juridic Persons (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
- encouraging and fostering greater collaboration at different levels among all Christ's faithful who share in the apostolate of Catholic education, 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)





## OUR GOVERNANCE FRAMEWORK

CSNSW is governed by a Board of independent directors and its work is undertaken by an experienced and professional secretariat.

The 2021 Board of CSNSW had 10 Directors including the Chairman. To assist in the execution of its role, the Board has five committees:

- Audit and Risk
- Compliance and Resourcing
- Education Effectiveness
- Executive
- Governance
- Human Resources and Remuneration



Each committee has its own charter. In addition, the Board has delegated responsibility for capital grants to the Capital Projects Evaluation Panel. All Directors are members of at least one committee and each committee is chaired by a Board Director.

We have established processes within our governance framework to provide our Board with oversight and accountability of the risk management framework (which includes modern slavery risks). Our Board is committed to ensuring that our operations and supply chains do not involve any instances of modern slavery.

Through our Audit & Risk and Governance, Human Resources and Remuneration Committees, our Board is kept apprised of modern slavery risk management programmes and activities.



## OUR OPERATIONS

CSNSW is responsible for:

- receiving and distributing government general recurrent and targeted programme funding to diocesan and RI/MPJP Catholic schools to support their operations and capital works;
- ensuring that Catholic schools and diocesan Catholic School Agencies adhere to compliance requirements;
- providing expert policy advice and coordinating policy development;
- reporting to the Bishops of NSW on the effectiveness of Catholic education in NSW;
- fostering collaboration and efficiency in the use of resources in NSW Catholic schools;
- promoting and advocating for Catholic education in NSW;
- providing sporting pathways opportunities for students & staff in NSW Catholic schools; and
- providing NSW, ACT and international secondary schools with high-quality Trial HSC Examinations.

## OUR SUPPLY CHAIN

Our suppliers provide us with the goods and services we need to support our operational needs and where possible our suppliers are engaged via formal agreement.

A detailed examination of our supply chain is contained in the sections below.

Our most common form of procurement is professional consultancy (low risk).

Our direct suppliers are predominantly located in Australia and range from small businesses, other Catholic entities and global multi-nationals. We recognise, however, that our suppliers' supply chains may extend outside of Australia. Our work has involved examining these extended supply chains and educating our suppliers about managing and monitoring their own suppliers for signs of modern slavery.

We have provided a breakdown of our procurement categories in this Statement below under *Reporting Criteria 3: Modern slavery risks in operations and supply chain*.



# REPORTING CRITERIA 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

CSNSW continues with its efforts to eradicate modern slavery.

We continue with our participation in the Modern Slavery Risk Management Program (Programme) with ACAN. As a participating entity, CSNSW cooperates with other Catholic entities, collaborates through monthly teleconferences, and keeps up to date with the requirements of the Act.

Throughout 2021 we continued with completion of our supplier categorisation, identifying high expenditure and high-risk categories. A supplier database was presented to ACAN to help develop category risk taxonomies for participating entities.



Categories identified as high risk included:

1. **Building and construction** - employing forced labour associated with the production of building and construction materials
2. **Apparel** (uniforms etc) – this sector is characterised by complex and opaque supply chains and competition for low prices and quick turnarounds
3. **Food and catering services** - the employment of seasonal labour and migrant workers is common, leading to potential for deceptive recruitment, human trafficking, and debt bondage, in addition to the use of excessive deductions and cashback payments to employers, recruiters and agents



CSNSW did not procure any new services or products from the high-risk categories for 2021. The vast majority of CSNSW's procurement spend is centred on suppliers of professional services such as insurance, financial systems, software, accounting, audit, etc.

As we have found previously, the potential for CSNSW to cause or contribute to incidents of modern slavery is very low. Notwithstanding this, we have identified some areas of vulnerability and have described in this Statement under *Reporting Criteria 4: Actions taken to assess and address risk*.

## OPERATIONAL RISKS

After a thorough audit of suppliers engaged by CSNSW, we have determined that the risk of modern slavery occurring in CSNSW's operations is very low as CSNSW's procurement of services is largely confined to professional services.

## OUR PEOPLE

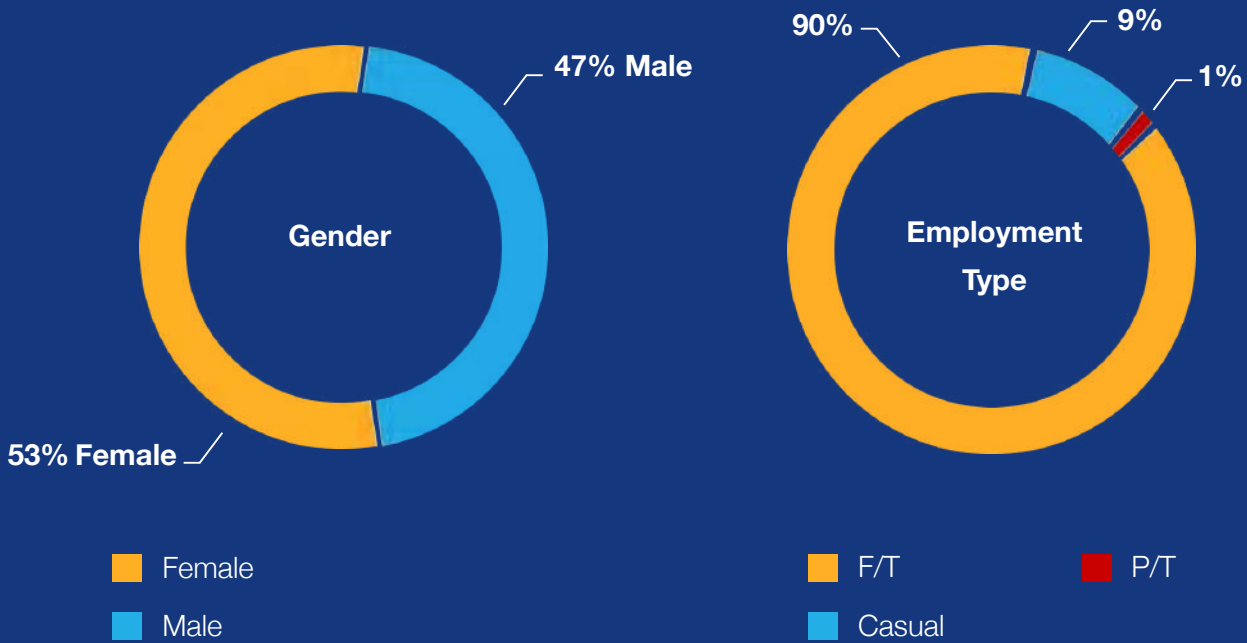
A breakdown of employees by employment type is described in the below graphs.

DIRECTORATE	FULL TIME EQUIVALENT (INCL DIRECTOR)	FULL TIME	PART TIME	CASUAL	CONTRACT
EDUCATION POLICY	15.6	15	0.6		
CAPITAL & PLANNING	5.5	5	0.5		
RESOURCES & STEWARDSHIP	3.5	3	0.5		
LEGAL, RISK & COSEC	5.2	4	1.2		
PA & ENGAGEMENT	2.0	2			
CHIEF OPERATION OFFICER	21.8	19	2.8		
SPORT	7	7			
CEO OFFICE	6.3	5	0.9	0.4	
TOTAL FTE	66.9	60	6.5	0.4	
TOTAL HEADCOUNT: 72 EMPLOYEES					

From time to time we utilise casual resourcing to accommodate busy periods. These casual resources are not included in the above table or organisation chart. As at 31 December 2021, CSNSW employed six casuals as per the below table:

<b>SPORTS SERVICES</b>	<b>CASUAL SPORT ASSISTANTS</b>	<b>4</b>
<b>EDUCATION POLICY PLANNING</b>	<b>COPYWRITE CLEARANCE OFFICER</b>	<b>1</b>
<b>LEGAL RISK &amp; COMPANY SECRETARY</b>	<b>PARALEGAL</b>	<b>1</b>

A breakdown of employee type by gender is described in the below graphs:



Since the last reporting period gender breakdown, full-time, part-time and casual employment remains static.

CSNSW employs a dedicated Human Resources Manager. We comply with labour, employment and immigration laws through a variety of HR Policies and Procedures including employment contracts, Code of Conduct, Flexible Work Arrangements and Working from Home Policy, Return to Work Policy, Child Protection/Safeguarding Policy, Privacy Policy, Work, Health & Safety Framework/Policies and Whistleblower Policy. This covers a broad range of legislation that governs our Human Resources and fair work practices.

In *Reporting Criteria 4: Actions taken to assess and address risk*, we have listed the actions which we have taken to further minimise these risks. However, our modern slavery risks within our direct team are minimal.

## SUPPLIER RISK IDENTIFICATION

Since 2019, we have regularly been conducting deep dive risk assessments of our suppliers with a spend data over \$10,000 against modern slavery indicators (such as location and industry of the supplier). Based on the findings of the risk assessment, the suppliers are then identified as one of the ten procurement categories that have a potential high risk of modern slavery.

The deep dive risk assessment involves:

- educating our suppliers about modern slavery risks; and
- writing to each of our ongoing suppliers formally asking them a number of targeted questions.

Working with our suppliers, we seek to address the modern slavery risks that were identified from their responses to the targeted questions. As part of this work, we also provided further information and assistance to our suppliers to help them better understand how modern slavery occurs and the potential risks that may exist in their own supply chains.







## OUR COVID-19 RESPONSE

The health, safety and wellbeing of our staff has been and remains the priority in our workplace plans to respond to the COVID-19 pandemic. CSNSW continues to monitor and adhere to all government advice in relation to the pandemic.

CSNSW also has due regard for the information provided by Australian Border Force in [MODERN SLAVERY ACT INFORMATION SHEET: CORONAVIRUS](#) and recognise that exceptional circumstances, such as the COVID-19 pandemic, can lead to increased risks of modern slavery in operations and supply chains due to changes such as sudden factory closures, workforce reductions, and higher demand and faster production times for certain goods and services (such as personal protective equipment).

To this end, we have honoured all existing contractual arrangements (wherever possible) and foster open communication with suppliers about risks (e.g. working with suppliers where required to ease pressures, such as deliverable timeframes).

CSNSW seeks advice and assistance from ACAN to help identify best practice approaches during the exceptional period of the ongoing pandemic.

## MODERN SLAVERY GAP ANALYSIS

CSNSW completed its first Bridge the Gap (BtG) analysis as part of the July 2019 Catholic Modern Slavery Conference. A further BtG analysis was completed for 2021 from the original Bridge the Gap.

The analysis covers the following key areas:

- Management Systems
- Risk Management
- Human Resources and Recruitment
- Customers and Stakeholders
- Procurement and Supply Chains

CSNSW will work to implement the work needed to bridge the gap following the initial and further analysis. The change analysis from the previous gap analysis for CSNSW showed:

- 22 areas of improvement
- 0 areas of no change
- 0 areas of regression



## SUPPLY CHAIN RISKS

We completed a desktop audit of all our new suppliers and those we use on an ongoing basis during 2021 with whom we spent \$10,000 or more.

We then conducted a deep dive assessment of these suppliers against key modern slavery indicators 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

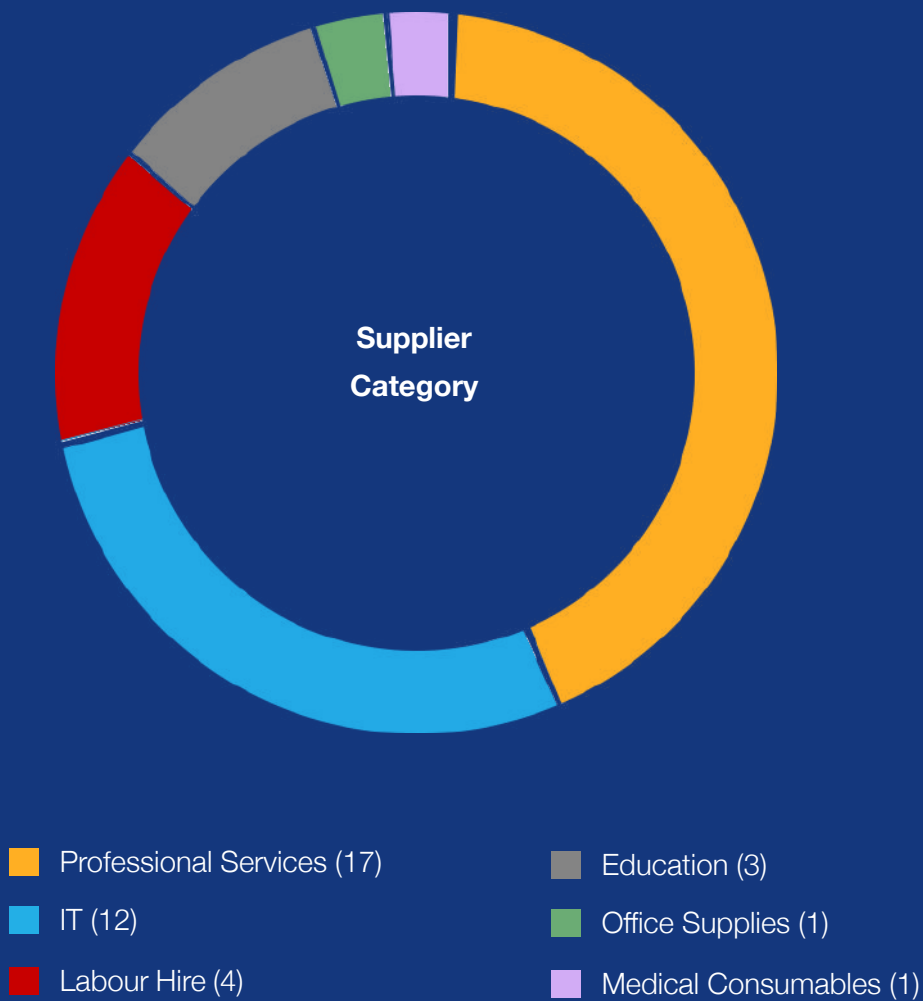
Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters

### 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).

## SUPPLY CHAIN RISKS

Based on these indicators, we identified the following categories that our suppliers fell into with a spend data over \$10,000.



# REPORTING CRITERIA 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

## ONGOING SUPPLIER ENGAGEMENT AND AUDIT OF NEW SUPPLIERS NOT CONTACTED IN 2020

We continued with our engagement strategy for all of our ongoing suppliers with spend data over \$10,000. This involved educating our suppliers about modern slavery risks. This included:

- providing context for our requests pursuant to the Act
- giving background details to the suppliers on the definition of modern slavery situations
- providing information about modern slavery produced by the Commonwealth Government in its Guidance for Reporting Entities
- providing the Global Slavery Index 2018, Extract “Top 105” countries at risk of modern slavery
- formally asking them a number of targeted questions

We then worked with our suppliers to address the modern slavery risks we identified from their responses.



## INTRODUCTION OF ANTI SLAVERY CLAUSES INTO CONTRACTS

New supplier agreements were reviewed internally by our in-house legal team. Our legal team ensured that an anti-slavery clause was included in the new agreements where appropriate (especially high risk suppliers).

The clause sets out the obligations of the supplier to ensure that all reasonable steps are taken to ensure that there is no modern slavery in its operations and supply chain, and that of its subcontractors and suppliers.

As part of the agreement, the supplier must notify CSNSW as soon as becoming aware of, or has a reasonable basis for suspecting that, any people working in its operations or supply chain are experiencing Modern Slavery.

Further, within timeframes agreed with CSNSW, the supplier must undertake, at its own cost, appropriate actions to provide remedy for people experiencing Modern Slavery in its operations or supply chains and take actions to cease and address any instances of Modern Slavery in its operations or supply chains.

CSNSW has not received any reports of suppliers experiencing or becoming aware of any modern slavery practices.



## MODERN SLAVERY ACTION PLAN AND ROAD MAP

During 2021, CSNSW sought ongoing support and guidance from ACAN.

The focus for CSNSW was to strengthen our understanding of potential modern slavery risks in operations and supply chains, identifying gaps and assessing high level supplier risks (Tier 1 or Direct Suppliers). CSNSW continued with the work needed in our action plan including:

- incorporating modern slavery requirements into existing policies and procedures
- development of a Modern Slavery Policy
- conducting desk top reviews
- mapping of our Top 50 tier 1 suppliers
- conducting a gap analysis
- working with suppliers to join Sedex

Our work is prioritised according to external and internal timetabled needs. All planned actions are entered as a compliance task in our governance and risk management assurance system, which is subject to accountabilities and reporting obligations.

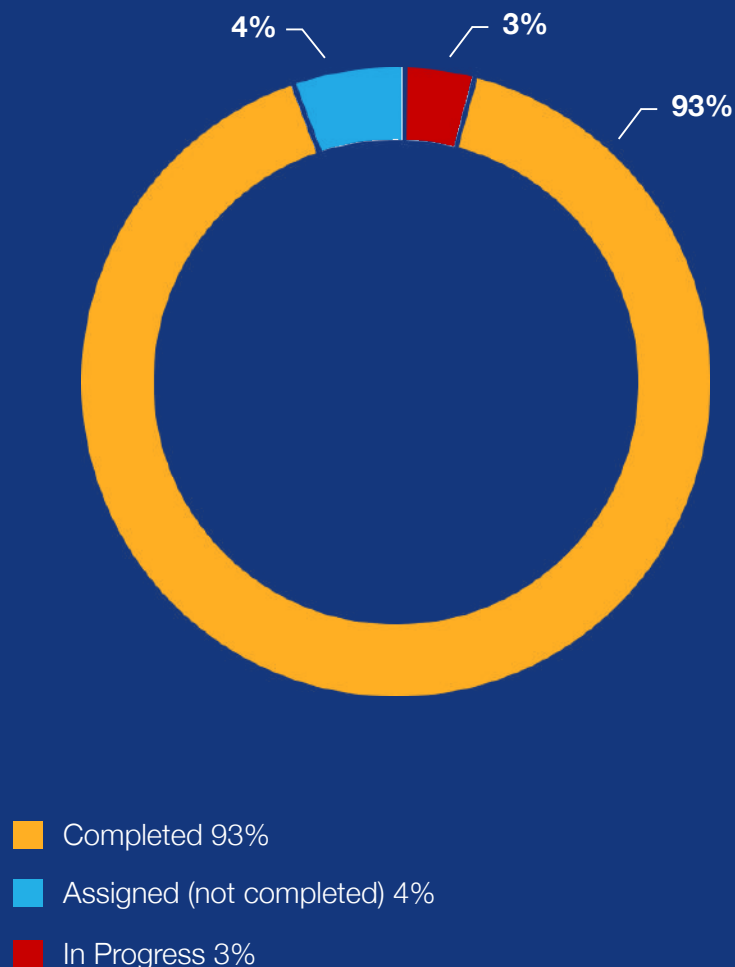
CSNSW use an online staff learning portal to undertake various forms of training. All staff have been assigned two modules entitled Modern Slavery 101 and Modern Slavery Business Relevance.



New staff are assigned the training as part of their induction programme and are requested to complete their training within two months of commencing employment with us.

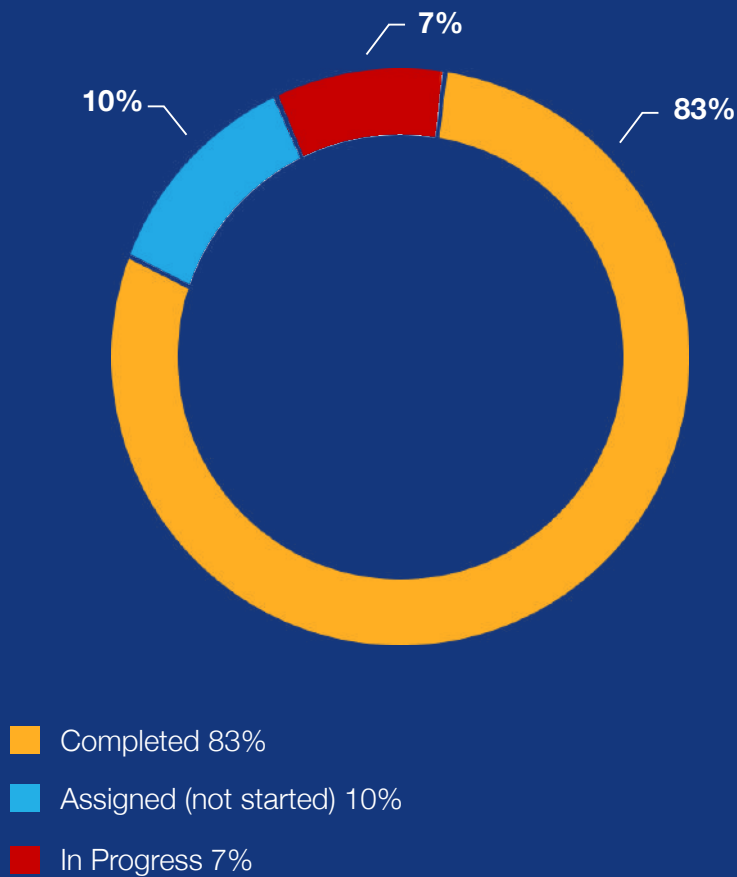
Completion statistics for each course are depicted below.

**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 those within the cleaning, security and hospitality sectors are also featured.





**Modern Slavery Business Relevance** - provides a business perspective on modern slavery and why it is important to manage modern slavery risk. The responsibilities of businesses to respect human rights through enhanced corporate due diligence are outlined and the key economic, legislative and stakeholder drivers to manage risk are discussed. A review of relevant modern slavery criminal offences and key reporting requirements of the Act are included.



In 2022, all staff will be invited to complete a further module on Modern Slavery Grievance Mechanisms and 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.

## SUPPLIER AUDITS

After undertaking our work with suppliers (as set out in *Reporting Criteria 3: Modern slavery risks in operations and supply chain*) we determined, as we did in 2020, that no further action was required for 2021 due to the minimal risks being identified.



## REMEDIATION

CSNSW 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 CSNSW is found to have caused or contributed to modern slavery.

As a participant in the ACAN network, CSNSW can access Domus 8.7 - an independent programme to provide remedy to people impacted by modern slavery. By partnering with Domus 8.7, CSNSW can help people impacted by modern slavery to achieve meaningful outcomes, improve our risk management response, supply chain resilience and prevent future harms.

When there are indicators of people who may be experiencing modern slavery identified through our risk management activities or other channels, staff will contact relevant law enforcement agencies, our own internal legal team and/or Domus 8.7 for an assessment, further investigation, action planning and implementation of a remediation process. Additional information about Domus 8.7 can be found at [www.acan.org.au/domus87](http://www.acan.org.au/domus87).

# REPORTING CRITERIA 5: EFFECTIVENESS ASSESSMENT

CSNSW regularly reviews the risk management framework which includes our modern slavery risks.

Details include:

- CSNSW appointed a Modern Slavery Liaison Officer (MSLO) who reports to the Audit & risk Committee (ARC). The committee report directly to the Board
- quarterly risk reports are presented to the ARC
- monitoring of compliance tasks via Complispace Assurance, our governance and risk management system, by the creation of 'Tasks' allocated to relevant employees for completion by specified dates
- training is assigned to all new staff as part of their induction programme
- although Modern Slavery has not been subject to our Internal Audit programme it is intended to form part of our next 2-3 year review cycle
- our in-house legal team review all contracts and agreements before final signatures are obtained
- ongoing engagement and monitoring of suppliers



# REPORTING CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

For the 2021 reporting period for this Modern Slavery Statement, Catholic Employment Relations (CER) Limited was a subsidiary of CSNSW. CER is a not-for-profit company limited by guarantee established to provide employment related advice and services for Catholic organisations.

This Statement excludes entities owned or controlled by Catholic Schools NSW Limited.



# REPORTING CRITERIA 7: OTHER

We do not have any further information to include in this Modern Slavery Statement.





**Modern Slavery Statement  
Catholic Schools NSW Limited**

**2021**



## **Catholic Archdiocese of Perth**

**Modern Slavery Statement 2021**

## Acknowledgement of Country

The Catholic Archdiocese of Perth acknowledges the Traditional Owners of the lands on which we live. We acknowledge the continued deep spiritual connection and relationship of Aboriginal people to this country and commit to the ongoing journey of Reconciliation.

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## Disclosure Note

This statement has been made on behalf of the Catholic Archdiocese of Perth and covers The Roman Catholic Archbishop of Perth Corporation Sole. The Archdiocese has no owned or controlled entities.

ABN 96 993 674 415



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## Brief Statement from The Most Reverend Timothy Costelloe SDB Archbishop of Perth



The Catholic Archdiocese of Perth welcomes the *Modern Slavery Act 2018* (Cth) and the ongoing awareness, increased due diligence and organisational responsibility that this legislation has called for as we continue to address Modern Slavery within the Archdiocese.

Over the last two years, the Catholic Archdiocese of Perth has implemented an intentional approach in our response to this current reality. Our efforts have been focussed on our operations and supply chains with the intent of identifying varying levels of risk across the Archdiocese of Perth. We continue to strive to appropriately address identified risks through an alignment between policies, processes and our governance framework.

As a member organisation of the Australian Catholic Anti-Slavery Network (ACAN), we are grateful for the support and guidance we have received from ACAN to date. The Catholic Archdiocese of Perth continues to develop risk action plans to mitigate risk exposures in our procurement processes by incorporating due diligence procedures, which include the development of supplier agreement clauses.

As a Catholic community, we are informed by Catholic Social Teaching which emphasises respect for the human dignity of each person. This means that we will continue to identify, mitigate, and remediate cases of modern slavery when they become apparent to us.

This is our second public disclosure that specifically addresses the very real risks of modern slavery emerging in our operations and supply chains. It has been prepared in line with the requirements of the *Modern Slavery Act 2018* (Cth).

+ Timothy Costelloe SDB



**Most Rev Timothy Costelloe SDB**

Archbishop of Perth

14th June 2022

# Modern Slavery Act 2018 (Cth) – Statement Annexure

## Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of **The Roman Catholic Archbishop of Perth Corporation Sole** as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> (“the Act”) on **June 14, 2022**

## Signature of Responsible Member

This modern slavery statement is signed by a responsible member of **The Roman Catholic Archbishop of Perth Corporation Sole** as defined by the Act<sup>2</sup>:



**Most Rev Timothy Costelloe SDB**

Archbishop of Perth

## Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
a) Identify the reporting entity.	3
b) Describe the reporting entity's structure, operations and supply chains.	6-9
c) Describe the risks of modern slavery practices in the operations and supplychains of the reporting entity and any entities it owns or controls.	10
d) Describe the actions taken by the reporting entity and any entities it owns orcontrols to assess and address these risks, including due diligence andremediation processes.	11-14
e) Describe how the reporting entity assesses the effectiveness of theseactions.	14
f) Describe the process of consultation on the development of the statementwith any entities the reporting entity owns or controls (a joint statement mustalso describe consultation with the entity covered by the statement).*	14
g) Any other information that the reporting entity, or the entity giving thestatement, 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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## About Us

The Catholic Archdiocese of Perth (CAP) is located in Perth, the capital city of the State of Western Australia. It is bounded to the north by the Diocese of Geraldton, in the east by the South Australian border, in the south by the Diocese of Bunbury and by the Southern Ocean in its south-east corner. Perth is the Metropolitan See for the Province of Western Australia which includes the Dioceses of Bunbury, Geraldton and Broome. The CAP comprises 94 metropolitan and 15 country parishes, with the parish priest as the canonical administrator of the parish.

The Roman Catholic Archbishop of Perth is a Corporation Sole by virtue of the Roman Catholic Church Property Act 1911 (ABN: 96 993 674 415), and is registered with the Australian Charities and Not-for-Profits Commission (ACNC). The Office of the Archbishop and the central administrative office are located at Griver House, 249 Adelaide Terrace, Perth 6000.

The Archdiocesan Plan 2016–2021, endorsed by the Archbishop, identified seven key priority areas, which from an organisational perspective, aimed to better facilitate the spreading of the Gospel:

- Professional standards;
- Effective communications;
- Support for the clergy;
- Strengthening and revitalising parishes;
- Adult faith formation;
- Outreach to those in need; and
- Archdiocesan growth and development.

The Plan's objective is to provide the pathway to deliver a Christ-centered, faithful, vibrant, welcoming, inclusive and mission-orientated Church.

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## Modern Slavery Risk Management Initiatives 2020 – 2021

Assisted by the Australian Catholic Anti-Slavery Network (ACAN), the following initiatives from 2020 have continued into 2021:

- Development of a Catholic Archdiocese of Perth (CAP) Modern Slavery Prevention Policy which articulates the roles and responsibilities in respect of risk identification and management of modern slavery risk in relation to CAP personnel and operations;
- Engagement with suppliers to enable the CAP to assess the risk of modern slavery from our direct supply chains;
- Development of a CAP Supplier Code of Conduct;
- Development of modern slavery clauses into our supplier agreements whereby suppliers must warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery;
- Promotion of the CAP Whistleblower Policy as a mechanism for our employees liaising with CAP suppliers to raise concerns regarding suspected unethical, illegal, or undesirable conduct;
- Continuation of awareness raising in the wider CAP community; and
- Support of Domus 8.7, which serves as ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service.

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## Our Plans for 2022 and Beyond

The CAP has renewed its participation in the ACAN Modern Slavery Risk Management Program 2021 to 30 June 2023 but will not submit a statement for 2022. Instead, the CAP will use its limited resources to consolidate the progress that has been made before re-committing to voluntary reporting.

Part of this consolidation work is to continue implementing the CAP Modern Slavery Prevention Implementation Plan. This Plan includes:

- finalising the CAP Modern Slavery Prevention Policy which articulates the roles and responsibilities in respect of risk identification and management of modern slavery risks in relation to CAP personnel and operations;
- engaging with more suppliers and the utilisation of supplier risk questionnaires to enable the CAP to adequately assess the risk of modern slavery from our direct supply chains;
- developing the CAP Supplier Code of Conduct that reflects our strong commitment to conducting our supply chain management in a responsible and sustainable manner, setting minimum expectations for supplier compliance with human rights laws as they pertain to CAP personnel and operations;
- including modern slavery clauses into every supplier agreement whereby suppliers must warrant that they conduct their business in a manner consistent with the objective of combatting modern slavery;
- promoting the CAP Whistleblower Policy as a mechanism for our employees liaising with CAP suppliers to raise concerns regarding suspected unethical, illegal, or undesirable conduct;
- continuing education of CAP personnel and the wider CAP community including the personnel of both faith and social outreach agencies that operate in the Archdiocese of Perth and Archdiocesan clergy and seminarians;
- raising awareness at the level of the parish of modern slavery by offering strategies that the parish and Catholic household can adopt to assist in the eradication of risk from supply chains that bring goods and services into parishes and households.



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## Our Governance Framework

The Roman Catholic Archbishop of Perth has the responsibility to govern the Archdiocese in meeting the material, social, personal and spiritual needs of its community, and to ensure that church laws are observed. The Archbishop is ultimately responsible for training and supplying priests for parishes, for the finances of the Archdiocese and for all church property.

The Archbishop consults with the Curia, Episcopal Vicars, the College of Consultors, the Council of Priests and the Archdiocesan Finance Council in order to discharge his canonical duties with respect to the administration of the Archdiocese.

Following the initial commencement of the CAP Transition, Archdiocesan governance has been divided into two pillars, each led by an Executive Director. These pillars are:

- The Pastoral Pillar, directed towards support and collaboration with Clergy and independent agencies delivering faith education and parish, mission, justice and pastoral support in the Archdiocese; and
- The Finance Pillar, directed towards the creation of a sustainable longer-term environment.

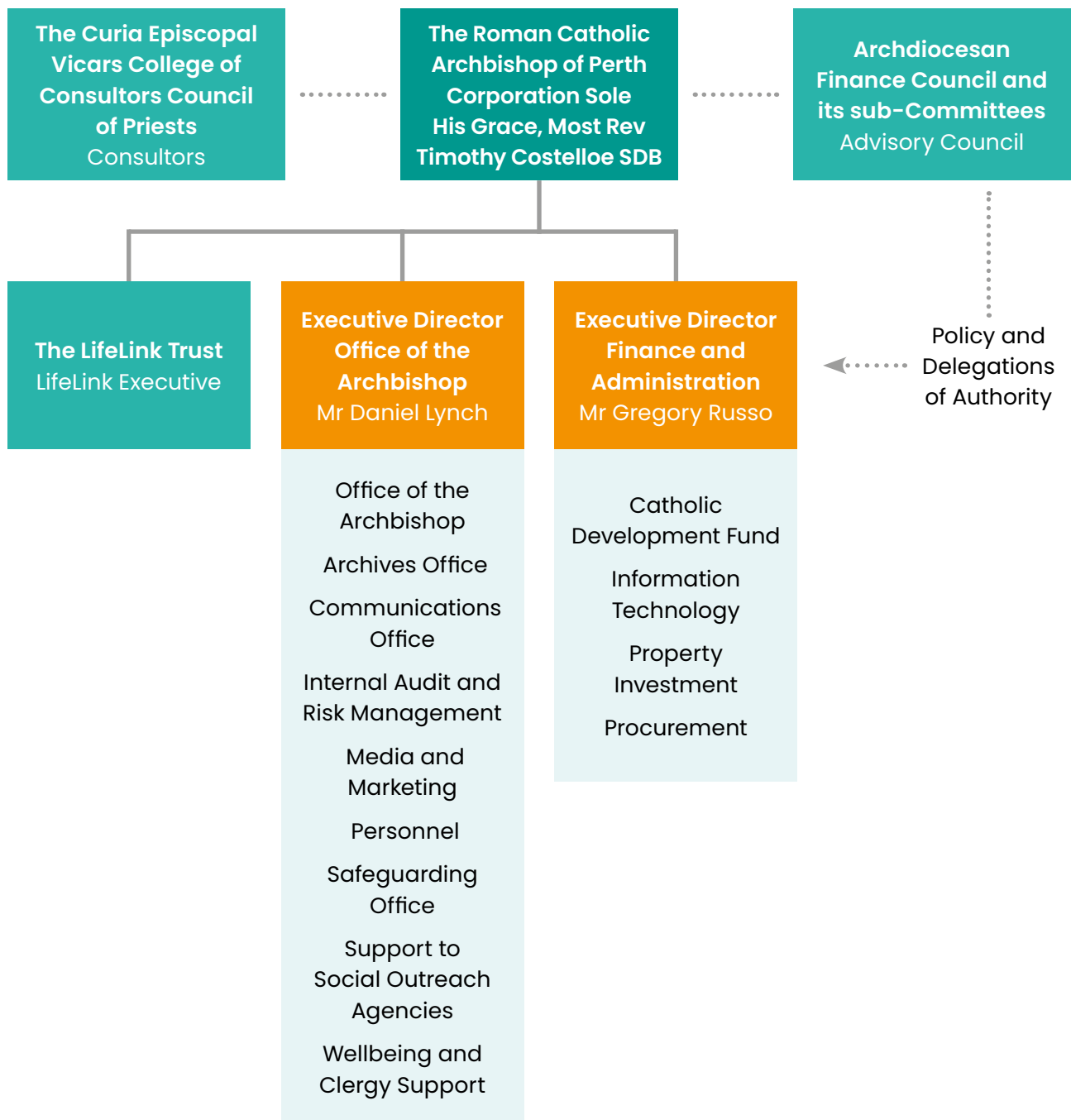
The Archdiocesan Finance Council (AFC) assists both the Archbishop and the Executive Directors in a consultative and advisory capacity. Committee members are approved by the Archbishop and serve on a voluntary basis, in accordance with the Standing Orders and Terms of Reference. The sub-committees of the AFC are the:

- Catholic Development Fund Committee;
- Property and Investment Committee;
- Finance and Audit Committee; and
- Governance and Risk Committee.

Governance roles are articulated in the CAP Governance Framework to ensure all decisions and actions are based on transparency, integrity, responsibility and performance for long-term sustainability.

The CAP Risk Management Framework was implemented in 2015. The Executive Directors have overall responsibility for the implementation and oversight of the Risk Management Plan, assisted by the Governance and Risk Committee. The plan addresses risks associated with CAP operations and includes risks relating to modern slavery.

# Our Organisation Structure



## Our Operations

The revenue stream generated from the Catholic Development Fund and investments in both managed funds and property provide the necessary funding for the Ministry of Priests, Safeguarding Program, Professional Standards, Communications and Media Office, Archives Office, Tribunal and the support to independent faith and social outreach agencies that operate in the Archdiocese.

Appeals and donations to The LifeLink Trust (ABN: 48 725 340 574) provide ongoing financial and promotional support to social service agencies that operate in the Archdiocese.

### Catholic Development Fund

Originating in December 1974, the Catholic Development Fund is the interest-bearing capital fund conducted by CAP. The Fund was established to enable Church organisations to securely invest their financial resources so that funds could be loaned to schools, parishes, Clergy and Catholic organisations to essentially fund new facilities or refurbish existing buildings for education, worship and other needs of the Church.

### Property and Investments

The property and investment portfolio play a significant role in producing recurrent income and financial stability to the Corporation Sole, and provide infrastructure for the delivery of social outreach objectives, priest accommodation and future sites of worship.

### The LifeLink Trust

LifeLink was established in 1994 as the fundraising arm of the Archdiocese which provides support to Public Benevolent Institutions (PBI) providing social service.

### Ministry of Priests

The Archdiocese provides support to specialist and retired Clergy, chaplaincy service to both hospitals and prisons, and support to St Charles Seminary and Redemptoris Mater Seminary which serve as the place of formation for Catholic Priests in both the Archdiocese and in Western Australia.

### Safeguarding Program

The Safeguarding Office is responsible for ensuring the safety of children, young people and the vulnerable within the confines of the Catholic Church across the CAP, educating the Catholic community on child protection and protective behaviours, and establishing Safeguarding Officers within Perth's metropolitan and rural parishes.

### Professional Standards

The WA Professional Standards Office is charged with implementing the National Response Protocol in Western Australia, assisting adults who have been subjected to historical childhood abuse or subjected to professional misconduct.

### Communications and Media

The Communications Office serves to develop and deliver the latest news and information of the Archbishop and the CAP, producing a weekly digital publication and a published bi-monthly magazine (The Record). In response to the COVID-19 restrictions on church attendance in 2020, the Communications Office live-streamed Mass to the CAP website, Facebook and YouTube.

### Archives

The official CAP archive is maintained at the Archives Office which also holds sacramental records for St Mary's Cathedral and a Central Database of Baptisms.

### Tribunal

The office is Western Australia's regional Tribunal for all formal cases of marriage annulment and for all Archdiocesan-related judicial and administrative cases.

### Support to independent agencies

Various independent agencies operate in the Archdiocese of Perth providing faith education, social outreach, and parish life and mission support. The CAP distributes annual funding to support the operations of these agencies which are governed by Agency Directors and Committees of Management.



**CDF**  
CATHOLIC DEVELOPMENT FUND



**LifeLink.**  
Catholic Caring Agencies



**The Safeguarding Program**

**THE RECORD**

## Resourcing Our Workplace



The CAP seeks to be more than a place of employment, offering the opportunity for all employees to contribute to the mission of the Church, supporting the Archbishop's Mandate and Strategic Plan for the Archdiocese of Perth. The CAP is committed to ensuring employment conditions sustain the health, safety and wellbeing of our employees, a workplace free from harassment, discrimination and bullying.



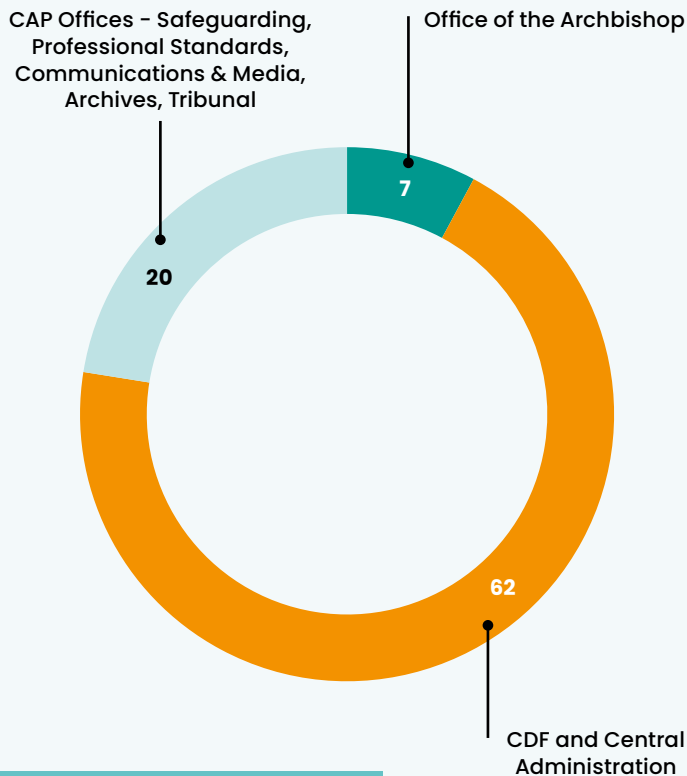
All CAP employees are required to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the CAP, employees are expected to practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

The CAP Code of Ethical Conduct sets out the expectations for all employees and articulates the Gospel's requirement for all to respect the dignity of each person, and to be fully supportive of the ethos of the Catholic Church.

The CAP Whistleblower Policy provides employees the opportunity to report concerns about violations of the code of ethics, laws or regulations that govern CAP operations.



Regular training opportunities are provided to enhance professional development, provide a mechanism for continual improvement in procedures and respond to changes in the regulatory environment. Opportunities for learning continued in 2021 to inform CAP employees of the Catholic action in Australia to eradicate modern slavery, and the risks that exist in employment practices and supply chains.



The CAP employs 89 full time, part time and casual staff all based in the Archdiocese of Perth.



Griver House blessed and officially opened by Archbishop Timothy Costelloe SDB on 8th December 2016



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## Our Supply Chains

In 2021 the CAP procured approximately \$30M in goods and services from 363 Tier 1 (direct) suppliers. We have established long-term relationships with many of our suppliers who are predominantly located in Australia.

The CAP maintains a significant investment portfolio, placed in managed funds via appointed Portfolio Advisers. It is acknowledged that those funds contain many layers of ownership in companies and organisations that may have varying commitments to upholding human rights.

The CAP purchases a wide range of goods and services which include the following:

- Building construction and associated professional services;
- Property maintenance;
- Information and communications technology;
- Furniture and office supplies;
- Cleaning and security services;
- Food and catering supplies and services; and
- Motor vehicles.

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## Modern Slavery Risks in Operations and Supply Chains

The CAP acknowledges that procurement activities could cause, contribute to or be directly linked to modern slavery practices. Procurement of goods and services attributable to construction, clothing, catering and cleaning are known to be at increased risk of modern slavery due to increased risk of worker vulnerability and labour exploitation, involving employment of migrant workers at low levels of pay.

In 2021 the CAP continued to participate in the Modern Slavery Risk Management Program 'Australian Catholic Anti-Slavery Network (ACAN)' facilitated by the Catholic Archdiocese of Sydney Anti-Slavery Taskforce. As a participating organisation, the CAP was provided with various resources including the Modern Slavery Category Risk Taxonomy. This risk taxonomy had been specifically developed for ACAN by external expertise and highlighted the following risks associated with the CAP's largest supply spend or high risk categories:

### Building and construction

There are numerous examples of forced labour associated with the production of building and construction materials commonly used in Australia. 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. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites.

### Finance and investment

Investor's 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.

### Facility management and property maintenance

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.

### Cleaning and security services

These sectors typically employ low skilled, often migrant, workers facing language barriers and a resulting lack of understanding of their rights. Jobs in this sector are often low paid and have high rates of staff turnover, with staff 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.

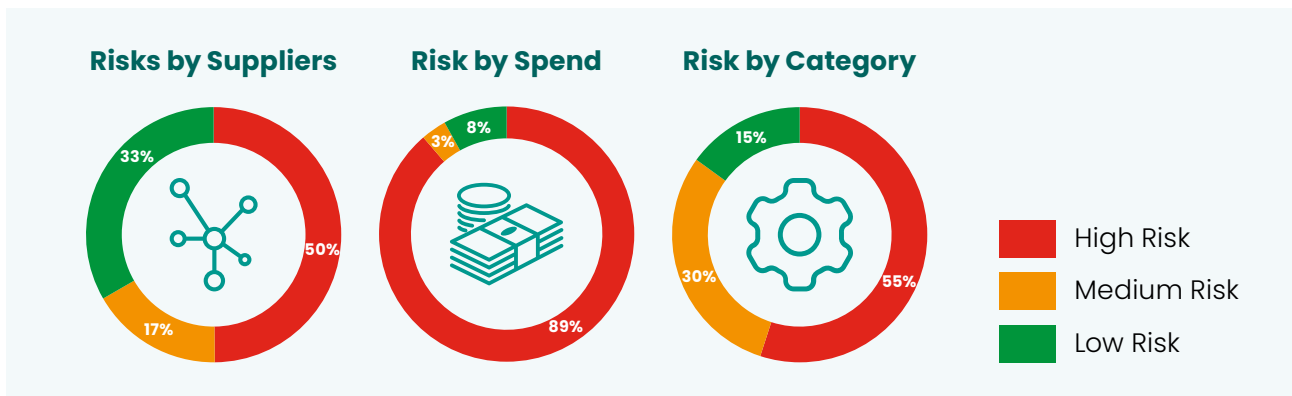
### Information and communications technology (ICT) hardware

According to the 2018 Global Slavery Index, electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia. Forms of modern slavery present 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.

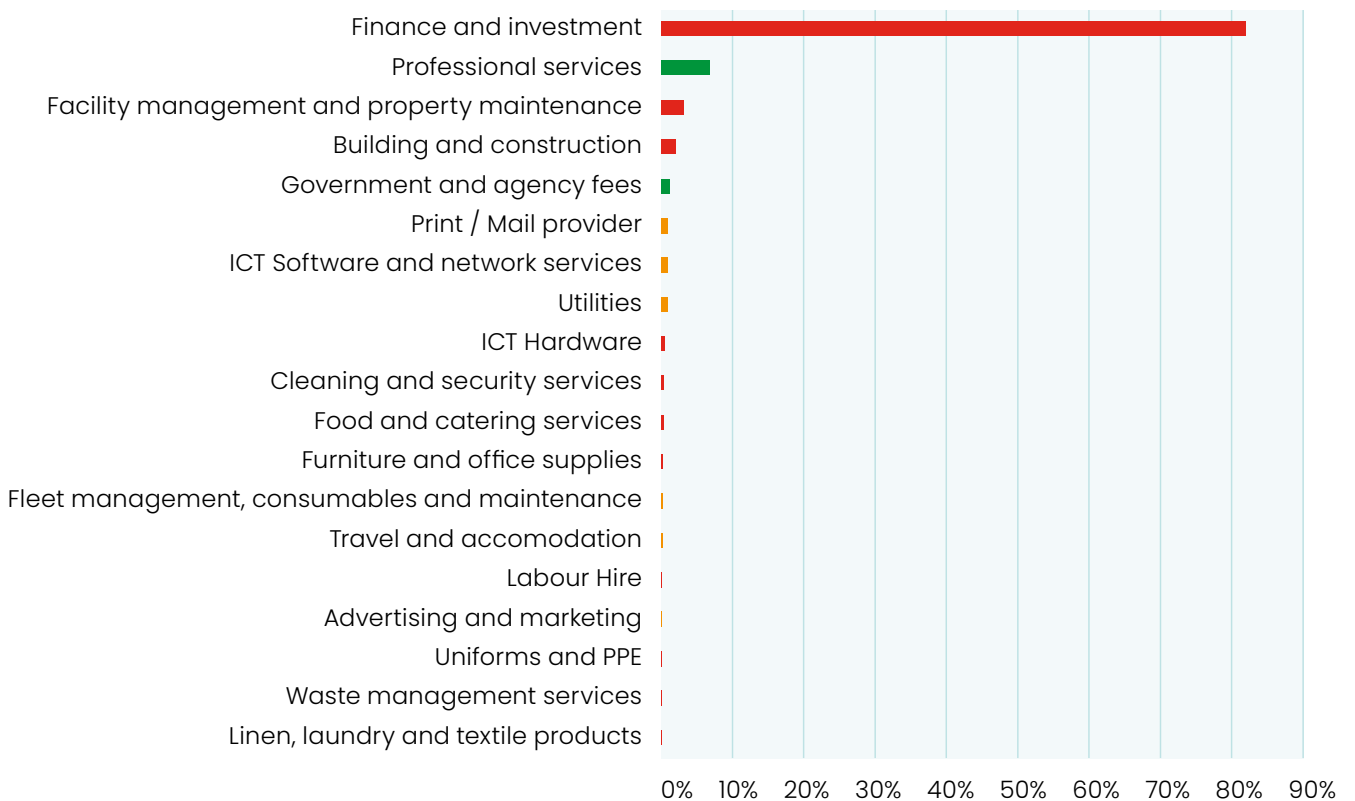
# Supplier Risk Identification

The CAP assessed the 2021 supply and net investment spend against the ACAN Category Risk Taxonomy in order to identify the potential risks. Actual risk has not been determined as the CAP has not yet conducted a detailed investigation of the suppliers engaged. In late 2020 the CAP advised its suppliers of its voluntary reporting in accordance with the *Modern Slavery Act 2018* (Cth) and the intention to ensure suppliers took reasonable steps to ensure no modern slavery existed in their supply chains or any part of their operations. Currently CAP procurement is undertaken by various operational or office managers. A Procurement Manager may potentially be appointed to facilitate the required oversight of the CAP supply chain management.

The CAP is committed to ensuring that the investment portfolio assets are not placed with organisations whose core business conflicts with the nature and teachings of the Catholic Church. The CAP does not wish to encourage or profit from activities which create goods or services that have unacceptable harmful effects on people or the environment which cannot be avoided by prudent and practical controls. The Executive Director, Finance and Administration works closely with the investment portfolio advisors to exclude investment in a fund with unacceptable core business or conduct.







## Percentage of Spend 2021



## Modern Slavery Gap Analysis

An assessment of existing governance, policies and procedures was first undertaken in 2019 to determine the CAP's effectiveness in managing modern slavery risks. This gap analysis was re-performed in December 2020 and December 2021 and serves to provide an understanding of areas that require improvement and the basis for a practical plan to better manage modern slavery risks.

Category	Topic	Result 2020	Result 2021	Change
Management Systems	Governance	Leading practice	Leading practice	-
	Commitment	Leading practice	Leading practice	-
	Business systems	Starting out	Starting out	-
	Actions	Starting out	Starting out	-
	Monitor/report	Starting out	Starting out	-
Risk Management	Risk Framework	Starting out	Starting out	-
	Operational risk	Starting out	Starting out	-
	Identifying external risks	Starting out	Starting out	-
	Monitoring & reporting risk	Starting out	Starting out	-
Procurement & Supply Chain	Policy & procedures	Starting out	Leading practice	+
	Contract management	Starting out	Starting out	-
	Screening & traceability	At the starting line	Starting out	+
	Supplier engagement	Starting out	Starting out	-
	Monitoring & corrective action	At the starting line	At the starting line	-
Personnel & Recruitment	Awareness	Leading practice	Leading practice	-
	Policies & systems	Starting out	Leading practice	+
	Training	Leading practice	Leading practice	-
	Labour hire/outsourcing	At the starting line	Starting out	+
Customers & Stakeholders	Customer attitude	Starting out	Leading practice	+
	Information provision	Starting out	Leading practice	+
	Feedback mechanisms	Leading practice	Leading practice	+
	Worker voice	Starting out	Starting out	-

	Leading practice
	Making progress
	Starting out
	At the starting line

---

## Actions Taken to Assess and Address Risk

The financial year ended 31 December 2021 is the second voluntary reporting period for the CAP with respect to the Modern Slavery Act. The actions undertaken during 2020 and 2021 were focussed on continuation of the establishment of a strong foundation for future action to identify and address modern slavery risks in our operations and supply chains.

### Actions undertaken

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#### Raising CAP awareness of modern slavery risks

- A session on modern slavery was presented at the inaugural Catholic Social Services Western Australia Symposium which highlighted the current reality and offered the leaders of Catholic welfare organisations a strategic first step in addressing the issue
- At the annual Archdiocesan Agency Network Dinner, CAP funded agency Directors were given a presentation on modern slavery and the Australian Catholic Anti-Slavery Network (ACAN) was promoted
- At an Archdiocesan Clergy Morning Tea, parish priests were asked to consider joining an initiative to slave-proof Sunday Mass morning teas. Three parish priests have joined the first phase of this project
- Formal communication from the Bishop to parish priests highlighting the work of the CAP around modern slavery with a request to read the CAP Modern Slavery Statement 2020 and invitation to participate in the Parish Modern Slavery Project

#### Incorporating modern slavery prevention into CAP governance

- Designated Modern Slavery Liaison Officer (MSLO) and Internal Audit and Risk Manager
- Development of the CAP Modern Slavery Prevention Policy and CAP Supplier Code of Conduct
- Inclusion of Modern Slavery risk from supply chains in the CAP Risk Register

#### Engaging with CAP supply chain

- Inclusion of ethical objectives in CAP investment policy, identifying unacceptable core business and unacceptable conduct in relation to investments within managed funds
- Development of reporting criteria to be provided by CAP investment Portfolio Advisers in respect of CAP ethical objectives
- Notification to suppliers of CAP's commitment to eradicate modern slavery and the intention to develop a Supplier Code of Conduct

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## Provision of Remediation Solution via ACAN

CAP is committed to ensuring it provides appropriate and timely remedies to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CAP is found to have caused or contributed to modern slavery. The CAP continued support of Domus 8.7 means there is provision of a remedy pathway for victims of modern slavery.

Where directly linked to modern slavery by a business relationship, CAP is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

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## Effectiveness Assessment

Actions taken to date continue to focus on the implementation of policies and underlying procedures. The CAP's greatest source of modern slavery risk comes from supply chains and as such, considerable work is required to fully assess the source of risk at an individual supplier level and engage initially with those high-risk suppliers to assess their business practices. The CAP is currently constrained to adequately resource this level of supplier assessment and engagement. The CAP aims to provide leadership by educating and raising awareness to CAP employees, suppliers, and other stakeholders of the reality that current operational models can either cause, contribute to or be directly linked with modern slavery practices.

The CAP Governance Framework articulates the roles of the Executive and Archdiocesan Finance Council with respect to risk management, internal controls, and codes of conduct. The CAP Internal Audit Program provides independent assurance that risk management, governance and internal control processes are operating effectively, reporting to the Governance and Risk, and Finance and Audit sub-Committees. The Internal Audit program is reviewed on a regular basis in line with risk exposures and will provide the mechanism for monitoring controls in relation to supply chain and modern slavery.

The CAP Whistleblower Policy provides the mechanism to respond to reported concerns and disclosures relating to modern slavery.

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## Process of Consultation with Entities Owned or Controlled

The CAP does not own or control any entities. This statement is provided on a voluntary basis, as a single reporting entity pursuant to section 13 of the *Modern Slavery Act 2018* (Cth).



For enquiries or more information, please contact:

Location: Griver House  
249 Adelaide Terrace,  
Perth, Western Australia

Post: GPO Box M962,  
PERTH WA 6843, Australia

Telephone: +61 (08) 6104 3600

Website: [www.perthcatholic.org.au](http://www.perthcatholic.org.au)



St Vincent de Paul Society  
NSW  
*good works*



# MODERN SLAVERY STATEMENT 2021



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## Disclosure Note

This statement has been made on behalf of 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.

Registered Office 2C West Street, Lewisham NSW 2049

Reporting period: 1 January 2021 – 31 December 2021



**ACKNOWLEDGEMENT OF COUNTRY**

We acknowledge Aboriginal and Torres Strait Islander peoples, as the Traditional Custodians of this land, with deep respect. May Elders, past and present, be blessed and honoured. May we join together and build a future based on compassion, justice, hope, faith and reconciliation.



## FOREWORD

The Trustees of the Society of St Vincent de Paul (NSW), the St Vincent de Paul Society NSW and St Vincent de Paul Housing aspire to an Australia transformed by compassion and built on justice. Our members, volunteers and employees work daily to bring about that transformation and advocate for greater justice on a range of social issues including Modern Slavery.

The *Modern Slavery Act 2018 (Cth)* describes Modern Slavery as eight types of serious exploitation including trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage and the worst form of child labour. It includes situations where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Modern Slavery is a challenge to justice in the world and it is contrary to our values. We are committed to the identification of Modern Slavery in our supply chain and taking action to eliminate it. We are also raising awareness across our organisation and with our suppliers of the steps we are taking to source products and services ethically.

### Approval And Signature

This joint statement was approved by the Trustees of the Society of St Vincent de Paul (NSW), the Board of St Vincent de Paul Society NSW, and the Board of St Vincent de Paul Housing.

Date of approval June 2022.

**Paul Burton**  
President of Trustees  
Society of St Vincent de Paul (NSW)

**Richard Stewart**  
Chair of the Board  
St Vincent de Paul Society NSW

**Denis Walsh**  
Chair of the Board  
St Vincent de Paul Housing

## ABOUT US

**The St Vincent de Paul Society was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.**

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

The St Vincent de Paul Society NSW (SVDP NSW) was established in 1881 and currently has more than 13,000 members and volunteers, and 1,300 employees across the state.

We have a large geographic footprint across NSW, with 372 local member networks, referred to as Conferences, present in communities across NSW.

Our members, also known as Vincentians, volunteers and staff help people experiencing poverty and 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. We also provide vital emotional support and referral services when they are needed.

We are a leading provider of social services, with 100 services across the state. Our services include homelessness and housing services; domestic and family violence services; disability services; mental health programs; and health services, including rehabilitation services.

SVDP NSW is committed to sustainability and recycling. Our network of Vinnies shops sell a range of pre-loved goods, the revenue from which we use to support people in need.

St Vincent de Paul Housing (SVDP Housing) partnered with the NSW Government to deliver new social and affordable housing. In this partnership, supported by the Social and Affordable Housing Fund, we build properties on our own land, which are then tenanted out by Amélie Housing who are contracted to provide day-to-day management of SVDP Housing. The Society provides ongoing social support for tenants, ensuring they not only have a home, but the wrap-around assistance they need to achieve stability.

## OUR MISSION

The St Vincent de Paul Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.



## OUR VISION

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

## OUR ASPIRATION

An Australia transformed by compassion and built on justice. The Society advocates on several pressing social justice issues such as homelessness, poverty and people seeking asylum.

## 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.

# IN THE 2020/21 FINANCIAL YEAR WE:



supported 3,595 people with disability to work towards their goals



assisted more than 13,852 people through homelessness and housing services



delivered 3,000 doses of COVID-19 vaccines in the space of 12 weeks at our immunisation hub in Sydney



helped 2,415 women and children experiencing domestic and family violence



served 9,073 meals through the Nagle Centre in Campbelltown



offered 1,335 people social inclusion and skills support through the Ozanam learning centre



provided flood appeal funding relief to 718 households



managed 502 social and affordable housing dwellings



provided assisted employment and access to recreation programs for 232 people with disability.

## 2021 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

In the 2021 calendar year, in support of our Modern Slavery Risk Management, we:

- participated in the Australian Catholic Anti-Slavery Network (ACAN) year two Modern Slavery Risk Management Program
- increased awareness of Modern Slavery among our people through training, regular internal communications and engaging more closely with parts of the Society where our people may encounter those directly affected by Modern Slavery
- ensured relevant policies are compliant with Modern Slavery legislation
- engaged with suppliers to increase awareness of the risks of Modern Slavery, and our expectations of them to address those risks
- ensured that an evaluation of Modern Slavery risk is embedded into our new supplier selection process
- negotiated with new suppliers to ensure new contracts, where appropriate, include anti-Modern Slavery requirements
- commenced implementation of a risk assessment process across our suppliers
- commenced the identification and mapping of high-risk supply chains across the state
- commenced the implementation of mitigation strategies where the potential for Modern Slavery was identified members of the Modern Slavery working group participated in the webinar: How to make progress tackling Modern Slavery.

## OUR PLANS FOR 2022

We will expand on our supplier engagement and proactively engage with new suppliers to ensure that our commitment to the elimination of Modern Slavery is understood by our partners.

We will:

- increase the awareness of Modern Slavery amongst our stakeholders through internal and external communications channels
- increase engagement with existing and new suppliers to increase awareness of Modern Slavery risk in their operations and supply chains and on-board them to SEDEX
- continue to progressively review and ensure anti-Modern Slavery terms are agreed in high-risk supplier contracts.



# REPORTING CRITERIA 1&2

## About St Vincent de Paul Society NSW

St Vincent de Paul Society in NSW is made up of three legal entities:

- **The Trustees of the Society of St Vincent de Paul (NSW)** (State Council) is a body corporate incorporated under the Roman Catholic Church Communities' Lands Act 1942 (NSW)
- **The St Vincent de Paul Society NSW (SVDP NSW)**, is a public company limited by guarantee
- **St Vincent de Paul Housing** is also a public company limited by guarantee.

The three legal entities are referred to as “the Society,” “we” or “us” throughout this document unless an individual entity is named specifically.

The three entities are a consolidated reporting group for the

purpose of annual reporting to the Australian Charities and Not-for-profits Commission.

St Vincent de Paul Society NSW annual revenue for the reporting period was \$212.1M.

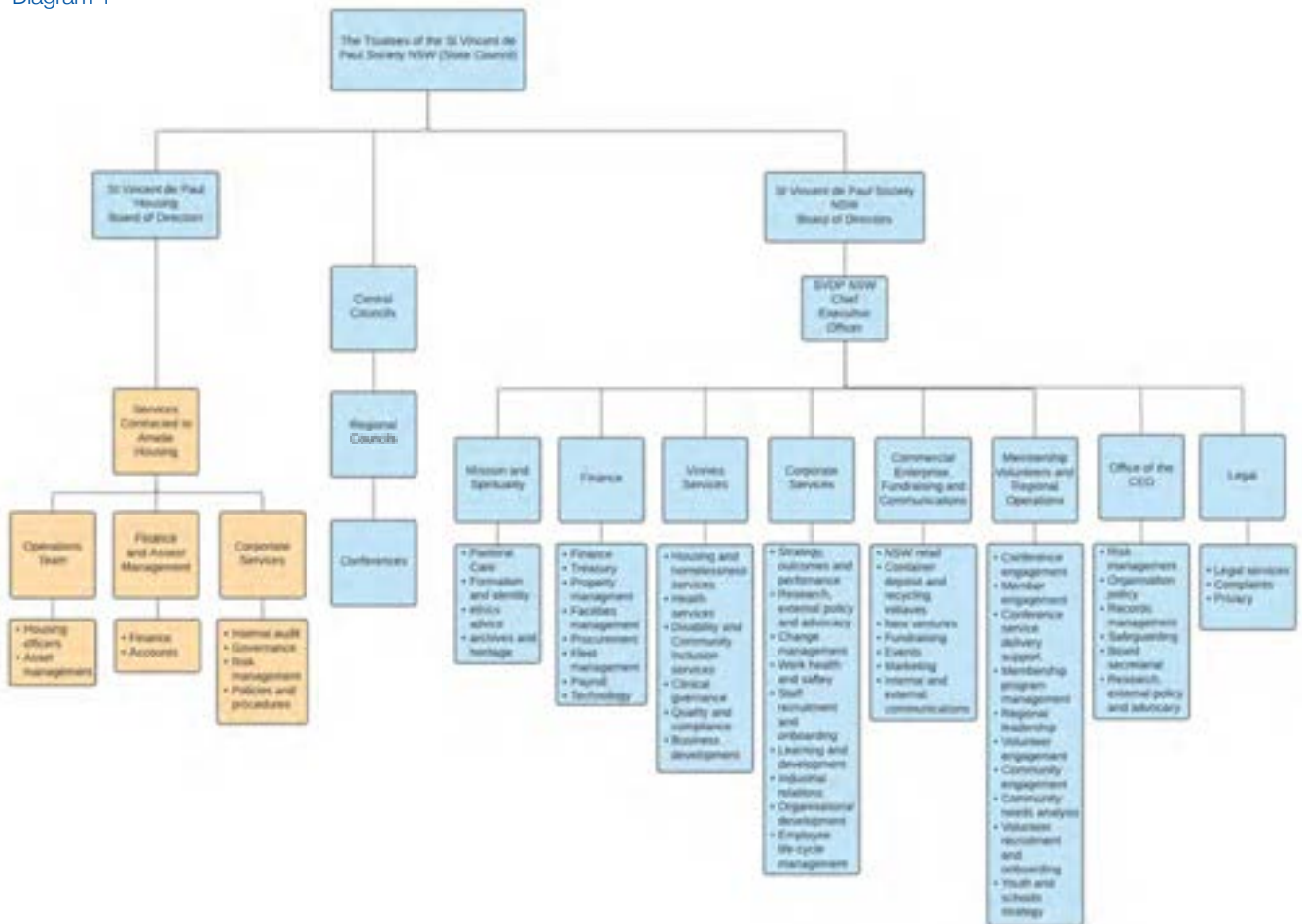
St Vincent de Paul Housing does not have employees and contracts Amélie Housing to run all day-to-day operations.

This Modern Slavery Statement does not apply to:

- the international body of the St Vincent de Paul Society, the International Consul General, or any entities owned or controlled by the International Consul General
- the National Council of St Vincent de Paul Society
- St Vincent de Paul Societies in other Australian states and territories, or any entities owned or controlled by these Societies.

### Our organisational structure

Diagram 1



## OUR GOVERNANCE FRAMEWORK

### St Vincent de Paul Society NSW

The St Vincent de Paul Society NSW Board provides strategic oversight and direction for the activities of the Company, St Vincent de Paul Society NSW. The Board is supported by four advisory committees, including the Governance, Risk and Nominations Committee.

The Board of Directors of St Vincent de Paul Society NSW, through its Governance, Risk and Nominations Committee has oversight of the Modern Slavery Risk Management program. It is responsible for:

- overseeing the development of the Modern Slavery Statement
- overseeing of any identified risks and advising the Board on the mitigation of such risks
- providing regular (quarterly) updates to the Board, in accordance with the Risk Management Framework.

Responsibilities for implementing our Modern Slavery obligations are as follows:

- The Chief Financial Officer (CFO) 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 CFO chairs the cross-functional Modern Slavery working group which drives the Modern Slavery work in the Society in NSW
- The Director, Office of the CEO is responsible for organisational governance and ensuring that governance policies and procedures are current.
- The Director, Legal is responsible for organisational risk management and compliance, including in relation to Modern Slavery.
- All Executive Directors are responsible for ensuring their staff comply with the organisations policies and practices.

Policies relevant to Modern Slavery include:

#### SVDP NSW

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework
- Code of Conduct

### Trustees of the Society of St Vincent de Paul (NSW)

The Trustees are a body corporate under the *Roman Catholic Church Communities Lands Act 1942* (NSW). The Trustees are the members of the State Council. The Trustees currently own all the real property assets of SVDP NSW in NSW and do not have any employees. The Company, SVDP NSW operates the businesses and services, it also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its obligations under the Modern Slavery Act.



### St Vincent de Paul Housing Board

St Vincent de Paul Housing is a special work of the Trustees of the Society of St Vincent de Paul (NSW). The Trustees of the Society of St Vincent de Paul (NSW) is the member of St Vincent de Paul Housing. St Vincent de Paul Housing does not have any employees. The St Vincent de Paul Housing Board is assisted, by its Governance Committee, to maintain compliance with corporate governance standards. The Board has responsibility for Modern Slavery oversight.

As Amélie Housing is contracted to run day-to-day operations, Amélie Housing's Chief Financial Officer and Operations Director have contractual responsibility for procurement in respect of St Vincent de Paul Housing.

Amélie Housing's National Corporate Services Director is responsible for organisational governance and ensuring that governance policies and procedures are current.

Policies relevant to Modern Slavery include:

- Procurement Contractor Policy
- Risk Management Policy
- Tenancy Complaints and Appeals Policy
- Whistleblower Policy

## OUR OPERATIONS

We are an organisation whose focus is on serving the most disadvantaged, including people at risk of Modern Slavery. Services are delivered by our members, volunteers and staff. We also have contractual arrangements with third-party suppliers including agency staff and suppliers of goods and services.

### OUR FOOTPRINT

We have a significant presence in NSW with operations across the State. Our members are arranged in five regions aligned with Catholic dioceses. Our staff 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 helping 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 floods and bushfires, and deliver emergency assistance.

### VINNIES SERVICES

The people we assist are at the core of everything we do at the Society. Vinnies Services delivers our social services including homelessness and housing services; disability and community inclusion services; and health services, including drug and alcohol programs.

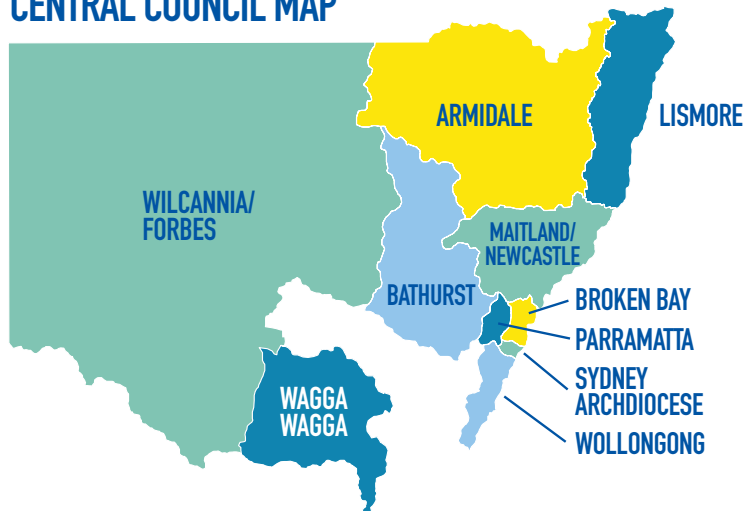
### ADVOCACY

Through our advocacy work we promote policies and initiatives to lift people out of poverty and homelessness. We have well established partnerships with other organisations to achieve our joint objectives.

### VINNIES SHOPS

Our Vinnies retail network includes 225 shops across NSW. Our shops primarily sell donated second-hand items including clothing, furniture, and bric-a-brac. Vinnies shops are much more than places to buy quality clothing at great prices. They are often co-located with or a conduit to the Society's Conferences or services, expanding the assistance we can deliver. Our shops are staffed with a combination of volunteers and staff. As well as offering value for money prices on a range of pre-loved goods, they also directly assist people experiencing disadvantage through the donation of furniture, clothing and household goods. Profits from the sale of goods go back to the community, going directly towards funding our services and programs.

## 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

## COMMERCIAL ENTERPRISE AND FUNDRAISING

We are a NSW Return and Earn Scheme collection partner for eligible containers. The Return and Earn Scheme in Dubbo is operated as a joint venture with the Regional Enterprise Development Institute (REDI.E), an Indigenous owned and managed organisation delivering employment, training and community services within the Murdi Paaki region.

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 of the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing built 502 units for people on low to moderate incomes in November 2020. Of these, 357 are for social housing and 145 for affordable housing tenants. SAHF homes are new dwellings, built to the latest standards of design, safety, and accessibility. As part of the SAHF model we use a housing first approach which provides people with housing that is located close to local services and transport, as well as connecting them with wraparound support from staff so that they can achieve their individual goals.



## OZANAM INDUSTRIES

Ozanam Industries is a Special Work of the St Vincent de Paul Society employing over 100 Australians with disability at our three Work Centres in Stanmore, West Ryde and Coonamble. Ozanam is registered with the National Disability Insurance Scheme (NDIS) to provide supports in employment.

92,650



the number of visits our members made to people's homes, hospitals, aged care facilities and prisons to offer support



35,289

total number of people assisted by our members



49% of people seeking assistance from our members was due to a shortage of food

1,259

people assisted to manage drug and alcohol addiction



1,228

people helped to secure permanent accommodation

\$2,200,000 allocated to Community Development Grants for people affected by the Black Summer bushfires



44 PROJECTS

by grassroots organisations benefiting from the first two rounds of Community Bushfire Grants

## OUR SUPPLY CHAIN

**We are continuing to mature the procurement function within the Society after transitioning from a distributed to a centre led approach. A significant undertaking is the establishment of a central register to facilitate the collection of supplier data, including key information relating to our agreements with suppliers, their services, supply chain and steps taken in relation to Modern Slavery risk.**

The St Vincent de Paul Society NSW and St Vincent de Paul Housing procure the following types of goods and services:

- building and construction services
- cleaning and security services
- food and catering
- professional services
- ICT hardware/ICT software and network services
- facility management and property maintenance
- furniture, office supplies and other consumables
- skilled labour hire
- waste management services
- events and event management (fundraising agency, digital and creative services)
- linen, laundry and textile products
- motor vehicles and fleet management services

Due to the history of our organisation, and the nature of the support we provide to those in need across metropolitan, regional and remote NSW, the Society has a high volume and broad mix of suppliers with a low annual spend. With these suppliers, we acknowledge that a more supportive and educational approach is required. During 2021 we communicated with our suppliers in relation to Modern Slavery and our commitment to understand and address the risk of Modern Slavery in our supply chains.

In addition, our supplier engagement program focussed on higher risk procurement categories including facility management and property maintenance, cleaning and security, building and construction and waste management. In engaging with suppliers, our focus has been on increasing awareness of the Modern Slavery Act 2018 (Cth) and risks of Modern Slavery for business and understanding how our suppliers are addressing the risk of Modern Slavery in their operations and supply chains. Many of our suppliers have confirmed their awareness of the legislation and steps taken to address Modern Slavery included:

- Modern Slavery policy or statement
- supplier code of conduct
- ethical sourcing policy
- practices to reduce the risk of Modern Slavery
- a supply chain that included other entities required to report on Modern Slavery
- training on Modern Slavery for appropriate staff
- established grievance procedures including whistle-blower policies and hotlines
- certifications e.g., Chain of Custody; ISO 9001:2015
- membership of Suppliers Ethical Data Exchange (SEDEX) to assess supply chain transparency.

# REPORTING CRITERIA 3

## Modern Slavery risks in operations and supply chain

### OPERATIONAL RISKS

**Our central function is the provision of support and assistance to people in need by offering a hand up, rather than a handout. We comply with labour, employment, work health and safety and whistleblower laws.**

Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020, we consider our operations do not cause or contribute to Modern Slavery.

#### Our COVID-19 Response

COVID forced the Society to change the way it delivered services to meet the needs of our community. Many of those we assisted, we have come to know over time, but this past year we were also meeting many who were turning to us for help for the first time.

A great example of this has been the COVID -19 vaccination program that began at the Ozanam Learning Centre in May 2021. This program was in collaboration with St Vincent's Hospital, the City of Sydney, and the Kirketon Road Centre. Its impact was remarkable. The program provided more than 200 vaccinations each week to people experiencing various forms of disadvantage, and homelessness. Our health team created a COVID-safe space that could accommodate these significant numbers, an inspiring achievement.

In our services, ranging from homelessness and domestic violence to health and disability, our staff and volunteers were committed to finding ways to continue operations throughout the pandemic and deliver the help people needed.

Our members and conferences were also called upon to innovate to ensure they could keep providing support to those in need. Unfortunately, COVID put a stop to home visitations, so our members used phone calls and video chats to keep in touch with the people we assist. Dropping off food became a contactless affair to keep everyone safe. In cases where it was too difficult to provide food directly, vouchers were distributed to make sure the people we assist still had enough to eat.

Despite the pandemic and associated lockdown, Society members helped tens of thousands of people in the 2020/21 financial year. Like our services, our members do essential work and they continued to provide assistance to people who need it.

Building on lessons learned in the previous financial year, the Society has been working to enable members to pursue their



goals in a COVID-safe way This has involved ensuring they are supplied with alcohol hand sanitiser, personal protective equipment, COVID-safe guidelines, and regular updates on the latest from government and NSW Health.

The contactless drop-offs established in the last financial year were built upon throughout the 2020/21 financial year and more contact with people we assist was done digitally through video conferences and by telephone. Adapting to COVID-safe conditions has been an ongoing process and our members have proven themselves up to the challenge no matter how quickly the situation has changed.

COVID-19 continued to disrupt normal operations this year, with Vinnies Shops having to shut and volunteers being asked to work in back of house roles or temporarily standing down. With our services designated essential, our volunteers showed just how keen they are to help and enabled the Society to operate throughout the pandemic.

## Our People

The St Vincent de Paul Society NSW is comprised of members, volunteers and employees. We have approximately 13,000 members and volunteers and 1,300 employees. The majority of members, volunteers and staff identify as female. Members and volunteers are predominantly over 60 years old. Young people may be involved through Youth Conferences.

Members and volunteers are integral to the Society's operations. Members provided support in the wake of the NSW floods and played a continuing important role in the distribution of black summer bushfire funding through the Community Grants scheme.

Our volunteers change lives every day through their work in Vinnies Shops and supporting the operation of our many services across the state, from food vans and community hubs to crisis accommodation centres for people escaping homelessness or domestic violence.

We safeguard our people from the risk of Modern Slavery by complying with relevant employment legislation. Most employees work under conditions of modern awards and have access to union membership. A small number of employees holding visas were employed in 2021. Visa status is noted during the recruitment process.

Our people are protected by the following policies:

- Code of Conduct
- Privacy Policy
- Safeguarding Children and Young People Policy
- Work Health and Safety Policy
- Conflict of Interest Policy
- Whistle-blower Policy

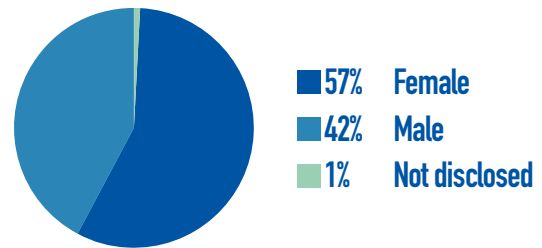
Our employment practices are governed by the following additional policies:

- Counselling and Disciplinary Policy
- Diversity and Inclusion Policy
- Flexible Work Policy
- Internal Grievance Policy
- Leave Policy
- Pandemic Leave Policy
- Respectful Workplace Policy

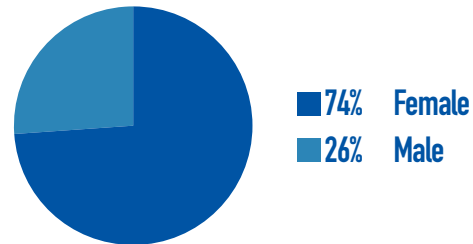
These policies and our commitment to ethical practices and ensuring the safety and well-being of our members, volunteers and staff give us confidence that our people are not at risk of Modern Slavery.

Agency staff may be engaged particularly where the Society is delivering health-related services. It is recognised that agency workers may be at a higher risk of experiencing Modern Slavery than employees engaged directly. We have ensured that agency staff are only engaged through companies that have a Modern Slavery Policy and other policies to promote a workplace in which employees are treated equitably.

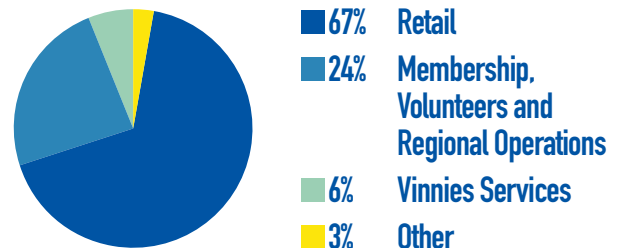
### Member Gender



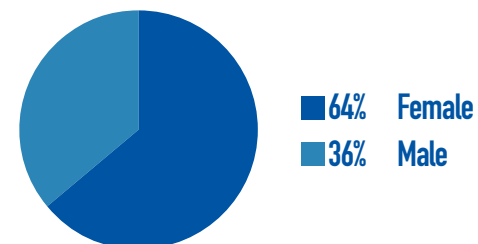
### Volunteer Gender



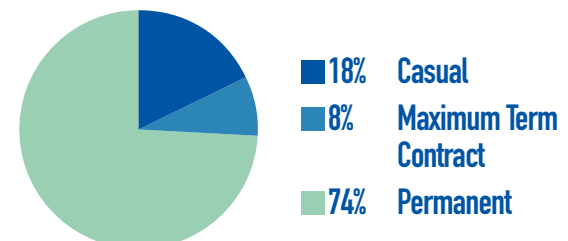
### Where Volunteers Work



### Employee Gender



### Staff type of Employment



## Modern Slavery Gap Analysis

In 2020, St Vincent de Paul NSW conducted an initial gap analysis which reflected that we were at the beginning of our work to identify and minimise the risks of Modern Slavery in our operations and supply chains. The Modern Slavery Risk Management Plan implemented in 2020/2021 has resulted in improvements in 20 of the 22 criteria assessed.

To achieve these improvements, we:

- increased engagement with our suppliers
- updated policies
- increased staff training on Modern Slavery. An introductory module is available to all employees and selected staff have access to courses supplied by the Australian Catholic Anti-Slavery Network (ACAN): Business Relevance, Implementing and Modern Slavery Risk Management Program and Grievance Mechanisms & Remedy

- Ensured our Executive Leadership Team completed our Modern Slavery training
- published 2020 Modern Slavery Statement to raise awareness, linked social media posts to anti-slavery day (UN)
- joined SEDEX platform for companies to manage and improve working conditions in global supply chains. SEDEX provides practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.

## Change Analysis

CATEGORY	TOPIC	RESULTS PREVIOUS YEAR	RESULT CURRENT YEAR	CHANGE
Management Systems	Governance	Red	Yellow	▲
	Commitment	Orange	Orange	—
	Business Systems	Red	Yellow	▲
	Action	Orange	Yellow	▲
	Monitoring and Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Red	Yellow	▲
	Operational Risk	Orange	Yellow	▲
	Identifying External Risks	Orange	Orange	—
	Monitoring and Reporting on Risk	Red	Orange	▲
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Yellow	▲
	Labour Hire / Outsourcing	Red	Yellow	▲
Customers and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Green	▲
	Feedback Mechanisms	Red	Green	▲
	Worker Voice	Red	Green	▲
Procurement and Supply Chain	Policies and Procedures	Orange	Green	▲
	Contract Management	Red	Yellow	▲
	Screening and Traceability	Red	Orange	▲
	Supplier Engagement	Red	Yellow	▲
	Monitoring and Corrective Actions	Red	Orange	▲

Results – Gap Analysis for the 2021 Bridge the Gap Heat Map



## SUPPLY CHAIN RISKS

During 2021 St Vincent de Paul Society NSW mapped our suppliers and analysed our supply chain for Modern Slavery risks, taking into consideration:

- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- **Geographic location** –Based on estimated prevalence of Modern Slavery and the government responses as outlined in the 2018 GSI. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers’ headquarters.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

The graph illustrates the Modern Slavery risk ratings by our highest spend categories.

Of the 10 supplier categories that are our greatest spend food and catering, finance and investment, facility and property maintenance, cleaning and security, furniture and office supplies categories are considered high risk.

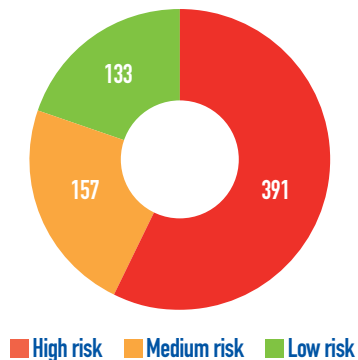
54% of the total spend analysed is considered high risk, and comprises more than 391 suppliers from 9 supplier categories:

- property and facility maintenance
- cleaning and security
- waste management
- furniture and office supplies
- food and catering
- property and facility maintenance
- finance and investment

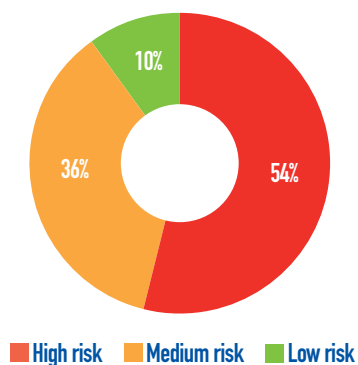
A further 36% of our total spend is with 157 suppliers across 7 supplier categories which are considered to be medium risk.

This is not a reflection of the practices of the individual suppliers, but rather an analysis based on industry sector, commodity/product, geographic location and workforce profile.

### SUPPLIERS BY RISK CATEGORY



### RISK BY SPEND





## REPORTING CRITERIA 4

### Actions taken to assess and address risk

#### In 2021, the Society:

Increased organisational awareness of our obligations under the Modern Slavery Act as we:

- participated in webinars and ACAN's monthly teleconference and leveraged their professional support and advice
- convened meetings of the cross-functional working group to assign accountabilities, drive awareness and new practices across the Society
- mapped our supply chain beyond the Greater Sydney Area. This included establishing a supplier register to record compliance data against suppliers as we engage with them
- trained staff who completed modules of the ACAN Modern Slavery courses, and invited all staff to complete training on a voluntary basis
- developed our supplier engagement strategy in relation to Modern Slavery
- established standard anti-Modern Slavery contract clauses for inclusion in all new supplier agreements and existing agreements as they fall due for renewal. The clauses require suppliers to have appropriate policies and procedures in place to assess and address risks of Modern Slavery in their operations and supply chains
- conducted a risk analysis of suppliers and identified those considered to be high-risk for initial engagement
- engaged with the select group of suppliers to gain information about their practices and their supply chain
- revisited and reassessed our gap-analysis to understand our progress and identify areas of activity which required greater attention
- ensured that our organisational policies continue to align with our obligations under the *Modern Slavery Act*.

#### We conducted a range of supplier engagement activities during 2021:

- we expanded our supplier engagement program to suppliers beyond the Greater Sydney Region
- we wrote to our suppliers to provide them with explanatory information about Modern Slavery, the legislation and our commitment to working with them to identify and address instances of Modern Slavery. We asked suppliers to confirm if they produce a Modern Slavery Statement, have a relevant policy in place and have a Supplier Code of Conduct
- our top 75 suppliers were invited to join Supplier Ethical Data Exchange (SEDEX) a membership organisation that provides an online platform, tools and services to help business operate responsibly and sustainably, protect workers and sources ethically
- in each Request for Proposal project that was undertaken we assessed Modern Slavery risk and ensured that all ensuing supplier agreements included anti-Modern Slavery clauses.
- we amended contractual terms with a number of our high and medium risk suppliers to include anti-Modern Slavery clauses. This work will continue through 2022



## REMEDICATION

The Trustees, St Vincent de Paul Society NSW and St Vincent de Paul Housing are committed to ensuring we provide appropriate and timely remedy to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights and the 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 we are 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, St Vincent de Paul Society NSW, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by Modern Slavery. The Society's remediation efforts will be enhanced in future through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with Domus 8.7 the Society can help people impacted by Modern Slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where we are 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. We aim to include 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.

When indicators of Modern Slavery practises come to our attention through whistle-blower or other channels, staff will contact relevant law enforcement agencies or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

We have funded a "Grievance Mechanisms and Remedy Pathways" module in our Modern Slavery E-Learning course that was made available to staff and other stakeholders in 2021.

- Review of our high and medium risk suppliers to understand their commitment and response to identifying and addressing Modern Slavery risks and practices was commenced. We identified 53% of our spend with high-risk suppliers, and 64% with medium risk suppliers (assessing suppliers with annual spend of \$10k or more) was with suppliers that have either
  - joined SEDEX,
  - produced a Modern Slavery Statement or
  - agreed to inclusion of anti-Modern Slavery terms in their supplier agreement with us.

In our engagements with suppliers, we noted an increased awareness and commitment to addressing the risk of Modern Slavery in their supply chains. It is becoming clear that the collaboration of customers and suppliers is gaining traction and momentum is building in the effort to identify and address the risk of Modern Slavery. Some smaller suppliers have requested more information, and we have provided the support with the assistance of ACAN. For example, we provided materials in Korean to a family owned and operated cleaning business.

# REPORTING CRITERIA 5

## Effectiveness assessment

Our Modern Slavery Action Plan will be reviewed twice a year by the Governance, Risk and Nominations Committee and by St Vincent de Paul Housing Governance Committee.

The Risk Management Framework has been updated to specifically address the risk of Modern Slavery.

INDICATORS/TARGET 2021	OUTCOME	
	PROGRESSING	ACHIEVED
Train key leaders on Modern Slavery Risk Management		✓
Include Modern Slavery clauses in our supplier agreement	✓	
Update our Risk Management Framework to include Modern Slavery		✓
Join Supplier Ethical Data Exchange (SEDEX)		✓
Increase supplier engagement on Modern Slavery by inviting suppliers to join SEDEX		✓

As we improve our risk and supplier management framework and business systems on an enterprise level, we will:

- be able to manage Modern Slavery risk more effectively
- continue to improve awareness of Modern Slavery with our Board, our people and suppliers
- continue to ensure Modern Slavery risk is actively considered when sourcing new suppliers, particularly in high-risk categories
- continue to collaborate with existing suppliers, focusing on those with higher risk, to incorporate Modern Slavery terms into their supply agreements and increase their understanding and commitment to addressing the risk of Modern Slavery in their operations and supply chains.

- Measures to assess effectiveness include:
  - the number of staff who have completed modern slavery training
  - the increase in Modern Slavery clauses in our supplier agreements
  - consideration of Modern Slavery in engagements with new suppliers and when renewing existing supplier relationships
  - suppliers who have joined SEDEX
  - increased evaluation of the risk of Modern Slavery when considering new initiatives



## REPORTING CRITERIA 6

### Process of consultation with entities owned or controlled

Members of the cross-functional 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 2021, the more regular meetings of the working group enabled an increase of momentum and allowed a more mature understanding of what Modern Slavery means in our operations. Awareness has increased and Modern Slavery is increasingly being considered in decision making and the assessment of new opportunities.

The entities work collaboratively to address Modern Slavery and have similar policies.

The Modern Slavery Statement was reviewed and approved by the cross-functional working group before presentation to the Trustees, Board of St Vincent de Paul NSW and Board of St Vincent de Paul Housing for approval and signature.

## REPORTING CRITERIA 7

### Other

#### **St Vincent de Paul Society NSW is engaged in responding to Modern Slavery beyond the scope of the Commonwealth *Modern Slavery Act 2018*:**

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 the capacity or provide assistance with earning an income of community members 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 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.

# APPENDIX

## Procurement Policy Attachment G – Supplier Engagement Principles

### Introduction

The St Vincent de Paul Society (the Society) was founded by a 20-year-old student named Frederic Ozanam in 1833. It was established by like-minded individuals who wished to put their faith into action.

This compassionate outlook, enthusiasm and vision continues today in Australia. There are thousands of people who every day share their time, care for humanity and energy to make a difference in the lives of disadvantaged people all around Australia.

### Our Mission

The Society is a lay Catholic organisation that aspires to live the gospel message by serving Christ in the poor with love, respect, justice, hope and joy, and by working to shape a more just and compassionate society.

### Our Vision

The Society aspires to be recognised as a caring Catholic charity offering “a hand up” to people in need. We do this by respecting their dignity, sharing our hope, and encouraging them to take control of their own destiny.

### Our Aspiration

An Australia transformed by compassion and built on justice. The Society advocates on a number of pressing social justice issues such as homelessness, poverty and asylum seekers. To read more about the Society’s work in these areas and others please visit the Our Impact section of the St Vincent de Paul website at [www.vinnies.org.au](http://www.vinnies.org.au).

### Business Ethics

We have always set high standards for the way in which we conduct business. We expect the same commitment from our suppliers. This is why we have established Supplier Engagement Principles (SEP). These principles speak to the commitments we make to those we serve. They establish the standards required for conducting business with the Society.

We will consider these principles in our selection of suppliers and will actively work with our suppliers to ensure compliance with these principles across the Supply Chain.

### Human rights

Our suppliers shall respect internationally proclaimed human rights and shall avoid being complicit in human rights abuses of any kind. The Society’s suppliers shall respect the personal dignity, privacy and rights of each individual.

### Forced Labour

The Society’s suppliers shall not use forced or involuntary labour, including, but not limited to, bonded or debt. The

supplier shall ensure that the work relationship between the worker and the supplier is freely chosen and free from threats.

The supplier shall ensure that all workers shall be free to leave their employment/work after giving reasonable notice. Workers shall not be required to lodge deposits of money, identity papers or similar in order to obtain or keep their employment/work.

### Child Labour

The Society’s suppliers will not use child labour. The term “child” refers to any person employed under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

The Society supports the use of legitimate workplace apprenticeship programs which comply with all laws and regulations applicable to such apprenticeship programs.

### Wages and Benefits

The Society suppliers shall provide remuneration that complies with any national legal standard of minimum wage. The basis on which workers are paid is to be clearly conveyed to them in a timely manner.

The supplier shall ensure all workers are provided with written agreements of employment setting out employment conditions in a language understandable to the worker.

### Working Hours

The Society’s suppliers shall ensure that working hours are not excessive and comply with applicable local laws. The supplier shall respect the individual worker’s need for recovery and secure that all workers have the right to adequate leave from work with pay.

### Non-discrimination

The Society’s suppliers shall not engage in direct or indirect negative discrimination in hiring and employment practices on grounds of race, colour, religion, political or other opinion, age, national or social origin, sexual orientation, gender, marital status, pregnancy, or disability, and shall promote equality of opportunity or treatment in employment and occupation.

### Respect and Dignity

The Society’s suppliers shall prohibit and refuse to tolerate, and not confer upon its workers, any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination, gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

## Freedom of Association

The Society's suppliers shall respect the legal rights of employees to join or to refrain from joining worker organisations, including trade unions.

## Health and Safety

The Society's suppliers will provide their employees with a safe and healthy working environment in compliance with all applicable laws and regulations.

The Supplier shall do its utmost to control hazards and take necessary precautionary measures against accidents and occupational hazards. Whenever necessary workers are to be provided with, and instructed to use, appropriate personal protective equipment. The Supplier shall provide adequate and regular training to ensure that workers are adequately educated on health and safety issues and provide the same standard of health and safety in any housing that is provided for employees.

## Protection of the Environment

The Society's suppliers shall undertake initiatives to promote greater environmental responsibility.

At a minimum, the supplier must comply with all applicable environmental laws, regulations, permits and licences, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

The supplier shall minimise its environmental impact and continuously improve its environmental performance in accordance with better practice standards.

## Laws, Including Regulations and Other Legal Requirements

The Society's suppliers will comply with all applicable laws and regulations in all locations where they conduct business.

## Ethical Dealings

The Society expects our suppliers to conduct their business in accordance with the highest ethical standards.

The Society's suppliers shall comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. The supplier shall not offer, promise or give any undue advantage, favour or incentive to any public official, organisation or any other third party. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

## Gifts, Hospitality and Expenses (Business Courtesies)

The Society's suppliers shall not, directly or indirectly, offer gifts to the Society's employees or representatives or anyone closely related to these, unless the gift is of modest value.

Hospitality, such as social events, meals or entertainments may be offered if there is a business purpose involved, and the cost is kept within reasonable limits. Hospitality, expenses or gifts shall not be offered or received in situations of contract negotiation, bidding or award.

## Monitoring/Record Keeping

The Society's suppliers must maintain documentation necessary to demonstrate compliance with these Supplier Engagement Principles (SEP) and must provide the Society with access to that documentation upon the Society's request.

# DEFINITIONS

**Cross functional working group/Modern Slavery working group:** a group of employees of St Vincent de Paul NSW and Amelie Housing which progresses our work on Modern Slavery, the development of the Statement and supports the Society with its compliance with the Modern Slavery Act.

**High risk suppliers:** products and services may have high Modern Slavery risks because of the way they are produced, provided or used and may have characteristics such as low wages and manual labour.

**Medium risk suppliers:** products or services may have medium Modern slavery risks because of their sector or because of weak governance structures in a geographic location or entity.

**Supplier Ethical Data Exchange (SEDEX):** a membership organisation that provides an online platform, tools and services to help business operate responsibly and sustainably, protect workers and sources ethically.



**MacKillop  
Family  
Services**



**Modern Slavery  
Statement**  
2020-2021

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

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# Introduction, Approval and Signature

This is the second Modern Slavery Statement (“Statement”) submitted by MacKillop Family Services Limited (“MacKillop”) pursuant to the Commonwealth *Modern Slavery Act 2018* (the “Act”).

We recognise that modern forms of slavery occur in many forms and that everyone plays a part in the elimination of modern slavery that can arise in any of the forms defined by the Act: slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services (“Modern Slavery”). The Act and its objectives are consistent with the values that form part of our Purpose, Vision and Values. 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.

This is a joint Statement made together with a range of Australian Catholic organisations which form part of the Australian Catholic Anti-Slavery Network (“ACAN”). It will form part of ACAN’s compendium of modern slavery statements.

This Statement relates to period 1 July 2020 to 31 December 2021 (“Reporting Period”). Although we generally report on a 1 July to 30 June basis, we have adopted the reporting period of ACAN’s compendium members for the purpose of this Statement.

This Statement was approved by the Board of MacKillop Family Services on 27 April 2022.

**Brian Keane**  
Chair of the Board  
MacKillop Family Services

# MacKillop Family Services: About Us

## 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



### 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



### Emotional Intelligence

Look out for yours and other people's feelings



### Democracy

Everyone is heard



### Open Communication

Be honest and share information



### Growth and Change

Open to new ideas and ways of thinking

## 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.

## MacKillop's Sanctuary Commitment to Social Responsibility

"The starting point for Social Responsibility is recognising that in any situation, we are either part of the problem or part of the solution - that is, we are either actors for the positive or bystanders.

When it comes to unethical, unjust or unhelpful behaviour, the challenge with being a bystander is that it helps contribute to an unhealthy group norm. A typical bystander response might be, "Well, I knew about the problem, but..."

As leaders and managers in organisations, the challenge for us is to always create ethical environments: in our teams, in our conversations, and in all our behaviours. This can be difficult because it calls us to balance our needs with our responsibility to our teams and the people we are working for.

When we think about Social Responsibility and engaging with children and young people, Social Responsibility really encourages us to work with people towards restoration.

The way we act or fail to act will always impact on other people."

- Cameron Burgess

*National Leader,*

*Program Development & Implementation for Sanctuary*



# Criteria 1, 2 and 6 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.

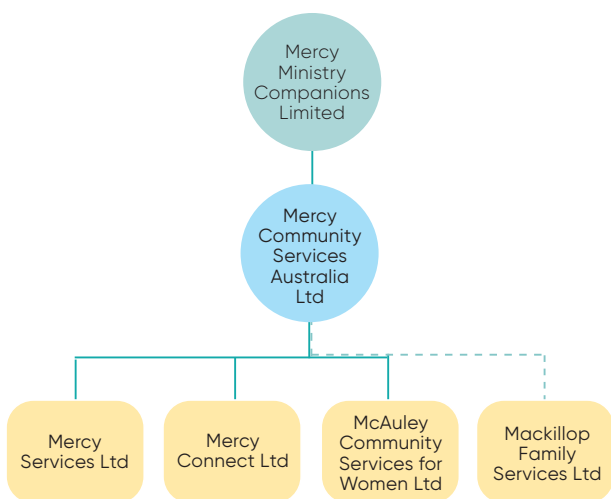
Prior to 3 December 2021, our Members were representatives from our founding congregations, being the Christian Brothers Oceania, the Institute of the Sisters of Mercy of Australia and Papua New Guinea, and the Sisters of Saint Joseph of the Sacred Heart.

On 3 December 2021, MacKillop's governance transitioned from its Founding Congregations to a Ministerial Public Juridic Person (PJP) called Mercy Ministry Companions. The change in governance does not affect our status as a separate legal entity.

We do not own or control any other entities and

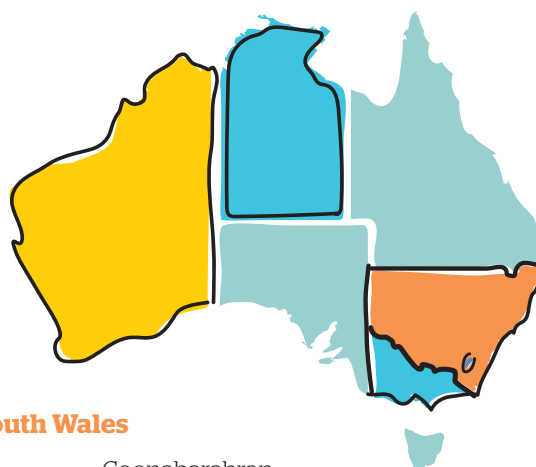
## Criteria 1, 2 and 6 MacKillop Family Services Structure, Operations and Supply Chains

## Mercy Community Services Group



## 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 and Darwin, Northern Territory. We also have many other offices and service locations in all those states.



### New South Wales

- |              |                 |              |
|--------------|-----------------|--------------|
| Sydney       | Coonabarabran   |              |
| Balranald    | Coonamble       |              |
| Batemans Bay | Dubbo           | Nowra        |
| Bega         | Goulburn        | Nyngan       |
| Bourke       | Grafton         | Queanbeyan   |
| Brewarrina   | Gulgambone      | Walgett      |
| Cobar        | Lightning Ridge | Warren       |
| Condobolin   | Lismore         | Weilmoringle |
| Cooma        | Murwillumbah    | Wollongong   |

### Victoria

- |                 |             |
|-----------------|-------------|
| South Melbourne | Maidstone   |
| Bendigo         | Melton      |
| Broadmeadows    | Mildura     |
| Caulfield       | Preston     |
| Dandenong       | Swan Hill   |
| Footscray       | Wangaratta  |
| Forest Hill     | Warrnambool |
| Geelong         | Wodonga     |
| Hamilton        |             |

### Australian Capital Territory

- Holt

### Northern Territory

- Darwin

### Western Australia

- West Perth
- Bunbury
- South Hedland
- Roebourne

## Our national and international footprint

We deliver training programs such as Sanctuary, ReLATE and Seasons for Growth across Australia. We also partner with organisations and trainers to deliver Seasons for Growth internationally in Scotland, England, Wales, New Zealand, Singapore and Ireland.



## Services

Today, MacKillop continues the work of our founding congregations within the framework of Catholic social teaching and in the spirit of the Gospel - one of radical inclusion, restoration and accompaniment. Just like our founders, we are deeply committed to our work and are driven by social justice. Every child should be protected from abuse, neglect and exploitation, and as a child-safe organisation, we are committed to protecting and advocating for the best interests of children and families across all our programs.

MacKillop is a national charitable organisation and a leading provider of services for children, young people and their families across all our service locations. Services and programs are offered in family support, foster care, residential care, disability services, youth support, education and training, parenting, family therapy, mental health, family violence, early childhood, and support to women and men who, as children, were in the care of MacKillop's founding agencies.

We also operate three specialist schools in Victoria and a pre-school in New South Wales. We also significantly increased our delivery of training and educational services across the country.

For more information on MacKillop and our services, go to [www.mackillop.org.au](http://www.mackillop.org.au).

## Supply Chains

MacKillop sources significant quantities of goods and services, including stationery, IT equipment and mobile devices, cleaning, gardening and maintenance products and services, labour hire services, food, clothing, furniture and motor vehicles.

The majority of our annual procurement occurs with our first-tier suppliers located in Australia. However, we know our extended supply chains may be located overseas. For example, motor vehicles and IT equipment are mostly manufactured overseas. Our aim is to progressively develop a supply chain map to better demonstrate the geographic location and nature of products and services sourced.

## Services provided in the year ended June 2021

**51**

Offices

**1400+**

Staff

**118**

Residential child care, homelessness and lead tenant homes

**676**

Foster care homes

**1720**

children in foster or residential care

**3**

Schools

**143**

Students enrolled in our MacKillop Education schools

## Criteria 3 Risks of Modern Slavery

MacKillop works to promote human rights - particularly the rights of children - and is committed to protecting the rights of all people including our employees, the communities in which we operate, those who may be impacted by our activities, our clients, and those within our supply chains.

Our framework for the management of Modern Slavery risks incorporates the potential risks of Modern Slavery practices across our operations and supply chains, taking into account the risks outlined in the Australian Government's Department of Home Affairs Guidance for Reporting Entities ("Guidance Report"). The Guidance Report identifies three categories of risk, being: risks that may possibly cause, contribute and/or be directly linked to modern slavery practices in the sector, industry, types of products and services, geographic locations; and business models that businesses operate within.

In considering the services we deliver, and the goods and services we procure, we believe that while our operations do not either cause or contribute to Modern Slavery practices, we may be directly linked to modern slavery risks through our supply chains.

### Operational Risks

We employ approximately 1,400 staff, operating out of more than 50 administration sites and over 110 other work sites.

We have a small number of employees sponsored to work with us. Visa applications related to those 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 have over 1,100 volunteer foster carers and many more contractors and agents operating across Australia.

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.

We also have a significant labour hire agency workforce. Labour hire is our largest spend category, with spend of just under \$29,000,000 with approximately 14 suppliers, during the Reporting Period. The labour hire workers to which this relates are predominantly contracted to work within our residential care homes. This category of suppliers is the focus of the Labour Hire Working Group, which is responsible for ensuring the labour

hire agencies meet compliance requirements have appropriate contracts in place and where state laws require, hold a labour hire licence. The Labour Hire Working Group has established an approved labour hire agency supplier list and a very robust business case approval process for any new labour hire agencies not on that list. We have updated our Standard Service Agreement which is issued to labour hire agencies in Victoria to address modern slavery. The Labour Hire Working Group is also looking at ways to embed better relationship management practices with the labour hire agencies it uses, including compliance requirements, occupational health and safety and modern slavery. To date the work of the Labour Hire Group has focussed on Victoria and will progress to dealing with other states in due course.

We have a range of systems in place to identify and action changes to employment entitlements, immigration requirements, equal opportunity requirements and health and safety legislation.

We 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.

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. These are available throughout the organisation and are reviewed and updated on a regular basis. Our Policies and Procedures are based on our organisational Purpose, Vision and Values.

We also have a Code of Conduct which sets minimum expectations about how our staff, volunteers and contractors conduct themselves.

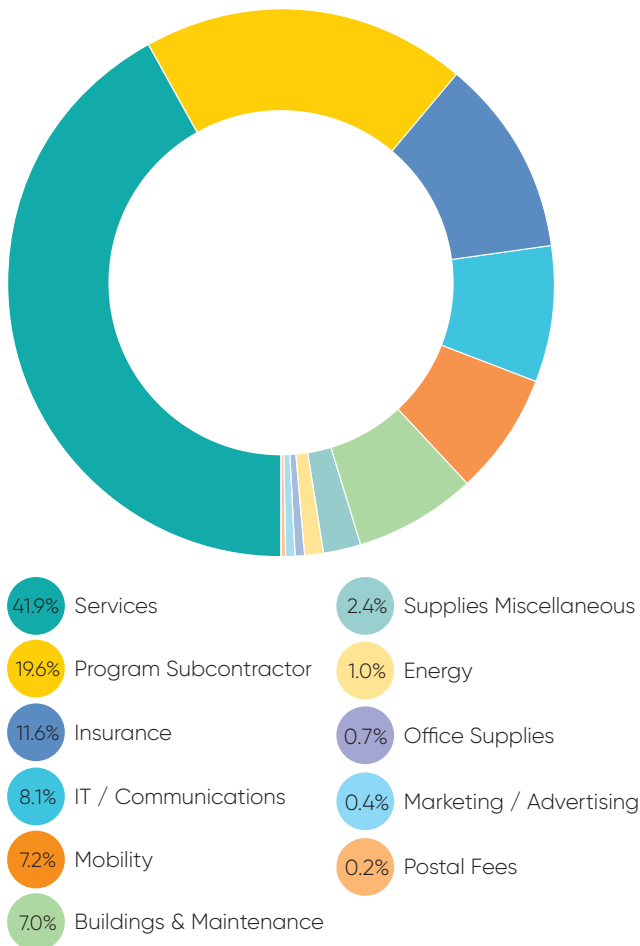
We are committed to protecting and supporting whistleblowers who disclose improper conduct, in accordance with our Whistleblowers Procedure.

## Supply Chain Risks

MacKillop is committed to developing systems and processes in accordance with the recommendations made by the Internal Audit firm engaged to undertake a review of our procurement practices in 2020 ("Internal Audit") and improving how it manages modern slavery risks within its supply chains.

We had an annual revenue for the Financial Year ended June 2021 of over \$180 million.

**Graph One:**  
Material Groups for Suppliers with spend of \$100,000 or more for the Reporting Period

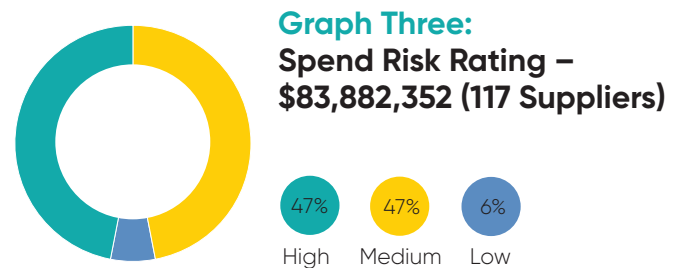
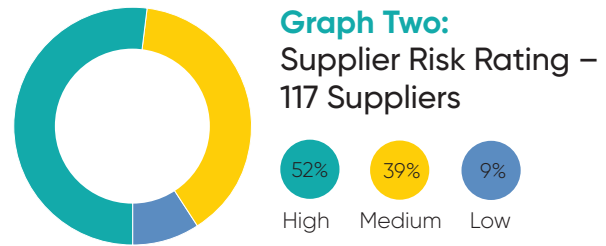


During the Reporting Period, we worked with approximately 3,115 suppliers nationally and engaged in approximately 34,700 transactions with a total spend of approximately \$99,301,377 dollars (ex GST).

During the Reporting Period, we spent \$100,000 or more with 117 suppliers. The total spend with those 117 suppliers was \$83,882,352. The spend category breakdown with those 117 suppliers is contained in Graph One.

Within our largest spend category, Services, labour hire was the most substantial sub-category, where we spent just under \$29,000,000 with approximately 14 suppliers.

A high level risk assessment of the 117 suppliers was completed using the ACAN Risk Taxonomy, the results of which are in Graph Two and Graph Three.



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.

The focus of our supplier engagement strategy for 2022 will be to undertake our new due diligence process for the 117 suppliers where we spent \$100,000 or more and any new suppliers we engage with, where we spend \$100,000 or more. Our Procurement and Sustainability Manager will work with the relevant Business Units to retrospectively assess the Modern Slavery risks for the 117 suppliers and any new suppliers that meet that criterion.

# Criteria 4 Mitigation Action in Relation to Modern Slavery Risks

## Procurement Strategic Plan

During the Reporting Period, we developed a Procurement Strategy for 2020-2023 and a Work Plan for 2021 to implement the Internal Audit recommendations. A further internal audit will be conducted when the recommendations have been implemented to ensure they have been effectively implemented.

## Governance Structure

MacKillop is committed to establishing a strong governance framework to manage modern slavery supply chain risks.

The following governance structure and processes will provide the Board with oversight of implementation of the Internal Audit recommendations.

### **The Board of Directors:**

The Board of Directors has ultimate responsibility for the governance of MacKillop, in accordance with legislative requirements, best practice standards in corporate governance and community expectations. The Board Audit and Risk Committee will report to the Board of Directors and make recommendations to the Board in relation to the approval of MacKillop's annual Modern Slavery Statement.

### **The Board Audit and Risk Committee:**

General Counsel and the Procurement and Sustainability Manager will report to the Board Audit and Risk Committee. The Committee oversees the implementation of the internal audit recommendations and our risk framework. The Committee is also responsible for the oversight of reporting on MacKillop's annual Modern Slavery Statement and receive reports at its quarterly meetings in relation to the mandatory criteria.

### **Procurement and Sustainability Manager:**

A Procurement and Sustainability Manager has been appointed to implement and oversee the development of a procurement framework at MacKillop, to improve our procurement practices, reporting and operationalises the strategies identified by the groups outlined below to mitigate the risk of breaching our modern slavery obligations.

### **Modern Slavery Working Group:**

A cross-functional working group has been established and is responsible for identifying and implementing process improvements and compliance processes. The Group Director of Corporate Services will oversee the working group. The working group will be chaired by General Counsel and will be comprised of the following people/roles: General Manager of Finance, Manager of Risk and Compliance, Chief Information Officer, Manager of Fleet, Procurement and Sustainability Manager, Manager of Property, Director of Human Resources, General Manager Aboriginal and Torres Strait Islander Service Development and the Operational Directors for each of our States and Territories.

### **Labour Hire Working Group:**

A working group led by the Director of Human Resources and comprised of the following people/roles: Group Director Operational Performance, HR Manager - Engagement, HR Manager - Business Change Enablement, General Counsel. Operational Directors are also asked to participate from time to time where their input is required. This group is a critical working group which aims to monitor and manage our engagement with labour hire agencies (and recruitment agencies) as well as ensure we are constantly monitoring and responding to our compliance obligations in relation to labour hire agencies, their staff and work health and safety issues.

## Policies and Procedures

The current 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.

## Achievements During the Reporting Period

During the Reporting Period we have continued to implement the Internal Audit recommendations and have achieved the following:

- a. We developed a Procurement Strategy for 2020-2023 and a Work Plan for 2021 to implement the Internal Audit recommendations.
- b. We updated our Risk Management Framework to include Modern Slavery as a separate risk category.
- c. We conducted a review of our policies and procedures and updated our *Procurement and Purchasing Procedure*.
- d. We introduced a *Supplier Due Diligence Questionnaire and Checklist* and a *Supplier Code of Conduct*. The *Supplier Due Diligence Questionnaire and Checklist* incorporates questions to aid us in conducting a Modern Slavery risk assessment within the supplier's organisation and supply chains, which currently applies to suppliers with an annual spend of \$100,000 or more.
- e. We implemented a new process in our revised *Procurement and Purchasing Procedure* which requires material suppliers to complete a *Supplier Due Diligence Questionnaire and Checklist* and sign a *Supplier Code of Conduct*.
- f. We subscribed to *Sedex* and the *Radar Risk Assessment Tool* to identify risk ratings of Suppliers, Countries and Categories. Using *Sedex* and the *Radar Risk Assessment Tool* will assist us with the risk assessment process and recommendations for mitigation actions which a supplier can take to reduce their risk profile.
- g. We have identified our high-level spend categories for the Reporting Period.
- h. We initiated our Modern Slavery Working Group to facilitate the monitoring and review of our Modern Slavery strategy and issues.
- i. We commenced development of contractor management procedures to strengthen our engagement, onboarding and induction of contractors.
- j. We conducted regular internal stakeholder engagement to promote awareness and education of Modern Slavery aspects.

## Future Goals

In 2022, the focus of our supplier engagement strategy will be the analysis of the 117 material suppliers identified during the Reporting Period. We will also apply the same due diligence requirements for any new material suppliers that we engage with. Moving forward, our Procurement and Sustainability Manager will work with the relevant Business Units to retrospectively require suppliers to complete our *Supplier Due Diligence Questionnaire and Checklist* and sign a *Supplier Code of Conduct* including carrying out an assessment of the Modern Slavery risks for each supplier.

We are committed to ensuring we provide appropriate and timely remedy to people impacted by modern slavery 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.

As a participant in ACAN, we have access to Domus 8.7 - an independent program to provide remedies 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 supplier 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.

## Moving forward, some of the key initiatives we aim to undertake are:

- a.** compiling a list of preferred suppliers and establishing national accounts where possible with those suppliers.
- b.** adopting a centralised onboarding process for suppliers.
- c.** undertaking risk assessments for suppliers and modern slavery.
- d.** development of a Labour Hire Relationship Management and Assessment Strategy to be developed by the Labour Hire Working Group in collaboration with the Procurement Team.
- e.** developing consistent quotation and tender documents and processes, which are coordinated centrally.
- f.** developing minimum requirements for engagement, such as standard terms and conditions which address modern slavery risk assessments and remediation requirements where required (where possible).
- g.** implementing changes within our finance system to assist us in easily identifying spend categories and developing reporting dashboards.
- h.** compiling an Internal Communication Plan for 2022 to raise awareness among our staff of our modern slavery obligations, and the strategies we have implemented to mitigate the risk of breach of these obligations.
- i.** in 2022, our Group Director of Corporate Services and the Board Finance and Investment Committee is undertaking a review of our Investment Procedure and investments to ensure all investments meet the organisations ethical investing standards.
- j.** undertake the gap analysis utilising ACAN's gap analysis tool.
- k.** category management strategies, in conjunction with internal stakeholders and buyers, to embed social procurement objectives in purchasing activities.



## Impact of COVID-19

Given the geographical locations in which MacKillop operates, the impact of the COVID-19 pandemic and our response has varied between the states and territories in which we operate, as well as regional and remote communities in which we deliver services or have administrative offices.

We continued to care for the children, young people, carers and employees in our residential and foster care homes, as well as other family and outreach services.

COVID-19 posed a particular challenge given the requirement to rapidly source and deploy essential personal protective equipment across the organisation. The Manager, Office of the CEO has been instrumental in sourcing and deploying personal protective equipment.

While COVID-19 has not prevented us from developing our response to modern slavery, it has delayed our implementation and engagement with suppliers throughout the Reporting Period, due to senior leadership being diverted to crisis management activities.

## 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.

The decision to engage an Internal Audit Firm to undertake a review of our procurement practices and make recommendations for process improvements, was a critical step. This engagement has helped us to establish the basis of our Procurement Strategy and develop a Work Plan to improve the framework, governance, policies and procedures reasonably necessary to address modern slavery risks, and measure the effectiveness of those processes and systems.

During the Reporting Period, our focus was on establishing the framework and governance structure we will use to identify, assess and take action to mitigate our Modern Slavery risks.

The Board Audit and Risk Committee will oversee the implementation of the recommendations, have oversight of reporting on MacKillop's annual Modern Slavery Statement, receive quarterly reports at its meetings and report to the Board. It is expected that a further internal audit will be conducted once the recommendations have been implemented.

Our Procurement and Sustainability Manager will oversee the implementation of our new due diligence process and report on areas of risk and improvement. The Procurement and Sustainability Manager has also commenced a spend analysis process to enable us to identify our significant areas of spend and risk, with a view to developing more targeted approaches with specific spend categories.

At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on improving our framework and processes to ensure we can review the effectiveness of the actions we are taking to assess and address Modern Slavery risks in our operations and supply chains.



## 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. In 2022, we plan to work with ACAN to undertake these assessments.



**MacKillop  
Family  
Services**

**MacKillop Family Services Limited**

ACN 078 299 288

**Registered Office**

237 Cecil Street  
South Melbourne VIC 3205

**Phone**

03 9257 2288

**Facsimile**

03 9696 6496

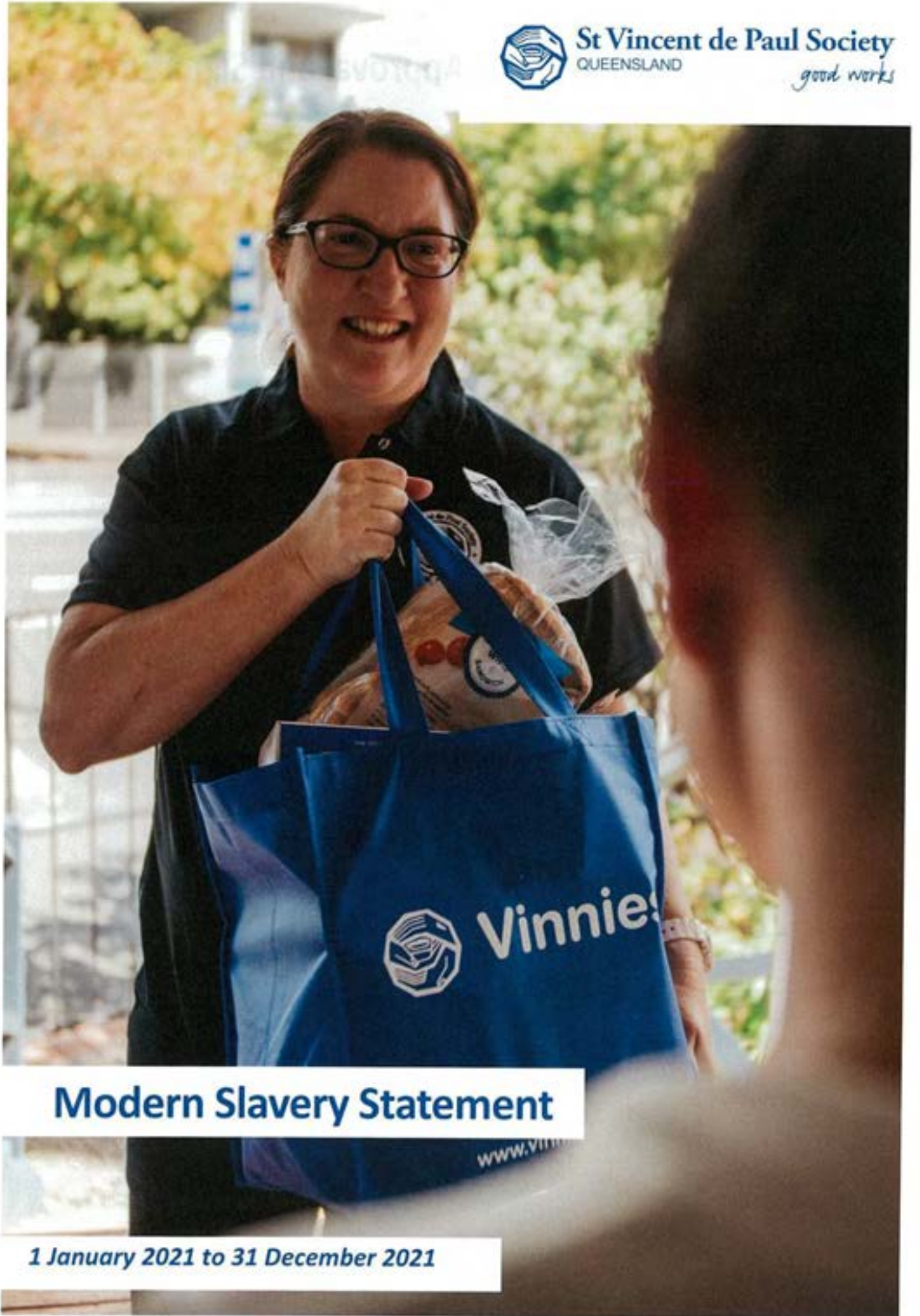
*MacKillop Family Services acknowledges  
the Traditional Custodians and their Elders in  
each of the Communities where we work.*

**[mackillop.org.au](http://mackillop.org.au)**





St Vincent de Paul Society  
QUEENSLAND  
*good works*



## Modern Slavery Statement

1 January 2021 to 31 December 2021

# Modern Slavery Statement Approval and Signature

This Modern Slavery Statement was approved by the principal governing body of St Vincent de Paul Society QLD as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 27 May 2022.

It is submitted as a joint statement by the following reporting entity:

St Vincent de Paul Society Queensland ABN: 14 211 506 904

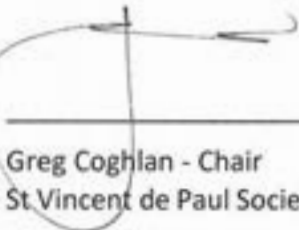
St Vincent de Paul Society Queensland Housing ABN 31 618 167 632

This Modern Slavery Statement is signed by a responsible member of St Vincent de Paul Society QLD and St Vincent de Paul Society Queensland Housing as defined by the Act.



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Dennis Innes - State President  
St Vincent de Paul Society Queensland



---

Greg Coghlan - Chair  
St Vincent de Paul Society Queensland Housing

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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.

Produced by Bruce Moaveni Sabet, Procurement Manager, St Vincent de Paul Society Queensland, May 2022. 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

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# About us

## Who we are

This statement is submitted as a joint statement in accordance with the Modern Slavery Act 2018 (Cth). It is submitted by St Vincent de Paul Society Queensland 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 2021.

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. We are a member and volunteer-based charity where Vincentians (Members belonging to local community-based Conference teams) help people in their community when they need assistance. We do this by visiting them in their homes, welcoming them in our support centres, helping others through our government and Society-funded services, providing material aid generously given by our donors and offering affordable items in our Vinnies shops.

Vinnies Housing is a wholly owned subsidiary of St Vincent de Paul Society Queensland 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 St Vincent de Paul Society Queensland. 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 stakeholders

At the core of our work are the people we assist, our Vincentians, volunteer members, employees and donors. These are the people who have enabled our good works to continue for the past 126 years. The commitment and compassion of our people empowers them to gain insight into local community needs and issues. Without the generosity of our loyal donors and customers the resources to provide required levels of assistance Queenslanders in need would not be available.

## 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.

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## 2021 Modern Slavery Risk Management Initiatives

In the reporting year, 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 risk categories and assessed potential modern slavery risks in operations and supply chain. This has helped us to begin planning what is required to bridge the gap in 2022 and beyond. The cornerstone of the reporting year was conducting the risk analysis on our supplier base.

We have also developed a high-level supplier engagement strategy and implemented key stakeholder training. Most importantly, we continued the conversation and bringing awareness of modern slavery to key staff members and suppliers.

In essence, 2021 has been used to:

- progress on developing a modern slavery management framework;
- review our supplier risk portfolio;
- develop high level supplier engagement strategy;
- develop supplier questionnaires;
- implement key stakeholder training on modern slavery risks;
- established a regular modern slavery working group meeting involving all the key stakeholders;
- provided report to Audit Risk Committee on modern slavery compliance obligations and process.

## Plans for 2022 and Beyond

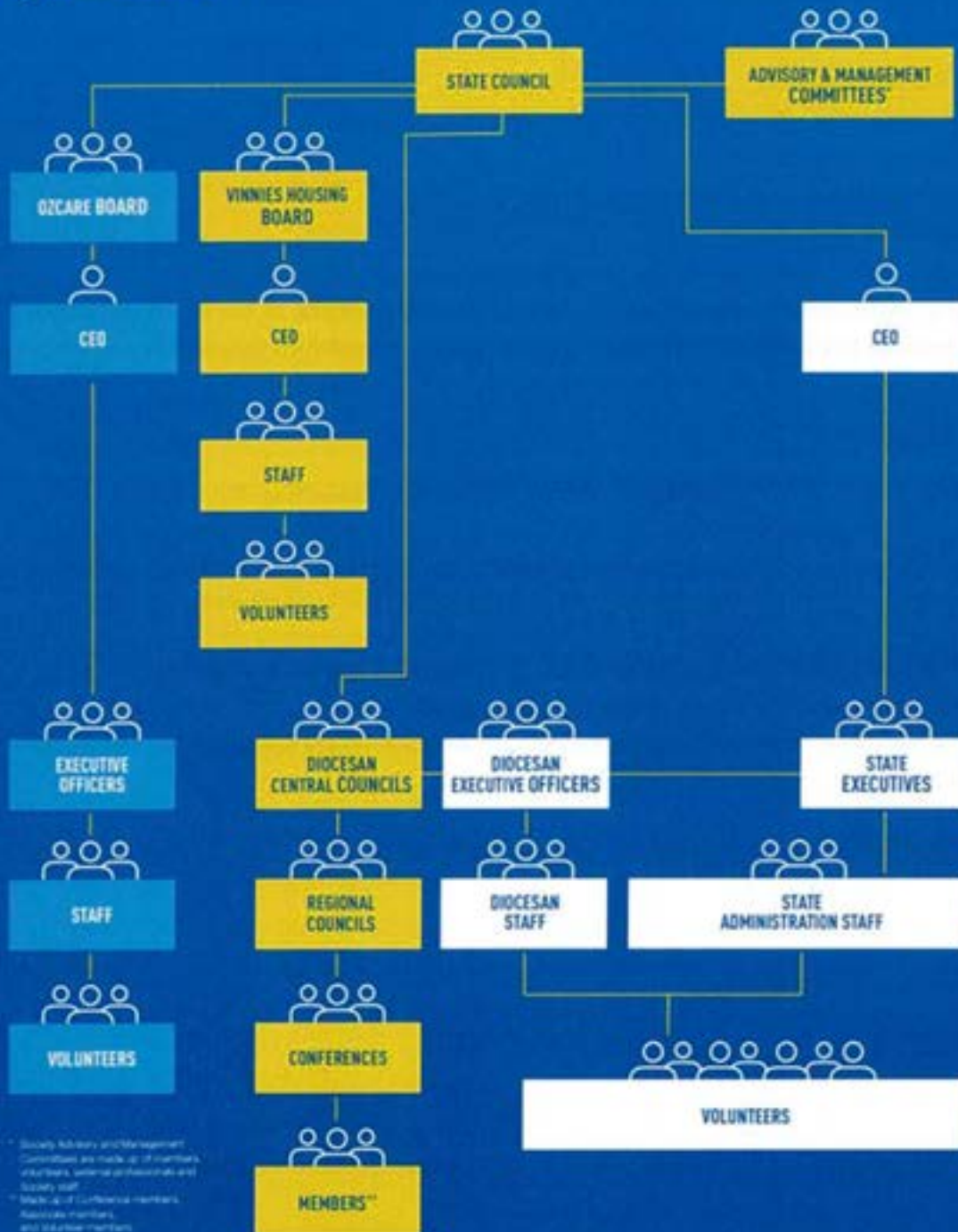
We will continue to review our policies, procedures and codes of conduct considering modern slavery risk and implement:

- a more vigorous supplier on-boarding process, which will include a supplier risk assessment prior to engagement. It is envisaged supplier risk assessments will be reviewed on a regular basis ;
- a mandated e-learning course for all members of the Modern Slavery Working Group;
- establish modern slavery provisions in new supply agreements; and
- collaborate and deliver targeted briefings to key suppliers to build greater awareness of modern slavery risks.

# Reporting Criteria 1 & 2:

## About St Vincent de Paul Society Queensland

Our 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 (SVDPQ) 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 SVDPQ incorporated under the Corporations Act 2001 (Cth). SVDPQ holds reserve powers to ensure that at all times Vinnies Housing acts within the philosophy, mission and values of the Society. This includes SVDPQ appointment of board members, the majority of which will be Vincentians and approval of the strategic direction of Vinnies Housing.

### Membership

SVDPQ 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 SVDPQ. Associate members also live out their faith in action but do not attend Conference meetings. Volunteer members are those who respect the ethos and mission of SVDPQ and who volunteer in any of its works or programs.

### Boards

The State Council of SVDPQ consists of the President and Vice Presidents, Diocesan Central Council Presidents, State Treasurer, Youth Representative, Spiritual Adviser 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 SVDPQ, its subsidiaries and all its Councils and Conferences. The President of State Council is SVDPQ's representative on the National Council of The St Vincent de Paul Society in Australia.

The Board of Vinnies Housing consists of Chair and directors, with a majority being members of SVDPQ. The Board is ultimately responsible for the overall governance of Vinnies Housing.

### Remuneration

Our Board members do not receive payment for their services. Their positions are voluntary. However, some members are provided with the use of a fleet vehicle to facilitate travel and are reimbursed for costs they incur to attend meetings, or in the course of performing the duties associated with their roles.

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## 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; Risk Register.

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, including the quarterly reporting of risks.

## Our Governance Framework

Consideration of modern slavery risks will form part of our risk management framework which will be reviewed and managed accordingly.

We have appointed a Modern Slavery Liaison Officer (MSLO), who leads the modern slavery working group. The working group consists of key stakeholders throughout the organisation, including:

- General Manager – People & Safety
- General Manager – Programs
- General Manager – Operations
- General Manager – Governance and Risk
- General Manager – CFO & Business Services
- CEO – Vinnies Housing
- Manager – Community Engagement
- Legal Counsel & Corporate Secretary
- Manager – Learning & Development
- Head of Information Technology
- Procurement – Procurement Manager (MSLO)
- Head of Internal Audit and Assurance

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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 SVDPQ, we provide a range of:

- housing solutions including homeless intervention and prevention services and crisis accommodation;
- drug and alcohol recovery;
- family support centers to help build capacity for families dealing with financial;
- 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;
- centres of charity, widely known as “Vinnies Shops”;
- child and family support services, focusing on intervention to families to improve the safety and well being of children in their home;
- migrant and refugee services;
- youth services assisting disadvantaged young people; and
- education and employment, by providing people who have experienced homelessness or hardship the chance to complete vocational and tertiary certificates.

In addition, Vinnies Housing works to relieve poverty distress or disadvantage by:

- providing subsidised housing options to those in need including people requiring accommodation, people with complex and specific needs, people in disadvantaged target groups and those on very low household incomes;
- providing affordable housing and support services to people experiencing housing stress, homelessness or at risk of homelessness.

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## Our Supply Chain

We purchase the majority of our goods and services at a local level from Australian suppliers, however we do import some products from overseas. We have inspected manufacturing facilities from some of our overseas suppliers and have the ability to conduct audits.

Our key categories of spend are:

- Property and facility maintenance (FM)
- Motor Vehicle Fleet (including maintenance and services)
- ICT Software, Hardware, and support services
- Utilities
- Building, construction and fabrication services
- Office supplies and services
- Professional services
- Travel and accommodation
- Furniture and bedding
- Waste management
- Food and hospitality
- Labour hire

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 in excess of 2,560 suppliers on our books ranging from tactical suppliers, through to cooperative, strategic and partners/alliances. Some suppliers have been providing services to us for a long period of time, with others being new to our operations.

Our key strategic suppliers are managed via informal performance management and relationship measurement tactics, giving our supply chain a good understanding on cultural similarity, corporate alignment, stability and mutual understanding.

Our policies and procedures prescribed supplier onboarding processes and due diligence, including review of the following:

- Business registration
- Insurance
- Licencing
- 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

We are also working to increase the transparency of our supply chain with the aim of increasing visibility of emerging risks. We have visibility on our direct tier one suppliers but acknowledge there is a need to bridge the gap for other suppliers.

# Reporting Criteria 3:

## Modern slavery risks in operations and supply chain

During the reporting year, we extended supplier risk assessment to the most of our active suppliers in our supply chain vendor base. We have mapped out our Top 100 suppliers by spend, allowing us to conduct category risk taxonomy assessments.

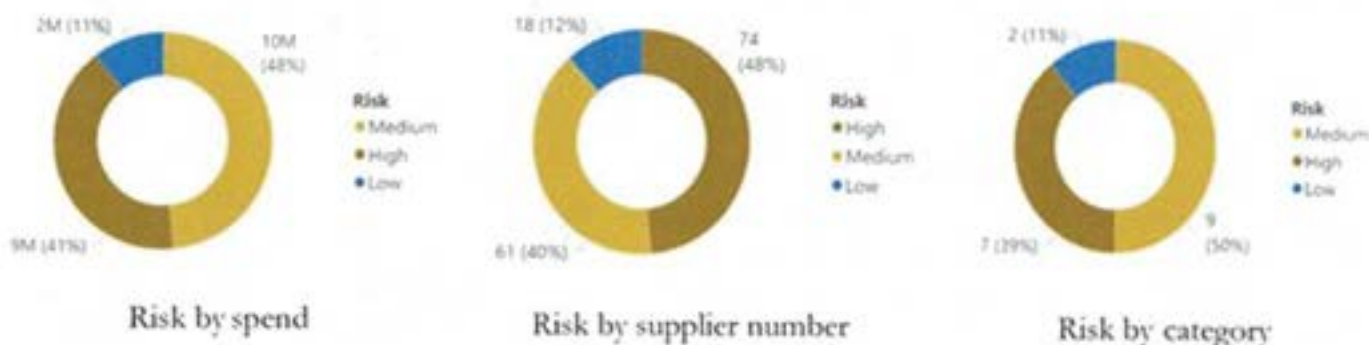
Our Top 100 suppliers represent 75% of our total spend on procurement of Goods and Services from suppliers in the year 2021, with 40% of this spend being assessed as high risk (a 3% increase compared to the last year spend), 48 % as medium risk and 12 % low risk.

The high-risk classified suppliers (46 suppliers) provide goods and services for the below categories:

- Property and facility maintenance (26 suppliers)
- Furniture and bedding (8 suppliers)
- Food and hospitality (6 suppliers)
- Waste Management (1 supplier)
- Office supplies and services (2 suppliers)
- Construction and modification (3 suppliers)

We have started working with several suppliers to understand their capabilities of identifying and mitigating modern slavery risks in their supply chain network.

## Supply Chain Risk



SPEND RISK (\$AUD)	\$8,637,273	\$10,221,336	\$2,223,003	\$21,080,613
SUPPLIER RISK (No.)	46	42	12	100
CATEGORY RISK (No.)	7	5	2	18

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## OPERATIONAL RISKS

### Our COVID-19 Response

During the peak of the pandemic, we closed our retail centres of charity to abide with Government mandated restrictions. We continued to maintain essential services during the pandemic, e.g. disability services, drug and alcohol rehabilitation services, hostels and other social inclusion services.

During the pandemic, we invested in COVID-19 related safeguards, including PPE and hand sanitisers, to protect our team, clients and customers. We also encouraged volunteers aged 65 years and over, or those with compromised immune systems or chronic illnesses to stay home.

In response to COVID-19, the following activities were paused to ensure our team could respond to the risks presented by the pandemic:

- Awareness raising of modern slavery among our team
- Identifying strategic partnerships to enhance our modern slavery program
- Engagement of key suppliers to bring awareness of modern slavery risks in their supply chain

### Our People

We have a diverse workforce to support the 'good works' achieved through the organisations 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 the Award 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 process. Feedback process is outlined in the organisation Complaint and Compliment framework policy.

Our people are required to adhere to the organisation Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments,

Fraud and values of expected behaviour. Policy and procedures are reviewed regular to ensure best practices and compliance requirements are achieved at all times. Staff are trained on policies and procedures through our Learning Management system.



# SUPPLY CHAIN RISKS

## Industry Sector

Our three highest spend categories are Property and facility maintenance (FM), Communications Technology (ICT) and Motor Vehicle fleet. The ICT and Motor Vehicle are classified as medium risk, however, the largest category spend is in Property and facility management category which is considered as a high risk category. Following on from these three are Furniture and bedding, food and groceries and waste management.

## Geographic location

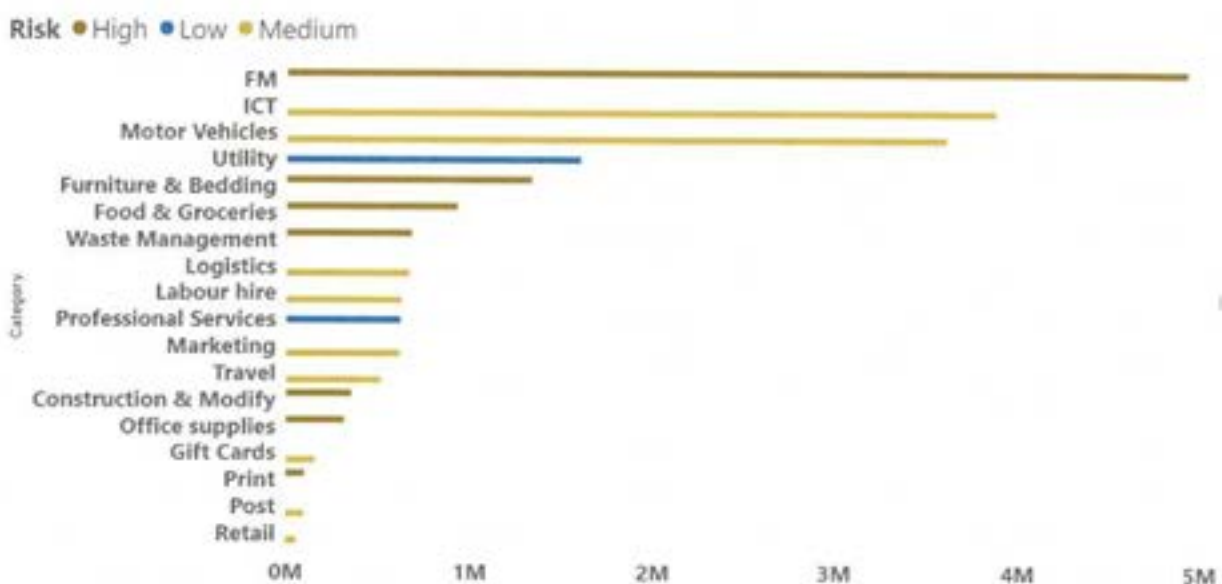
While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

## 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 over 38% of potentially high risk spend is within 6 spend categories:

- Property and facility maintenance (FM)
- Furniture and bedding
- Food and hospitality; and
- Waste management
- Building, construction and fabrication services
- Office supplies



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# Reporting Criteria 4:

## Actions taken to assess and address risk

In the reporting year, we assessed our potential modern slavery risks in operations and supply chain and began planning what is required to bridge the gap in 2022 and beyond. The cornerstone of the reporting year was conducting the analysis on our supplier portfolio.

In the reporting year, we continued our collaboration with the Australian Catholic Anti-Slavery Network (ACAN) and used the resources with other like-minded entities and developed several processes in line with industry best practice. The Modern Slavery Liaison Officer (MSLO) continued to lead the discussion and strengthen the approach by conducting internal modern slavery working group meetings.

The key steps in 2021 has been :

- develop a modern slavery management framework;
- review our supplier portfolio;
- develop high level supplier engagement strategy;
- incorporate supplier questionnaires into our tendering process;
- continue to provide training on modern slavery risks to key stakeholders
- conduct modern slavery working group meetings;

Resources used include the spend category risk taxonomy, supply chain risk dashboard, bridge the gap analysis, and guidance for supplier questionnaire.

### Remediation

St Vincent de Paul Society QLD (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.

Where SVDP QLD is directly linked to modern slavery by a business relationship SVDP QLD is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations will be included in contracts with high-risk suppliers who must notify and consult with SVDP QLD to ensure victim centred remediation processes are implemented to



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the satisfaction of the society.

## Modern slavery action plan and road map

In 2022, we plan to:

- review and update our policies, procedures and codes of conduct to embed modern slavery provisions.
- implement a mandatory training course on modern slavery for all members of the Modern Slavery Working Group.
- implement supplier engagement strategy and negotiate with our Top 100 suppliers to include modern slavery provisions in new supplier contracts.
- build greater awareness on modern slavery throughout our operations.

We plan on monitoring our implemented actions and reviewing our gap analysis and risk taxonomy assessments. We are committed to conducting our business and operations responsibly and continue to refine our systems and processes to reduce the risk of modern slavery in our business and supply chain.

The following four key actions would be prioritised and implemented as part of our modern slavery risk management approach:

### Management System:

- Establish board level targets and KPIs for Modern Slavery risk management
- Broaden the commitment base by involving mid-tier and other levels of staff to
- Integrate modern slavery risk management into supplier review processes

### Risk Management:

- Establish systems and processes to evaluate and take immediate action on identified risks
- Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks
- Map modern slavery risks and vulnerabilities along extended supply chain drive change
- Human Resources and Recruitment:
  - Incorporate modern slavery information into induction programs
  - Incorporate modern slavery risk management specific responsibilities into position descriptions
  - Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts

### Customers and Stakeholders:

- Engage external third-party labour-rights auditors to validate worker voice data
- Run pilot project worker voice program for high-risk suppliers

### Procurement and Supply Chain:

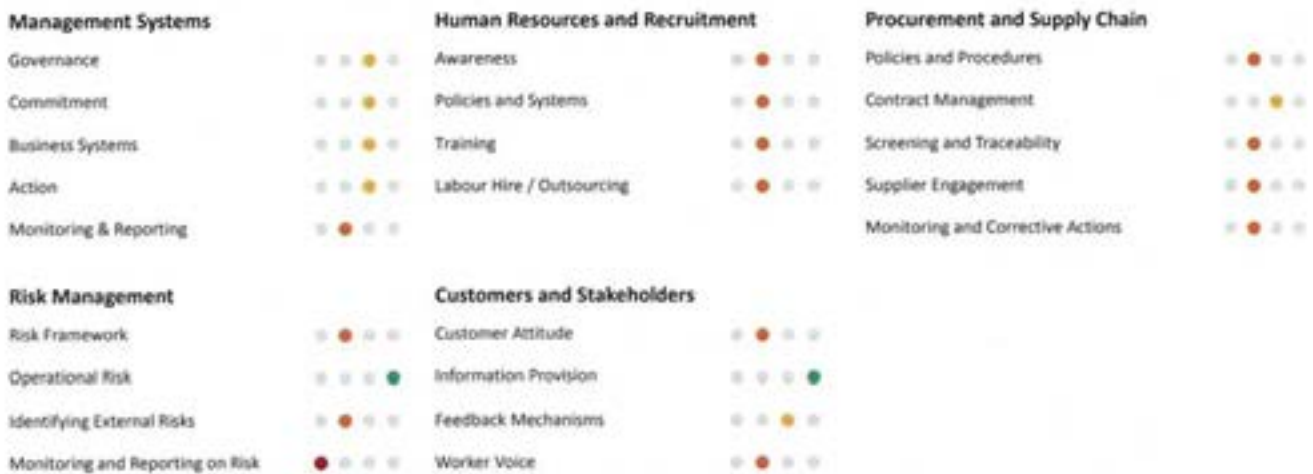
- Include general clauses on modern slavery in all supplier contracts
- Undertake gap analysis of procurement policies and procedures
- Develop targeted communications & engagement programs for high-risk supplier
- Establish a supplier monitoring program

# Reporting Criteria 5:

## Effectiveness of Actions

### Modern Slavery Gap Analysis

We have completed a modern slavery gap analysis focused mainly on Management Systems, Risk Management, Human Resources and Recruitment, Customers and Stakeholders and Procurement and Supply Chain. The result of Gap Analysis for 2021 shows a very good progress in considering Modern Slavery risk in our Management system, Customer and Stakeholders, Procurement and Supply chain and Human Resource area. In overall we made improvement in 17 areas, 5 areas remained unchanged, and no area went backwards.



### Results – Gap Analysis for 2021 Bridge the Gap Heat Map

Category	Topic	Result		Change
		Previous Year	Current Year	
Management Systems	Governance	Red	Yellow	▲
	Commitment	Red	Yellow	▲
	Business Systems	Red	Yellow	▲
	Action	Red	Yellow	▲
	Monitoring & Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Red	Yellow	▲
	Operational Risk	Red	Green	▲
	Identifying External Risks	Red	Red	-
	Monitoring and Reporting on Risk	Red	Red	-
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Yellow	-
	Labour Hire / Outsourcing	Red	Yellow	▲
Customers and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Green	▲
	Feedback Mechanisms	Yellow	Yellow	-
	Worker Voice	Red	Yellow	▲
Procurement and Supply Chain	Policies and Procedures	Red	Yellow	▲
	Contract Management	Red	Yellow	▲
	Screening and Traceability	Red	Yellow	-
	Supplier Engagement	Red	Yellow	▲
	Monitoring and Corrective Actions	Red	Yellow	▲

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SVDPQ will assess its implemented actions on a regular basis. The following process key performance indicators will be considered in our assessments:

- Number of training modules completed by the Modern Slavery Working Group;
- Number of suppliers engaged;
- Number of supplier contracts with modern slavery clauses;
- Number of supplier questionnaires issued and returned;
- Inclusion of modern slavery question on annual organisational health check;
- Inclusion of modern slavery on internal audit review schedule;
- Review of category risk taxonomy assessments;
- Modern Slavery Gap Analysis updates;
- Implementation of supplier risk assessments;
- Updated supplier onboarding process;
- Increased Board awareness and engagement

## Reporting Criteria 6:

### Process of consultation with entities owned or controlled

This statement is intended to cover the operations of St Vincent de Paul Society Queensland and St Vincent De Paul Society Queensland Housing. The Statement was approved by the St Vincent de Paul Queensland State Council and Vinnies Housing Board.

The other wholly owned subsidiary of SVDPQ - Ozcare has been consulted in the process and it has issued its own Modern Slavery Statement which can be accessed on their website <https://www.ozcare.org.au/>

## Reporting Criteria 7:

### Other

Not applicable





**Catholic  
Cemeteries +  
Crematoria**

# Modern Slavery Statement

1 January 2021 – 31 December 2021



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## Disclosure Note

This statement has been made on behalf of *Catholic Metropolitan Cemeteries Trust*. This Statement covers all entities owned or controlled by *Catholic Metropolitan Cemeteries Trust*.

# Acknowledgement of Country

Catholic Cemeteries + Crematoria acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land on which we live. We pay our respects to Elders past, present and emerging.

## What is Modern Slavery?

Modern slavery refers to situations of exploitation where a person cannot refuse or leave, because of threats, violence, coercion, abuse of power or deception. Modern slavery includes:

- Debt bondage
- Deceptive recruiting for labour/services
- Forced labour
- Servitude
- Trafficking in persons
- Child labour
- Slavery or slavery-like conditions

According to the 2018 Global Slavery Index, 40.3 million people are enslaved in the world today, with the highest number in the Asia Pacific region. Of those people trapped in slavery in the Asia Pacific region, 70% are women and girls.

Although modern slavery is illegal everywhere, millions of people continue to be trapped in factories, fields, fisheries and mines. People become trapped in modern slavery by poverty, vulnerability, corruption and systems that create the conditions and opportunities for it to exist.

Modern slavery is not the same as exploitation such as poor working conditions or low pay, although such conditions often underpin and are foundational to (or precursors of) modern slavery.

Criminals use deceptive means to hold captive their workforce and exploit their labour. Children and vulnerable workers are targeted, using control tactics such as charging extortionate recruitment fees, threatening deportation, retaining passports and withholding wages.

# Why Catholic Cemeteries & Crematoria Cares?

Catholic Cemeteries & Crematoria (CCC) are committed to a programme directed towards eradicating modern slavery and human trafficking, through practical measures such as anti-slavery supply chain strategies and procurement, as well as anti-slavery education and engagement initiatives.

CCC recognises that working to eradicate modern slavery is the right thing to do for the organisation and the people forced to work in these enslaved conditions. This is strongly aligned with CCC values to respect the dignity of all people and to act ethically.

We take our responsibility to respond to modern slavery seriously, to help alleviate the exploitation of millions of people worldwide. Implementing anti-slavery strategies will also protect CCC from reputational damage, consumer boycotts and loss of market share.

By making these changes, CCC will be seen as a thought leader and advocate to put an end to modern slavery.

## The Benefits

There are multiple benefits that CCC will receive by implementing a comprehensive anti-slavery programme which include:

- Improved brand recognition,
- Positive business reputation,
- Increased customer loyalty and sales, as consumers sees businesses with higher ethical standards,
- Greater ability to attract talent and staff retention,
- More responsive and stable supply chains, and
- Organisational growth.



# About us

This statement involves the Catholic Metropolitan Cemeteries Trust (ABN 85 744 325 709), trading as Catholic Cemeteries and Crematoria (CCC) is a Trust constituted under the Crown Lands Act 1989 (NSW) and currently transitioning to a Crown Land Manager pursuant to the Crown Land Management Act 2016 (NSW). It is not controlled by any other entity.

It is registered as a charity with the Australian Charities and Not-for-Profits Commission. It has been serving the Sydney community for over 150 years, commencing operations in 1867 at Rookwood Cemetery. The principal activities of the Trust are to provide and maintain burial sites for all members of the community, caring for families with dignity and respect.

Catholic Metropolitan Cemeteries Trust (CMCT) believe that everyone has the right to a dignified funeral and enduring, future care of the family's resting place. CMCT believe 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 a program directed towards eradicating modern slavery and human trafficking, through practical measures such as anti-slavery supply chain strategies and procurement, as well as anti-slavery education and engagement initiatives.

## THE ROAD MAP

Achieved in 2021	Plan for 2022	Plan for 2023
<ul style="list-style-type: none"> <li>• Feedback from our surveyed potential high-risk suppliers assessed to understand their awareness and actions to MS</li> <li>• Implement Procurement Strategy Plan</li> <li>• Implement MS policies and procedures</li> <li>• Implement MS considerations in tender process and purchase orders</li> <li>• Published the MS Statement 2020</li> </ul>	<ul style="list-style-type: none"> <li>• MS is briefly covered in staff and contractor education and induction programs</li> <li>• All potential high-risk suppliers are effectively engaged and educated in MS</li> <li>• Maintain MS information in the Procurement Portal</li> <li>• Implement regular (or quarterly) progress reports to Board and management</li> </ul>	<ul style="list-style-type: none"> <li>• Establish remedy response when MS practices are identified in operations</li> <li>• Survey all medium priority suppliers</li> <li>• Redo survey of all potential high-risk suppliers to note progress</li> <li>• Undertake refresher training to key staff.</li> </ul>



## Our Vision + Mission

### OUR VISION

Create and maintain sacred memorial places for all we serve.

### OUR MISSION

We are a not-for-profit Catholic organisation committed to caring for and supporting communities by providing quality cemeteries, memorial services and bereavement support.

### OUR VALUES

#### Respect

We protect and promote the dignity of the human person made in the image and likeness of God.

#### Integrity

We are ethical and authentic in the things we do.

#### Faith

Our faith guides us in everything we do.

#### Compassion

We are empathetic and sensitive to all.

#### Innovation

We create inspiring places with a commitment to innovate to meet the evolving needs of our community.

#### Collaboration

We value and nurture strong relationships with communities and key stakeholders.

## CEO Statement, and Approval & Signature by Board Chair



CMCT has a zero-tolerance approach to all forms of modern slavery within its business and its supply chain and is committed to acting ethically and with integrity in all business dealings and relationships. CMCT will implement and enforce effective systems and controls to mitigate the risk of modern slavery taking place in its own business or any of its supply chains.

To achieve this aim, we are taking the following steps:

1. Implement a policy which articulates CMCT's commitment to prevent modern slavery within its operations and supply chains.

2. Communication of this policy and all relevant elements of the programme to all employees throughout the organisation and our business partners and supply chains.

3. The assessment of modern slavery and human trafficking risk within CMCT and supply chains and the development of effective, efficient and transparent controls to reduce exposure to those risks.

4. The adoption of anti-slavery contract provisions.

5. The adoption of appropriate due diligence on business partners, agents, contractors, consultants, sub-contractors and suppliers, coupled with the requirement that they implement procedures which incorporate the principles under the applicable modern slavery legislation.

6. Training of all relevant individuals throughout CMCT so that compliance with this policy is the duty of all relevant employees at all levels and individuals can recognise modern slavery practices and take steps to avoid the same.

7. This Modern Slavery Statement represents the 2021 calendar year and was approved by the principal governing body of Catholic Metropolitan Cemeteries Trust as defined by the Modern Slavery Act 2018 (Cth) ("the Act") on 22 June 2022.

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



Hon G. E. Smith  
Chairperson

# Criteria 1 & 2: Structure, Operations and Supply Chain

## Our Organisational Structure

---

CMCT is an independent not-for-profit organisation and one of the largest cemetery trusts in NSW, managing and delivering high quality cemetery services to a diverse range of communities and families across Western Sydney.

The 5-member Board meets bimonthly and has established the following sub committees to assist in performing its duties:

- Finance, Investment & Remuneration
- Audit, Corporate Governance & Risk Management
- Community Advisory
- Project Development

It has a clearly defined organisation structure comprising six departments reporting to the CEO:

- New Business Ventures
- Infrastructure, Major Projects and Assets
- Client Services & Operations
- Strategy, Communications & Marketing
- Finance & Procurement
- People Capability & Change

The Strategic Plan 2020-2022 outlines five key priorities:

- 1. Grow and maintain relationships
- 2. Business sustainability
- 3. Staff and culture
- 4. Service excellence
- 5. Embrace technology

## Our Governance Framework

---

Modern Slavery initiative has the following governance framework in CMCT:

- (a) Board,
- (b) Audit, Risk Management & Corporate Governance Committee (ARMCGC)
- (c) CEO
- (d) Head of Finance & Procurement (F&P)

The Board approved the Procurement Strategy Plan in February 2020 which incorporated ACAN's Modern Slavery initiative. The F&P leads a Procurement Project team and reports periodically to the CEO and the ARMCGC.

## Our Operations

---

Catholic Metropolitan Cemeteries Trust (CMCT) currently operates three cemeteries in the western Sydney area. These cemeteries are located at Rookwood, Kemps Creek and Liverpool. In addition, we are developing two greenfield cemeteries at Varroville and Wallacia. The location of the Head office and the Board's registered office is Level 2, 11 Murray Rose Ave, Sydney Olympic Park NSW 2127. CMCT's 2021 audited financial statements highlights a \$28.9m operating revenue generating \$5.3m surplus.

CMCT 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).*

Currently supplier relationships are a combination of short and long-term engagements. For the supply of goods, contractual terms are generally dictated to us while supply of services undertakes a negotiation process. Other than suppliers, the key business relationships are with Community Groups and Funeral Directors. There are no joint ventures.

The Procurement Strategy has been fully implemented as at 1 April 2022 with the establishment of an appropriately resourced 'centre-led' procurement function and going live with a 'one-stop-shop' procurement portal. An important outcome of the Procurement function is organising and managing "common use" contracts covering a substantial proportion of OPEX AND CAPEX. This reduces the risk of CMCT inadvertently being linked or connected to modern slavery. We will be developing longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Only those suppliers who can meet our standards are appointed.

## Our Supply Chain

---

Over 12 months ending Dec 2021, CMCT purchased over \$11.3m of goods and services mainly from 84 direct suppliers. Our suppliers range from stone masons, builders, cleaners, security, legal and IT advisors, and waste service providers. All procurement was sourced from Australian suppliers which 32% was spent on CAPEX and 68% on OPEX.

CMCT continues to participate in the Australian Catholic Anti-Slavery Network (ACAN [www.acan.org.au](http://www.acan.org.au)) collaboration which provides modern slavery expertise, tools and resources to our efforts.

# Criteria 3: Modern Slavery risks in Operations and Supply Chain

The key area of potentially high-risk suppliers is in Grave & Monuments, Building, Construction and Landscaping services totalling \$3.3m. This has decreased from \$7.9m in 2020 due to no crypt construction. The next major areas of potentially high-risk suppliers are with Waste and Cleaning totalling \$451k.

## OPERATIONAL RISKS

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### Our People

We are confident that our risk to modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. These include Human Resource policies which are intended to ensure that all staff are paid at award rates (above) according to their role and qualification. All employment information is managed through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details.

The key points are:

- Employment - as per our Recruitment and Selection procedure, selection is based on merit, equal employment opportunity and relevant Federal and State Legislation.
- Rates of pay are checked annually to ensure they meet minimum standards.
- Labour hire agencies inclusive of apprentices are also governed by legislation ensuring minimum award rates of pay to all employees. Currently we have 7 firms with 35 people engaged through them. All agencies are engaged on the basis that they reflect pay rates based on Catholic Cemeteries relevant instruments and provide us with pay rates to labour hire personnel.
- Discrimination is outlined in our Code of Conduct – we value the diversity of our people, and as such have employees from a wide diverse.
- Protection of individuals who disclose information about illegal or improper conduct occurring within CMCT is outlined in our Whistleblower policy.

Sourced from CMCT's 2021 Annual Report, highlights a profile of our employees and services.



\*includes interments, cremations and chapel services

†56% decrease due to COVID



## Criteria 4: Actions taken to assess and address risk

The focus in 2021 was implementing a centre-led fully resourced procurement function, one-stop-procurement portal and understanding the awareness and action taken by potentially high-risk suppliers.

### Modern slavery action plan and road map

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Representatives of CMCT participated in the ACAN conference in July 2019 and worked with the Archdiocese of Sydney to develop a sector-wide action plan. We used that format to progress our own action plan by:

- (a) the Head of F & P regularly attending the Modern Slavery Liaison Officer conference group and accessing the ACAN web site for resources.
- (b) a consultative group representing senior management and key staff undertaking the Bridge-to-Gap exercise, and
- (c) Establishing a Project team consisting of 3 Senior Managers, a procurement specialist and an accountant.

The key actions delivered for 2021 were:



Awareness	Published MS information on the CMCT website <a href="https://catholiccemeteries.com.au/general-info/corporate-social-responsibility/">https://catholiccemeteries.com.au/general-info/corporate-social-responsibility/</a> and Link on corporate website to ACAN website
	Incorporate MS statement into Annual Reports
Business Systems	Implement Procurement strategy and MS policy
	Procurement Portal set up to communicate progress on project
Contract Management	Tender process involves assessing bidder response to their approach to MS
	The risk profile of suppliers has been determined based on spend , location, etc.
	Anti-slavery clause included in targeted contracts
	Approved and published the Modern Slavery Policy <a href="https://catholiccemeteries.com.au/wp-content/uploads/2022/04/CMCT-Modern-Slavery-Policy.pdf">https://catholiccemeteries.com.au/wp-content/uploads/2022/04/CMCT-Modern-Slavery-Policy.pdf</a>
	Road Map for MS implementation
Management Commitment	Management engaged in the Expense Category review in procurement
Monitor/Report	Review expense analysis against the potential high-risk categories
	Surveyed 60 high risk suppliers to understand their awareness and approach. Analysed 30 responses.
	Joined SEDEX to understand supplier's supply chain risk
	Self assessment questionnaire to develop gap analysis
Supplier Engagement	Communication letter to all staff and suppliers

## Grievance Mechanism

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CMCT currently does not have any specific grievance mechanism or whistleblower service to target workers in supply chains or labour hire contractors. CMCT is building capacity of its direct employees and stakeholders to recognise and respond to indicators of poor labour practices, unsafe working conditions and modern slavery in its operations and supply chains and raise these concerns to management. In 2022, key staff will be required to complete the ACAN e-learning module on Grievance Mechanisms.

## Remediation

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

Where CMCT 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.

## Our COVID-19 Response

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While COVID – 19 significantly impacted the delivery of services with restrictions at funerals and the social distancing of staff and members of the public, we were able to procure the necessarily Personal Protective Equipment (PPE) and IT hardware to continue operations and ensure the physical contact of suppliers / contractors and members of the public was in accordance with the NSW Health regulations. There has been no identifiable increase in modern slavery risk to staff or engaged contractors due to COVID-19.

## Our Investments

---

CMCT seeks to invest as a responsible community member, and also to ensure that the investments are consistent with its specific mission, the values of the Catholic Church, and the broader arena in which the Trust operates.

The Ethical Statement within the CMCT Investment Policy requires investment managers of managed funds to monitor the portfolio in relation to globally accepted norms on corporate sustainability behaviours in the areas of Human Rights, Labour, Environment and Corruption.

In addition, on an annual basis we receive a proxy voting report from our Investment Advisor, currently Russell Investments, as well as a report on those companies with main businesses that engage in unethical or undesirable practices.

# Criteria 5: Effectiveness Assessment

Effective assessments include, but not limited to:

- Four emails were sent to “All Staff” on the procurement project.
- Two emails were sent to “Senior Management” on the procurement project.
- Gap analysis exercise was completed annually.
- Over 400 emails were sent to suppliers to raise awareness on Modern Slavery risk.
- 7 tenders included “Awareness and Approach to managing Modern Slavery” in the evaluation criteria.

## Modern Slavery Gap Analysis

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A self-assessment questionnaire exercise to quantify the progress achieved was completed to measure change from the 2020 gap analysis.

Outcomes:

- 16 Areas of Improvement
- 4 Areas of no change
- 2 Areas of going backwards.

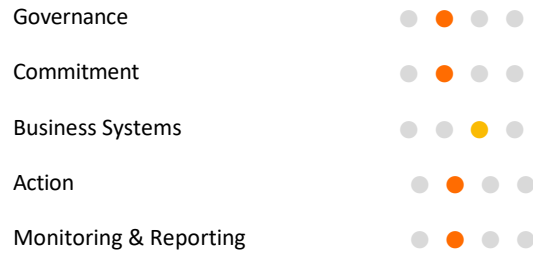
The key areas of improvement in 2021 was in the Risk Management and Procurement & Supply chain, particularly in the policy and procedural aspect. In regards to ‘Identifying External Risks’ and ‘Screening and Traceability’ going backwards, it represents a more accurate reflection of reality.

The focus in 2022 is towards:

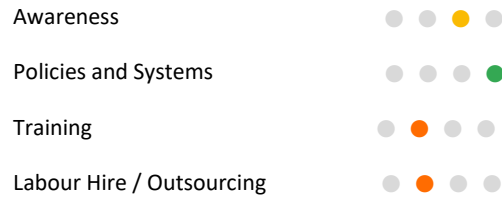
- greater engagement and education with suppliers on modern slavery risks in their organisation,
- greater awareness of staff regarding this initiative and the steps CCC is undertaking, and
- regular reporting to Board on the progress of this programme.

### Heat Map

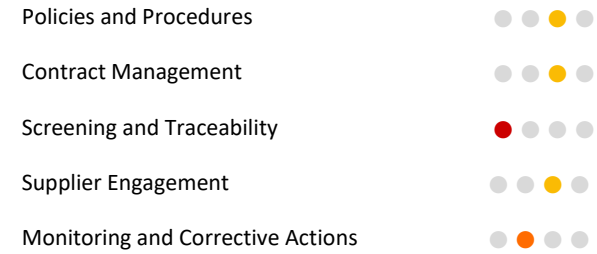
#### Management Systems



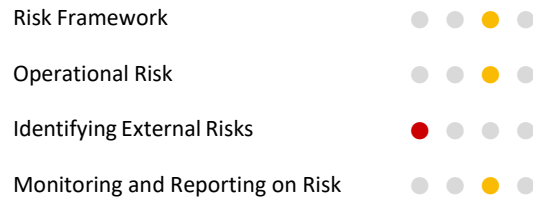
#### Human Resources and Recruitment



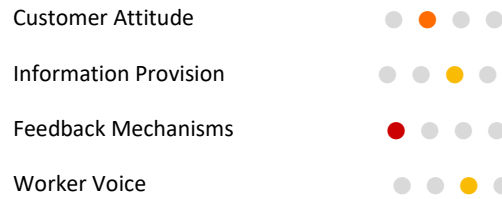
#### Procurement and Supply Chain



#### Risk Management



#### Customers and Stakeholders



## Change Analysis

Category	Topic	Result Previous Year	Result Current Year	
Management Systems	Governance			-
	Commitment			-
	Business Systems			▲
	Action			-
	Monitoring & Reporting			▲
Risk Management	Risk Framework			▲
	Operational Risk			▲
	Identifying External Risks			▼
	Monitoring and Reporting on Risk			▲
Human Resources and Recruitment	Awareness			▲
	Policies and Systems			▲
	Training			▲
	Labour Hire / Outsourcing			▲
Customers and Stakeholders	Customer Attitude			▲
	Information Provision			▲
	Feedback Mechanisms			-
	Worker Voice			▲
Procurement and Supply Chain	Policies and Procedures			▲
	Contract Management			▲
	Screening and Traceability			▼
	Supplier Engagement			▲
	Monitoring and Corrective Actions			▲

## Category Summary

### Management Systems

CMCT have taken steps to understand the modern slavery risks in our operations and supply chain. We have policies supporting our anti-slavery commitments, and they are publicly available. We use the software Risk Wizard to capture incidents, grade the severity, map a course of action and track progress in mitigating the risk. In addition, we subscribe to SEDEX to identify risk in the supply chain of our potentially high-risk suppliers.

### Risk Management

CMCT has a risk framework, which covers the risk of modern slavery. While our Board and senior management team acknowledge that modern slavery occurs in our business sector, our approach to identifying and managing modern slavery risks has only recently commenced. As part of the Procurement Strategy Plan, Modern slavery risk management processes is being integrated into the Procurement function. We perform regular payment checks to ensure that we comply with award wages and legislative requirements.

### Human Resources and Recruitment

CMCT has commenced incorporating modern slavery issues into our employee or contractor training or awareness programs. In 2022 our aim is hiring and onboarding processes that reference modern slavery risk management. We have policies and systems in place to identify and mitigate the risk of modern slavery in recruitment, payment of wages, etc.

Once the procurement strategy is implemented, a training module for modern slavery will commence deployment to relevant staff members. In addition, implement specific policies and processes assisting to understand and mitigate the risk when using labour hire companies and/or outsourcing of jobs to subcontractors.

### Procurement and Supply Chain

We have mapped our supply chain to understand priority suppliers and risk categories. Our procurement framework is aligned with our risk management framework and it has been updated to cover screening for modern slavery and other risk factors in the supply chain. Our contract management and tender process takes modern slavery parameters into account, and it is used for decision making when awarding tenders.

We have commenced a supplier engagement process by communicating our intent to all suppliers on this matter and surveying all potentially high-risk suppliers on awareness and actions to MS.

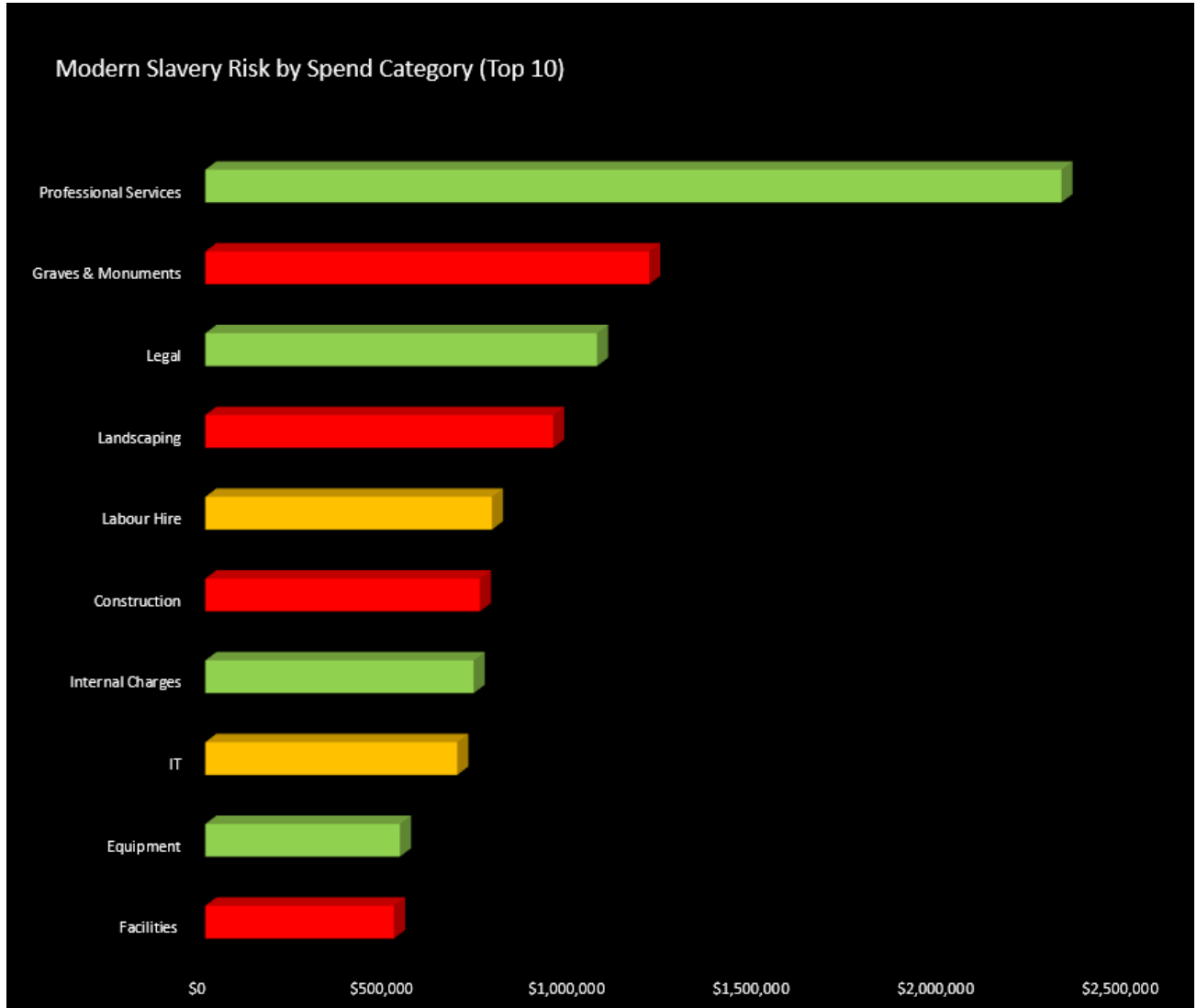
### Customers and Stakeholders

CMCT have no understanding of our customer or stakeholder expectations around modern slavery risk management. CMCT has communicated our commitments and values to the stakeholders and starting to engage with key stakeholders,

Through our whistle blower policy (staff and labour hire contractors) and complaints policy (customers), we have an active, anonymous and efficient grievance mechanism. However, it doesn't target workers in our supply chains.

## SUPPLY CHAIN RISKS

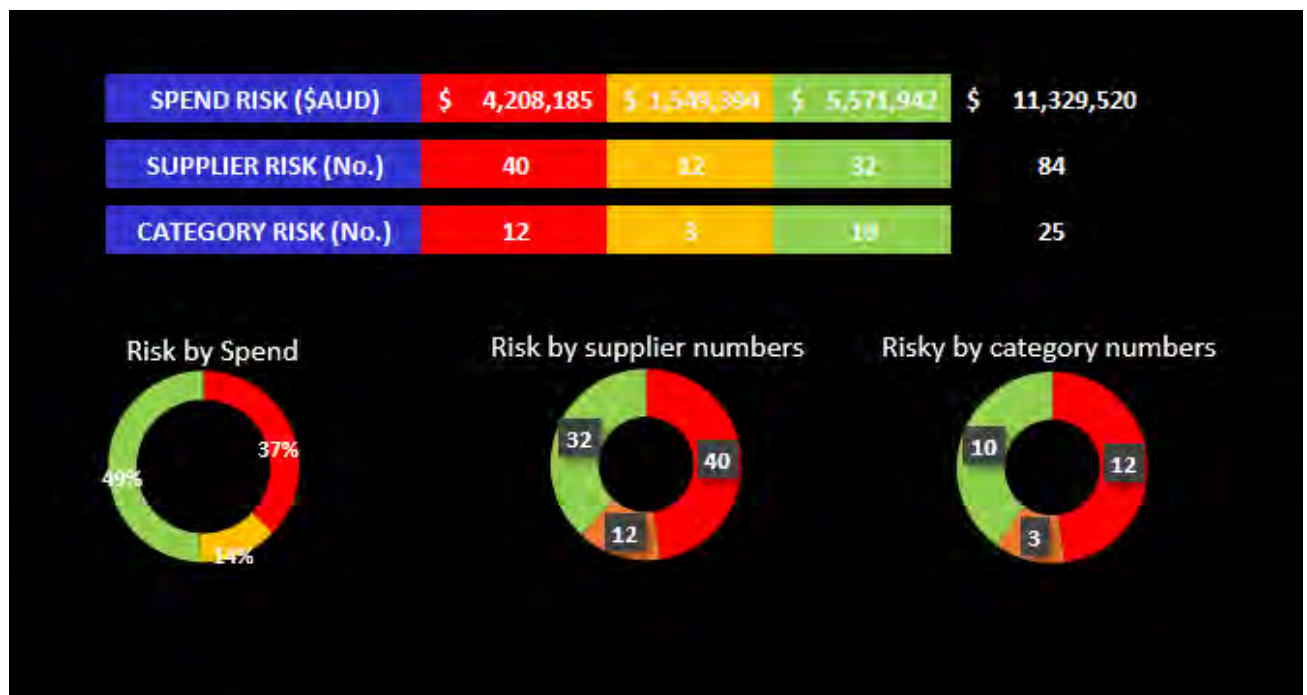
In 2021 we identified the potential highest risk suppliers according to the ACAN Category Risk Taxonomy. This formed the basis of the supplier dashboards.



The dashboard below provides an overview of the scope and scale potential modern slavery risk within CMCT’s supply chain and is the first step in developing robust risk management systems. The information was sourced from the 2021 calendar year and the indicators of potential risk are based on the best available information as disclosed by ACAN.

The Dashboard does not attempt to determine actual risk to the organisation or the modern slavery risk presented by individual suppliers. Determining actual risk requires detailed information, analysis and investigation from multiple sources and stakeholders.

For example, “Graves & Monuments” may have the risk with materials imported from overseas. “Construction” and “Facilities” may represent a risk due to migrant workers from many overseas countries.



It highlights CMCT has 12 potential high-risk categories involving 40 suppliers that constitutes 37% of the overall spend.

## Criteria 6: Consultation

CMCT does not own or control any other entities therefore this criteria is not applicable.

## Criteria 7: Other

No other relevant information to report.





# Modern Slavery Statement 2021

ABN 18 643 442 371



MELBOURNE  
ARCHDIOCESE  
**CATHOLIC SCHOOLS**

D22/37782

**First published June 2022**

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Our vision is for an outstanding Catholic education that equips young people with the knowledge, skills, hope and optimism to live meaningful lives, and shape and enrich the world around them.

# About us

Archbishop Peter A Comensoli established Melbourne Archdiocese Catholic Schools Ltd (MACS) to be responsible for the governance and operation of parish primary schools, and regional and archdiocesan secondary colleges in the Archdiocese of Melbourne. Operations commenced on 1 January 2021, with Catholic Education Melbourne transferring to MACS with approximately 290 schools.

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

Our vision is for an outstanding Catholic education that equips young people with the knowledge, skills, hope and optimism to live meaningful lives, and shape and enrich the world around them.

Our schools make it a priority to create an environment where all parents and families feel welcomed, valued and supported.

Our schools recognise that every child is special and unique, and make every effort to cater for individual learning needs.

Our schools actively promote the faith development of students in an environment where prayer and sacramental celebrations are structured into daily activities. They provide religious education programs which make students knowledgeable about their faith.

Our schools have high expectations and priority is placed on service to the community, with a firm commitment to nurturing school communities that not only encourage and celebrate intellectual achievement and academic excellence, but also participation, leadership and achievement in other fields – sports, the arts and citizenship activities.

## Structure

MACS was established in 2020 by Archbishop of Melbourne Peter A Comensoli. The Archbishop is the sole member of MACS and appoints the 11 members of the MACS board.

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 managing and delivering MACS' objectives, and implementing policies.

## Board and committees

The MACS board is responsible for the overall corporate governance of the organisation, which includes:

- overseeing regulatory compliance
- ensuring that MACS upholds Church laws
- ensuring that appropriate, adequate and effective systems of risk management and internal control are established and maintained
- charting the overall strategy and direction of MACS – including setting, monitoring and reviewing strategic, financial and operational plans, and determining matters relating to policy and practice.

The board includes various committees that report to it, such as the Child Safety and Risk Management Committee, and Finance and Audit Committee.

## Modern slavery risk management initiatives 2021

Modern slavery is a multifaceted issue that requires a multifaceted approach.

MACS has put into place the following work streams in our targeted approach to ethical procurement supply chain mapping and spend analysis:

- supplier engagement
- modern slavery risk assessment
- employee engagement and training
- embedding of ethical procurement in our processes
- compliance with and reporting against the *Modern Slavery Act 2018* (Cth)
- participant of the Australian Catholic Anti-Slavery Network (ACAN)
- thought leadership and advocacy: driving collaboration and best practice.

In its first year of operation, MACS has taken significant steps in that approach by delivering several important initiatives:

- introducing Sedex for suppliers used by the MACS office
- developing a new MACS Modern Slavery Policy
- replacing all the tea, coffee and drinking chocolate with a fair-trade brand
- providing regular updates to schools on using fair-trade sports goods and uniforms, etc.
- including a modern slavery clause in all tenders to make the procurement as ethical as possible.

MACS also developed a risk framework and tools to identify and manage the risks of modern slavery in our operations and supply chain. Working collaboratively with ACAN and the Catholic Archdiocese of Melbourne, our risk framework will assist us to prioritise and assess supplier risks.

By implementing these initiatives, we have gained greater visibility over procurement and integrated ethical sourcing practices more broadly into these areas in the future.

## Our annual report

MACS' 2021 financial report will be included in the annual report when published on our website [www.macs.vic.edu.au](http://www.macs.vic.edu.au). The 2021 financial report will be published in July 2022 on the Australian Charities and Not-for-profits Commission (ACNC) website.

## Our operations

MACS provides a high-quality Catholic education to more than 112,000 students at approximately 290 primary and secondary schools across the Archdiocese of Melbourne.

This makes MACS the second largest proprietor of schooling in Victoria and the largest Catholic education provider within a diocese in Australia.

Our head office is located in East Melbourne. It is supported by four regional offices in the north, south, east and west of Melbourne, and the Catholic Leadership Centre. MACS employs close to 500 staff in Melbourne.

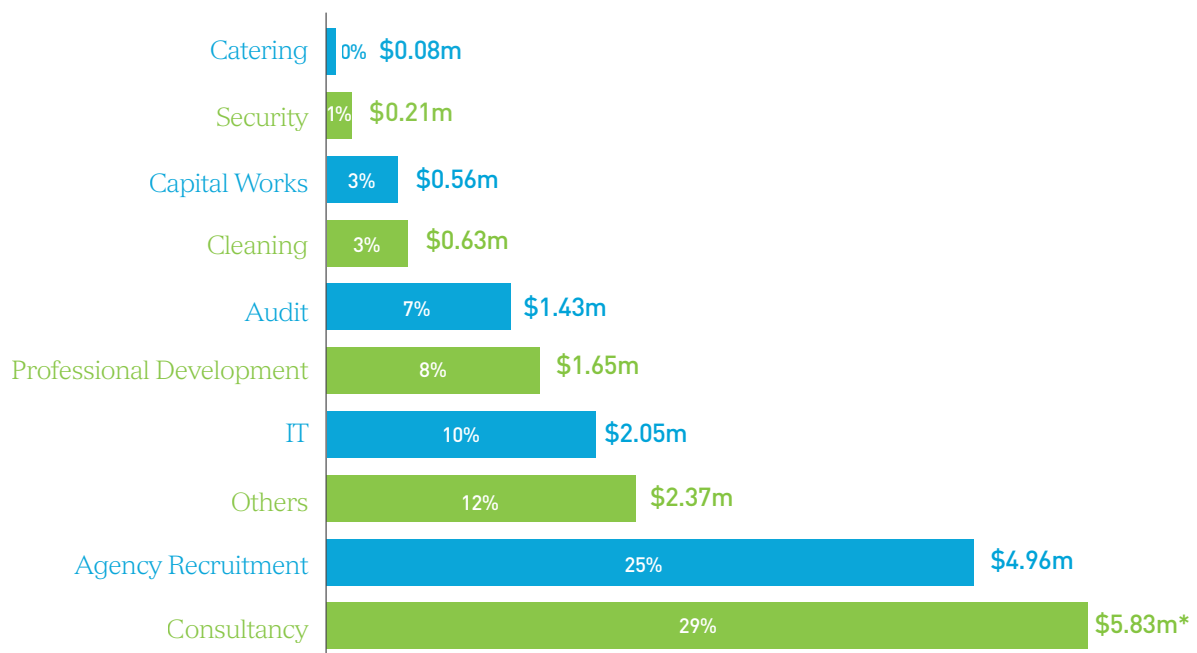
## Our supply chain

The majority of MACS' significant suppliers are based in Australia. The top 50 suppliers used by MACS office operations were considered for this analysis and the percentage breakdown of those is shown in Figure 1. In future years, this will be expanded to include school suppliers once the current migration of all MACS schools to the one financial reporting platform is complete.

The details will be available in the financial report and on the [ACNC website](#) in July 2022.

In 2022, a new role will be created for a General Manager of Procurement, with a dedicated team that will further enhance the monitoring of modern slavery for MACS.

Figure 1: MACS office percentage of spend for top 50 suppliers in 2021



\* includes \$2m PwC Cash to Accrual conversion for schools



MACS has taken a whole-of-group approach to our due diligence by establishing a relationship with ACAN.



# Modern slavery risks in operations and supply chain

MACS has taken a whole-of-group approach to our due diligence by establishing a relationship with ACAN.

ACAN will help us understand the entities we partner with for our operational activities and those involved in our supply chains. In addition, we have established an ongoing monitoring system of our suppliers by commodity. Should there be any changes to our risk profile, or a credible report alleging that one of our suppliers is engaging in human trafficking or other prohibited activities, we will be notified promptly.

The highest risk areas identified are as follows:

- Cleaning services – as highlighted last year in Catholic Education Melbourne’s Modern Slavery Statement, a new tender took place that included modern slavery clauses.
- Facilities management – this includes maintenance such as plumbing, handyman services and minor repairs, etc. There are no current contracts with MACS covering these services, although purchase orders have a modern slavery clause in their terms and conditions.
- ICT hardware – these goods may be manufactured using conflict minerals (e.g. cobalt used in lithium-ion batteries, which is common to most mobile phones throughout the world) or forced labour by entities in earlier stages of their supply chains. Over time, our understanding of supply chains will improve by working with ACAN.

## Operational risks

We recognise that the economic impacts of the global COVID-19 pandemic may increase the prospect of exploitation in certain jurisdictions. While the full ramifications of the pandemic on social and economic standards worldwide are not currently known, we will use the monitoring system outlined above and continue to work with our supply chain resilience solutions partner.

The impact of the COVID-19 pandemic will be closely monitored going forward to ensure we are aware of the pressures on supply chains, especially those parts that rely on overseas sources.

### Supply chain risks

- **Industry sector** – specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – specific products and commodities deemed high risk by the United States Department of Labor’s 2020 List of Goods Produced by Child Labor or 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 outlined in the 2018 GSI. While MACS predominantly uses Australian suppliers, it is recognised that goods and services may come from countries other than those of the suppliers’ headquarters.
- **Workforce profile** – In undertaking supplier analysis, we consider the type of labour involved in producing goods and services, particularly where low-skilled, vulnerable or migrant labour is used, or where the work is deemed as ‘3D’ (dirty, dull and dangerous). Based on our profile, 77% of the spending was considered as no risk, with 14% as high risk, as shown in Figure 2. Three categories were considered to be high risk: cleaning services, facilities management and ICT hardware. School-based capital infrastructure projects are a growing risk that we will continue to monitor.

Figure 2: MACS supply chain risk profile 2021



# Actions taken to assess and address risk

For the 2021 reporting period, MACS undertook initial actions to address the modern slavery risks in its operations. MACS became a member of ACAN, along with key partners the Catholic Archdiocese of Melbourne and the Catholic Education Commission of Victoria Ltd (CECV). We have assessed our operations and subsequently commenced actions to manage the existing and ongoing risk exposure.

The following actions have been taken throughout the reporting period:

- a. **Signed up with Sedex for supplier assessment and supply chain visibility.** Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. Membership supports us to be aware of every supplier in our supply chain. It ensures we have key information on our suppliers, including the location of all suppliers through the whole value chain, and the inherent risks to human and environmental rights associated with the countries, industries and activities of each supplier. Sedex provides visibility on the full extent of our supply chain, from raw material harvesting and transport of goods to finalised products and services in the forms they are provided to us.
- b. **Created a Modern Slavery Policy.** MACS adopted a Modern Slavery Policy with the overarching purpose of preventing modern slavery by managing and mitigating the risk within our business operations and supply chains. This policy ensures that modern slavery does not flourish within our operations, business relationships and extended supply chains. It also provides a robust framework to ensure compliance with the reporting requirements of the Modern Slavery Act.
- c. **Provided slavery-free tea, coffee and drinking chocolate.** Our tea, coffee and drinking chocolate supplier was changed to Sprout, the preferred brand for slavery-free products.
- d. **Communicated with schools.** All Catholic schools in the Archdiocese of Melbourne were given updates on modern slavery, especially high-risk categories such as sporting goods, uniforms and cleaning services.
- e. **Undertook modern slavery awareness training.** At least one staff member in all MACS office business groups has undertaken modern slavery awareness training and supplier engagement training. Supplier awareness training will be rolled out to all staff in the organisation.
- f. **Undertook supplier risk assessments.** MACS has undertaken a risk assessment of corporate office suppliers and service providers, and categorised them into risk-rated cohorts and spend volume. This risk assessment has identified the areas where the risk of modern slavery exposure is elevated. MACS will focus its preventative and mitigation compliance activities on these areas throughout the next reporting periods.
- g. **Commenced supplier engagement.** MACS has commenced its supplier engagement strategy by introducing modern slavery clauses into the terms and conditions of purchase orders. This is the first of many steps related to building supplier awareness. Subsequent action and compliance will be taken to reduce modern slavery risk from MACS' immediate supply chain.
- h. **Added contractual clauses.** Working closely with our legal team, all new supplier contracts include modern slavery clauses to ensure suppliers take all reasonable steps to remove modern slavery from their supply chains. Moreover, minimum entitlement clauses for supplier employees have been included in MACS supplier contracts.



MACS will undertake reviews of its modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective.

# Effectiveness assessment

Using the *Bridge the Gap* assessment tool provided by ACAN, MACS completed a gap analysis to review the following five categories:

1. Management Systems
2. Human Resources and Recruitment
3. Procurement and Supply Chain
4. Risk Management
5. Customers and Stakeholders.

These are the areas of focus in future years for MACS.

## Review process

MACS will undertake reviews of its modern slavery action plan at regular and appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists of five stages:

1. **Annual review of the modern slavery framework.** This annual review will be undertaken to assess the effectiveness of the existing framework and identify areas for improvement. As MACS is still in the process of building and strengthening its current controls, the existing tools used (such as the *Bridge the Gap* assessment tool) will be a key driver for areas requiring further attention and action.
2. **Regular check of the risk review process.** At this stage, we will further assess suppliers using the existing risk identification methodology. Over time, it will provide further insight into the supply chain map.
3. **Supplier and engagement feedback process.** Ongoing engagement with suppliers to identify areas of improvement and education has been identified as a key step towards eliminating risk. A dedicated member of staff will provide a communication channel for information, and feedback will assist in the ongoing improvement of the modern slavery framework.
4. **Annual supplier reports/attestation.** These reports will assist in understanding our suppliers' risk framework and exposure, which will help us direct resources where needed most, for example, further communication or education advice in relation to modern slavery.
5. **Corrective actions process.** Following stages one through four, we will take corrective actions where required to further enhance the modern slavery framework.

# Looking ahead to 2022

MACS is committed to providing an appropriate and timely remedy to people impacted by modern slavery in line with the United Nations Guiding Principles on Business and Human Rights, the Modern Slavery Act and other applicable Australian laws.

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.

MACS recognises that remediation may be complex and require specialist resources to ensure comprehensive and rights-compatible outcomes for people impacted by modern slavery. As such, we have, through ACAN, become a founding partner of Domus 8.7, which is an independent program to provide a remedy to people impacted by modern slavery. Our remediation efforts will be enhanced through further policy development, detailed response procedures, and engagement with Domus 8.7 and other civil society stakeholders.

Where MACS 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, which must notify and consult with MACS to ensure victim-centred remediation processes are implemented to our satisfaction.

When allegations of modern slavery practices come to our attention through whistleblowers or other channels, staff will contact relevant law enforcement agencies if a person is in immediate danger or Domus 8.7 to begin the remediation process.

In 2022, MACS will collaborate with the CECV to encourage staff and suppliers to undertake the five ACAN e-learning modules as part of the Modern Slavery e-Learning course:

1. Modern Slavery 101
2. Business Relevance
3. Modern Slavery Risk Management for Suppliers
4. Implementing a Modern Slavery Risk Management Program
5. Grievance Mechanisms & Remedy.

MACS also plans to progress with the following actions:

## Build our understanding and capabilities

- Develop and deliver a broader training program for employees to increase understanding and awareness of modern slavery risks within our operations and supply chains.
- Educate and support providers to understand their obligations under the Modern Slavery Act and our supplier statement.
- Develop response plans that are monitored and managed for continuous improvement with identified suppliers.
- Define and implement second-line review processes to ensure independent oversight of the modern slavery framework.

### Improve our processes

- Further embed due diligence processes within the first line of defence and adapted learnings.
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Uplift our compliance obligations framework.
- Develop guidance on remediation actions to support relationship owners in addressing modern slavery risks.
- Define qualitative and quantitative indicators for assessing the effectiveness of our actions to assess and address modern slavery risks.
- Leverage the ICON platform to identify key suppliers and risks across all schools in MACS.
- Embed ethical procurement in our processes, including developing and rolling out ethical procurement guidelines for employees.

### Enhance engagement with suppliers

- Engage with more high-risk suppliers to assess their modern slavery practices.
- Continue to assess risks within our operations and supply chains, expanding the scope to include our schools.
- Participate in the ACAN forum to ensure alignment in approach.
- Obtain greater visibility of the risks of modern slavery in our supply chains beyond tier one.
- Introduce a vendor terms and conditions project to embed ethical sourcing for all new vendors.
- Disseminate our supplier Code of Conduct and enhance direct engagement with certain high-priority suppliers.

We will continue to strive to prevent modern slavery and any inadvertent involvement we may have across our operations and supply chains. There is more to do, but we are always looking for new and better ways to eliminate modern slavery, in partnership with others.

## Consultation with controlled entities

During 2021, MACS had no controlled entities.



Our efforts have centred on improving the visibility and understanding of our supply chain and ethical procurement practices.



# Statement from Jim Miles, Executive Director



We are pleased to share our first Modern Slavery Statement since MACS was established to own and operate approximately 290 schools in 2021.

We have taken steps in assessing, addressing and setting up initiatives in this Modern Slavery Statement. We are committed to continuous improvement and reducing any modern slavery risks arising from our supply chain. Our efforts have centred on improving the visibility and understanding of our supply chain and ethical procurement practices, as we focus on creating a more sustainable supply chain.

Our focus for the year 2021 has been to develop a risk framework and tools to identify and manage the risks of modern slavery in our operations and supply chain. To help us do this, we have actively engaged with ACAN and worked collaboratively with the Catholic Archdiocese of Melbourne to assist with prioritising and assessing supplier risks.

While we are encouraged by the progress that has been made in our first reporting year as MACS, we know more needs to be done and will continue to refine our tools to address modern slavery risks as we work to deliver great outcomes. This also includes the continued awareness of schools within MACS. We are cognisant that dealing with modern slavery will require ongoing focus in collaboration with industry, the community and other stakeholders.

## Endorsement

This Modern Slavery Statement, as defined by the Modern Slavery Act, was approved by the board of MACS on 17 June 2022.

A handwritten signature in blue ink that reads "Jim Miles". The signature is fluid and cursive, written on a light-colored background.

**Jim Miles**  
**Executive Director**

Melbourne Archdiocese Catholic Schools  
James Goold House  
228 Victoria Parade, East Melbourne Victoria 3002



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ARCHDIOCESE  
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DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



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# Modern Slavery Statement

# 2021

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## Disclosure

This statement has been made on behalf of member and directors of DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED. This Statement covers all entities owned or controlled by the DIOCESE OF BALLARAT CATHOLIC EDUCATION LIMITED.

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 Diocese of Ballarat.

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 68 629 894 686 Diocese of Ballarat Catholic Education Limited

200 Gillies Street North, Lake Wendouree, Vic 3350



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## Message from the Executive Director – Tom Sexton



Our common humanity requires respect for and support of the sanctity and worth of every human life. All other rights and responsibilities flow from the concept of human dignity. This principle is deemed as the central aspect of the Church’s social teaching. The belief that each life has value is shared with International Human Rights which are universal, inviolable and inalienable.

Catholic social teaching calls for recognition of the dignity of work, the rights of workers and advancing the common good.

Action against modern slavery is fundamental to catholic social justice. DOBCEL is committed to work with each of its school communities and play its part to rid the world of this affront to human dignity and human freedom.

A handwritten signature in black ink, appearing to read 'T. P. Sexton'.

**Tom Sexton**

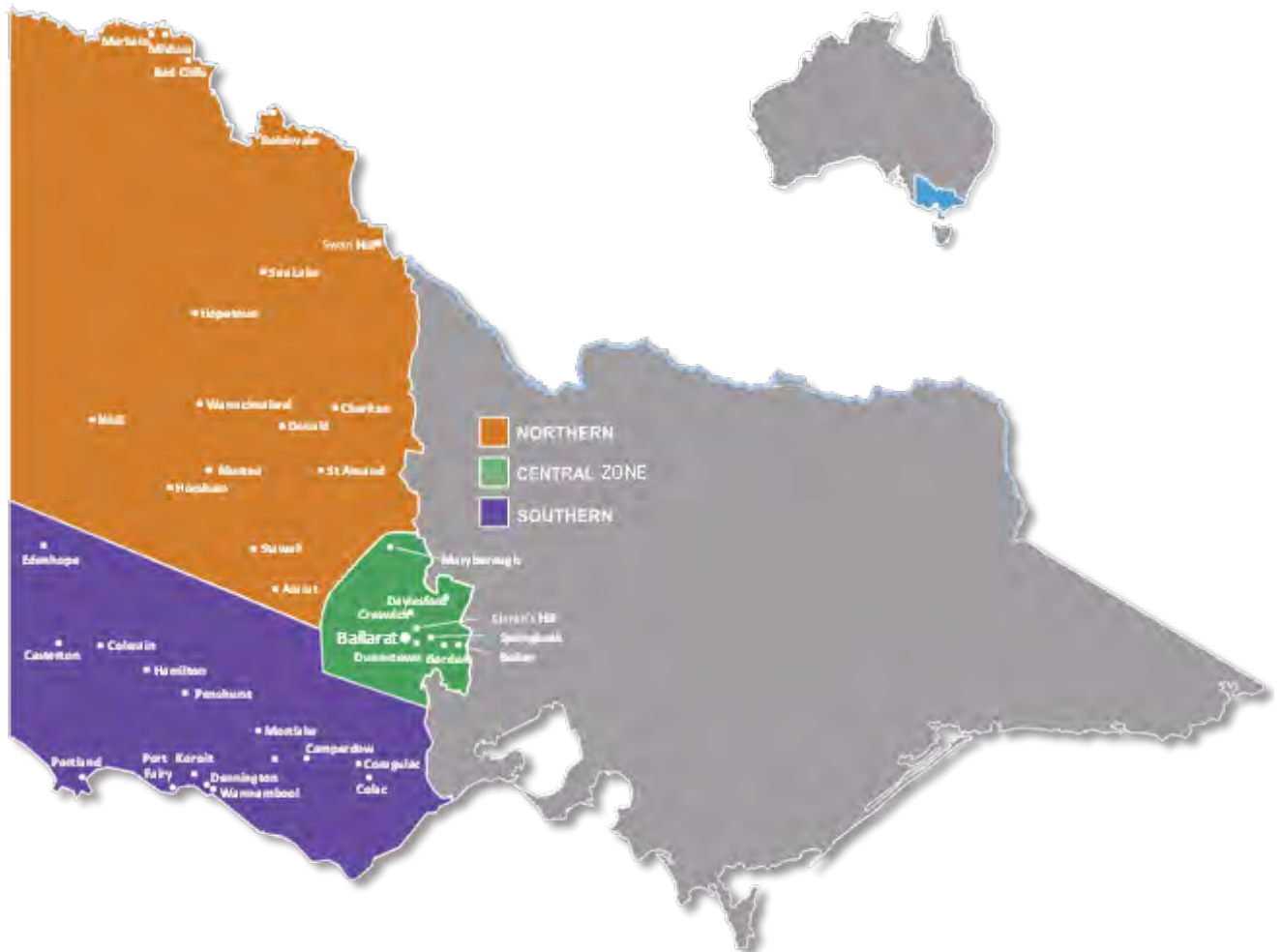
Executive Director

Diocese of Ballarat Catholic Education Limited



## About us

The Diocese of Ballarat has 64 diverse primary and secondary schools in total, providing distinctive Catholic education in rural and regional settings from the Murray to the Sea. The Diocese is divided into the Northern, Southern and Central zones and has over 18,000 students enrolled in 52 Primary Schools (Foundation to 6), one Foundation to Year 8 School and 11 Secondary Schools (years 7-12).



The Diocese of Ballarat is diverse and geographically extensive, covering the western third of Victoria, extending from the Murray River in the North to the Southern Ocean in the South. 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 has a number of provincial centres and large rural areas. There is a wide range and mix of primary and secondary industry and tourism and many places of natural beauty – the Great Ocean Road, the Grampians, the towns of the Murray River, the Little Desert and the goldfields.



## Our Vision

“As partners in Catholic education and open to God’s presence, we pursue fullness of life for all”

Together, we journey towards this vision through:

- Proclaiming and witnessing to 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 the image of God.

Strategic priorities for DOBCEL are illustrated in the diagram below:



*Partnering: A Step Further. Strategic Directions 2020-2024*





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## 2021 Modern Slavery Risk Management Initiatives

To support the work of meeting our modern slavery responsibilities, the DOBCEL has established a working group. This Modern Slavery Working Group with representatives from various areas across education including Finance and Accountability, Planning, Risk and Assurance, IT and Business systems, Social Justice and sustainability, Liturgy and Special Projects. The objectives of this group are to:

- Provide input and advice to DOBCEL on issues related to modern slavery;
- Actively support the development and implementation of DOBCEL's modern slavery action plan;
- Assist DOBCEL 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 DOBCEL meets the requirements of the Modern Slavery Act 2018 (Cth).

## Our Plans for 2022 and Beyond

While actions to date have been modest as catholic education within the Diocese has undergone a significant governance restructure during 2021, DOBCEL is currently developing the modern slavery program for 2022, including the following initiatives:

- Modern Slavery awareness training to 70% of all staff;
- Implement a due diligence program for key suppliers;
- Undertake awareness training with high risk suppliers;
- Initiate a modern slavery communications program, advice and guidance to 58 schools;
- Develop and implement a Supplier engagement strategy that includes a Supplier Code of Conduct, procurement principles, compliance measures and clauses for major contracts;
- Support the Domus 8.7 reporting framework within DOBCEL schools;
- Review key procurement processes to ensure greater supervision and mitigation of DOBCEL's risk exposure to Modern Slavery; and

The ongoing goal is to identify and eliminate modern slavery supply chain risks from our service providers and suppliers across the key industries we engage with to deliver our services to the school communities within the Ballarat Diocese.



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## CRITERIA 1 + 2

### About Diocese of Ballarat Catholic Education

#### Our Organisational Structure

Diocese of Ballarat Catholic Education Limited (referred to as DOBCEL in this document), is the company established by Bishop Paul Bird to become the governing body for schools in the Ballarat Diocese.

DOBCEL was established to fulfill the following objectives:

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

DOBCEL acts as the governing authority for 58 primary and secondary schools within the Diocese.

The following are schools are part of DOBCEL:

- St Thomas More Primary, Alfredton
- St Brigid's Primary, Ballan
- St Alipius Parish Primary, Ballarat East
- St Columba's, Ballarat North
- St Patrick's Primary, Camperdown
- St Joseph's Primary, Charlton
- Sacred Heart Primary, Colac
- Trinity College, Colac
- St Brendan's Primary, Coragulac
- St Michael's Primary, Daylesford
- St John's Primary, Dennington
- St Brendan's Primary, Dunnstown
- St Patrick's Primary, Gordon
- St Joseph's Primary, Hopetoun
- St Brigid's College, Horsham
- Siena Catholic Primary, Lucas
- Our Lady of the Sacred Heart, Merbein
- St Paul's Primary, Mildura
- Damascus College, Mount Clear
- Our Lady Help of Christians, Murtoa
- St Joseph's Primary, Penshurst
- All Saints Primary, Portland
- St Aloysius Primary, Redan
- St Mary's Primary, Sea Lake
- St Mary's Primary, Ararat
- St Patrick's Primary, Ballarat
- St Francis Xavier, Ballarat East
- Mercy Regional College, Camperdown
- Sacred Heart Primary, Casterton
- St Mary's Primary, Clarkes Hill
- St Mary's Primary, Colac
- St Joseph's Primary, Coleraine



- St Augustine’s Primary, Creswick
- Lumen Christi Primary, Delacombe
- St Mary’s Primary, Donald
- St Malachy’s Primary, Edenhope
- St Mary’s Primary, Hamilton
- Ss Michal and John’s Primary, Horsham
- St Patrick’s Primary, Koroit
- St Augustine’s Primary, Maryborough
- Sacred Heart Primary, Mildura
- St Colman’s Primary, Mortlake
- Emmaus Catholic Primary, Mount Clear
- St Patrick’s Primary, Nhill
- St Patrick’s Primary, Port Fairy
- St Joseph’s Primary, Red Cliffs
- St Mary’s Primary Robinvale
- St James’ Primary, Sebastopol
- St Patrick’s Primary, St Arnaud
- St Mary MacKillop College, Swan Hill
- St Thomas’ Primary, Terang
- St Joseph’s Primary, Warrnambool
- St Pius X Primary, Warrnambool
- St Patrick’s Primary, Stawell
- St Mary’ Primary, Swan Hill
- St Mary’s Primary, Warracknabeal
- Our Lady Help of Christians, Warrnambool
- Our Lady Help of Christians, Wendouree

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

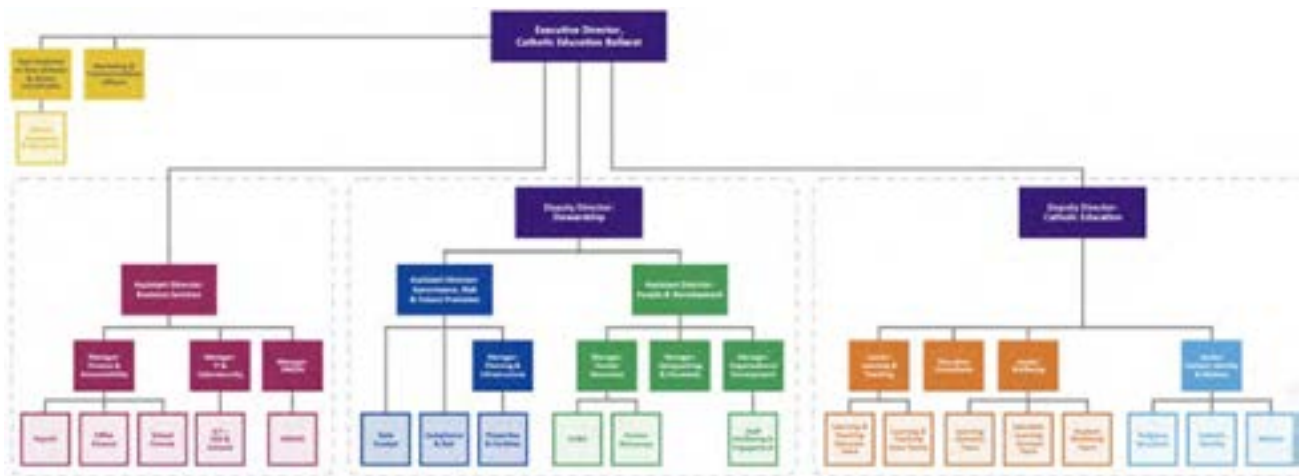


Chart 1 – Organisational Structure of DOBCEL.



## Our Governance Framework

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

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

Bishop Paul Bird established a company limited by guarantee, Diocese of Ballarat Catholic Education Limited (DOBCEL), and appointed a board of directors to govern parish schools. The Board of the company reports directly to Bishop Paul as the Bishop of the diocese and as the member of the company. It also approves education policies in consultation with and for the whole diocesan education community. The day-to-day management of the schools governed by the company is delegated to the Executive Director, Catholic Education, and Principals of these schools have the appropriate delegations to lead and manage their schools and their staff.

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

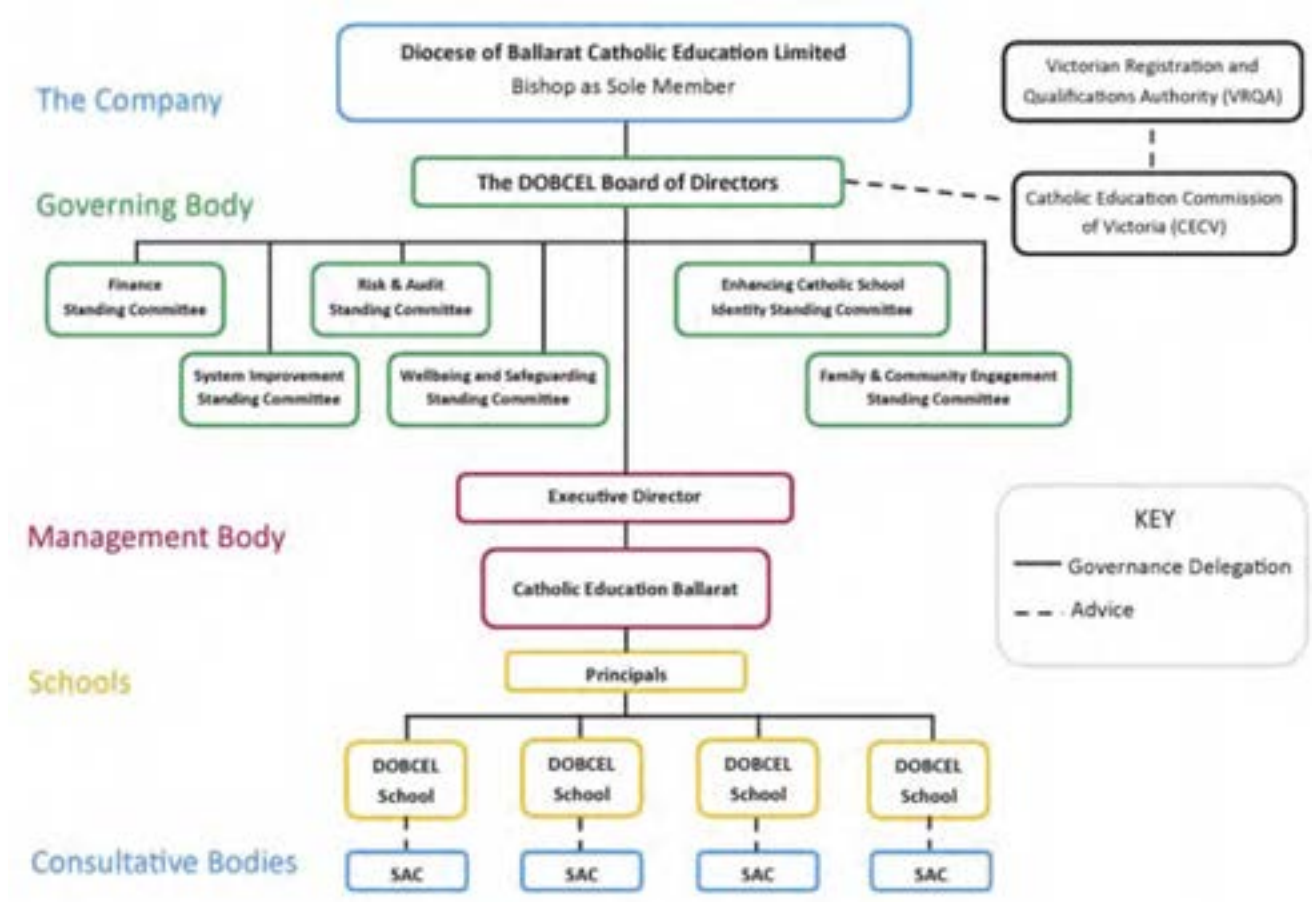


Chart 2 - Governance Structure of DOBCEL



## Our Operations

In the Diocese of Ballarat, the Bishop has responsibility for Catholic education. As the sole Member of DOBCEL, the Bishop delegates responsibility for the governance oversight of schools (other than those governed by Institute and Ministerial PJPs) to the DOBCEL Board, which is a skills-based Board. The Chief Executive Officer assists the DOBCEL Board in meeting their responsibilities for school governance. Religious

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

- Building inclusive Catholic learning communities.
- Empowering all to flourish.
- Enhancing family engagement, governance and stewardship.
- Fostering inspiring leadership.
- Achieving best practice.
- In compliance with the Australian Education Act, DOBCEL utilises funding received from both the Federal and State Governments to provide quality learning outcomes for all students.



Illustration 1 – DOBCEL SCHOOLS



## Our Schools

A summary of key information for is provided below:

DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



**13,084**

Students



**2,261**

Staff



**58**

Schools

**58** Schools, comprising

**52** Primary Schools

**1** Primary to Year 8 School

**5** Secondary Schools

**5** Offices

**21.3%** of students in the Diocese of Ballarat attend a Catholic School

**2.35%** of students identify as Aboriginal or Torres Strait Islander

**23.2%** of students have a disability

### Income

In 2021 DOBCEL had total revenue of \$223.7million of which \$192.9 million was recurrent funding. The main source of this income was Australian and Victorian Government grants for the provision of educational services.

**\$196.7m** Australian and State Government grants

**\$20.1m** School fees and levies

**\$6.9m** Other Income



## Our People

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

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

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.



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## Our Supply Chain

DOBCEL currently has a de-centralised procurement model, with the exception of banking services, fleet procurement and major capital works. There are approximately 14,200 suppliers engaged throughout the reporting period with some duplication within our decentralised model.

There is currently no centralised contracts system in place, with contracts being of short- and medium-term durations with responsibility resting at different levels of the organisation, including schools, DOBCEL office and service centres.

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

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

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

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

Based on the nature of the spend within the diocese, four sectors have been identified as high risk under the ACAN risk taxonomy and will be the focus for 2022. These are building and construction, ICT, maintenance and cleaning and security services. Additional sectors may be added as further risk assessments are undertaken.





## CRITERIA 3

### Modern slavery risks in operations and supply chain

#### Our operations

DOBCEL has undertaken a number of steps to identify Modern Slavery risks in its operations.

From an internal perspective, DOBCEL has implemented sound recruitment processes to ensure that all staff are engaged in a fair and equitable manner. These processes provide us with confidence that the residual risk of modern slavery in our operations can be assessed as low.

The key identified modern slavery risk for DOBCEL is tier one suppliers not complying with labour standards, including health and safety, excessive working hours, unpaid work, below legal minimum wages, forced labour, child labour and limited or no freedom of association.

This risk is heightened in our supply chain by factors including:

**Outsourcing** – there is an increased risk of unfair working conditions for people when suppliers outsource activities, and we no longer have a clear line of sight over supply of the end product.

**Labour hire** – there is an increased risk of unfair working conditions for people who are employed by third party labour hire companies. Third party labour hire companies may be contracted to provide cleaning services, construction labour, or grounds keeping services.

**Country of sourcing** – certain risks have been identified in certain countries.

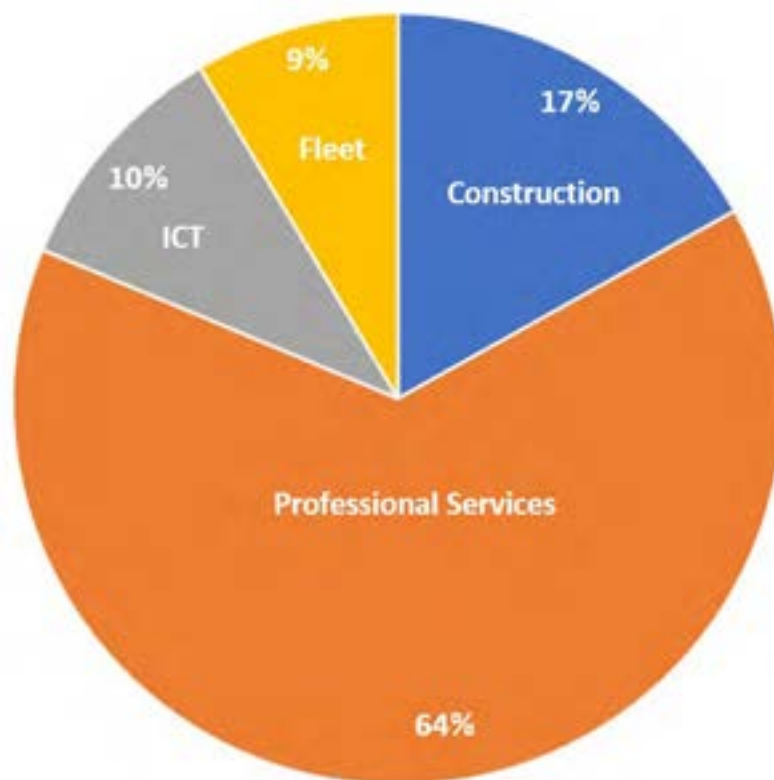
COUNTRY	RISK	EXAMPLE OF PRODUCT/SERVICE SOURCED
<b>Australia</b>	Migrant labour exploitation	Cleaning contractors, construction contractors
<b>China</b>	Freedom of association, excessive overtime, forced labour	Electronics, general merchandise, office supplies
<b>Indonesia</b>	Forced labour, bonded labour, migrant labour exploitation	General merchandise
<b>Malaysia</b>	Forced labour, bonded labour, migrant labour exploitation	IT products, office supplies, electronics, general merchandise
<b>Thailand</b>	Migrant labour exploitation	General merchandise
<b>Vietnam</b>	Excessive overtime	General merchandise, office supplies, electronics



DOBCEL understands that direct relationships with tier one suppliers will assist in managing these risks and will focus on developing these relationships over the coming years. We also acknowledge there may be a heightened risk of modern slavery among tier two and three suppliers and others further down the supply chain, where we do not have direct relationships and therefore little or no visibility of employment practices.

To consider our external operations, the Working Group initially extracted data from the accounting system and undertook an analysis of the top 50 vendors/suppliers by total spend for the office, while we developed our data capture from the schools. The vendors/suppliers were then categorised into sectors and allocated a risk level by category.

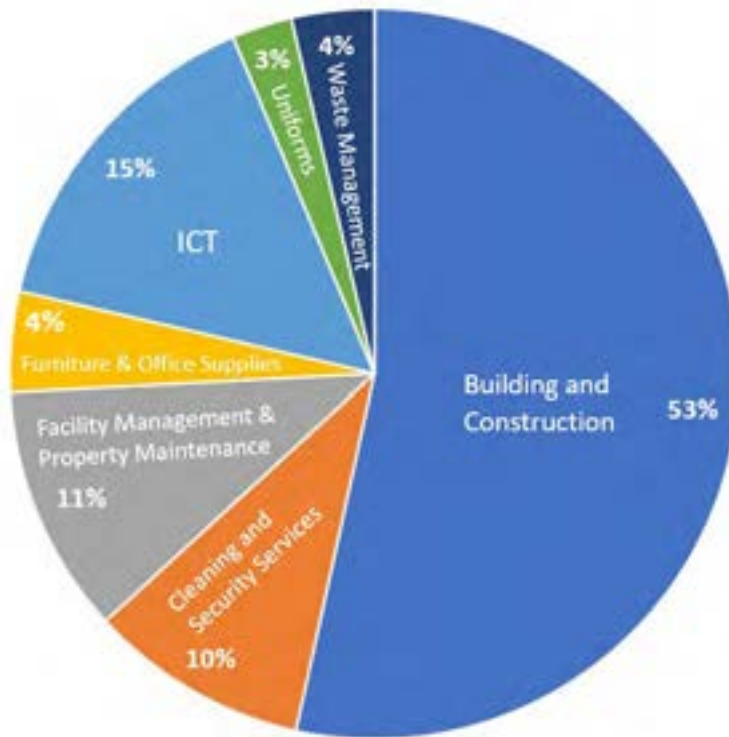
The following chart reflected the bulk of the expenditure by category across the DOBCEL office.



*Chart 3 – high risk sector analysis of spend.*



In 2021, further analysis across all entities of the consolidated spend across all categories identified that building and construction, information and communications technology, facilities management and cleaning are key risks within the supply chain. (Refer Chart 4 below).



*Chart 4 – 2021 Consolidated spend profile*

We have identified and assessed the risk exposure for modern slavery within our supply chains. The key categories identified during the risk assessment process for potential risk to the diocese are:

- Building & Construction
- Information & Communications Technology (ICT)
- Furniture
- Property Maintenance
- Waste Management
- Office Stationery & Supplies
- Educational Materials
- Uniforms
- Cleaning Services
- Labour Hire



## Modern Slavery Gap Analysis

As a member of ACAN, DOBCEL has undertaken an assessment of its modern slavery journey using a gap analysis tool developed by Vantage Compliance and Mitigation Pty Ltd. 2021 is the first year assessment was undertaken and the results will be used as the baseline to measure ongoing organisational progress. Although improvement has been modest, continued evolution of our systems and processes will support ongoing improvement.

### Modern Slavery - Gap Analysis Report, Diocese of Ballarat Catholic Education Limited

Category	Topic	Result		Change
		Previous Year	Current Year	
Management Systems	Governance	Red	Yellow	▲
	Commitment	Red	Yellow	▲
	Business Systems	Red	Yellow	▲
	Action	Red	Yellow	▲
	Monitoring and Reporting	Red	Yellow	▲
Risk Management	Risk Framework	Red	Yellow	▲
	Operational Risk	Red	Yellow	▲
	Identifying External Risks	Red	Red	-
	Monitoring and Reporting on Risk	Red	Red	-
Human Resources and Recruitment	Awareness	Red	Yellow	▲
	Policies and Systems	Red	Yellow	▲
	Training	Red	Red	-
	Labour Hire / Outsourcing	Red	Yellow	▲
Customers and Stakeholders	Customer Attitude	Red	Yellow	▲
	Information Provision	Red	Yellow	▲
	Feedback Mechanisms	Red	Yellow	▲
	Worker Voice	Red	Yellow	▲
Procurement and Supply Chain	Policies and Procedures	Red	Yellow	▲
	Contract Management	Red	Yellow	▲
	Screening and Traceability	Red	Yellow	▲
	Supplier Engagement	Red	Yellow	▲
	Monitoring and Corrective Actions	Red	Red	-



## Supply Chain Risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 22 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted DOBCEL to assess potential risk so it can prioritise engagement activities with suppliers.

### Risk taxonomy

CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
<b>Building and Construction</b>	Building materials (e.g. concrete, steel, timber, plaster products, glass, plastics, stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	HIGH	53%
<b>Cleaning &amp; Security Services</b>	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment, security and patrols	HIGH	10%
<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,.	HIGH	11%



CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
<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>ICT Hardware purchases, support services, call centres (offshore).</p>	HIGH	15%
<b>Uniforms and PPE</b>	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc).	HIGH	3%
<b>Waste Management services</b>	Sub-contracting and labour hire services	LOW	4%



## CRITERIA 4

### Actions taken to assess and address risk

Throughout the reporting period, DOBCEL has undertaken a review of its decentralised supply chain to address the modern slavery risks in its operations. Membership and participation with ACAN and attending the monthly webinars and e-Learn assessments has assisted the assessment of operations and initiated the following actions to manage the existing and ongoing modern slavery risk exposure.

Actions taken during the reporting period:

- I. Designated a Modern Slavery Liaison Officer (MSLO): The MSLO holds the responsibility for coordinating overarching operational activities in the identification and mitigation of modern slavery risks within the DOBCEL. DOBCEL has recognised the importance of the MSLO role to lead activity on the anti-slavery program to minimise risks from the supply chain network.
- II. The establishment of a Modern Slavery Working Group (MSWG): Through the MSLO, DOBCEL has established the MSWG consisting of key members across the organisation. The MSWG met on a regular basis to:
  - Provide input and advice on issues relating to modern slavery action;
  - Provide analysis and feedback of the supply chain spend within their areas;
  - Collaborate in developing draft modern slavery policy and guidelines; and
  - Assist in the preparation of the Modern Slavery Statement.

### Modern slavery action plan and road map

In 2022, DOBCEL will be implementing Supplier Engagement Action Plans with a focus on functions where our suppliers are identified as high- risk. A supplier engagement plan to support reduction of modern slavery risks and elimination of modern slavery from the supply chain will be developed. This will be supported by the development of an entity wide eFinance system to support procurement processes. This will be further supported by an education and awareness program to our staff who directly engage suppliers for many goods and services.

#### Modern Slavery Action Plan 2022

Action Category	Actions for Implementation
1. Business & Management Systems	Establish KPI's for the modern slavery action plan and ways to monitor compliance Communicate action plan to the Board via the Finance Standing Committee and Assurance and Risk Standing Committee.
2. Risk Management	Include modern slavery into DOBCEL risk framework Review procurement processes and expectations on suppliers that may increase modern risk exposure



3. Procurement & Supply Chain	Promote approach to modern slavery internally Develop a supplier engagement strategy that includes a code of conduct Ensure all contracts contain appropriate modern slavery clauses Continue development of eFinance Map suppliers across all school
4. Human Resources & Recruitment	Develop a modern slavery communications strategy
5. Customers & Stakeholders	Engage key stakeholders on our modern slavery expectations Implement supplier/vendor questionnaires as required Implement supplier code of conduct and communicate to suppliers

## Domus 8.7

DOBCEL 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 DOBCEL is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, DOBCEL has partnered with Domus 8.7 - an independent program which provides remedy to those impacted by modern slavery. By partnering with Domus 8.7 DOBCEL can help those impacted by modern slavery to achieve meaningful outcomes that can be reported on and continuously improve risk management and response.

Domus 8.7 affirms that:

- Modern slavery remediation is about the victim, first and foremost.
- Remediation is complex; by using Domus 8.7 victims have access to specialist disciplines from legal, social, psychology, business and human rights etc.
- Proper remediation serves as a feedback mechanism where the risks were not adequately managed.
- Remediation is NOT only about having a whistle blower policy - it is about righting the wrongs and harm caused to people.
- Partnering with Domus 8.7 is not outsourcing responsibility, it improves the ability to respond.





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

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

Chart 5 (below) further describes the reporting process.



Chart 5 - Modern slavery reporting process

Further information about Domus 8.7 and the process can be found at [www.acan.org.au/domus87](http://www.acan.org.au/domus87)



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## Effectiveness Assessment

In 2021 DOBCEL has completed the first 'Gap Analysis Report' supplied by Vantage Compliance & Mitigation through our ACAN membership. This assessment has provided the baseline for addressing modern slavery in our supply chain and assists in determining the next stages in addressing the various categories for ongoing improvement.

While modest improvements have been made to date, they form a key component of our action plan for 2022 and beyond. The target for 2022 is to make improvements across the various indicators.

The current review of the governance framework will establish additional mechanisms in 2022, including:

- Annual reporting to the Bishop's Advisory Council to include updates on modern slavery.
- Alignment of assurance functions through our Risk and Assurance area created from the 2021 DOBCEL restructure.



---

## CRITERIA 5

### Process of consultation with entities owned or controlled

DOBCEL established a Modern Slavery Working Group in 2020 with representatives across the organisation, including:

- Modern Slavery Liaison Officer (MSLO)
- Manager, Finance and Accountability
- Manager, Planning, Risk and Infrastructure
- Manager, IT & Business Systems
- Education Officer – Social Justice
- Education Officer – Sustainability, Liturgy and Special Projects

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

- Preparation of Anti-Slavery Working Group Terms of Reference
- Preparation of an Anti-slavery Policy
- Preparation of Anti-Slavery Procedures
- Preparation of DOBCEL Procurement Policy and Procedures
- Analysis of vendor/supplier spend
- Agreement on contract clauses for major and minor contracts
- Planning for rollout of ACAN e-Learn modules on Salt platform
- Project planning for modern slavery reporting.



DIOCESE  
OF  
BALLARAT  
CATHOLIC  
EDUCATION  
LIMITED



CATHOLIC EDUCATION BALLARAT

200 Gillies Street North, Lake Wendouree, VIC 3350

P 03 4344 4350 | E [execdirector@dobcel.catholic.edu.au](mailto:execdirector@dobcel.catholic.edu.au) | W [dobcel.catholic.edu.au](http://dobcel.catholic.edu.au)

# MODERN SLAVERY STATEMENT

# ACKNOWLEDGEMENT OF COUNTRY, HEALING AND INCLUSION

We acknowledge and pay respect to the original and ongoing custodians of the land upon which we live, work, learn and teach  
We commit to actively working alongside First Nations people for healing, reconciliation and justice.

The Catholic education faith community is inclusive and acknowledges that we are all made in the image and likeness of God and we are created in love. People of all faiths, genders, sexualities, abilities and cultures are therefore respected equally in the Sandhurst Catholic community.

We acknowledge the pain and suffering of all who have been hurt in body, mind and spirit by those who have betrayed the trust placed in them.

May we all stand tall, stand firm, grounded in truth, together as one.

## CHILD SAFETY

Catholic Education Sandhurst Limited (CES Ltd) is 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 (CES Ltd) ABN 94 493 967 364. This statement is prepared pursuant to section 134 of the Modern Slavery Act 2018 (Cth) and covers CES Ltd as a single reporting entity.

## ENTITY DETAILS

Catholic Education Sandhurst Limited (CES Ltd)  
ABN 94 493 967 364.  
120 Hargreaves Street Bendigo Vic 3550  
PO Box 477, Bendigo Vic 3550  
P: 03 5443 2377  
E: [enquiries@ceosand.catholic.edu.au](mailto:enquiries@ceosand.catholic.edu.au)  
W: [www.ceosand.catholic.edu.au](http://www.ceosand.catholic.edu.au)

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# DECLARATION

## 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 Board (CES Ltd Board)*.

as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("*the Act*") on 26 April 2022.

### Signature of Responsible Member

This modern slavery statement was approved by a *responsible member of Catholic Education Sandhurst Limited Board (CES Ltd Board)* as defined by the Act<sup>2</sup>.



**Patricia Cowling**

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

### Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

#### Mandatory criteria Page number/s

- |  |         |
|--|---------|
| a) Identify the reporting entity.  | Page 8  |
| b) Describe the reporting entity's structure, operations and supply chains.  | Page 13 |
| 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.  | Page 17 |
| 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.   | Page 24 |
| e) Describe how the reporting entity assesses the effectiveness of these actions.  | Page 28 |
| 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).* | Page 28 |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**  | Page 30 |

\* 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.



## VISION

The vision for Catholic Education Sandhurst Limited (CES Ltd) is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within the Diocese. 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 values of the Gospel are 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 vision for education in Sandhurst is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within Catholic Education Sandhurst Limited (CES Ltd). 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.

The identity of the Sandhurst Catholic Schools 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.

## CES Ltd Modern Slavery achievements in 2021

Catholic Education Sandhurst Limited (CES Ltd) transitioned to a new Governance structure in 2021 and is currently establishing procedures and oversight of all our Catholic schools. Under the new company structure the roles of both Risk and Compliance and Procurement and Contracts has been designated to new roles within the organisation which will be very effective to centrally focus on our procurement function and risk management in Modern Slavery.

To begin the CES Ltd Modern Slavery eradication journey, several initiatives began in 2021, to build a framework for the future of CES Ltd.

- Joined the Australian Catholic Anti-slavery Network (ACAN) and commenced participation in the ACAN modern slavery risk management program.
- Social Justice Reference group working with ACRATH and CARITAS to educate our students and school communities.
- Modern Slavery Policy was developed and Board approved at the end of 2021 (and launched on 8th of February 2022).
- Developed Guiding Principles of Procurement to raise awareness for ethical, sustainable and socially conscious procurement practices.
- Implemented Modern Slavery clauses into standard contracts.

## Our plans for 2022 and beyond

To strengthen our mitigation practices going forward the following initiatives are in development for 2022:

- Modern Slavery awareness training to all staff at CES Ltd
- A due diligence program for key suppliers
- A modern slavery communications program, education, advice and guidance to 52 Catholic Schools, through the Modern Slavery Action Working Party
- A contact system for escalation protocol and remedy pathways
- Utilising the SEDEX (ACAN program) platform to identify and assess the risk of engaging various suppliers who may have a red flag for modern slavery practices in their operations.
- Continue our partnership with ACAN with guidance and support through their webinars and compliance program

CES Ltd aspirational goal is to identify and eliminate all risks associated with modern slavery from our operations, business partnerships and supply chain.



# FROM THE BISHOP

## Most Reverend Shane Mackinlay DD



The Christian tradition affirms the inalienable dignity of each person: created in the image of God, with unique gifts and talents, connected with the whole of creation, enriched by relationships of friendship and love lived out in a shared common life, capable of astonishing creativity, insight and achievement, and invited into communion with the Triune God revealed by Jesus. This core Christian vision of the human person is fundamental to the mission of Catholic Education Sandhurst Ltd.

While the most immediate consequence of this principle is in the way that students are placed at the centre of Catholic education, it also directs the relationship that Catholic schools have to parents, staff and the broader community. One of the insights we have learned from the COVID pandemic is the truly global reach of our human interdependence, with the potential for outbreaks of disease in remote parts of the world to have a dramatic impact on our local community.

This interdependence is also relevant to the various forms of modern slavery, which have many opportunities for connection to the operations and supply chain of our schools, often in ways that are not immediately apparent. Practices such as human trafficking, child labour, and exploitation of workers for minimal or no wages are terrible abuses of human dignity and are contrary to the fundamental respect that Christians seek to promote for each person. Catholic Education Sandhurst Ltd is committed to doing all in its power to assist in eliminating these practices.

The new corporate structure for Catholic education in the Sandhurst Diocese was established in January 2021, and so this is the first Modern Slavery Statement of Catholic Education Sandhurst Ltd. I am very pleased to see that in the first year of its operations, the Company has already taken significant steps to identify and address ways in which it might be at risk of supporting modern slavery.

I am confident that the Company has put in place structures, partnerships and policies that will help all involved in Catholic education in the Sandhurst Diocese to grow in awareness of modern slavery, and to act in ways that promote the dignity, freedom and wellbeing of each person.

**Most Reverend Shane Mackinlay**  
*Bishop of Sandhurst*

FROM THE  
EXECUTIVE DIRECTOR  
Mr Paul Desmond



Slavery has always been a stain on the history of humanity. It is so important that we, who have so much, do all we can to help those who do not experience wealth and freedom.

Slavery treats human beings like belongings. In the eyes of God who created every one of us, each person is special, each has rights, each should be treated respectfully.

At Catholic Education Sandhurst Ltd, we believe it is important to protect every person's rights. We have a duty to do whatever we can to protect the rights of other people, no matter where on this planet those people exist. Human life must always be treated with the greatest respect.

In the first year of operation under a new governance structure, we have laid the foundations of ethical and sustainable standards for our business practices 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. At the heart of this vision is our commitment to the ongoing duty of care that we have for the dignity, safety, wellbeing, and inclusion of all people.

Our focus for 2021 and 2022 has been to develop a risk framework and tools to identify and manage risks of modern slavery in our operations and supply chain. To walk with us on this journey, we have partnered with organisations such as the Australian Catholic Anti-Slavery Network (ACAN), Caritas Australia and the Australian Catholic Religious Against Trafficking in Humans (ACRATH) who are leading the way and providing valuable support to organisations such as ours.

We are committed to continuous education and awareness of Modern Slavery as well as increasing visibility of the risks not only throughout our supply chains but also the impact of Modern Slavery on the day to day lives of our whole school community. In 2022 we have established the CES Ltd Modern Slavery Action Working Group comprised of members from across the organisation that will drive the education and change required for a positive future.

We are a people of hope, and we are encouraged by the progress that has been made in our first reporting year. We know too that much more needs to be done. We are cognisant that tackling Modern Slavery will require ongoing focus in collaboration with industry, the community and I appeal to our young people, the students of Sandhurst schools- do whatever you can to carry this message out to others, stand united in the belief that you can make a difference, you can improve the opportunities for people everywhere.

**Mr Paul Desmond**

*Executive Director of Catholic Education Sandhurst Limited (CES Ltd)*

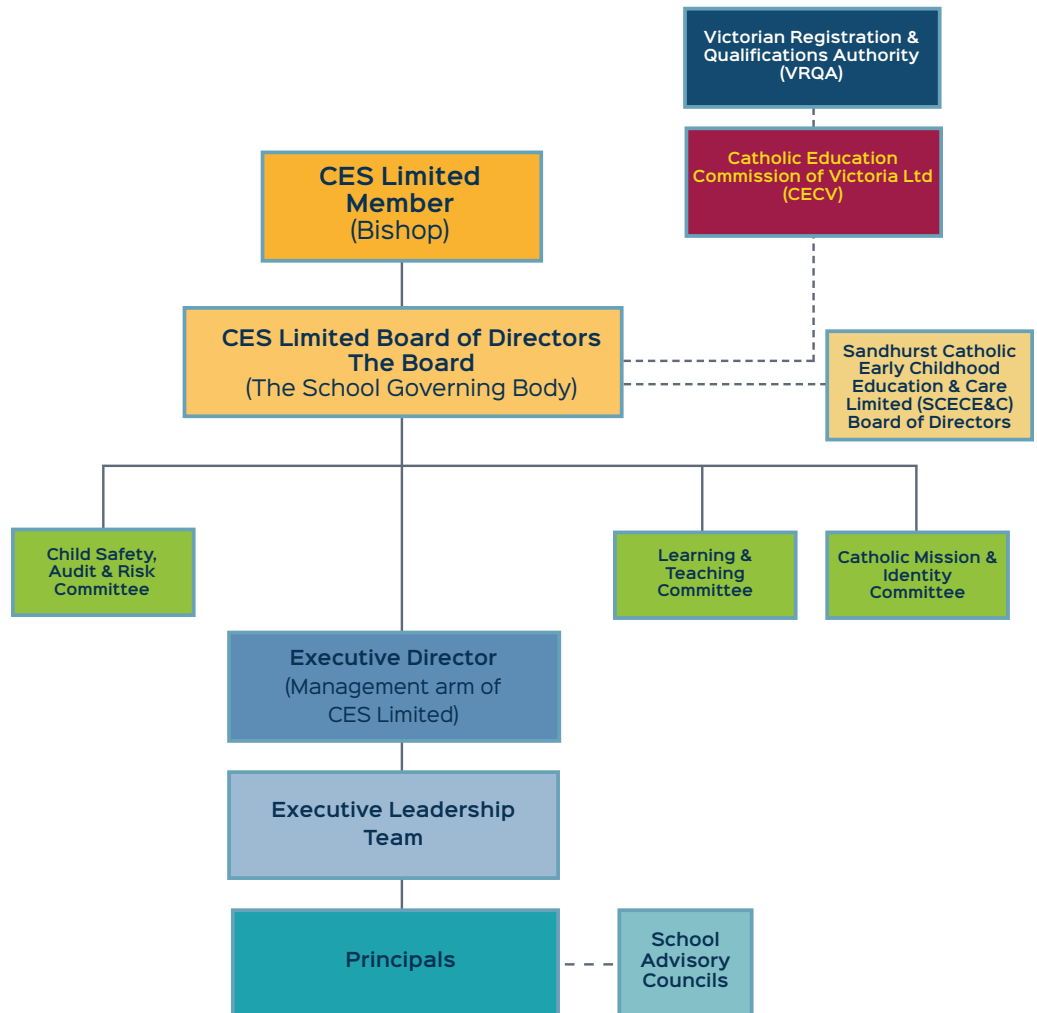
# REPORTING CRITERION 1

## Catholic Education Sandhurst Limited (CES Ltd) - Governance Framework

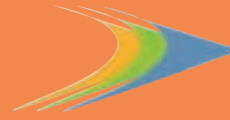
In 2021 the Bishop (Bishop Shane Mackinlay) established the Company, Catholic Education Sandhurst Limited (CES Ltd), to assume the ownership and operation of fifty-two Catholic schools previously operated in an unincorporated form, and to be responsible for the operation of any further schools that will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

The CES Ltd Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CES Ltd spans primary schools, secondary schools, and schools in specialist settings. It is the responsibility of the CES Ltd Board to ensure that each school that is 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 that Sandhurst Catholic schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).



# REPORTING CRITERION 1



It is the role of the Board to make explicit the importance of system improvement, facilitate the achievement of high-quality personal learning outcomes for all students and the provision of educational environments in which all will continue to flourish. In so doing the Board ensures that all legal obligations and compliance responsibilities arising from being a Company are met, particularly the:

- key aspects of the Board's legal obligations under the Corporations Act (i.e. Board of Director responsibilities)
- governance standards imposed by Division 45 of the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (ACNC Act)
- minimum standards for school registration under Schedule 4 of the ETR Regulations, including all matters relating to Governance; Enrolment; Curriculum and Student Learning; Student welfare; Staff employment and School infrastructure
- Ministerial Order 870 – 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 implementation of the policies.

- reviewing and ensuring the reliability and effectiveness of CES Ltd's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy • finance and audit management
- capital development.

For the purposes of school regulation, the Board is structured in a way to enable:

- effective development of strategic direction of Sandhurst Catholic schools
- effective management of the finances of the Sandhurst Catholics schools; and
- fulfil its legal obligations in respect of each Sandhurst Catholic school.

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

Sandhurst Catholic Early Childhood Education and Care Ltd (SCECE&C) 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. From January 1, 2021, SCECE&C was an approved Provider with the Australian Children's Education and Care Quality Authority (ACECQA) for the early learning centres at St Mel's Kindergarten Shepparton and Assisi

# REPORTING CRITERION 1

Kindergarten Strathfieldsaye. SCECE&C is a company limited-by-guarantee and registered with the Australian Charities-and-not-for-profit Commission.

As a wholly owned subsidiary of CES Ltd, SCECE&C is governed by a Board of Directors, and led by the Executive Director of CES Ltd with a delegation to the Assistant to the Executive Director, Early Childhood Education and Care. SCECE&C works in close collaboration and partnership with local Catholic and Government schools, parish communities and diocesan agencies, to help ensure a continuity of growth and development for each child and their family.

## Educational and Office Services

### Key Objective of CES Ltd

*“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a love of learning, a sense of curiosity, and respect for themselves and for others, including the poor and marginalised.”*

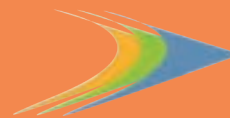
Bishop Shane Mackinlay: CES Ltd Initial Directions 2020

The history of Catholic schools within the Diocese of Sandhurst spans 168 years, with the first school opened on the Bendigo Goldfields in 1853 and forty years since the Catholic Education Office began. Over the decades, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region.

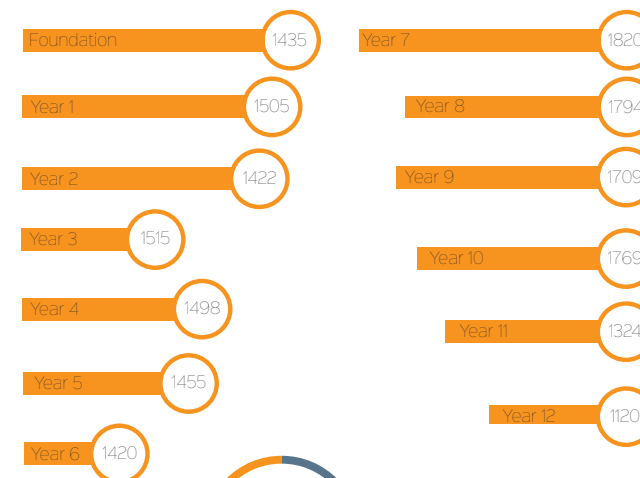
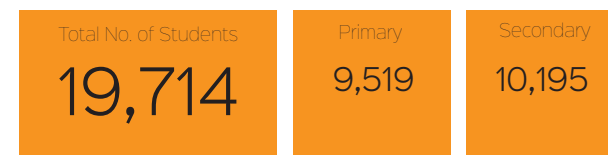
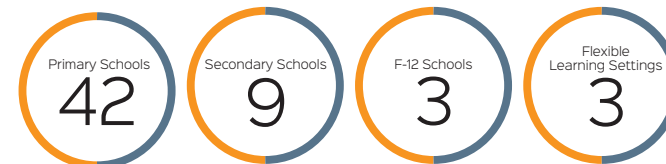
Sandhurst Catholic schools are part of a long tradition of Catholic education in Australia. Countless thousands of young people have benefited from the experiences they had and the skills they acquired in Catholic learning environments.

Today Catholic Education Sandhurst Limited oversees and is responsible for the operation of fifty-two Catholic schools (including Primary, Secondary and Specialist Settings). It will also be responsible for the operation of future schools that will be established by the Company referred to as (Sandhurst Catholic schools).

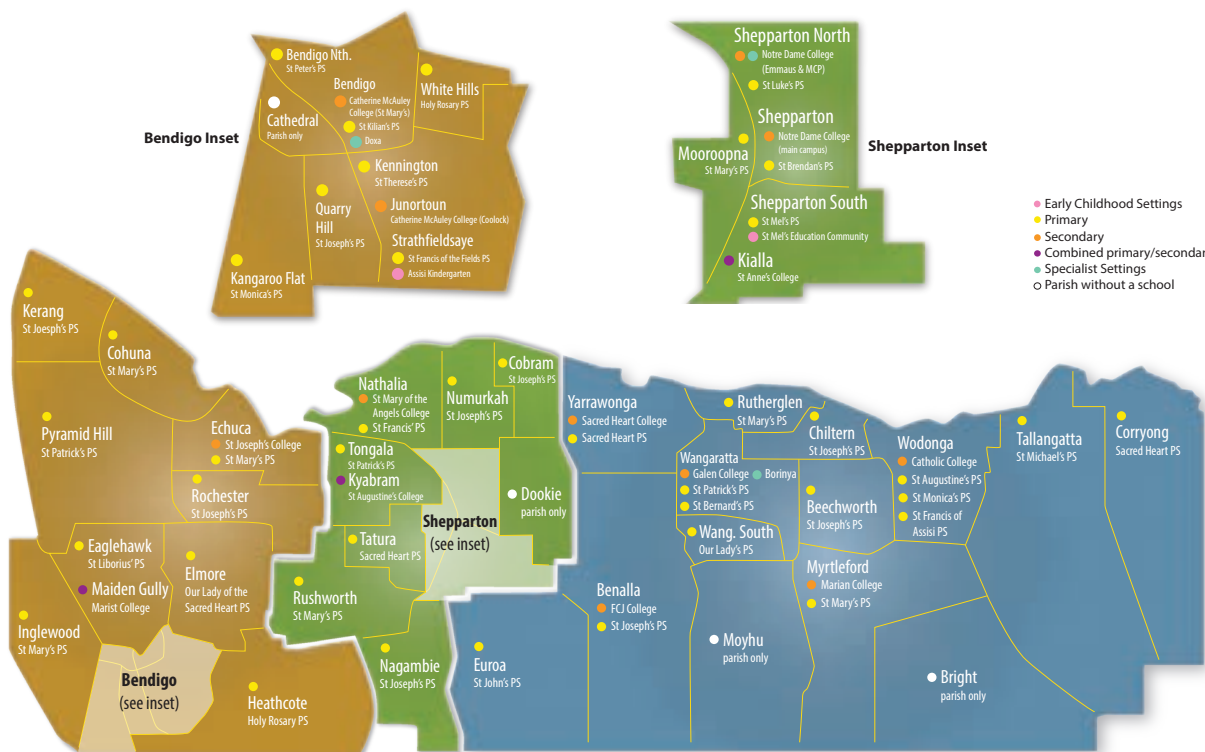
# REPORTING CRITERION 1



## Student Population



## CES Ltd Staff Population



**WESTERN DEANERY** Principal Consultants: Ashley Marsh (Primary) and Leonie Irwin (Secondary)  
**GOULBURN VALLEY DEANERY** Principal Consultants: Janet Claassen (Primary) and Leonie Irwin (Secondary)  
**NORTH EASTERN DEANERY** Principal Consultants: Kim Butler (Primary) and Leonie Irwin (Secondary)

Western Deanery      Goulburn Valley Deanery      North Eastern Deanery



# REPORTING CRITERION 1

## The CES Ltd Head Office Structure

The CES Ltd Head Office, operates as the business and management arm of CES Ltd. CES Ltd Office employs 94 staff members located in three regional locations, Bendigo (Head Office), Tatura and Wangaratta to lead and support CES Ltd schools in all areas of operation.

The Executive Director of CES Ltd, supported by the CES Ltd Executive Leadership Team is responsible for the oversight of all areas of management of CES Ltd schools and will ensure full compliance by all schools with all CECV and legislative requirements.

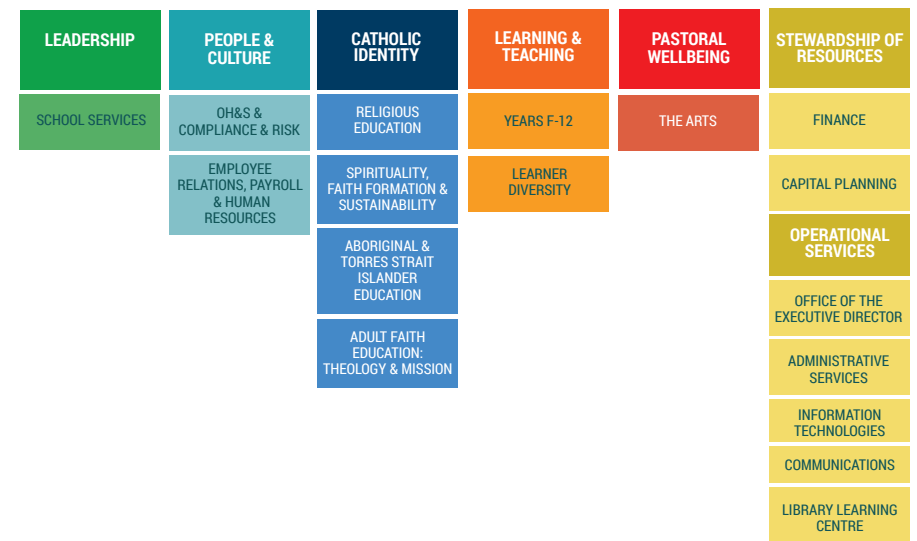
The Catholic Education Office is strongly committed to working with each school and parish community and the broader Catholic education community of Victoria in a spirit of co-responsibility. We commit to shaping the culture, enhancing the performance and building the capacity in schools and the Catholic Education Office.

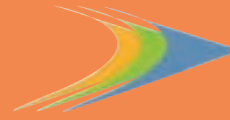


## CATHOLIC EDUCATION OFFICE SANDHURST STAFF STRUCTURES, ROLES & PROCESSES

**EXECUTIVE DIRECTOR**  
CATHOLIC EDUCATION SANDHURST

**EXECUTIVE LEADERSHIP**





## Operations and Supply Chains

In 2021 CES Ltd had a total turnover of approximately \$220 million. As an educational institution our largest expenditure is the salaries of teachers and support staff whose salaries and employment related costs represent 48% of the company's annual expenditure.

In terms of non-salary related costs, during the reporting period. Across all 52 CES Ltd schools and 3 support offices, CES engaged with in excess of 3,000 Service Providers and Goods Suppliers.

Schools are supported through the CES offices providing support services to schools which include:

- Leadership
- Catholic Identity (including Religious Education, Faith Formation and Aboriginal and Torres Strait Islander Education support and resources)
- People and Culture (HR Services)
- Learning and Teaching Support
- Pastoral Wellbeing
- Finance Support
- Property and Capital Works
- Risk and Governance
- Marketing and Communication

## Delegations Framework

Schools operate under a Financial Delegation oversight and approval framework approved by the CES Ltd Board which provides authority to engage suppliers 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 CES Ltd Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

# REPORTING CRITERION 2

## LEVELS OF DELEGATION

### Level 1

Executive Director

### Sub-delegations from the Executive Director

### Level 2

Deputy Director: Catholic Mission and Identity

Deputy Director: Learning and Teaching

Assistant to the Executive Director: Finance and Resources

Assistant to the Executive Director: People and Culture

Assistant to the Executive Director: Pastoral Wellbeing

Assistant to the Executive Director: Leadership Development

Assistant to the Executive Director: Planning, Resources and Governance

### Level 3

Principals

### Level 4

Deputy Principals

Business Managers

Leadership Teams

### Level 5

An employee at the school who has written authority by the Principal.

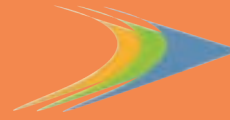
Please note:

Certain functions will require that Board approval and Member approval be sought. These are noted in the Schedules, where applicable.

## Function – School Contracts

Description	Delegation Reference	Limitations/Conditions	Delegated Level
School Contracts	SCON 1.0	Primary Schools – Contracts up to \$50,000 per annum	Level 3
	SCON 1.1	Primary Schools – Contracts of \$50,000 and above per annum	Level 2
	SCON 1.2	Secondary Schools – Contracts up to \$100,000 per annum	Level 3
	SCON 1.3	Secondary Schools – Contracts of \$100,000 and above per annum	Level 2
	SCON 1.4	School Camps Contracts and Booking Agreements/All schools	Level 3
<b>Includes</b> – Before and After School Care, School Cleaning and Maintenance, Uniform Supplies, Canteen Operator/Supplier, Employment Agency, Service Providers (Independent Contractor), Bus Contracts, Camp Contracts, ICT providers, All Other			
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Work Experience	SCON 3.0	All schools	Level 3
Facilities Licence, Joint Use, Leasing Agreements	SCON 2.0	To be prepared by CES Ltd	Level 2
Capital Expenditure – Furniture, Plant and Equipment	FIN 12.0	Primary Schools (up to but less than \$50,000 and within approved budget)	Level 3
	FIN 12.1	Primary Schools (up to but less than \$50,000) and NOT within approved budget	Level 2
	FIN 12.2	Primary Schools \$50,000 and greater	Level 2
	FIN 12.3	Secondary Schools	Level 3
Expenditure – ICT Equipment	FIN 13.0	Primary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.1	Primary Schools – ICT Equipment NOT within approved budget	Level 2
	FIN 13.2	Secondary Schools – ICT Equipment within approved budget	Level 3
	FIN 13.3	Secondary Schools – ICT Equipment NOT within approved budget	Level 2
Capital Expenditure Projects – Land, Building and Improvements	FIN 14.0	All land purchases To be approved by CES Ltd Board	N/A
	FIN 14.1	All Schools less than \$100,000 within approved budget	Level 3
	FIN 14.2	All Schools \$100,000 or greater To be approved by CES Ltd Board	N/A

# REPORTING CRITERION 2



The current practices involving the schools and offices using 3 different accounting systems and autonomy over supplier selection has caused a high-risk issue with data integrity and insight. Due to inconsistent and repetitive data across various accounting systems the consolidation of the information is difficult to gain meaningful analysis of the Supply Chain. In 2022 CES Ltd Procurement Department will begin strategic planning to:

- establish a financial data consolidation process in conjunction with the Finance team's rollout of the ICON program to all schools (due to conclude in 2023)
- analysis of Service Providers and develop a data consolidation process
- and using the consolidated data to create a "Preferred Service Provider" list for the schools and offices.

The Service Providers and Suppliers on this preferred list will be vetted by the Procurement team in accordance with the CES Ltd Procurement Guiding Principles and recontracted with the new Service Agreement that outlines a Modern Slavery Compliance clause.

*CES Ltd seeks to work in partnership with Service Providers to meet and exceed the minimum expectations to drive success for our relationships and continuously strives to improve the ethical and sustainable standards of our business practices.*

*We believe in leadership encompassing vision, innovation, and empowerment.*

# REPORTING CRITERION 2

## The Guiding Principles of Procurement at CES Ltd are:

**Responsibility** – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain.

**Integrity** - CES Ltd and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CES Ltd policies. Service Providers will be treated fairly, respectfully and free from bias.

**Clarity** – We will drive transparency and accountability to support open, success-driven and respectful partnerships with our Service Providers. We strive for success with our partnerships because when our Service Providers succeed, CES Ltd and our school communities will thrive!

**Community** – CES Ltd greatly values our local communities and is committed to supporting and fostering prosperity with local businesses. CES Ltd actively seeks the engagement of goods, services and staff sourced from within the Sandhurst Diocese and the wider Victorian area.

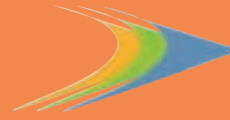
**Balance** - CES Ltd determines “the Best Value” for goods and services to balance cost, service, quality, reliability, innovation, ethics, sustainability and value alignment.



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

Pope Francis (2014)

# REPORTING CRITERION 3



## Operational Risks

CES Ltd has undertaken a number of steps to identify Modern Slavery risk in its operations.

CES Ltd acknowledges that business procurement activities could cause, contribute to or be directly linked to modern slavery practices. In response to the Modern Slavery Act (2018) and the obligations to report, CES Ltd have established a relationship with the Australian Catholic Anti-Slavery Network (ACAN) to assist CES Ltd to identify and assess risks in our organisation, to reduce any chance of modern slavery practices in our supply chains. Identifying and addressing modern slavery risks and reporting on the risks and actions taken is highly complex and will not be fixed quickly or easily. ACAN provides a support forum for Catholic executives tasked with the new obligations about supply chain transparency to work in collaboration and cooperation with each other.

CES Ltd Board and CES Ltd Leadership have adopted a Risk Management Framework, that defines CES Ltd's risk operating model, appetite, responsibilities, methodology this Framework supports the approach to manage modern slavery risks through good governance and accountability. The *ISO 3100:2018 Risk Management - Guideline* consists of a set of Principles, Framework and Processes that will aim to improve the decision making about risks in our organisation.

## Our COVID-19 response

CES Ltd recognise that impact of COVID 19 may increase the vulnerability of workers in our supply chains to modern slavery in certain jurisdictions. With the ever-changing environment of the pandemic on social and economic standards and the unknown ramifications, CES Ltd will commit to continually assess our risks as per our Risk Management Framework and mitigate solutions to reduce the likelihood of the risk in our supply chains.

Throughout the 2 years of the pandemic, CES Ltd have been able to keep all 52 schools operating, some small closures resulting in positive cases, but regardless of the number of students attending, continuation of education was ensured. Essential workers and vulnerable students continued their education on site at school, which was imperative for the safety of the families and the country. Introduction of online learning was essential, with staff and families working together to work safely in their home environments. Staff wellbeing was always at the forefront of all decisions relating to work arrangements and ensuring staff were able to take sick days and leave when required and encouraged for their safety.

# REPORTING CRITERION 3

Safeguarding of staff, students and the school community throughout the pandemic has been the key focus for CES Ltd. Purchasing of PPE, sanitiser and cleaning supplies and the engagement of cleaning services increased during the pandemic and with it increased the risk of Modern Slavery in the supply chain due to product being sourced by our supply chain from high-risk areas overseas. Whilst further action is required, CES Ltd was formed in January 2021, twelve (12) months into the pandemic, and in the first twelve (12) months of operating has implemented a number of operating changes including the creation of a Risk and Governance and Procurement and Contracts roles to work with suppliers and develop an ethical procurement strategy and assess and monitor the risk moving forward.

## **Our People**

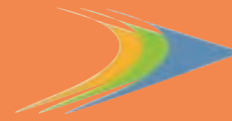
The staff employed at CES Ltd come from a diverse background, nationalities and experiences. Our schools and offices are across a vast stretch of land, including small communities, remote locations, rural areas and country cities. The range of age of our staff include newly graduated to those preparing for retirement and have committed a service to the Catholic Education.

CES Ltd complies with labour, employment and immigration laws through a variety of HR suite of policies and procedures, including employment contracts, Code of Conduct, Staff Bullying, Harassment and Discrimination Policy, Complaints Management Framework, Whistleblower Policy, Managing Performance Concerns Policy and Staff Grievance Policy. All employment related policies and procedures are regularly reviewed and updated by the Compliance, Policy and Reference Group to ensure any changes in law and legislative are reflected accordingly.

The Modern Slavery Policy identifies the escalation process for all staff at CES Ltd and if a case of modern slavery was suspected, it would be fully investigated and any appropriate disciplinary action would be taken.

If a staff member has a query around their conditions of employment, where relevant they can contact their Principal or Team Leader. Staff also have access to the Complaints Management Framework which clearly provides guidance and support in complaints procedures and escalation process.

# REPORTING CRITERION 3



## Modern Slavery gap analysis

CES Ltd undertook the 'Bridge the Gap' analysis, which is an online tool developed by ACAN, to assist organisations to understand gaps, assess maturity and modern slavery risk.

The following categories are the key focus in the organisations gap analysis:

1. Management Systems
2. Human Resource and Recruitment
3. Procurement and Supply Chain
4. Risk Management
5. Customers and Stakeholders

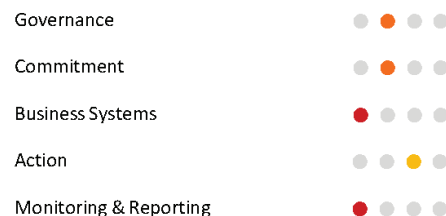
The results below are based on the initial analysis conducted in October 2021 which identified the following strengths and weaknesses:

### Legend

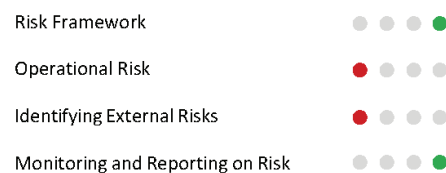
- Leading practice (**GREEN**)
- Making progress (**YELLOW**)
- Starting out (**ORANGE**)
- At the starting point (**RED**)

### Heat Map

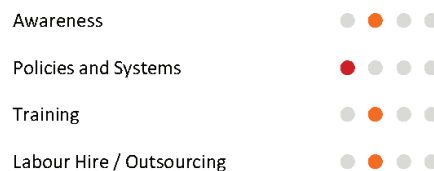
#### Management Systems



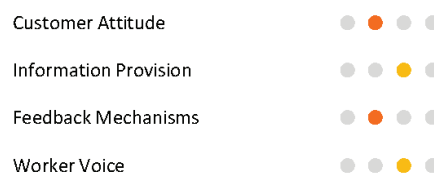
#### Risk Management



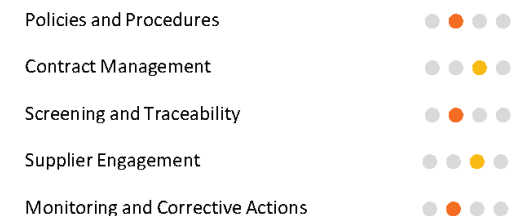
#### Human Resources and Recruitment



#### Customers and Stakeholders



#### Procurement and Supply Chain

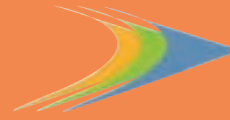




# REPORTING CRITERION 3

*Suggested actions based on the Bridge the Gap analysis of priority areas to refine our risk management to modern slavery:*

Category	Actions
<b>Management Systems</b>	
<b>Business Systems</b>	Review existing business systems against the requirements of modern slavery legislation
<b>Monitoring and Reporting</b>	Integrate modern slavery risk findings into monthly management reports
<b>Risk Management</b>	
<b>Operational Risk</b>	Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks
<b>Identifying External Risks</b>	Map modern slavery risk and vulnerabilities along extended supply chain
<b>Human Resources and Recruitment</b>	
<b>Policies and Procedures</b>	Encourage lowering tolerance approach to modern slavery among all staff and contractors
<b>Training</b>	Create instructional materials, from all stakeholder perspectives
<b>Customer and Stakeholders</b>	
<b>Customer Attitude</b>	Develop awareness raising programs for customers and stakeholders
<b>Feedback Mechanism</b>	Establish system and processes to evaluate and take immediate action on feedback received
<b>Procurement and Supply Chain</b>	
<b>Screening and Traceability</b>	Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow
<b>Monitoring and Corrective Actions</b>	Establish a supplier monitoring program



## Supply Chain Risks

Supply Chain Risks Due to the data consolidation issues caused by multiple accounting systems and inconsistent data entry across these platforms and volume of goods and service providers, the risk analysis has been conducted using the data obtained only from the 35 schools using the ICON accounting system. The assumption being that the 35 schools using the ICON platform is a large enough data sample to provide an accurate assessment of the Modern Slavery risk in the supply chain. However, it should be noted that the 35 schools in the data sample are all primary schools.

Using this data we have identified the top 100 suppliers by spend as well as suppliers of key high risk goods and services. The highest risks areas identified for educational institutions are:

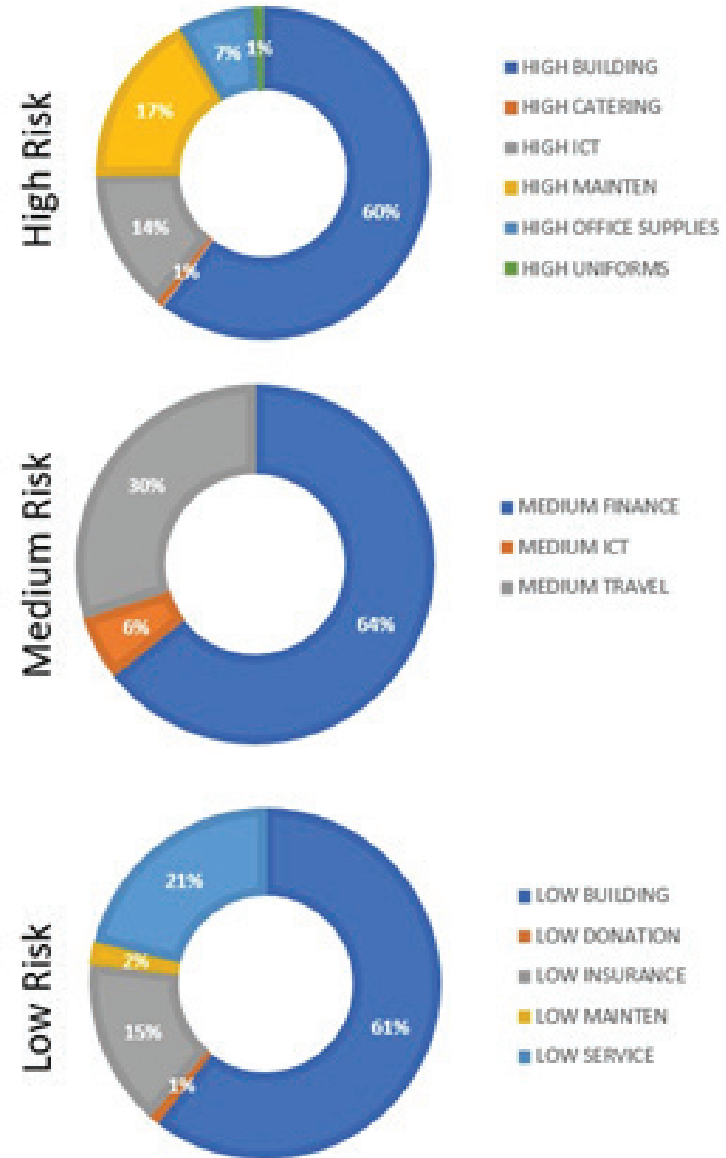
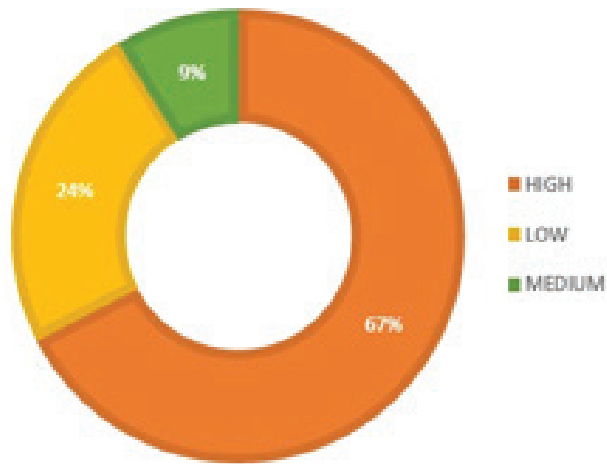
- Building and Construction
- ICT Hardware
- Cleaning services and equipment
- Uniforms and PPE
- Furniture and Office Supplies
- Catering.

## Key Expenditure Categories

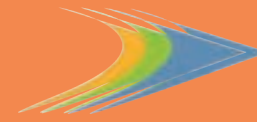


# REPORTING CRITERION 3

CES LTD SUPPLY CHAIN RISK TO MODERN SLAVERY



# REPORTING CRITERION 3



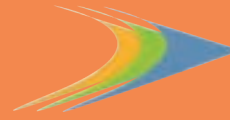
**When procuring goods and services the table below identifies 4 key risk factors which can indicate an increase of modern slavery in supply chains:**

Sector	Example of Goods or Service with Potential Risk	Example of Labour Rights Risk
<b>Industry Sector</b>	CES Ltd procures construction and facilities maintenance services, which are known to be high risk for both domestic instances of modern slavery and for the manufacturing of products used in the course of those operations.	Forced labour in the production of building and construction materials
<b>Commodity or Product</b>	Specific products and commodities are deemed high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.	CES Ltd recognises, for example, that electronic equipment contains metals and minerals that may be sourced from regions known to be at high risk of modern slavery practices.
<b>Geographic Location</b>	The risk based on geographic location is based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. CES Ltd predominantly engages Australian suppliers, it is recognised that goods and associated services may come from countries other than those of suppliers' headquarters.	For example, that electronic goods from Malaysia would be considered to be at high risk of modern slavery.
<b>Workforce Profile</b>	In undertaking the supplier analysis, CES Ltd considered the type of labour involved in the production of our goods and services, particularly where low skilled, vulnerable or migrant labour is used, or where the work is deemed as 3D' work (dirty, dull or dangerous).	Cleaning services, may use vulnerable or migrant labour which the work is deemed as '3D' work (dirty, dull, or dangerous) Exploitation of such employment conditions, below award wages or docking of wages.

CES Ltd has identified the following risk factors and will implement a process to engage with high spend suppliers and invite them to join Sedex. In doing so, suppliers will complete a comprehensive self-assessment questionnaire (SAQ) and SCS will have access to results of the SAQ and any corresponding red flag factors that may contribute to modern slavery practices. Currently CES Ltd has a decentralised data system and collation of this data is under development, clear understanding of risks in our operations will be developed further throughout 2022 and onwards.

There is further risk associated with the uncontrolled expenditure in Staff Reimbursements, while there is an approval process in place for these expenses, there is no overall visibility for these costs and is a considered a High Risk procurement activity. Review of this process may be required in future by CES Ltd.

# REPORTING CRITERION 4



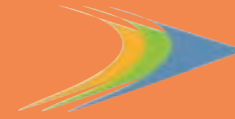
## Actions taken to assess and address risks

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

The following actions have taken place:

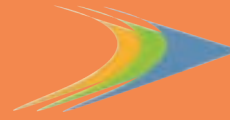
- **Joined the Australian Anti-Slavery Catholic Network (ACAN)**
- **The appointment of two Modern Slavery Liaison Officers (MSLO)**, who lead the operational activities to identify and mitigate modern slavery risks within the organisation. The MSLOs work closely with the Executive Leadership Team to 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.
- **Developed the CES Ltd Modern Slavery Policy** - CES Ltd has developed a Modern Slavery Policy endorsed by the Board to clearly establish our commitment to mitigate modern slavery risks within our business operations and supply chains. This Policy provides a robust framework to ensure compliance with the reporting requirements of the Act, whilst also providing guidance for staff not to knowingly use or contribute to modern slavery practices.
- The development of **contractual clauses** for standard contracts. CES Ltd will access ACAN guidance for comprehensive clauses for high-risk contracts.
- **Completed a Modern Slavery risk assessment Operations and Supply Chain.**
- **Completed modern slavery awareness training through ACAN** - The two MSLO have completed modern slavery training-learning modules and are developing a training session for all of the organisation. E-learning modules cover:
  - » ACAN- Modern Slavery 101
  - » ACAN- Business Relevance
  - » ACAN- Implementing a Modern Slavery Risk Management Program.
- Engage with internal stakeholders of the organisation to seek their input in addressing the risk of modern slavery, by creating **Modern Slavery Action Working Party (MSAWP)**.
- Recognising the Feast Day of St Bakhita on the 8th February concerning the plight of the victims of modern slavery.
- CES Ltd **Social Justice Reference Group** initiatives / website.

# REPORTING CRITERION 4



- Attendance of a supplier engagement workshop organised by ACAN. The purpose of the workshop was to train participants on how to run supplier workshops for high-risk expenditure categories
- Completion of the 2021 BtG analysis, identifying areas in which progress has been made as well as areas requiring further attention in 2022 and beyond. These will be addressed in accordance with the Action Plans for 2021, 2022 and later years.
- Commenced **supplier engagement** – CES Ltd has commenced its supplier engagement strategy by introducing **modern slavery clauses in the terms of Service Agreements** and Tendering activities.
  - » In 2021 ACAN joined **Sedex, one of the world’s leading ethical trade membership organisations**, working with businesses to improve working conditions in global supply chains. Via this connection, CES Ltd Procurement now has access to an online platform, tools and services to help schools operate responsibly and sustainably, protect workers and source ethically.
  - » Tendering templates have been updated to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CES Ltd.
  - » As well as developing the above-mentioned **Guiding Principles of Procurement** aimed to establish CES Ltd’s values and commitment to responsible procurement. This communication strategy is the first of many steps related to building supplier awareness.
  - » In 2022 the CES Ltd Modern Slavery Action Working Party will develop a School and Office awareness plan and a **Supplier Code of Conduct** and updated **Supplier Induction Procedures** will be developed and distributed in 2022, current practice is for Service Providers to adhere to CES Ltd policies and codes, the Procurement Team is working on a tailored document specifically for Service Providers.
  - » In 2021 ACAN joined the **Cleaning Accountability Framework**. CAF is a multi-stakeholder organisation that exists to end exploitation in property services and improve labour standards through education and advocacy. CAF stakeholders work together in a spirit of cooperation to drive responsible standards for the procurement, management, and delivery of cleaning services. This occurs through CAF Certification, a worker-centric due diligence mechanism that assesses, addresses and mitigates the risk of labour exploitation by engaging workers and other supply chain stakeholders. In 2022-23 CES Ltd will have access to these resources in order to develop a review of cleaning providers and products to ensure workers are protected and supplies are sourced ethically and responsibly.
  - » CES Ltd will invite high spend suppliers to join Sedex and undertake the SAQ.

# REPORTING CRITERION 4



## Modern Slavery Action Plan and Road Map

CES Ltd is committed to follow the 5 Step action plan as provided by ACAN to guide and support our processes and objectives to reduce the risk of modern slavery in our operations.

Progress has been made in this reporting period from the Road Map, and some actions have been achieved, but there are still areas of improvement and opportunities to build and educate all our staff and stakeholders.

## 5 Step Action Plan and Road Map

Areas in bold text, indicate action has been taken or under development.

### STEP 1: Commitment

**Engage top management and set direction**  
**Adopt the Modern Slavery Policy**  
**Establish a Modern Slavery Action Working Party**  
**Define roles and responsibilities**

### STEP 2: Business State of Play

**Understand what you are doing well and where your gaps are to manage modern slavery risks**  
Prepare and implement a modern slavery action plan or strategy to address your gaps  
Monitor progress and ensure continual improvement

### STEP 3: Supplier Risk

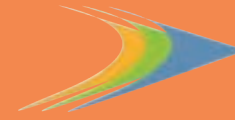
Prioritise suppliers based on potential risk and spend  
Seek responses from suppliers on their modern slavery actions in EOI or tender processes  
Clearly outline expectations to suppliers

### STEP 4: Engage, Educate and Respond

Engage and train management, employees and contractors  
Engage and educate highest priority suppliers  
Establish remedy pathway to respond when slavery practices identified in operations or supply chain

### STEP 5: Modern Slavery Statement

**Prepare draft Modern Slavery Statement and submit to leadership for signature**  
Collaborate with ACAN participants to develop Modern Slavery Compendium and upload to Commonwealth Modern Slavery Statement Register  
Publish Modern Slavery Statement on entity website



## **Provision of Remediation Solution through ACAN**

CES Ltd is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CES Ltd is utilising the Domus 8.7 program from ACAN - an independent program to provide remedy to people impacted by modern slavery.

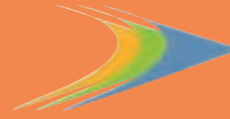
CES Ltd has not had the opportunity to review the remediation program, but will enhance future directions through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with ACAN, Domus 8.7, CES Ltd can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CES Ltd is directly linked to modern slavery by a business relationship, CES Ltd is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with CES Ltd to ensure victim centred remediation processes are implemented to the satisfaction of CES Ltd.

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



# REPORTING CRITERION 5



## **Effective Assessment**

CES Ltd Board 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. The “Bridge the Gap” analysis was completed, and the assessment has provided clear actions and key components that require development. Our target for 2022, is to make improvements over the majority of the indicators provided from the ‘Bridge the Gap’ assessment tool.

As this is our first year in submitting a Modern Slavery Statement, there are no results or effective process to report or to compare to at this stage.

# REPORTING CRITERION 6

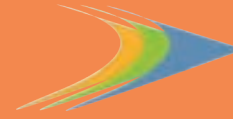
## **Consultation with Entities Owned or Controlled**

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 two early learning centres.

For the preparation of this statement we have consulted with different departments of CES Ltd such as Procurement, Risk and Compliance, Marketing and Finance teams, when preparing this statement as well as ACAN and other members of the ACAN network.

This consultation with ACAN and our other departments has informed our 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 6

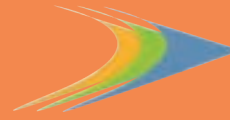


CES Ltd is committed to modern slavery eradication and in 2022 will establish the Modern Slavery Action Working Party (MSAWP) made up of representatives from across operations and education including:

- Social Justice Team / Catholic Identity
- Capital Planning
- Operations and Facility Management
- Procurement and Contracts
- Risk and Governance
- People and Culture
- Communications
- School Liaisons and Representatives

The purpose of the MSAWP is to facilitate CES Ltd's response to modern slavery legislative requirements utilizing the support and resources developed by our Modern Slavery Support Partners including: the Australian Catholic Anti-slavery Network (ACAN), ACRATH, VicTas Anti-Slavery Taskforce and other relevant sources.

The MSAWP will inform and advise CES Ltd's Executive Leadership Team and Board on modern slavery related issues and CES Ltd's role in managing and mitigating modern slavery risks. The Working Group will particularly advise on the development, implementation, monitoring and review of CES Ltd's Modern Slavery Action Plan which includes developing an education plan for our schools to promote awareness and educate students of the risks of modern slavery.



## **CES Ltd Current and Future Initiatives**

### **Social Justice Reference Group**

Prior to the incorporation of CES Ltd, The Social Justice Reference Group (SJRG) has existed in the organisation for many years and has evolved over time. The SJRG is mandated to ensure our schools respond to the mission of Jesus encapsulated by John 10:10 by ensuring regular social justice activities are conducted at diocesan and local levels. These activities are clearly grounded in a well-developed understanding of the principles of Catholic Social Teaching, particularly showing respect and compassion for the dignity of all humankind.

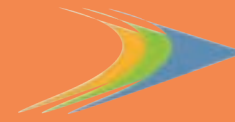
The purpose of the SJRG is:

1. To demonstrate that through our Catholic Identity social justice is core to Learning and Teaching, Wellbeing, Leadership and Stewardship of Resources.
2. To educate and empower all members of our Sandhurst school communities to uphold and respond to the principles of Catholic Social Teaching.
3. To provide a space for social justice initiatives to be generated and discerned for proposed common applications in schools throughout the diocese.
4. To collect and map key social justice initiatives throughout the diocese to ensure a common voice and clear message.

### **The SJRG believes ...**

That opportunities to experience inequity and injustice lead to awareness which has the potential to transform and lead to justice action. The SJRG has been actively involved with the school communities in awareness raising, action for solidarity, advocacy and action for change as the principles which inform and guide an interdependent approach to social justice initiatives and programs.

# REPORTING CRITERION 7



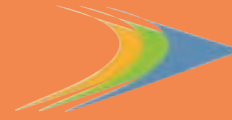
## The SJRG includes representation across the school community

- Primary and Secondary Teachers
- CES Ltd Catholic Identity Team
- Diocesan Caritas/Justice Coordinator
- CES Ltd Indigenous Education Officer
- Secondary Students

## The SJRG Action Plan for 2022 includes

- Conduct Justice Matters Camp
- Raise awareness and provide educational resources for Refugee Week
- Conduct Diocesan Winter Sleepout
- Develop and distribute a School Social Justice Planning template for both Primary and Secondary schools
- Develop, launch and monitor CES Ltd Laudato Si' Action Plan

# REPORTING CRITERION 7



## Next Steps for 2022

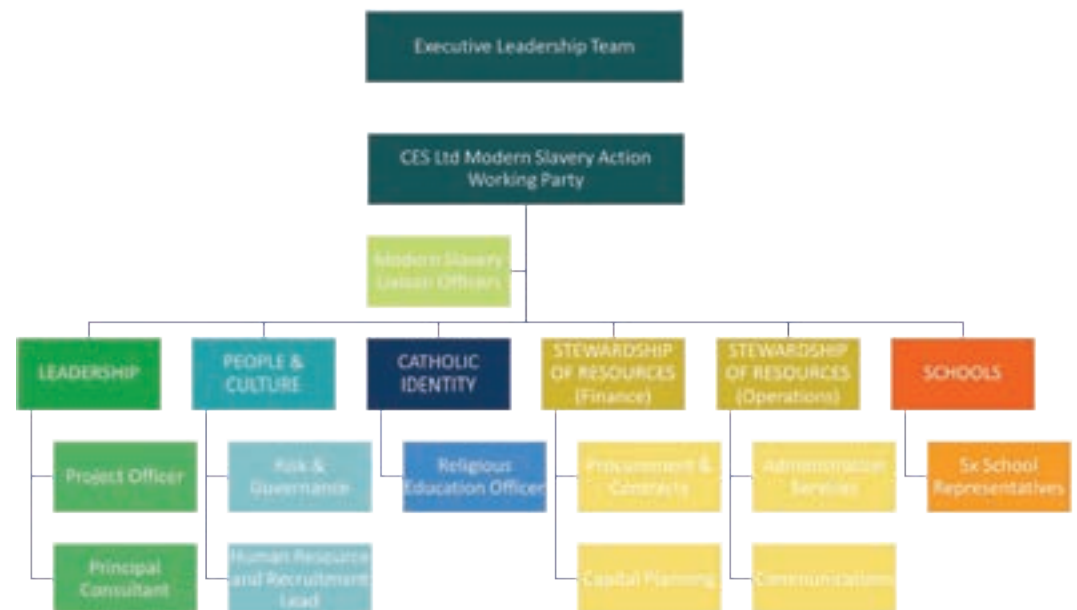
- The MSLO and SJRG launched the Modern Slavery Policy to CES Ltd on the Feast Day of St Josephine Bakhita (8th of February) - the policy has been publically published on the CES Ltd website (<https://www.ceosand.catholic.edu.au/about-us/policies>)
- Develop and Implement a Modern Slavery Escalation and Remediation Process,
- Strategic Procurement Action Plan for:
  - » Managing data consolidation and analysis issues,
  - » Accurately identifying supply chain risk and establishing a monitoring strategy
  - » Supplier Engagement to raise awareness of Modern Slavery Risk and education
  - » Develop and implement specific Service Provider Code of Conduct and update to Supplier Induction procedures.

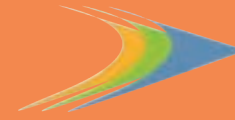
## Modern Slavery Action Working Party

A Modern Slavery Action Working Party (MSAWP) has been established and will meet once a term to monitor the progress of the Modern Slavery Action Plan.

The MSAWP will inform and report to CES Ltd's Executive Leadership Team and Board on all issues related to modern slavery and CES Ltd's role in managing and mitigating modern slavery risks.

The MSAWP is comprised of representatives from all across the entity in order to provide maximum input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery.

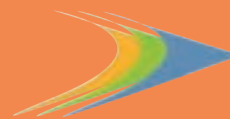




## **Objectives of the Modern Slavery Action Working Party**

The objectives of the Modern Slavery Action Working Group are to:

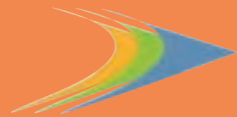
- Provide input and recommendations for continuous improvement for CES Ltd on risks and issues related to modern slavery.
- Actively support the development and implementation of CES Ltd's Modern Slavery Action Plan.
- Assist CES Ltd to determine priority actions to be undertaken and to establish annual goals and targets.
- Monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness.
- Ensure CES Ltd meets the requirements of the Modern Slavery Act 2018 (Cth).



## List of schools with ABNs

E Number	Name	Town	Office	Deanery	ABN
E3999	Catholic Education Office Sandhurst	Bendigo	Head Office	Western Deanery	94493967364

E Number	School Name	Town	Primary / Secondary	Goulburn Valley Deanery	ABN
E3035	St Mary's	Rushworth	Primary	Goulburn Valley Cluster	54294883020
E3054	St Augustine's F-12 College	Kyabram	F-12	Central Murray Cluster	27464784130
E3051	St Francis'	Nathalia	Primary	Central Murray Cluster	54412713465
E3015	St Joseph's	Numurkah	Primary	Central Murray Cluster	97392135646
E3029	St Joseph's	Cobram	Primary	Central Murray Cluster	18744901330
E3041	St Patrick's	Tongala	Primary	Central Murray Cluster	26830037899
E3042	St Mary of the Angels College	Nathalia	Secondary	Central Murray Cluster	24118139345
E3061	St Anne's College	Kialla	F-12	Goulburn Valley Cluster	24880421954
E3007	Sacred Heart	Tatura	Primary	Goulburn Valley Cluster	45985652934
E3003	St Brendan's	Shepparton	Primary	Goulburn Valley Cluster	47792950935
E3005	St Joseph's	Benalla	Primary	Goulburn Valley Cluster	77557417261
E3030	St Joseph's	Nagambie	Primary	Goulburn Valley Cluster	47043727335
E3055	St Luke's	Shepparton North	Primary	Goulburn Valley Cluster	28727486838
E3034	St Mary's	Mooroopna	Primary	Goulburn Valley Cluster	74357745481
E3038	St Mel's	Shepparton South	Primary	Goulburn Valley Cluster	85558516062
N/A	St Mel's	Shepparton	Kindergarten	Goulburn Valley Cluster	98643978205
E3013	Notre Dame College	Shepparton	Secondary	Goulburn Valley Cluster	50248908314



## List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	North Eastern Deanery	ABN
E3058	Borinya Wangaratta Community Partnership	Wangaratta	Flexible Learning Setting	Ovens Cluster	48234647790
E3040	Our Lady's School	Wangaratta	Primary	Ovens Cluster	20376223461
E3012	Sacred Heart	Yarrowonga	Primary	Ovens Cluster	31105341490
E3043	St Bernard's	Wangaratta	Primary	Ovens Cluster	45622757419
E3028	St John's	Euroa	Primary	Ovens Cluster	95487582538
E3022	St Joseph's	Beechworth	Primary	Ovens Cluster	39457814349
E3031	St Mary's	Myrtleford	Primary	Ovens Cluster	82074132527
E3001	St Patrick's	Wangaratta	Primary	Ovens Cluster	14591826647
E3049	Galen Catholic College	Wangaratta	Secondary	Ovens Cluster	65163726691
E3045	Marian College	Myrtleford	Secondary	Ovens Cluster	41878533208
E3014	Sacred Heart College	Yarrowonga	Secondary	Ovens Cluster	39641905468
E3044	Sacred Heart	Corryong	Primary	Upper Murray Cluster	52056437203
E3024	St Augustine's	Wodonga	Primary	Upper Murray Cluster	34865040990
E3056	St Francis of Assisi	Baranduda	Primary	Upper Murray Cluster	26559101675
E3008	St Joseph's	Chiltern	Primary	Upper Murray Cluster	15998336276
E3009	St Mary's	Rutherglen	Primary	Upper Murray Cluster	90053304261
E3039	St Michael's	Tallangatta	Primary	Upper Murray Cluster	82622718301
E3046	St Monica's	Wodonga West	Primary	Upper Murray Cluster	77239304724
E3050	Catholic College Wodonga	Wodonga	Secondary	Upper Murray Cluster	31244284084

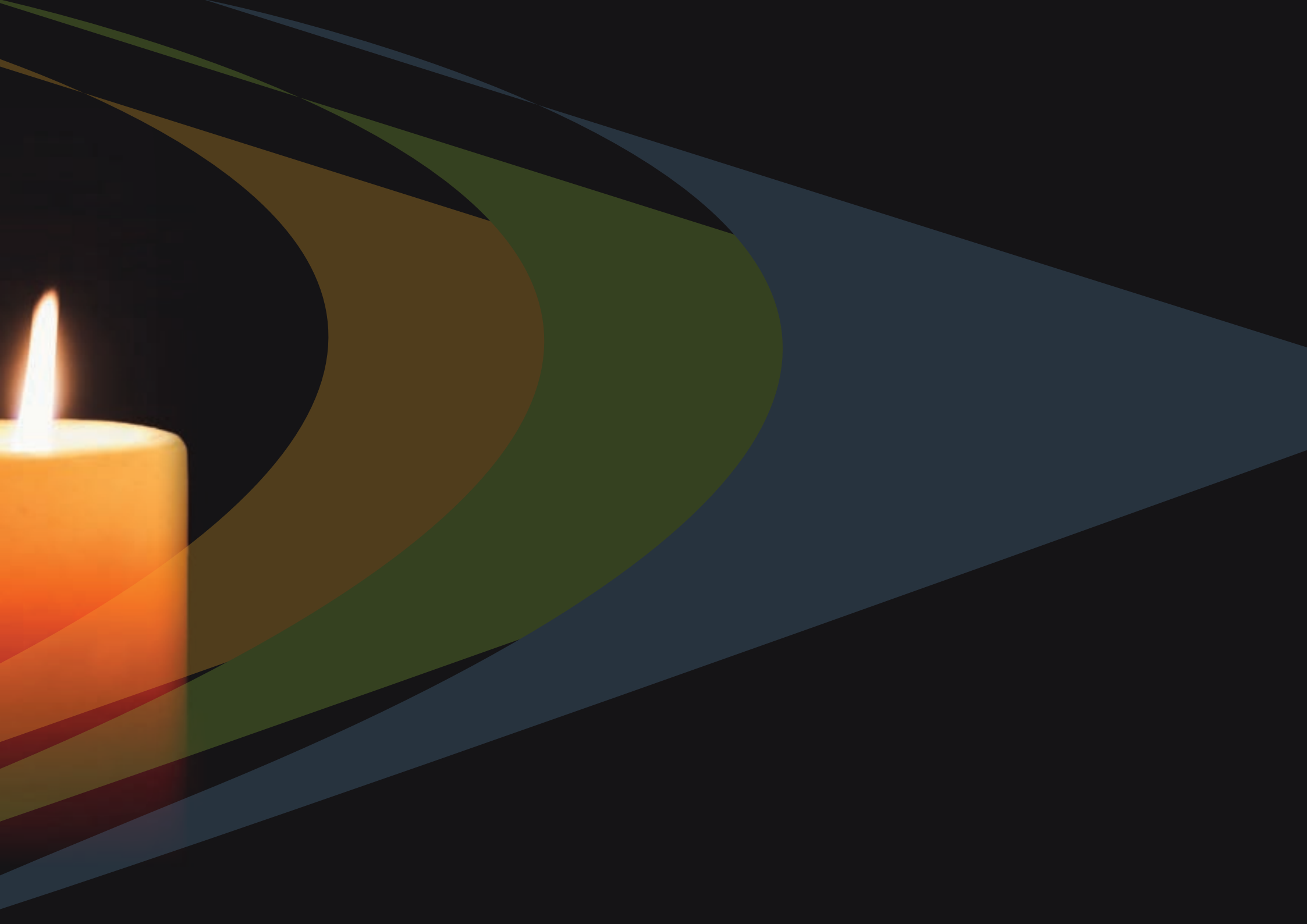


# APPENDIX

## List of schools with ABNs

E Number	School Name	Town	Primary / Secondary	Western Deanery	ABN
E3057	Doxa School	Bendigo	Flexible Learning Setting	Goldfields Cluster	76421028851
E3027	Holy Rosary	White Hills	Primary	Goldfields Cluster	89199183200
E3053	St Francis of the Fields	Strathfieldsaye	Primary	Goldfields Cluster	15768597240
N/A	Assisi	Strathfieldsaye	Kindergarten	Goldfields Cluster	98643978205
E3025	St Joseph's	Quarry Hill	Primary	Goldfields Cluster	28371056933
E3023	St Kilian's	Bendigo	Primary	Goldfields Cluster	93721943550
E3006	St Liborius'	Eaglehawk	Primary	Goldfields Cluster	39031591026
E3004	St Monica's	Kangaroo Flat	Primary	Goldfields Cluster	30477548549
E3047	St Peter's	Bendigo North	Primary	Goldfields Cluster	87736760135
E3037	St Therese's	Kennington	Primary	Goldfields Cluster	55460716403
E3032	Holy Rosary	Heathcote	Primary	Northern Plains Cluster	78836957753
E3020	Our Lady of the Sacred Heart	Elmore	Primary	Northern Plains Cluster	48491407034
E3018	St Joseph's	Rochester	Primary	Northern Plains Cluster	84603693288
E3026	St Joseph's	Kerang	Primary	Northern Plains Cluster	32650192040
E3010	St Mary's	Inglewood	Primary	Northern Plains Cluster	11237942413
E3016	St Mary's	Echuca	Primary	Northern Plains Cluster	77914476179
E3033	St Mary's	Cohuna	Primary	Northern Plains Cluster	70245681952
E3036	St Patrick's	Pyramid Hill	Primary	Northern Plains Cluster	76745874254







Catholic Education Sandhurst Ltd





# **MODERN SLAVERY STATEMENT**

**1 January 2021 to 31 December 2021**



## MERCY COMMUNITY MODERN SLAVERY STATEMENT

1 JANUARY 2021 to 31 DECEMBER 2021

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### CRITERION 1: ENTITY NAME

The reporting entity is Mercy Community Services SEQ Limited (Mercy Community), a company limited by guarantee. Mercy Community's ABN is 51 166 477 318.

This Modern Slavery Statement is the first Statement prepared by Mercy Community after reaching the threshold for reporting with an annual consolidated revenue of over \$100 million in the 2021 financial year. This Modern Slavery Statement was prepared pursuant to the *Modern Slavery Act 2018 (Cth)* ("Act").

The establishment of Mercy Community is inspired by the work of Catherine McAuley who founded the Sisters of Mercy in Ireland in 1831 in response to the call of the gospel and meet the social justice needs of that time. Mother Vincent Whitty, a pioneer Sister of Mercy from Dublin, started the first community work in Brisbane in 1861. As a company, Mercy Community Services SEQ Limited (Mercy Community) was established in 2013. Mercy Community is part of the Mercy Partners group of companies.

We welcomed the coming together of Mercy Health and Aged Care Central Queensland (MHACCQ) and Mercy Community in November 2020 as part of a decision by our governing body, Mercy Partners to harmonise its aged care ministries which was previously under Mater Health.

MHACCQ is an aged care operation in Rockhampton providing residential aged care, independent living units and community services. We share the legacy of the Sisters of Mercy and have strong alignment of mission and values.

Mercy Community's key priorities are delivered in our three key service streams: Aged Care Services, Families and Young People Services, and NDIS Services. Mercy Community's values are Compassion, Integrity, Dignity and Empowerment. We are committed to the safety, well-being, legal and human rights of the people we support and Mercy Community people. Our Code of Conduct sets the standard for ethical and professional behaviour of Mercy Community people. We are fully committed to acting responsibly with the highest ethical standards and reject any form of modern slavery. We acknowledge that modern slavery may happen in the form of human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and services and child labour.

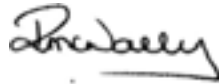
Mercy Community's achievements can be found in the Annual Report 2020-2021 on the Mercy Community website: [mercycommunity.org.au](http://mercycommunity.org.au) Mercy Community's Strategic Plan 2021-24 is also available on the website. The Annual Report provides a snapshot of the programs we deliver and the impacts they have, the projects undertaken, as well as the challenges faced and overcome. The 2020-21 Financial Statements for both Mercy Community and MHACCQ are available from the Australian Charities and Not-for-profits Commission's (ACNC) website.

**Principal Governing Body Approval and Signature of Responsible Member**

This Modern Slavery Statement was approved by the principal governing body of Mercy Community as defined by the Act on 1 June 2022.

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

**Signature**

A handwritten signature in black ink, appearing to read "Rowena McNally".

**Name**

Rowena McNally

**Title**

Board Chair



**Date of Approval**

1 June 2022

## Summary of Achievements and Future Actions

### Achievements

- Joined Australian Catholic Anti-slavery Network
- Formed a Modern Slavery Working Group with Modern Slavery Liaison Officer as Chair
- Developed an implementation action plan

### Future Actions

- Implement a Modern Slavery Policy
- Develop a labour hire workforce profile
- Review supply chain procedures
- Identify high-risk suppliers
- Commence targeted training of Mercy Community employees.

## CRITERION 2: OPERATIONS AND SUPPLY CHAIN

### STRUCTURE

Mercy Community is a not-for-profit organisation registered with the ACNC, committed to enhancing the quality of life and well-being of those who access its services. Mercy Community believes that through its actions of merciful love, Mercy is given and received.

Mercy Community is a Catholic ministry incorporated in 2013. Although Mercy Community is associated with Mercy Partners, it is financially independent from Mercy Partners. Mercy Community does not have any subsidiary or sub-entities. The Mercy Community Organisation Chart is shown below.

Mercy Community's Board of Directors is the ultimate decision-making body and is responsible for its overall governance. The Board abides by the Mercy Community Code of Conduct, acting ethically and with the highest standard of integrity and accountability. The Modern Slavery Working Group (MSWG) meets regularly to strengthen Mercy Community's approach to managing modern slavery risk and compliance with the Act. The MSWG has a direct reporting link to the Finance, Audit and Risk Management Committee which reports directly to the Board.

Mercy Community's head office is in the following address:  
131 Queens Road, Nudgee QLD 4014

### OPERATIONS

Mercy Community operates in the State of Queensland. It has no operations outside Australia. On any given day, there are over 1500 Mercy Community Services SEQ employees supporting many thousands of individuals and families through a comprehensive range of programs and services that cater for all ages, circumstances, and seasons of life, in the key areas of Aged Care, NDIS Services and Families and Young People.

**Aged Care Services:** include Home Care, Transition Care, and Residential Aged Care. These services span the continuum of care and allow individuals the flexibility to adapt their level of care as their needs change.

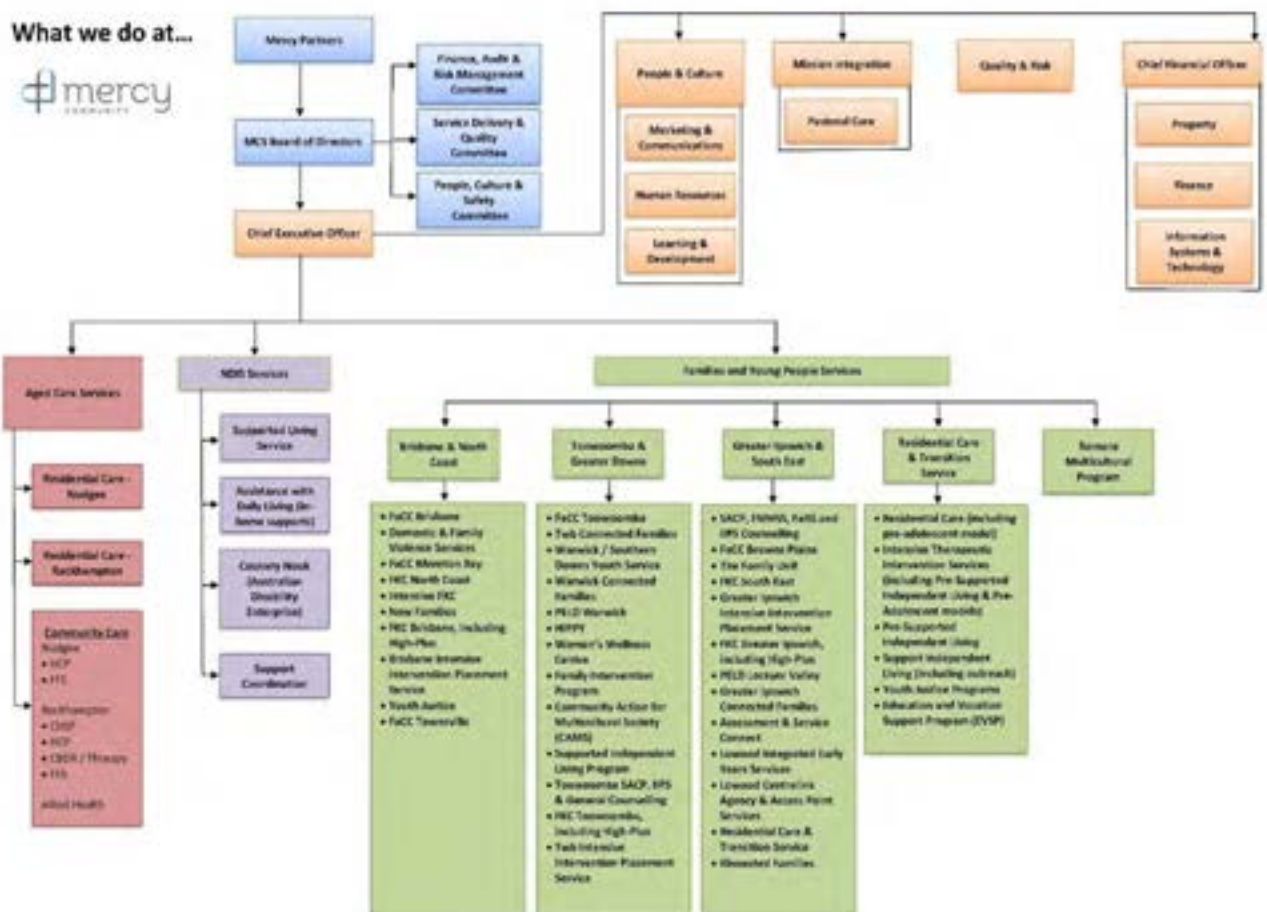
**NDIS Services:** includes Support Coordination, Supported Independent Living, a range of in home and community participation supports including learning and life skills; and the supported employment service known as the Cookery Nook (a high-quality catering service).



**Families and Young People Services:** includes foster and kinship care programs, residential care and transition programs, with significant partnerships within Aboriginal and Torres Strait Islander communities in Queensland. Additionally, we offer counselling, live-in home supports for mothers and babies, community engagement and development programs and multicultural support for refugees and migrant families.

**Romero Centre:** forms part of our Families and Young People services. It is a dedicated resource centre for people and families seeking asylum in Brisbane and is fully funded by Mercy Community with the generous support of a few religious institutes and community members. The team at Romero provide case coordination and a range of welcoming, inclusive support services for people seeking asylum.

For the 2021 financial year, Mercy Community had revenue of \$113,194k.



Last updated - March 2022

### SUPPLY CHAIN

Mercy Community evaluates and selects its suppliers to maintain a reliable supply of products and services vital to service delivery. The supply chain process includes procuring the following: temporary labour hire, food and beverages, property maintenance, staff training, clinical equipment and consumables, information technology software and hardware, utilities, motor vehicles, laundry services, cleaning services, medical products, and general office supplies. These categories represent the major supplier spend categories.

New suppliers are evaluated if they are a reporting entity or not. Reporting entities with Modern Slavery Statements are preferred. Engaging a supplier without such statement is assessed based on risk.

Mercy Community has added a modern slavery clause in its new contracts requiring new suppliers to attest that the supplier is a Modern Slavery reporting entity or otherwise. Suppliers with existing contracts are notified with the variation. Suppliers without existing contracts will go through the new supplier evaluation and selection process.

All existing suppliers must attest that to the best of their knowledge, they do not cause, contribute to, or be directly linked to modern slavery through their operations and supply chains.

Mercy Community is undertaking steps to gain more information to understand where the current suppliers are based, and the type of services provided.

### **CRITERION 3: MODERN SLAVERY RISKS**

Mercy Community assesses the risk of modern slavery practices whether it causes, contributes to, or is directly linked to modern slavery.

**Risks that Mercy Community causes modern slavery practices.** Mercy Community assessed this risk as low. The controls in its processes are effective in mitigating the risk.

**Risks that Mercy Community contributes to modern slavery practices.** Mercy Community implements a value-based, transparent, and ethical procurement system. Value is not limited to monetary cost but considers other factors such as environmental impact, quality, and service. The list of current active suppliers is checked first to determine if any of them can supply the required product or service before a purchase order is raised.

A new supplier is evaluated, then after evaluation, added to the active list and a purchase order is raised. Mercy Community assessed the risk of contributing to modern slavery practice as negligible. Mercy Community's value-based procurement is an effective control.

**Risks that Mercy Community is directly linked to modern slavery practices.** Mercy Community recognises that there may be risk of connecting with an entity involved in modern slavery practices. In 2021-22, Mercy Community will be reviewing its suppliers and identifying Tier 1 suppliers. These suppliers will be further assessed on the following high-risk categories: sector and industry risks, product and service risks, geographic risks, and entity risks. Mercy Community will be focusing its due diligence activities on the Tier 1 (high-risk) suppliers.

The potential risks for modern slavery in Tier 1 suppliers were determined according to the following indicators:

- Sector and industry risks: Certain sectors and industries deemed as potentially high risk in international and national guidance documents.
- Product and services risks: Certain products and services deemed as high risk because of the way that they are produced, provided, or used. Also, 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 risks: Some countries may have higher risks due to poor governance, weak rule of law, conflict, migration flows, and poverty. The GSI outlines which countries are high risks.
- Entity risks: Some entities may have poor governance structures, records of treating workers poorly or a track record of human rights violations.

73% of Mercy Community’s supplier expenditure in 2020-2021 relates to the top 20 suppliers within the following categories:

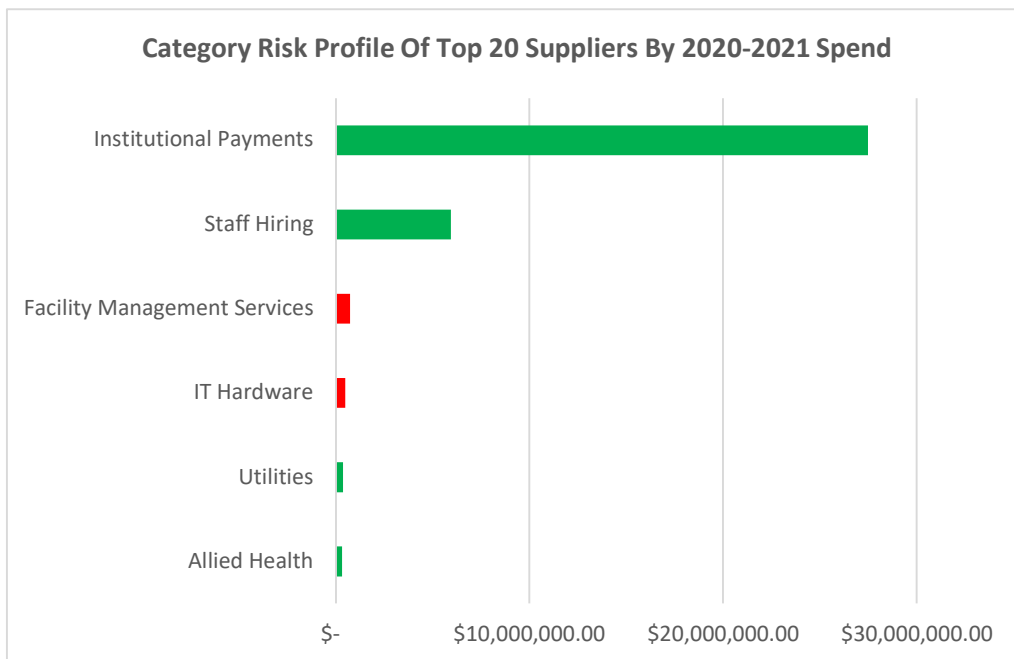
- Institutional Payments (large private suppliers and government agencies)
- Staff Hiring (labour and recruitment agencies)
- Facility Management Services (including cleaning, waste management and hygiene services)
- IT Hardware
- Utilities

Mercy Community has focused on the top 20 suppliers due to the amount of total spend and their location within Australia. The top 20 is being used as a baseline for risk assessment, however, Mercy Community understands that risk is often not relative to spend and does not equate to actual risk.

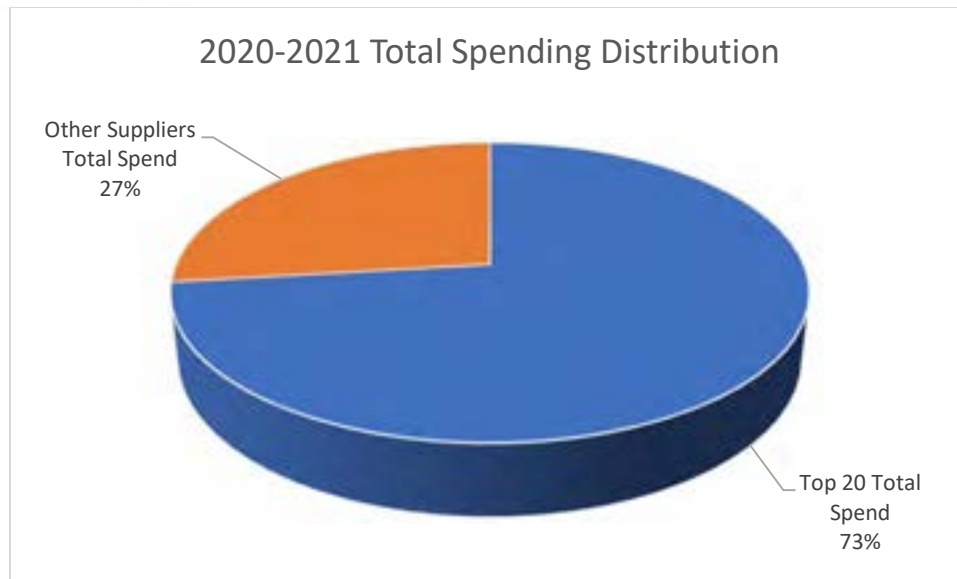
Three of the top 20 suppliers (by spend) have a potential risk of modern slavery as they are in the IT hardware (electronics) and facility management services categories. These categories are potentially high risk due to:

- The prevalence of opaque subcontracting arrangements and frequent use of labour hire; and
- Use of manufacturing materials associated with labour exploitation such as electronics, cotton, and apparel and clothing accessories.

There is no information available to Mercy Community to indicate that the three entities have poor governance structures, records of treating workers poorly or a track record of human rights violations.



**Legend:** Green=Low Risk, Red=Potential Modern Slavery Risk



Almost all Mercy Community spending is to suppliers based in Australia. GSI considers Australia to be low risk geographically, however some of the suppliers are providing products and services belonging to the high-risk categories. Those suppliers will be assessed in 2021-22.

**CRITERION 4: STEPS TAKEN TO ADDRESS MODERN SLAVERY RISK**

During the reporting period Mercy Community has implemented the following actions to address modern slavery risk. Senior management commitment and support has enabled action to be taken effectively to:

- Appoint a Modern Slavery Liaison Officer (MSLO);
- Form a Modern Slavery Working Group with MSLO as Chair;
- Provide MSLO, Working Group members and staff with access to four ACAN training modules-several of whom have completed the four-module course;
- Develop an implementation action plan;
- Implement inclusion of the Modern Slavery clause in new contracts;
- Develop Modern Slavery training material for staff;
- Advise the top 20 suppliers that Sedex will invite them to join. (Sedex is a membership organisation that provides an online platform for companies to manage and improve working conditions in global supply chains); and
- Review the New Supplier Policy to confirm that the intent of the Act is embedded, for example, a new supplier’s authorised officer must not, to the best of their knowledge, cause, contribute to or be directly linked to modern slavery through its operations and supply chains.

Actions planned to be implemented in the next reporting period 1 January 2022 to 31 December 2022:

- Implement a Modern Slavery Policy;
- Review supply chain procedures to include modern slavery obligations;
- Develop a labour hire workforce profile to understand vulnerabilities;
- Identify and address operational risk within Mercy Community;
- Identify Tier 1 suppliers and assess if those suppliers are high-risk by using the following indicators: sector and industry risk, product and service risk, geographic risk, and entity risk;

- Develop a Supplier Risk Dashboard;
- Determine the suppliers which have joined Sedex;
- Develop metrics to provide a baseline for risk exposure for future years;
- Commence targeted training of Mercy Community employees via the training portal and develop training targets;
- Amend New Supplier Form to include a due diligence assessment; and
- Actively engage with and monitor suppliers, particularly those identified as high-risk.

Mercy Community 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.

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. As a participant in ACAN, Mercy Community has access to Domus 8.7 – an independent program to provide remedy to people impacted by modern slavery. Mercy Community will develop response procedures and engagement with Domus 8.7 and other stakeholders. By partnering with Domus 8.7 Mercy Community can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

If Mercy Community becomes aware that a supplier has engaged in modern slavery, Mercy Community is committed to working with the supplier that caused the harm to ensure remediation and mitigation of its recurrence.

When there are indicators of people who may be experiencing modern slavery identified through Mercy Community's risk management activities or other channels, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process. Additional information about Domus 8.7 can be found on [www.domus87.org.au](http://www.domus87.org.au)

#### **CRITERION 5: EFFECTIVENESS OF STEPS TAKEN UNDER CRITERION 4**

Mercy Community has taken steps to raise awareness and conduct risk assessments of its top suppliers. Mercy Community has completed the actions in Criterion 4 above. Mercy Community is committed to embedding modern slavery actions and processes within its organisation. Mercy Community has undertaken a self-assessment to arrive at a gap analysis to report the extent to which those actions and processes have taken hold. The results of the gap analysis will establish a baseline for the next reporting period and has provided areas for action to be taken as indicated in Criterion 4 above. At that time, Mercy Community will assess the effectiveness of those actions by establishing relevant metrics and targets.

Evidence is available that increased awareness and resources are being provided by Mercy Community to not only comply with the legislation, but undertake operational actions designed to give effect to the spirit of the legislation. This evidence is seen in proposed future actions.

In terms of monitoring compliance, Mercy Community plans to:

- Regularly report the number of suppliers identified as high-risk and number of due diligence completed on those suppliers; and
- Report on the number of employees who complete Modern Slavery training either targeted or at induction.

## **CRITERION 6: INTERNAL CONSULTATION**

Mercy Community does not control any other entities and accordingly, no consultation was undertaken.

## **CRITERION 7: ANY OTHER RELEVANT INFORMATION**

Mercy Community has projects aimed at helping stop some of the contributing factors to modern slavery such as, poverty, forced migration and lack of education.

Mercy Community's Romero Centre provides asylum seekers with practical support, legal connections, English language and skills growth, and community connection. Mercy Community's Community Action for Multicultural Society (CAMS) Program supports migrant and refugee community in the Darling Downs South West Region. Mercy Community's Unaccompanied Humanitarian Minors Program (UHMP) provides young people under the age of 18 years from refugee backgrounds with support services as they settle in Australia.

## **COVID-19 RELATED INFORMATION**

Mercy Community's commitment during the COVID-19 pandemic is to the safety and wellbeing of the people we support and our team members. Due to the pandemic, Mercy Community required high volume and continuous supply of Personal Protective Equipment (PPE) and Rapid Antigen Test kits (RAT). Mercy Community also experienced staff shortages and recognises that COVID-19 may have increased the potential for modern slavery risk. We were able to access, store and distribute PPE and RAT testing kits using existing suppliers, and most importantly ensure adequate staffing levels to keep our services operating, while managing modern slavery risk.

Mercy Community worked to be as ready as possible for COVID-19 and developed a COVID Taskforce and Emergency Management Group. Those effective groups have been largely successful in keeping the impacts of COVID-19 in Mercy Community to a minimum.

Mercy Community regularly assesses its risks to better understand its risk exposure and identify effective actions to mitigate its risks. The Enterprise Risk Report is submitted to the Finance Audit and Risk Management Committee which reports to the Board. Both the Committee and the Board are actively engaged in managing risk. During the reporting period, Mercy Community formed a Modern Slavery Working Group, developed new provisions with new suppliers to address modern slavery risk, developed training material for staff and provided information to those areas of its operations requiring guidance in relation to modern slavery risk management, specifically to those areas of operations affected by COVID-19.

# Modern Slavery Statement 2021





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 MercyCareWA  @MercyCareWA  @MercyCare

MercyCare Ltd (ACN 098 197 490)  
Mercy Community Services Ltd (ABN 96 487 116 582)  
Mercy Human Services Ltd (ABN 21 612 759 654)

# Kaya Ngaji gurrijin Hello

---

MercyCare wishes to acknowledge the Whadjuk People of the Bibbulmun nation, also known as Noongar nation, the Yawuru People of Broome and the Aboriginal and Torres Strait Islander Peoples of Derby where MercyCare operates, and pay our respects to elders past, present and emerging.







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**Our Vision is for people and communities to thrive, and our Mission is to bring compassion and justice to life and break cycles of significant disadvantage.**





# Introduction

MercyCare is a not-for-profit provider of aged care, early learning, disability services and family and community services. MercyCare builds on a strong service provision track record in responding to people faced with significant needs.

Our Vision is for people and communities to thrive, and our Mission is to bring compassion and justice to life and break cycles of significant disadvantage.

With this ethos driving the very core of what we do, we share MercyCare's first Modern Slavery Statement.

We recognise the pain and suffering of those exploited across the globe through the use of coercion, threats and violence and we will work to bring an end to forced labour, child labour, trafficking and other forms of actions that deprive people of their freedoms.

Yet despite these challenges, MercyCare is determined to play a part in ending Modern Slavery.

MercyCare recognises that we have a long way to go and that the eradication of slavery is a challenging path, with risks

throughout almost every supply chain across the world and even in Australia.

We recognise approaching this challenge requires cooperation from our suppliers and partners and we are committed to sharing our knowledge and resources with others to help bring about change.

## Endorsement

This Modern Slavery Statement, as defined by the Modern Slavery Act 2018 (Cth) (Commonwealth Act), was approved by the Board of Directors of MercyCare Ltd on 7 April 2022.

**Mary Woodford**  
Board Chair



## PART 1

# The Entities

This statement is prepared in accordance with the requirements of the Modern Slavery Act 2018 (Cth) in relation to the following entities:

**MercyCare Ltd (ACN 098 197 490)**

**Mercy Community Services Ltd (ABN 96 487 116 582)**

**Mercy Human Services Ltd (ABN 21 612 759 654), (together MercyCare).**

The organisation currently has 1390 staff and 140 volunteers located and operating in 44 locations across the Perth metropolitan area and in the West Kimberley who have an unwavering commitment to MercyCare's values and mission.

Our workforce is diverse with around 85 per cent of the workforce being female and over 20 per cent speaking a first language other than English.

MercyCare's origins date back to 1846 when the Sisters of Mercy arrived in Western Australia and established a long track record of service to the Perth community.

As a not-for-profit organisation, MercyCare has expanded its reach and breadth of service to support thousands of Western Australians, focusing on those who need us most and ensuring our services are there to support people throughout their life journey.

Our organisation has grown significantly over the past five years, with our revenue now exceeding \$100 million.

We are now adopting a more robust and structured approach to identify and mitigate modern slavery risks that may arise from the work we do and we are pleased to publish our first Modern Slavery Statement.

MercyCare recognises that this is a challenging and evolving process and commits to working within our organisation and with others that we interact with to continuously improve our approach and response to modern slavery.

---

**We are now adopting a more robust and structured approach to identify and mitigate modern slavery risks that may arise from the work we do.**

## PART 2

# Our structure, operations and supply chains

## Structure

The MercyCare civil entities listed above in Part 1, are the civil entities through which MercyCare, a Public Juridical Person (PJP) of the Catholic Church formed under Canon Law, operates.

Mercy Community Services Ltd and Mercy Human Services Ltd are subsidiaries of MercyCare Limited.

The MercyCare civil entities are companies limited by guarantee. They are governed by a Board of Directors with the requirement to operate as a non-profit organisation pursuant to their relevant constitutions. MercyCare Ltd is registered as a charity with the Australian Charities and Not-for-Profits Commission and has a Public Benevolent Institution (PBI) status.

### FIVE KEY AREAS OF SERVICE

	<b>Residential Aged Care</b>
	<b>Community Aged Care</b>
	<b>Community, Family and Children Services</b>
	<b>Disability Services</b>
	<b>Early Learning Services</b>

## Operations

MercyCare has over 1,390 employees.

Our Head Office is based in West Perth. Across the Perth metropolitan area, MercyCare has 14 early learning centres, five residential aged care facilities and a retirement village. We also provide a range of community services, family and youth services and disability and home care support across Perth. In addition, MercyCare manages two short stay accommodation facilities for Aboriginal and Torres Strait Islander people in Broome and Derby in the Kimberley region.

## Supply Chains

MercyCare spent just over \$42 million dollars throughout its supply chain in the financial year to June 2021. All suppliers are Australian businesses, although many are linked to international organisations. We purchase a diverse range of goods and services across approximately 700 suppliers. Our primary categories of spend are:

- Agency labour hire
- Medical equipment and aids
- Business technology
- Food and beverages
- Specialist consultancy services

## PART 3

# Modern Slavery Risks

**MercyCare is cognisant of modern slavery risks that may exist within the sectors in which we operate, especially regarding care staff.**

We recognise the higher proportion of employees from migrant backgrounds, especially where English is not the first language, can leave many exposed to unfair employment conditions.

At MercyCare, our robust recruitment processes, contemporary rostering and payroll systems and our continuous investment in values-based leadership significantly reduce the modern slavery risks. However, we remain vigilant to any practices within our own organisation and our agency support staff to ensure issues do not arise.

We equally recognise the diverse and often hidden risk of modern slavery in our supply chains, especially beyond our tier one vendors. As we grow, we have identified the need to improve our categorisation of our purchases to help better understand the nature of our requirements and the risks that arise. This categorisation will be implemented during the course of 2022.

Towards the end of 2021, MercyCare became a member of the Australian Catholic Anti-Slavery Network (ACAN). This will enable us to undertake more robust risk assessments of our suppliers in collaboration with ACAN member companies and the resources ACAN offer.

In the interim, MercyCare undertook an initial risk assessment referencing data produced by US Department of Labor Bureau of International Labor Affairs. Through this process, we have ascertained our highest risks to be:

- Medical and clinical supplies – such as rubber gloves, textiles
- Textiles – bed linen and towels used in our aged care facilities
- Children’s toys
- Food and drink
- Workwear
- Technology

Our aim is to explore these categories in more depth, seeking to map the supply chain from the source to use to better identify the modern slavery risks associated with the procurement of the above listed supplies.

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**We recognise the higher proportion of employees from migrant backgrounds, especially where English is not the first language, can leave many exposed to unfair employment conditions.**



## PART 4

# Our Actions

As this is our initial Modern Slavery Statement, MercyCare's focus is to strengthen our understanding of potential modern slavery risks in our operations and supply chain. This past year has been the start of our journey towards focusing more on eliminating the risks of modern slavery.

### Our actions to date



MercyCare published a **Modern Slavery Policy**, approved by our Board, to be adopted in all areas of our work, especially within our procurement activities. This Policy will be regularly reviewed to assess and address risks of modern slavery.



A project to systemise our **purchase order process** with the aim to provide improved compliance and better categorisation of our spend, which in turn will help us focus on the highest risks within our supply chain.



We have commissioned the **preparation of contract standards** to include specific obligations for our suppliers to consider modern slavery risks and work with us to mitigate such risks.





These actions are simply foundational steps in our approach to Modern Slavery. Our initial goal is to ensure we have a robust understanding of the issue and evaluate where modern slavery exists within our operations and supply chains.



MEMBER  
OF ACAN

MercyCare have joined the **Australian Catholic Anti-slavery Network (ACAN)** to support our risk assessment process, share best practice across member organisations and facilitate training and awareness for key staff and employees.



SEDEX  
ACCESS

Our engagement with ACAN also brings **access to Sedex** – an online platform designed to collaboratively identify and reduce risks in supply chains. Throughout 2022, MercyCare will work with ACAN to improve our efforts in tackling modern slavery risks.



CHRISTMAS  
REFLECTION

MercyCare sponsored a **Christmas Reflection** on Modern Slavery, Let the Children Be Heard, to help to raise awareness in the wider community.

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**We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate the risks of modern slavery.**

## **PART 5** **Effectiveness** **of our Actions**

This is our first step towards improving the management of modern slavery risk and embedding risk evaluation and decision-making into our procurement procedures.

We have carefully considered the key actions to be taken so the maximum benefit can be achieved and our future modern slavery risk management practices can be improved.

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate the risks of modern slavery in our operations and supply chain.

## **PART 6** **Consultation** **Process**

In reviewing our approach to modern slavery, MercyCare has consulted with our auditors (Ernest & Young) who have provided guidance in relation to our obligations in regard to modern slavery.

Our Board of Directors have also been involved in discussions relating to this subject and are fully committed to the organisation taking steps above and beyond the requirements of the Act.

We have also sought an understanding of practices deployed by other Catholic organisations and will seek to develop this network further in the next financial year.

## **PART 7** **Consulting with Entities** **Owned or Controlled by** **MercyCare**

All entities owned and controlled by MercyCare are managed and governed by the same Executive Team and Board.

MercyCare consulted with each entity that it owns and controls for this modern slavery statement. Each entity owned and controlled by MercyCare understands the organisation's commitment to reduce modern slavery risks in its operations and supply chain. MercyCare will continue to engage in discussions with each of its controlled entities regarding modern slavery risks.



## PART 8

# Action Plan

## Procurement Practices

### Training and Awareness



All staff will receive **modern slavery awareness** training.

More **in-depth training** will be provided to leadership and procurement staff.



A new **purchase order system** will be implemented to improve our categorisation and understanding of our supply chain.

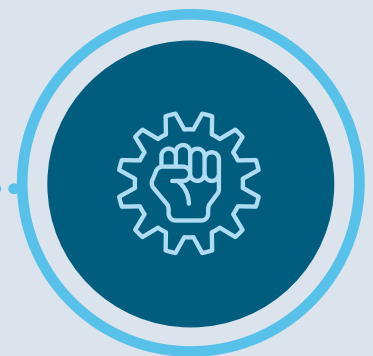
Our procurement strategies and supplier selection **evaluation process** will include modern slavery risks as part of the decision-making process.

Using **Sedex** and **ACAN** resources, we will undertake a deeper risk assessment of our suppliers and seek evidence of commitment to eradicating modern slavery risks from subsequent tiers of the supply chain.

With support from the **McCusker Centre for Citizenship**, we will develop ways to support small and medium sized suppliers to manage and increase awareness of modern slavery risks.

We will create a **Supplier Code of Conduct policy** to share with our suppliers, setting out our expectations of how they should consider modern slavery risks and other social issues.

### Labour Practices



We will review our approach to **engaging labour hire** organisations and ensure modern slavery risks are acknowledged and captured in our expectations of agencies.

# Modern Slavery Remediation

In the event that suppliers are not adhering to clauses within the Modern Slavery Statement and steps are required to rectify a modern slavery issue, MercyCare's remedial steps will include:

- Providing avenues to report modern slavery within our organisation and our supply chains (including our whistle-blower reporting channels)
- Discussing the allegations with the supplier in question and working closely with them to eliminate the risks
- Sourcing alternative suppliers and products or reassessing procurement requirements if it cannot be rectified with satisfactory processes that have been put in place to address modern slavery.



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



MercyCareWA



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MercyCare





# Modern Slavery *Statement* 2020-21

STATEMENT

FINANCIAL YEAR  
(1 JULY 2020 – 30 JUNE 2021)



ST VINCENT'S  
HEALTH AUSTRALIA

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## ACKNOWLEDGEMENT

This Statement is made on behalf of St Vincent's Health Australia Ltd (ABN 75 073 503 536), and all entities owned or controlled by St Vincent's Health Australia Ltd.





# Who we are

Founded by the Sisters of Charity more than 180 years ago, St Vincent's Health Australia is a clinical, research and education leader working in private hospitals, public hospitals, and aged care services in New South Wales, Victoria and Queensland.

When the first five Sisters arrived in Australia in 1838 they carried with them the vision of their Founder, Mary Aikenhead, to reach out to all in need of care, but particularly those living on the fringes of our society.

Today, St Vincent's Health Australia is the largest not-for-profit health and aged care provider in Australia.

It is the legacy entrusted to us by the Sisters of Charity that continues to inspire St Vincent's Health Australia to strengthen and grow our mission.

## OUR MISSION

As a Catholic health care service, we bring God's love to those in need through the healing ministry of Jesus. We are especially committed to people who are poor or vulnerable.

## OUR VISION

We lead through research driven, excellent and compassionate health and aged care.

## OUR VALUES

St Vincent's Health Australia's four core values are compassion, justice, integrity and excellence.

# Our Commitment to addressing Modern Slavery

Modern Slavery and human trafficking is a global issue and one that remains largely hidden in Australia. Our commitment to addressing this issue as it intersects for our work in health and aged care, is a core expression of our Mission and special commitment to those who find themselves on the margins of society. Building on the strong foundations set by our initial work with Australian Catholic Religious Against Trafficking in Humans, (ACRATH), St Vincent's Health Australia remains committed to maintaining our momentum across the various components of the work that has been undertaken to date.

St Vincent's' work in this area aims at achieving systematic change in the Australian healthcare community, so that the needs of those affected by human trafficking and modern slavery can be more strategically addressed within the sector.

**We are committed to:**

- reducing or eliminating the risk of modern slavery occurring in the supply chains of the goods and services we procure across our health and aged care facilities.
- awareness raising and advocacy of the issue among our community and wider society, including leadership within the health and aged care sector.
- the safe identification, treatment and referral of victims of human trafficking and modern slavery who present for care at our service.
- Establishing transparent, co-operative and accountable relationships with our business partners, so that we may educate and inspire one another to transform our practices.

We aspire to see the dignity of every human person protected, so that each person may flourish as it is their right to do so.

# A message from our Chair



**Mr Paul McClintock AO**

At St Vincent's Health Australia (SVHA), our Mission is to bring God's love to those in need through the healing ministry of Jesus with a special commitment to people who are poor or vulnerable. A special feature of the charism of our founders, the Sisters of Charity, is that they read the signs of the times and focus their love and skills where they are needed most. Responding to the needs that arise in health and aged care, especially the issues impacting those on the peripheries of our society, has always been our core business. As such, our response to the scourge that is modern slavery and human trafficking arises from the heart of our Mission. Few are more vulnerable than those who are subject to slavery and human trafficking.

Pope Francis has led the way on this issue, noting modern slavery for what it truly is - a crime against humanity. In encouraging people all over the world to remove their own 'veil of indifference', he reminds us powerfully that, "All of us are called [by God] to be free, all are called to be sons and daughters, and each, according to his or her own responsibilities, is called to combat modern forms of enslavement. From every people, culture and religion, let us join our forces,"

At St Vincent's, our commitment to work towards the eradication of modern slavery as it presents in the operations of health and aged care has always gone beyond merely meeting our legal requirements. We focus on the human beings at the centre of this issue and work to ensure that those who are victims of this exploitation have their best chance at being freed from the conditions which so grossly undermine their dignity and opportunity to flourish.

As organisations the world over now rightfully grapple with how they might best express their commitment to environmental, social and corporate governance, we are cognisant of our opportunity as the largest non-for-profit health and aged care provider in Australia to bring about positive change. We are mindful that health care workers are one of the few groups of professionals likely to interact with victims and that this places our teams in a unique position to intervene and disrupt the cycle of exploitation. As such, we continue to find opportunities to train our staff to recognise the red flags and appropriately enquire with those who present for care who are suspected victims of modern slavery. This education has led to the rescuing of various individuals, our staff being able to support the connecting of these people to appropriate services once identified as impacted by this issue. We have also realised our opportunity to support those who have survived this plight through employment opportunities within our network of hospitals and aged care facilities. In so doing, we know this has the power to transform lives.

We are very grateful to the support we've received from our colleagues in the Catholic health and aged care sector and the ways in which we've been able to advocate together. We are united in our commitment to uphold the dignity of all and we will continue to seek opportunities to collaborate. Our internal staff Advocates for Change continue

to raise awareness both internally and externally about this issue, as is noted in our Statement. This model is key to fostering our commitment within our whole staff group.

Modern slavery and human trafficking is a serious issue and the problem remains large. It is ever important that our organisation stays focused on this issue, especially because of its largely hidden nature. We are conscious not to rest on any laurels of progress that we may have already made. It will be increasingly important that we have visibility and relationships of integrity within our large and complex supply chain. These relationships and transparent data will ensure we can promote best practice and ethical commitments of our suppliers.

This, our second Statement, signals our long term obligation to work diligently to eradicate the crime of modern slavery in our midst. In this Statement, we reflect on some of our gains in the 2020/2021 financial year and importantly, commit to maintaining momentum into the future. We know that continuing to address this issue in earnest requires our utmost integrity, focus and commitment to continuous improvement. Such do the times require us to promote the dignity of all, especially those who suffer in hidden places.

# Board approved Statement

This Modern Slavery Statement was approved by the Board of St Vincent's Health Australia Ltd on 2nd December, 2021. It is submitted as a joint statement by the following reporting entity:

**St Vincent's Health Australia Ltd** ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

**St Vincent's Hospital Sydney Limited** ABN 77 054 038 872

**St Vincent's Hospital (Melbourne) Limited** ABN 22 052 110 755

**St Vincent's Private Hospitals Ltd** ABN 61 083 645 505

**\*St Vincent's Private Hospital Sydney** ABN 99 269 630 262

**St Vincent's Care Services Ltd** ABN 50 055 210 378

**St Vincent's Healthcare Ltd** ABN 46 095 382 791

**St Vincent's Care Services Boondall Ltd** ABN 15 146 972 303

**St Vincent's Care Services Carseldine Ltd** ABN 49 094 645 262

\*affiliated entity



**Mr Paul McClintock AO**

2 December 2021

# Reporting Criteria 1 & 2: About St Vincent's Health Australia

## OUR ORGANISATIONAL STRUCTURE

St Vincent's Health Australia (SVHA) is a not-for-profit group of companies operating under the stewardship of Mary Aikenhead Ministries.

SVHA is governed by a board that sets our strategic direction and oversees compliance, legal and legislative requirements. The SVHA Board sits as the board of SVHA and of 6 of the subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. It also governs the SVHA group of companies in compliance with the *Corporations Act 2001 (Cth)*, the *Australian Charities and Not-for-profits Commissions Act 2012 (Cth)*, and all other relevant civil legislation.

Our group executive aims to manage the daily operations of the organisation to the highest standard. We all work together to realise the mission of our founders to serve all in need of care.

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

### The following are wholly owned subsidiaries of St Vincent's Health Australia Ltd:

- St Vincent's Hospital Sydney Limited
- St Vincent's Hospital (Melbourne) Limited
- St Vincent's Private Hospitals Ltd
- St Vincent's Care Services Ltd
- St Vincent's Healthcare Ltd

### The following are wholly owned subsidiaries of St Vincent's Care Services Ltd:

- St Vincent's Care Services Boondall Ltd
- St Vincent's Care Services Carseldine Ltd

### The following is an affiliated hospital:

- St Vincent's Private Hospital Sydney

## OUR GOVERNANCE FRAMEWORK

The Executive sponsor of our Modern Slavery work is the SVHA Group Mission Leader, Dr Lisa McDonald who has convened the Anti-Modern Slavery Working Group.

The Group Mission Leader presents this work to the Executive Leadership Team of SVHA. Proceeding through the Mission, Ethics and Advocacy Committee, the Statement is presented to our St Vincent's Health Australia Board.

## OUR OPERATIONS

We operate 6 public hospitals, 10 private hospitals and 23 aged care facilities in Queensland, New South Wales and Victoria. Along with three co-located research institutes – the Victor Chang Cardiac Research Institute, the Garvan Institute of Medical Research, and St Vincent's Institute of Medical Research – we work in close partnership with other research bodies, universities, and health care providers.

SVHA employs around 22 000 staff and operates more than 4,892 hospital beds and residential aged care beds. In our hospitals, we provide more than 1 million episodes of care for patients each year.

We are a clinical and education leader with a national and international reputation in medical research. Our areas of expertise include heart lung transplantation; bone marrow transplantation; cardiology; neurosurgery; cancer; clinical genomics; HIV medicine; palliative care; respiratory medicine; mental health; drug and alcohol services; aged psychiatry; homeless health; and prisoner health.

## OUR SUPPLY CHAIN

SVHA has a diverse and complex global supply chain – our largest suppliers operate mainly in the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1billion per annum in clinical and non-clinical goods and services across almost 16,000 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, through to wound care, dressings, intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms and equipment servicing and repairs as well as corporate overheads such as office supplies and travel.

A "centre led" Procurement Team, Group Procurement Services, organises and manages "common use" contracts covering a substantial proportion of clinical and non-clinical spend across the Group. Group procurement also manages the Group's catalogue of material goods holding over 120,000 material items. Distributed on-site supply chain teams manage day to day materials management and supply as well as local purchasing, with facilities management procurement also at a local level.

Our two major public hospitals in Sydney and Melbourne have access to respective State Government Procurement arrangements which they access directly. Our Group Procurement Services team is responsible for selecting and appointing common use suppliers of all commodities and services used by the group. We prefer to develop longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Competitive tender processes are used to monitor the marketplace and potential suppliers and only those suppliers who can meet our standards are appointed.

# Reporting

## Criteria 3: Modern slavery risks in operations & supply chain

### OPERATIONAL RISKS

#### Our Operations

Regardless of the form of exploitation, research shows that health care providers are one of the few groups of professionals likely to interact with victims of human trafficking and modern slavery. However, there are barriers that exist within health care settings, both here in Australia and internationally, which hinder the identification of victims of trafficking and the delivery of appropriate treatment and support to this vulnerable group.

We acknowledge that the harm caused by exploitative activities means that a person who is trafficked has an increased likelihood of presenting to a hospital. We also recognise that we are in a unique position to intervene and disrupt the cycle of exploitation.

We see that we have a role in disrupting this cycle of exploitation and, as such, continue to refine our Clinical Pathway and find various ways to equip our frontline staff with the training and awareness capabilities for the identification and referral of victims of modern slavery.

#### Our People

Our values are evident in the way we behave, care for our patients and residents and interact with each other within the SVHA community.

We are confident that our risk of modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. These include Human Resource policies so that all staff are paid at award rates (or above) according to their role and qualification. All employment information is managed through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details. We also operate Kronos, our time management system, the intended purpose of which is to manage rosters and pay our staff accurately for the hours that they work. **Other relevant policies and frameworks we have in place include:**

- Code of Conduct
- Whistle-blower policy
- Ethics Competency Framework
- Applicable Enterprise Bargaining Agreements

Regarding employment law, all of our HR teams strive to remain up to date on relevant legislation and review our contract templates and obligations on a regular basis. Where an employment law specialist is required, we seek external assistance as required. Regarding visa management, we endeavour to carry out all our recruitment and employment operations

in line with relevant visa management guidelines outlined by the Australian Government and seek external specialist advice if required.

### SUPPLY CHAIN RISKS

SVHA remains committed to taking steps to identify and eradicate modern slavery and human trafficking from our supply chain.

Given the nature of our business, and the types of goods and services we procure, SVHA acknowledges that our risk to modern slavery practices across our supply chain is very real. Therefore, investigations into the supply of goods and services at risk to modern slavery and human trafficking continues to be a focus of the Working Group.

During this current reporting period, SVHA has identified that our highest risk is the lack of transparency we have over our own supply chain, our lack of ability to assess the origins and supply channels of our bought in goods and services and, in turn, the lack of visibility and awareness our suppliers have over their own supply chains.

Prior to the implementation of the Modern Slavery Act, SVHA undertook an initial supply chain assessment as a baseline exercise. This was reported in our previous statement. As a manual audit, it lacked the ability to replicate the process at scale on an ongoing basis. As such, SVHA is now exploring ways to identify further risks across our supply chain, past the initial deep dive of our top 50 suppliers. We recognise that our exposure to risks may be increased simply due to our challenges with supply chain transparency and risk assessment reporting capabilities.

SVHA also recognises that we do not currently have fully automated processes or systems in place capable of supporting us with supplier management and contract compliance. A summary of the measures we are taking to address these supply chain risks are provided in section 4, below.

### OUR COVID-19 RESPONSE

St Vincent's Health Australia continues to play our part in the national response to the pandemic and is working closely with State Governments to help keep our patients, visitors, staff and doctors safe from COVID-19. Our commitment to providing professional and compassionate care to the most vulnerable and disadvantaged members of our community endures during this pandemic.

Our critical role in this pandemic, has seen the increase in demand for personal protective equipment (PPE) including things such as medical gloves, masks, and gowns. This means that there are added pressures on our supply chain, and our suppliers, as demand for these items increases across the globe.

While we do continue to seek assurances that specific measures are in place for high-risk suppliers, including that the appropriate controls and protections are in place, that they can provide audit reports when required and have memberships to platforms such as Sedex, SVHA acknowledges that these unprecedented times come with increased risk exposure to modern slavery.

SVHA continues to work with suppliers with whom we have existing relationships. We have not sought to make drastic changes to our supply chain during this time, but have attempted, where possible, to reduce our reliance on high volumes of disposable gowns and PPE, and continue to work closely with our existing supply partners to ensure we are not adding more undue pressure to already complex, existing supply challenges.

# Reporting Criteria 4:

## Actions taken to assess & address risk

SVHA is committed to reducing and working towards ultimately eradicating modern slavery within our operations, business partnerships and supply chain. As such, our commitment to this issue is facilitated by our internal Anti-Modern Slavery Working Group.

### The values of the Working Group are underpinned by:

- Respecting and protecting the life and dignity of workers trapped in modern slavery everywhere;
- Working towards the Common Good and actively collaborating with relevant groups in government, business and community sectors; and
- Open, respectful and inclusive sharing of our learnings and resources with other entities.

### In keeping with the invaluable work started with ACRATH in 2017, the Working Group has three key objectives:

1. The safe identification, treatment and referral of victims of human trafficking and modern slavery who present for treatment,
2. Investigations of the supply chain of services and goods used that are liable to modern slavery and human trafficking and develop a plan to address these issues,
3. To incorporate suitable activities (awareness raising and prayer) across the organisation to increase recognition of the issues and give staff the opportunity to take action in the workplace (and beyond) to help eliminate human trafficking and modern slavery.

The Working Group continues to focus on the development, implementation, monitoring and review of SVHA's Modern Slavery Policy and the objectives are supported by actions and timeframes.

## SUPPORT FOR VICTIM-SURVIVORS – AWARENESS RAISING AMONG CLINICAL STAFF

SVHA continues to prioritise awareness and training measures that support our frontline staff to recognise and respond to victims of trafficking who present to our services. Significant development has occurred during this reporting period to develop a Modern Slavery Training session for our clinical staff. This training has been developed in partnership with ACRATH and will be available in the second half of 2021.

Growing awareness among our established Modern Slavery Advocates for Change has generated broader understanding of the issue and empowered our frontline staff to leverage locally available communication channels to help staff to recognise and address modern slavery. **The efficacy of our internal awareness raising has been evidenced by several cases of survivors who attended St Vincent's facilities and were able to be rescued from modern slavery, these included;**

- A woman from South East Asia presented to our Emergency Department, fearful of her husband who had threatened to report her to police about her visa and she had separated from him. Our team supported her to access family violence support which she was fearful of doing. She reported she was working for a

friend at a club, but the health care workers weren't able to reach her by phone. She sent text messages stating she was being drugged and forced to work at the club and that she had been to the police. She was able to communicate to the health care worker that she was leaving the country to return home; the police were contacted who confirmed that she had already left Australia for her country of origin.

- A woman, who speaks only Mandarin, lives on the outskirts of the city with her Australian husband. When her husband was admitted to hospital she stayed with her step daughter, who became concerned about her working conditions at a massage parlour and considered she was vulnerable. A Social Worker at St Vincent's was notified who spoke to her with a Mandarin interpreter and she was able to communicate she had her passport and Medicare card; knew about what type of visa she had; is employed as a masseuse and is being paid; has regular contact with her family in China and her husband is her sponsor. She reported she communicates with her husband through a translation app and didn't show any signs of being fearful or controlled in any way. The Social Worker considered she was assertive and in control of her situation.
- A woman from South East Asia was found on the streets in an altered state and was taken to our Hospital for treatment. She had previously worked at a brothel that had closed due to COVID-19 and had subsequently found herself homeless. She reported her husband was abusive; he had sent her to Australia first so she could then sponsor him; he controlled her access to money, passport, flights and her child which he had kept with him. At first he paid for her accommodation while she was studying but when he stopped paying her rent she was forced to work in the brothel. Our team identified these red flags, contacted the Australian Federal Police (AFP) who visited the client in the Emergency Department. The AFP provided trauma-informed care and identified her as a victim/survivor of human trafficking; they referred her onto the Red Cross for ongoing care.
- A man from a south island nation had come to Australia on a working visa to pick fruit.

He was admitted to our hospital with neurological symptoms; was found to have a lesion and had surgery to remove it, with the plan to return to work. On further investigation it was found he wasn't being paid correctly; was having expenses deducted from his pay, was denied access to medical care, wasn't allowed to leave the work site and expected to work while he was unwell. He was identified as a victim of modern slavery and he was educated about his work rights and was able to identify other workers in the same position as him. He is being supported by the community, has access to medical care, is recovering well from his surgery and has been linked with Anti-Slavery Australia who are assisting him with his visa and exploring whether he wants to pursue legal action against his employer.

In addition, one of our Modern Slavery Advocates for Change has fostered a working relationship with a United States based clinician, Dr Danielle Bastien, regarding her Human Trafficking Objective Screening Tool and Policy. This is just one example of important sharing of experience and resources that we are promoting within the healthcare sector for the improvement of responses to victims who present to our service.

The training delivered in the second half of 2021 will be a significant opportunity to gather expressions of interest for more staff to become Modern Slavery Advocates for Change.

Through our ongoing collaboration with ACRATH, SVHA has also been able to support a number of people impacted by human trafficking to find employment opportunities within our facilities working sensitively with them to ensure they had a positive experience of the recruitment process and felt supported at each step.

## SUPPLIER RISK MANAGEMENT PLATFORM – SEDEX AUSTRALIA

Challenges around supply chain transparency is a current and real risk to SVHA, thus we are engaging supplier risk management platform, Sedex, to support us with the monitoring, assessment, and mitigation of risks across our supply chain.

Through Sedex, SVHA will have the ability to map our supply chain, identify high risk suppliers, and request our high-risk suppliers to conduct third party social and ethical audits. Sedex is unique in the fact that it supports visibility of ethical and responsible business practices across multiple levels of the supply chain, including the ability to conduct physical site audits in the country of origin and regions where our suppliers source from.

## SUPPLIER AND CONTRACT MANAGEMENT PLATFORMS

In addition to Sedex, St Vincent's has acquired the contract management platform, Open Windows which is in implementation phase across our supply base. This will allow suppliers to St Vincent's to operate on the latest terms, conditions, controls, and policies – which will also improve contract compliance and create auditable trails and support risk and compliance monitoring.

Open Windows will also enable greater effectiveness in supplier onboarding processes, ensuring validation and certification tools. It is also the longer-term intention to leverage connection between both Sedex and Open Windows, further supporting SVHA's supplier risk management approach across our supply chain.

Additionally, Open Windows has an automated Modern Slavery actions module enabling SVHA to conduct an annual (or more frequent survey) audit of all contracted suppliers. This will ensure that all suppliers have reported confirmation of the status of policy and compliance as well as addressing action items in a timely manner.

The implementation of SEDEX and Open Windows is a key enabler for increased and meaningful supplier engagement driving improved visibility and pointed activity to address areas of concern

## DIRECT SUPPLIER ENGAGEMENT

Group Procurement strives to develop long-term partnerships with our supply partners and care is taken to ensure that suppliers remain the best all-round provider to our organisation. As such, we believe in engaging with suppliers directly and discussing openly and honestly when issues are identified. It is important for SVHA to continue to work with our supply chain to identify our risks and understand how we can educate and support our suppliers to eradicate issues together.

SVHA has engaged in direct supplier conversations, remediation and resulting changes to the supply chain for gloves. Supply shortages, pricing issues, known adverse labour practices and the need to increased bulk buying from new offshore sources led SVHA to use Sedex allowing us to transparently source a bulk volumes from a Sedex noted supplier that demonstrated sound and equitable labour practices as well as affirmative responses to prior audit recommendations.

As part of these ongoing conversations, SVHA utilises resources to assist with education of our key supply partners. These describe what modern slavery is, how it affects our supply chain, what SVHA's commitment is, as well as what we expect from our suppliers and contractors.

## ST VINCENT'S HEALTH AUSTRALIA MODERN SLAVERY POLICY

The development of our first ever Modern Slavery Policy supports SVHA's broader commitment to working towards eradicating modern slavery from within our operations, business relationships and extended supply chains. This Policy also aims to provide a robust framework to ensure governance and compliance with the reporting requirements of the Modern Slavery Act.

At time of reporting, the Policy is being circulated internally for consultation and is expected to be presented to our Board for final approval early 2022.

## MODERN SLAVERY E-LEARNING MODULES FOR OPERATIONAL STAFF

Levering our existing HR platform, Workday, SVHA has begun the roll out of modern slavery e-learning modules to SVHA operational staff. Modules currently on the platform include Modern Slavery 101, Business Relevance, Implementing a Modern Slavery Risk Management Program and Grievance Mechanisms & Remedy.

In line with our Action Plan, targets are in place to ensure that all SVHA Supply Managers and Facilities Managers have undertaken at least the first e-learning module (Modern Slavery 101) by December 2021.

## AWARENESS RAISING

Raising awareness of modern slavery across St Vincent's and in the wider community, continues to be a key strategic objective of the SVHA Anti-Modern Slavery Working Group (Objective 3).



Awareness raising across SVHA takes on various forms including encouraging staff to attend relevant conferences and webinars as well as awareness of ethical purchasing choices at key times such as Christmas (promotion of the option to buy local and choose gifts that come from supply chains free from slavery), the feast day of the patron saint of slavery victims St Bakhita (general awareness raising of the issue of human trafficking and modern slavery and our organisational commitment to reducing and eradicating it) and Easter (promotion of chocolate purchasing choices that are fair-trade, certified slavery-free).

Our Group CEO, Toby Hall sees our work in this area as a key expression of our Mission and has also contributed to awareness raising for staff. See below and example of one internal communicate:



## CATHOLIC PARTNERSHIPS

During this reporting period, SVHA continued its memberships with the Australian Catholic Anti-Slavery Network (ACAN) and commenced participation in the Catholic Health Australia committee established to consolidate efforts across the Catholic Health and Aged Care sector. As part of our ACAN membership, SVHA leveraged valuable ACAN resources and networking opportunities.

## APPLICATION FOR GOVERNMENT GRANTS

In April 2021, SVHA submitted an application to the National Action Plan to Combat Modern Slavery 2020-25 Grant Program - Round One Grant Opportunity – Stream 1.

The title of our application for the project was 'Development and implementation of an intervention and support program for modern slavery victims-survivors who present to frontline health care services'. In August we were disappointed to receive the message from the Commonwealth Government that our application was unsuccessful. We plan to apply for funding for a similar project when the opportunity is available to us again.

# Reporting Criteria 5: Effectiveness Assessment

SVHA is committed to measuring the effectiveness of its work to combat modern slavery and reporting against our goals currently takes place at our national Anti-Modern Slavery Working Group.

Through the implementation of SVHA's Modern Slavery Policy (slated for early 2022) SVHA will further progress, apply, and manage our governance framework for assessing effectiveness.

**These measures include but are not limited to:**

- The number of Supply and Facility staff trained in Modern Slavery 101 e-learning
- Increased awareness of modern slavery at executive level across all SVHA facilities
- Number of self-assessments submitted to Sedex by suppliers
- Development of Supplier Risk Management Program, and regular review of its effectiveness
- Number of mitigation actions, including site audits, undertaken across our supply chain
- The number of victims of modern slavery that are identified and rescued from harm
- The number of Modern Slavery Advocates for Change who have received awareness and referral training and across the number of SVHA facilities this applies to,
- Ongoing review of the effectiveness of the Clinical Pathway

SVHA aims to develop further governance frameworks to monitor and track the effectiveness of these above measures and will continue to capture data and refine our processes, as we progress our work in this space.

# Reporting Criteria 6: Process of consultation with entities owned or controlled

As noted under Reporting Criteria 1 and 2, SVHA is a group of companies bringing together private and public health facilities and services, aged care services, and related mission activities which are committed to helping those who are poor and vulnerable. SVHA is governed by a board that sits concurrently as the board of SVHA and of 6 of the subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. The Group CEO and divisional CEOs of the public hospitals division, private hospitals division, care services division and other senior executives make up the Executive Leadership Team (ELT) of SVHA which meets monthly. Functions of the ELT include making strategic decisions and setting the policy direction for the SVHA group.

As a result of the common board and the ELT structure, underpinned by our shared mission and values, there is a general consistency of policies and processes across the various entities making up the group.

Consultation as between the parent company St Vincent's Health Australia Ltd and the subsidiaries and affiliates in the preparation of this statement has occurred via the common board and ELT structures as described above and Group Procurement, as well as the Board's Mission Ethics and Advocacy Sub-Committee and the Anti-Modern Slavery Working Group which comprises staff drawn from the different entities, facilities and group functions. In light of these structures, SVHA considers it is reasonable and appropriate for St Vincent's Health Australia Ltd 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.

# Reporting

## Criteria 7: Other

St Vincent's continues to remain engaged with advocacy in this area. Including our ongoing relationship with ACRATH and regular attendance at their monthly 'Conversation Series' which is a series of conversations about their Advocacy work against Modern Slavery (Forced Labour, Human Trafficking and Forced Marriage).

STATEMENT

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

