



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**

Compendium of Modern Slavery Statements

2020



ACAN COMPENDIUM
EXECUTIVE SUMMARY

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“Australia can be a leading force in the Catholic world in seeking to eradicate modern slavery, human trafficking and forced labour.”

MOST REV MARK COLERIDGE
PRESIDENT, AUSTRALIAN CATHOLIC
BISHOPS CONFERENCE

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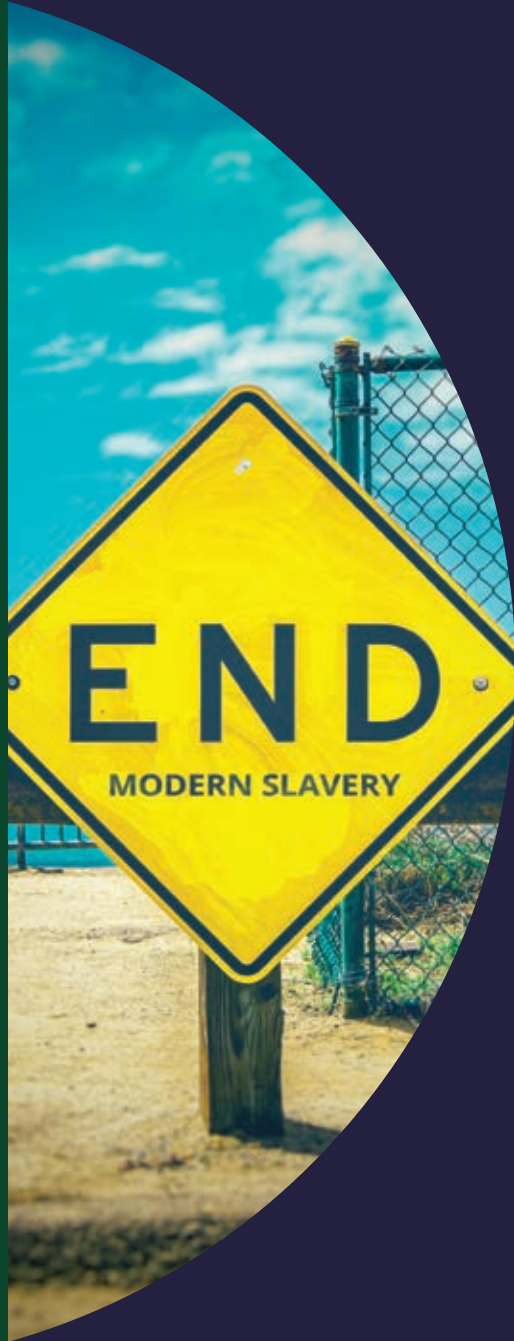
Facilitated by the
Anti-Slavery Taskforce
Catholic Archdiocese of Sydney

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The Australian Catholic Anti-Slavery Network (ACAN)



OVER \$1B ANNUAL CONSOLIDATED REVENUE

- ✕ St Vincent's Health Australia
- ✕ St John of God Health Care
- ✕ Catholic Archdiocese of Brisbane
- ✕ Calvary Little Company of Mary Health Care Ltd
- ✕ Catholic Education Western Australia
- ✕ Sydney Catholic Schools
- ✕ Mater Misericordiae Limited
- ✕ Melbourne Archdiocese Catholic Schools
- ✕ Catholic Education Commission Victoria

BETWEEN \$500M - \$1B

- ✕ Edmund Rice Education Australia
- ✕ Mercy Health Ltd
- ✕ Catholic Education Diocese of Parramatta
- ✕ Cabrini Health Ltd
- ✕ Australian Catholic University

BETWEEN \$250M - \$500M

- ✕ Australian Catholic Super and Retirement Fund
- ✕ Diocese of Maitland-Newcastle
- ✕ Archdiocese of Hobart
- ✕ Diocese of Rockhampton
- ✕ Catholic Healthcare Ltd
- ✕ Diocese of Lismore Catholic Schools Office
- ✕ Catholic Education Office Diocese of Wollongong
- ✕ Catholic Education Archdiocese of Canberra Goulburn
- ✕ Catholic Church Insurance
- ✕ Mercy Education Ltd

BETWEEN \$100M - \$250M

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

LESS THAN \$100M

- ✕ Catholic Schools NSW
- ✕ Catholic Cemeteries and Crematoria
- ✕ Catholic Archdiocese of Melbourne
- ✕ Catholic Archdiocese of Perth
- ✕ Catholic Archdiocese of Sydney
- ✕ Catholic Archdiocese of Adelaide
- ✕ CatholicCare Sydney
- ✕ CEnet Ltd

Foreword

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

Over 40 million people around the world are trapped in modern slavery, more people than at any time in history. Today the risk that a product or service is tainted with exploitation and forced labour somewhere in the supply chain occurs in almost all industries. All countries are affected. So too are the supply chains of Catholic entities in Australia.

Pope Francis has referred to slavery as “an open wound on contemporary society, a wound on the body of Christ and a crime against humanity.” He has pledged with other global religious leaders to collectively work to bring each faith community together to rid the earth of this affront to human dignity and freedom.

Australia and 190 other nations have pledged to end modern slavery by 2030, by adopting the Pope Francis-inspired UN Sustainable Development Goal (SDG) 8.7.

SDG 8.7 calls on all to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking.

In 2020, the Holy Father continued to raise his voice against modern slavery and human trafficking.

The extent of Catholic supply chains is therefore highly significant in this global battle. Indeed, the major exposure to modern slavery of the Church in Australia is related to procurement decisions - to the buying of goods and services and investments.

THE GENESIS OF ACAN

The Australian Catholic Anti-Slavery Network (ACAN) emerged as a key recommendation from a groundbreaking conference in July 2019, organised by the Sydney Archdiocesan Anti-Slavery Taskforce.

The Eradicating Modern Slavery from Catholic Supply Chains Conference was attended by over 100 executives representing 45 large Catholic entities to canvas practical steps to comply with Australia’s Modern Slavery Act 2018 (MSA).

This Conference had major consequences. In September 2019, the [Catholic Action in Australia to Eradicate Modern Slavery from Supply Chains Progress Report](#) was released, recording for the first time the potential modern slavery risks in the operations and supply chains of major Catholic entities in Australia.

This Compendium of Modern Slavery Statements bears witness to the substantial work done by ACAN entities throughout the 2020 COVID-19 pandemic to assess and address modern slavery risks in Catholic operations and supply chains.

ACAN MODERN SLAVERY STATEMENTS

In early 2019, the Australian Government confirmed that it was an appropriate application of MSA s.14 for all ACAN entities to align the first reporting period to the calendar year 2020 and report by 30th June 2021. Moreover, it was also stated that the Australian Government preferred Catholic entities to report as a group.

The ACAN Compendium meets the criteria in the MSA for joint statements in that it:

- ✗ provides information that addresses the mandatory criteria
- ✗ has been developed in consultation with reporting entities
- ✗ is in a format (PDF) acceptable for publication as a Modern Slavery Statement.

ACAN will take the additional step required to submit the Compendium, as a formal joint statement under the MSA, by ensuring it is approved in accordance with the requirements set out in s.14(2)(e) of the MSA.

To this end, the Taskforce executive have fostered a strong culture of collaboration with ACAN participants, providing direct support to senior executives, who are tasked with meeting the statutory obligations to implement a comprehensive modern slavery risk management program.

CATHOLIC ACTION TO ERADICATE MODERN SLAVERY

ACAN entities are united in the belief that action against modern slavery is fundamental Catholic Social Teaching.

ACAN seeks to work for the Common Good and actively collaborates with all relevant sectors - Government, business and community - for the preservation of life, liberty and dignity of workers everywhere.

ACAN works to eradicate modern slavery in all its forms from the operations and supply chains of the Catholic Church in Australia.

ACAN strives to put the Catholic Church at the forefront of efforts and programmes to eradicate modern slavery nationally and globally in our generation.

On behalf of ACAN I wish to thank the Sydney Archdiocesan Anti-Slavery Taskforce Executive Team Alison Rahill, Jenny Stanger and Carsten Primdal for their modern slavery expertise, vision, capacity and generous endeavours.



“Migrants are often victims of criminal human smuggling and human trafficking.”

POPE FRANCIS



AUSTRALIAN CATHOLIC BISHOPS CONFERENCE
THE PRESIDENT

27 April 2020

Message to Australian Catholic Anti-Slavery Network

The formation of the Australian Catholic Antislavery Network (ACAN) was a major achievement within the Church in Australia and far beyond. ACAN has done much in a short time, working to ensure a high level of cooperation and coordination among Australian Catholic entities in dioceses, as well as education, health and aged care, welfare, finance and investment in response to the Modern Slavery Act.

Catholic entities participating in ACAN are strongly positioned to respond effectively to the statutory requirements in the Modern Slavery Act with a comprehensive risk management program. The Modern Slavery Statements of Catholic entities will also form a compendium of Catholic principles and action for the advancement of human dignity and the common good.

Australia can be a leading force in the Catholic world in seeking to eradicate modern slavery, human trafficking and forced labour. That is the purpose of the Sustainable Development Goal (SDG) 8.7, which was inspired by Pope Francis.

ACAN also strives to help the Australian Government in important ways to meet its international commitment to SDG 8.7 and to provide assistance to other countries to end this blight upon the human family.

May Saint Josephine Bakhita, patron saint of slavery victims, guide and protect all associated with ACAN who are working to eradicate modern slavery in service of the freedom which comes from God.

Yours sincerely in Christ,

✠ Mark Coleridge
Archbishop of Brisbane
President

Australian Catholic Anti-Slavery Network (ACAN) Profile¹

ALL AUSTRALIAN STATES AND TERRITORIES REPRESENTED



\$22.3 billion

ANNUAL REVENUE



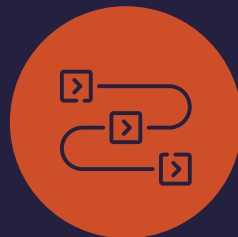
737,179

STUDENTS IN 1,529 SCHOOLS



12,578

AGED CARE PLACES IN 170 FACILITIES



\$6.38 billion

ANNUAL PROCUREMENT SPEND



13

UNIVERSITY CAMPUS LOCATIONS



18,755

VOLUNTEERS



156,898

EMPLOYEES



10,685

BEDS IN 63 HOSPITALS



20,000

SOCIAL CARE CLIENTS

¹34 entities provided data

ACAN action to eradicate modern slavery



Each participating entity in ACAN has nominated a Modern Slavery Liaison Officer (MSLO) to coordinate the implementation of the ACAN Modern Slavery Risk Management Program. Internal stakeholders within ACAN entities are integral to developing and implementing an effective risk management program via Modern Slavery Working Groups comprised of staff from:

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

Team building is a core principle of ACAN, which fosters sharing of experience amongst all entities. During 2020, staff spent a total of 14,735 hours engaged in work to eradicate modern slavery.

In 2020, MSLOs participated in eight ACAN teleconferences via Zoom. During these meetings, updates were presented on new resources and next steps to implement the Risk Management Program. Virtual breakout rooms allowed MSLOs to share experiences, progress and challenges. A key activity has been the consideration and adoption of ACAN template modern slavery policies, code of conduct and contract clauses by individual ACAN entities.

Another measure of the resolve of ACAN entities to tackle modern slavery is that a number of them fall 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.

MODERN SLAVERY RISK ASSESSMENT

The ACAN Risk Management Program has identified modern slavery risks in the operations and supply chains of the 36 ACAN entities.

Throughout 2020, the Taskforce worked with MSLOs and procurement staff in each entity to collect data on their 50 top suppliers by spend, using a standardised template to ensure consistency.

Key information collected from each entity included:

- ✘ Supplier name
- ✘ Annual spend
- ✘ Spend categories
- ✘ Internal user (if available)
- ✘ Supplier location country (if available)

Potential modern slavery risks for each of the spend categories were assessed using the ACAN Category Risk Taxonomy, itself based on the best available information on industry sectors, geographic locations and commodities at risk of involving modern slavery and forced labour.

High level findings from the analysis can be found in the [ACAN 2019–2020 Annual Report Eradication of Modern Slavery: Catholic Action in Australia.](#)

CATEGORY RISK TAXONOMY

Understanding potential modern slavery risks is central to building the capability within Catholic entities to assess and address these risks in operations and supply chains. Modern slavery risk profiles have been developed for the supply chains of ACAN entities using a category risk taxonomy.

This Category Risk Taxonomy aggregates over 600 ACAN spend categories into 23 sections of goods and services (Box 1).

Potential modern slavery risks associated with each major category were assessed using sources such as the Global Slavery Index, International Labor Organisation (ILO), US Department of Labor, Business and Human Rights Research Centre, United Nations Human Rights Commissioner (OHCHR), Australian Human Rights Commission, Shift Project, research papers and media articles.

Each major category was assessed as having potentially high, medium or lower risk of modern slavery, justified and backed up with documented case studies. Four key indicators were also used to determine the assessed level of risk:

01 | Geography: the country or location where a good is made or a service delivered.

02 | Industry: the industry sector in which the making of the good or delivering of the service occurred.

03 | Commodity: the raw materials or components that comprise a product.

04 | 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 their supply chains.

AGGREGATED GOODS AND SERVICES CATEGORIES

-  ADVERTISING AND MARKETING
-  BUILDING AND CONSTRUCTION
-  CLEANING AND SECURITY SERVICES
-  EVENTS AND EVENT MANAGEMENT
-  FACILITY MANAGEMENT / PROPERTY SERVICES
-  FLEET MANAGEMENT AND VEHICLES
-  FOOD AND CATERING SERVICES
-  FURNITURE AND OFFICE SUPPLIES
-  FINANCIAL SERVICES
-  FINANCE AND INVESTMENT
-  GOVERNMENT FEES AND SERVICES
-  ICT HARDWARE
-  ICT SOFTWARE AND NETWORK SERVICES
-  LABOUR HIRE
-  LICENCES AND MEMBERSHIPS
-  LINEN, LAUNDRY AND TEXTILES
-  MEDICAL DEVICES AND SUPPLIES
-  PRINT AND MAIL PROVIDERS
-  PROFESSIONAL SERVICES
-  TRAVEL AND ACCOMMODATION
-  UNIFORMS AND PPE
-  UTILITIES
-  WASTE MANAGEMENT SERVICES

MODERN SLAVERY RISK DASHBOARD

In addition to the high level findings, each ACAN entity received a modern slavery risk dashboard, summarising the key findings from the risk analysis of their spend data.

The dashboard gives a quantitative snapshot of high, medium and low-risk by total spend, numbers of suppliers, and number of spend categories.

Potentially high-risk spend categories and their associated suppliers are identified, enabling entities to prioritise engagement and focus additional due diligence activities on these higher risk sectors.

MSLOs have used the findings from the ACAN Risk Management Program to engage senior management about the entity's modern slavery risk in their operations and supply chains.



SUPPLIER ENGAGEMENT STRATEGY WORKSHOPS

During 2020, ACAN entities were invited to participate in workshops to develop supplier engagement strategies. Originally planned as a series of face-to-face workshops, COVID-19 restrictions meant that these workshops were delivered via Zoom and were tailored specifically for each entity.

More than 400 staff across 36 Catholic entities attended at least one of the 28 workshops representing 1600 hours of staff engagement.

The objective of the Supplier Engagement Strategy Workshops was to equip ACAN entities to engage with key suppliers about modern slavery risks and motivate suppliers to take action.

During the four-hour workshops, participants were provided with an overview of supplier engagement, key engagement strategies, and a demonstration of the connection between supplier engagement and the mandatory reporting criteria of the Modern Slavery Act 2018 (Cth).

Having already assessed suppliers against modern slavery risk criteria, ACAN entities used the workshops to develop targeted engagement strategies for their high-risk suppliers or high-risk supply categories.

In particular these workshops canvassed practical and effective processes to:

- ✕ establish mutual understanding and trust with priority suppliers
- ✕ educate suppliers on modern slavery risks
- ✕ communicate fundamental principles, values and expectations
- ✕ identify areas for collaboration with suppliers, and
- ✕ aid suppliers to Catholic entities to engage their suppliers, thereby facilitating the mapping and management of supply chains.

By the end of 2020, Catholic reporting entities had analysed at least 50 of their top suppliers for modern slavery risks.

ACAN entities will be engaging with high-risk suppliers via Sedex in the course of 2021. This will be an important step for ACAN entities towards complying with the requirement for continuous improvement under the MSA.



BUILDING LINKS raises awareness of modern slavery in the construction sector, and is funded by a grant from the Australian Government. In collaboration with consortium partners the Supply Chain Sustainability School, the Minerals Council of Australia and the Property Council of Australia, the Taskforce hosted an online construction industry supplier forum with 76 building industry participants.

ACAN MODERN SLAVERY STATEMENT WORKSHOPS

To ensure that each ACAN entity could effectively document progress and meet statutory reporting requirements, a “How to Write your Modern Slavery Statement” online workshop was conducted on five occasions in 2020.

These half-day interactive workshops presented a detailed overview of the mandatory reporting criteria, the specific information required to address the criteria, and how entities could best format information about activities undertaken during the first reporting period.

During the workshops, MSLOs were guided to collaborate with Working Group colleagues, to review and collate information, identify gaps and document points under each criteria using the template provided.

The Taskforce executive worked full time to respond to queries from MSLOs, effectively operating a modern slavery specialist helpdesk, providing MSLOs with timely advice, support and feedback. All Modern Slavery Statements in this Compendium were subsequently reviewed by the Taskforce against criteria and detailed feedback was provided on draft Statements.

ACAN MODERN SLAVERY E-LEARNING MODULES

Resources to raise awareness about modern slavery risks in supply chains and operations were a high priority request from ACAN participants who attended the Eradicating Modern Slavery from Catholic Supply Chains Conference.

Targeted training resources were subsequently developed for board members, staff, procurement teams, suppliers and key stakeholders. All ACAN resources were made available to entities via a password protected portal on the ACAN website, to be adapted to meet the specific needs of individual entities.

Staff education programs have been developed including a resource database, power point presentations and eLearning modules, which are available via a purpose-built Learning Management System (LMS).

ACAN entities also uploaded the modules directly into their in-house learning management systems. This equipped 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.

ACAN’s modern slavery eLearning modules include:

✘ Module 1: Modern Slavery 101

✘ Module 2: Business Relevance

Modules 1 and 2 were made available to ACAN entities in the 2020 reporting year.





MODERN SLAVERY 101

This 30-minute module provides a comprehensive overview of modern slavery practices – who is vulnerable and how and why modern slavery persists. The goods and services most frequently associated with modern slavery are also profiled.

In particular, goods linked to modern slavery through harvesting, processing or mining or raw materials; sourcing components for electronics or furniture; and the manufacture and distribution of products are highlighted. Service sector risks including those within the cleaning, security and hospitality sectors are also explained.

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

BUSINESS RELEVANCE

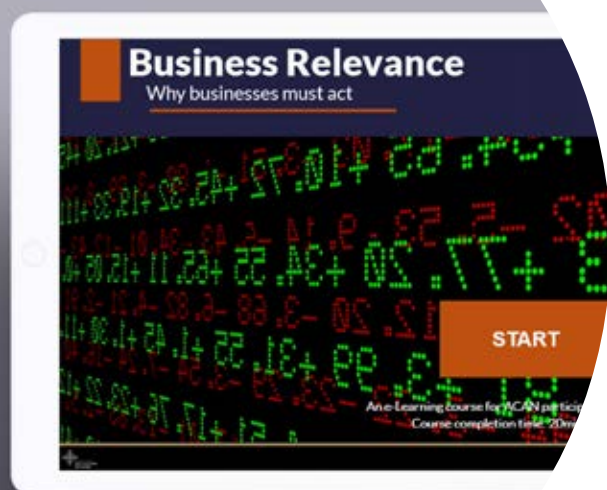
This module provides a business perspective on modern slavery and why it is important for ACAN entities to address modern slavery risk. Key topics covered include:

- ✗ the intersection of business and modern slavery
- ✗ business drivers to manage risk in operations and supply chains
- ✗ the requirements of the Modern Slavery Act 2018 (Cth).

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.

The final section of the module looks at relevant legislation in Australia, outlining criminal offences, as well as 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.



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

Statistical Overview of Procurement



\$6.38b

COMBINED ANNUAL PROCUREMENT SPEND REPORTED BY ACAN ENTITIES

With nearly half of total spend by all entities considered to be potentially high risk for modern slavery.

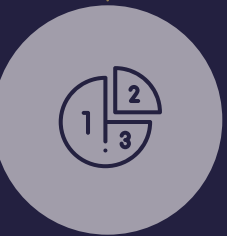


High risk

THE FOUR LARGEST POTENTIALLY HIGH RISK SPEND CATEGORIES ACROSS ALL ENTITIES ARE:

- ✘ Medical Consumables
- ✘ Building and Construction
- ✘ ICT Hardware
- ✘ Facilities Management

Other potentially high risk categories include Cleaning and Security Services, Uniforms, Labour Hire and Food and Beverage supplies.



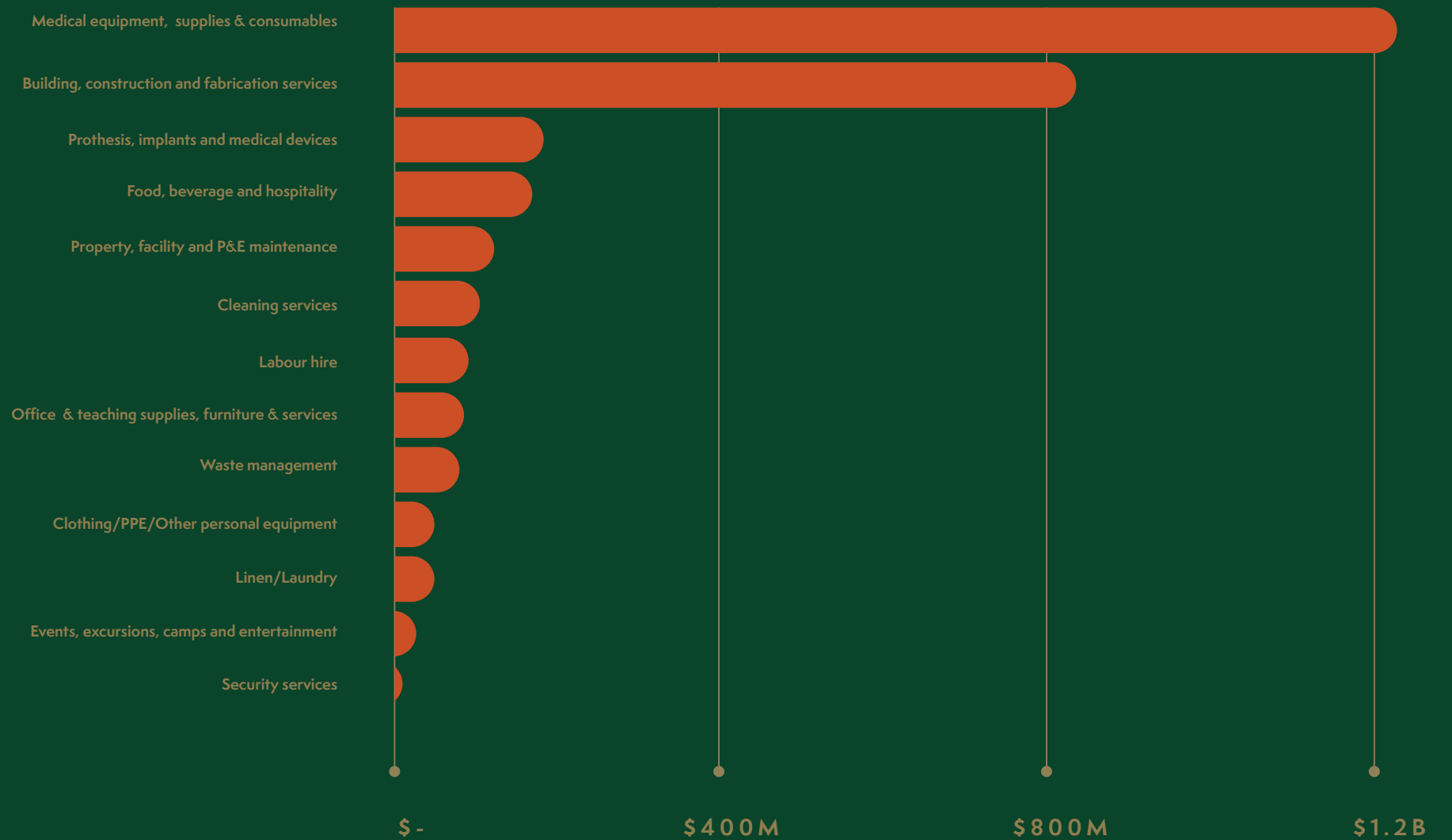
16,000

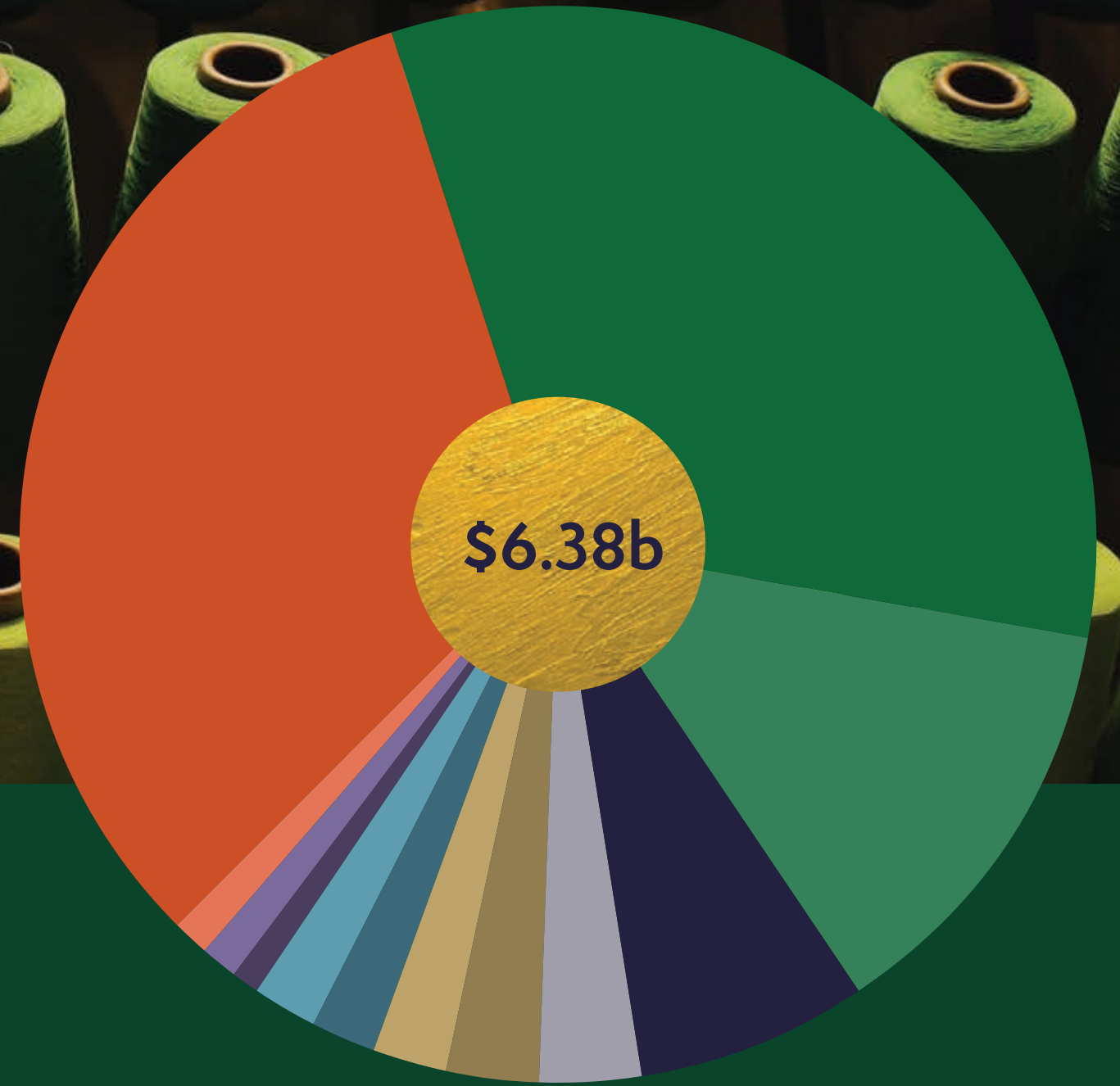
SUPPLIERS ACCOUNT FOR 80% OF THE SPEND

(Not just high risk suppliers)



Category risk by spend (\$) - High





Procurement of high risk goods and services

CONSTRUCTION & MAINTENANCE	\$1,006,172,711
MEDICAL CONSUMABLES AND DEVICES	\$1,005,364,411
ICT	\$395,001,704
FACILITIES MANAGEMENT	\$214,999,553
LABOUR HIRE	\$99,836,624
FOOD & BEVERAGE	\$93,929,539
OFFICE & EDUCATIONAL SUPPLIES	\$76,400,753
SECURITY	\$68,906,274
CLEANING	\$67,131,112
WASTE MANAGEMENT	\$21,255,096
FURNITURE MANUFACTURE	\$17,847,504
APPAREL	\$14,902,543

- Sum of Medical Consumables & Devices: 33%
- Sum of Construction & Maintenance: 33%
- Sum of ICT: 13%
- Sum of Facilities Management: 7%
- Sum of Labour Hire: 3%
- Sum of Food & Beverage: 3%
- Sum of Cleaning: 2%
- Sum of Security: 2%
- Sum of Office & Educational Supplies: 2%
- Sum of Waste Management: 1%
- Sum of Manufacture: 1%
- Sum of Apparel: 0%

Domus 8.7 Remedy Pathway

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 MSA. 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 due diligence and 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

Future Actions

A comprehensive [ACAN Modern Slavery Risk Management Program for 2021 – 2023](#) is documented and publicly available on the [ACAN website](#).

During 2021, eLearning Module 3 - Implementing a Modern Slavery Risk Management Program will provide ACAN entities with step-by-step guidance and support for developing, implementing, enhancing and reporting on their modern slavery risk.

Module 3 will be completed by each ACAN entity's Modern Slavery Working Group, allowing a wider cross-section of internal stakeholders to obtain the knowledge and skills required to implement effective, ongoing modern slavery risk management programs across the ACAN Network.

Module 4 on Modern Slavery Risk Management for Suppliers will clearly outline the expectations of ACAN entities to their suppliers. This thirty minute interactive module will provide an overview of the different forms of modern slavery, the legislative reporting requirements, and explain the relevance of modern slavery risk management to suppliers. This education is important as many suppliers are not reporting entities under the MSA.

Module 5 on Remedy Pathway - an important requirement of the Act – will introduce Domus 8.7 and explain the key elements of an effective remedy pathway, including victim safety, protection and consent, ensuring a human rights-based approach, and the provision of independent advice and support.

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

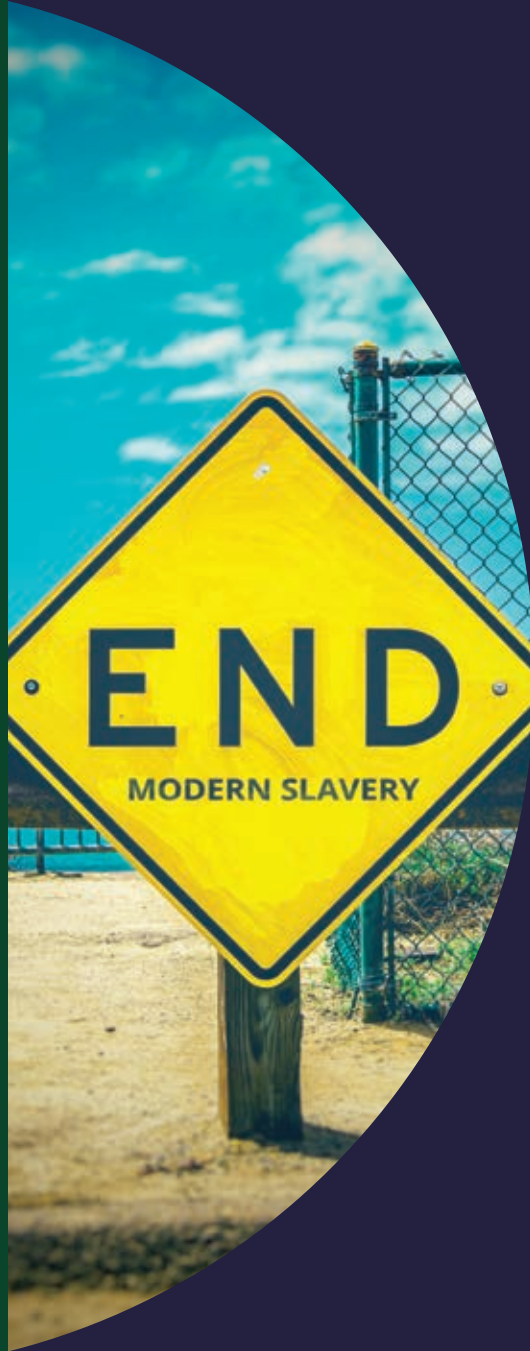
REMEDATION SUPPORT AND ADVICE



Mind the
modern
slavery
gap

Index of Modern Slavery Statements

<https://www.acan.org.au/acan-modern-slavery-statements>



	ENTITY NAME	ABN
1	St John of God Health Care Inc	21930207958
2	Catholic Archdiocese Of Brisbane	25328758007
3	Calvary Little Company of Mary Health Care Ltd	11079815697
4	Catholic Education Western Australia Ltd	47634504135
5	Sydney Catholic Schools Trust	26158447082
6	Mater Misericordiae Ltd	83096708922
7	Edmund Rice Education Australia	96372268340
8	Mercy Health Australia Ltd	89614115856
9	Catholic Education Office Diocese of Parramatta	86875623906
10	Cabrini Australia Ltd	42624828306
11	Australian Catholic University Ltd	15050192660
12	Catholic Diocese of Maitland-Newcastle	62089182027
13	Catholic Archdiocese of Hobart	24097986470
14	Catholic Diocese of Rockhampton	50979741889
15	Catholic Healthcare Ltd	69064946318
16	Diocese of Lismore Catholic Schools Ltd	93638070836
17	Catholic Education Diocese of Wollongong	6778692362
18	Catholic Education Office Archdiocese of Canberra Goulburn	47824127996
19	Catholic Church Insurance Ltd	76000005210
20	Mercy Education Ltd	69154531870
21	St Vincent de Paul Society NSW	91161127340
22	University of Notre Dame Australia	69330643210
23	Southern Cross Care (NSW & ACT) Limited	76131082374
24	Villa Maria Catholic Homes Ltd	32004364103
25	St Vincent de Paul Society Qld	14211506904
26	Catholic Education Diocese of Bathurst	73470086952
27	Catholic Education Melbourne	85176448204
28	Catholic Education Commission Of Victoria Limited	92119459853
29	NT Catholic Education Office	22616685167
VOLUNTARY REPORTING ENTITIES		
30	Catholic Schools NSW	46619593369
31	Catholic Metropolitan Cemeteries Trust	85744325709
32	Catholic Archdiocese of Perth	96993674415
33	Catholic Archdiocese of Melbourne*	64047619369
34	Catholic Archdiocese of Sydney	72823907843
FY 2019-2020		
35	St Vincent's Health Australia*	75073503536

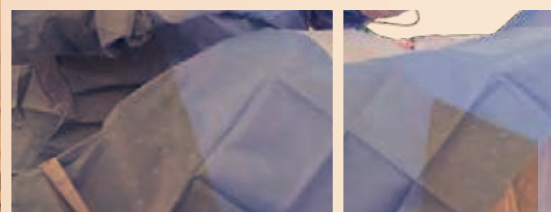
*Additional Modern Slavery Statements added to the ACAN Compendium 2020 in July 2021



AUSTRALIAN CATHOLIC
ANTI-SLAVERY
NETWORK



MODERN SLAVERY
STATEMENT 2020



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

2021

Effectiveness review and monitoring



Review approach/framework



Extend beyond Tier 1 suppliers



Review goals, targets and KPIs



Rollout Australian Catholic Anti-slavery Network (ACAN) Modern Slavery 101 training to key St John of God Health Care caregivers, as identified

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 working group



Develop policies and processes



Engage with high priority Tier 1 suppliers



Establish working group



Launch awareness and communication campaign

2019

Initial awareness and mobilisation



Engage with Catholic peer and industry groups



Undertake due diligence activities

About us

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

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 14,500 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, Mission and Values

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 values reflect our heritage and guide our behaviours:

Hospitality

A welcoming openness, providing material and spiritual comfort.

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 2020

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) to leverage strength and expertise across Australia's large network of Catholic hospitals and aged care service providers.

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

Supplier surveys

As part of ACAN, we undertook a survey of our top 25 suppliers to understand their procurement and sourcing practices. This information is used for risk assessment and vendor management.

Risk assessment and framework

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

We also identified and conducted a risk assessment of our top 50 suppliers and are in the process of varying their contract terms to include clauses addressing modern slavery risks.

Separately, we have reviewed and approved new modern slavery clauses which will be included in categories of procurement contracts.

Ethical sourcing guidelines

We have developed ethical sourcing guidelines and have a *Socially Responsible and Ethical Business Practice Statement*, which 48 of the top 50 St John of God Health Care suppliers doing business with us have signed. This commits them to follow ethical procurement and sourcing practices across labour hire, workforce management, product sourcing and other associated areas.

Supplier Code of Conduct

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

Modern slavery policy

We have commenced developing a *Modern Slavery Policy*, outlining underpinning principles, requirements, supplier and business partner engagement, reporting and governance.

Education and training

All members of the working group undertook Modern Slavery 101 training, developed by ACAN, to commence building organisational understanding and knowledge.

Governance and reporting

We have put in place 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 an assessment of changes needed across St John of God Health Care to help us put in place internal changes to identify and address modern slavery.

Communication

We commenced an organisation-wide communication plan to raise awareness of modern slavery. This will explain the roles and responsibilities of caregivers and our consulting specialist doctors, and what things might change. It will explain how we will work with government and other organisations to eradicate modern slavery.

Action plan

We have 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. This is part of a broader three-year roadmap.

Our plans for 2021 and beyond

Risk assessment

We will review and update our supply risk assessment.

Education and training

We will develop job-specific training in the high risk areas for facilities managers, supervisors and coordinators. This will be rolled out via our online learning and development platform and will be mandatory for procurement and supply employees in 2021 and for other caregivers as identified through our risk assessment the following year.

We will also roll out *Modern Slavery 101* training across the organisation to raise awareness and ensure caregivers understand how to identify and either address or escalate risks.

Contract management

We will complete and execute the variations to contracts, which include the new anti-slavery clauses for our top 50 suppliers, and commence the inclusion of the new anti-slavery clauses in existing contracts with the next 50 suppliers.

The newly approved modern slavery clauses will be included in the templates of high-risk procurement categories for contracts going forward.

Supplier compliance framework

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

We will 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 the Board Chair and Group CEO

Statement from St John of God Health Care Board Chair the Hon Kerry Sanderson AC CVO and Group CEO Dr Shane Kelly.

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.

In the tradition of the Sisters, we place great emphasis on compassionate care and the dignity of the human person.

We do not support or condone modern slavery or the exploitation of people in any form, but we recognise that it can be hidden and difficult to identify.

It requires a clear organisational framework, active focus from management, and good governance at Board level to reduce the risks through our supply chain and other parts of our operations.

It also requires a partnership approach, and we are working with our suppliers and other stakeholders, to take joint responsibility for action.

We are making good progress and have a longer term roadmap in place.

We are pleased to present our first modern slavery statement and to take our place working with government and other organisations to help eradicate the practice and existence of modern slavery.

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

Hon Kerry Sanderson AC CVO

Dr Shane Kelly



This document addresses specific criteria as laid out in the Modern Slavery Act 2018 (Cth)

Reporting Criteria 1 & 2

More about St John of God Health Care

Our 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 14,500 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 50.5 per cent are professional nurses and midwives, 81 per cent are female and 58.7 per cent work part-time, with a further 22 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.

St John of God Health Care favours a permanent workforce over casual workers and agency personnel, a commitment that is captured in our relevant enterprise bargaining agreements. Agency and casual nurses or personal care assistants are mainly used to supplement our permanent caregivers and assist in filling unexpected short-term absences, or meeting shortfalls in fluctuating rosters if permanent staff are not available. We monitor their usage weekly and while there are variations across hospitals and services, they usually comprise less than three per cent of our workforce in all states on any given week.

We discern our use of agencies carefully and negotiate a panel of agencies to provide staff as required. Each agency is required to comply with enterprise bargaining agreements and must warrant terms and conditions no less favourable than our own employees.

In addition to agency and health care professional casuals, St John of God Health Care engages a small number of casuals in higher-risk areas such as housekeeping, cleaning and security, often through third-party contractors. Like all our suppliers, these providers are subject to a review of contracts at present, but recognising the higher risk of these categories, St John of God Health Care will undertake a more specific review of these suppliers and the underlying risk in the coming 12 months.

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 3,374 beds. In 2019-20 we treated more than 350,000 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, including acute, post-acute and community services to privately and publicly funded clients, through St John of God Healthcare at Home. In 2019-20, we delivered more than 89,000 episodes of care.

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

SOCIAL OUTREACH SERVICES

St John of God Health Care allocates a percentage of eligible revenue to community and youth services programs, administered by St John of God Social Outreach.

These include:

- Community mental health services provided by St John of God Mental Wellbeing Services
- Support for families experiencing perinatal anxiety or depression through St John of God Raphael Services
- Support for people with drug and alcohol dependence (publicly funded), and
- Accommodation services for people experiencing or at risk of homelessness through St John of God Horizon House and Casa Venegas.

St John of God Social Outreach also works with a number of Governments and local healthcare providers in the Asia Pacific region to support them to build sustainable and high quality programs and capacity building of their healthcare workforces.

These include:

- Timor-Leste - supporting the Timorese government and our counterparts to build healthcare capacity through sustainable, long term development programs to improve patient outcomes and experience, develop health care skills and implement self-sustaining, quality healthcare.
- Papua New Guinea - St John of God Social Outreach support the Brothers of St John of God, to operate the first drop-in centre in the nation for people experiencing mental health issues, located in Madang.

DISABILITY SERVICES

We provide disability services across 43 sites in Victoria through St John of God Accord and at a range of locations in New Zealand, through St John of God Hauora Trust.

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 healthcare organisation, our direct supply chain consists primarily of healthcare 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 and technology

In 2019 we had 134 active contracts and \$721 million non-payroll procurement spend with our suppliers where annual spend is >\$50,000. 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 100 suppliers.

Our supply chain: key statistics

\$721m spend with suppliers

Approx. 5,000 suppliers

~134 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.

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 has the accountability for embedding and maturing the organisation's approach to enterprise risk management and compliance, as well as the internal audit function.

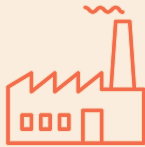
Internal audits are undertaken in relation to specific areas of risk, both at a divisional and organisational-wide level. The internal audit program operates in accordance with an internal audit charter and an annual internal audit plan.

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 2020, 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.



CATEGORY RISK TAXONOMY

Specific products and commodities deemed as high risk according to the category risk taxonomy specifically developed for ACAN entities.



GEOGRAPHIC LOCATION

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



WORKFORCE PROFILE

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

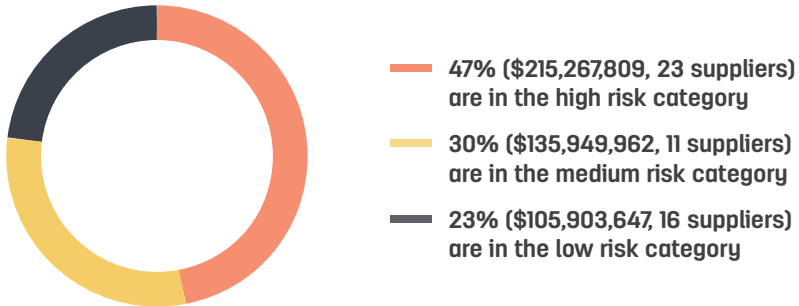
The total spend for the top 50 suppliers for whom the risk assessment was completed amounts to \$457,121,418 million.

Using these categories above, we identified that the high risk spend is within three spend categories: medical equipment and consumables (87 per cent), building construction and fabrication services (nine per cent), and property and facility maintenance (four per cent).

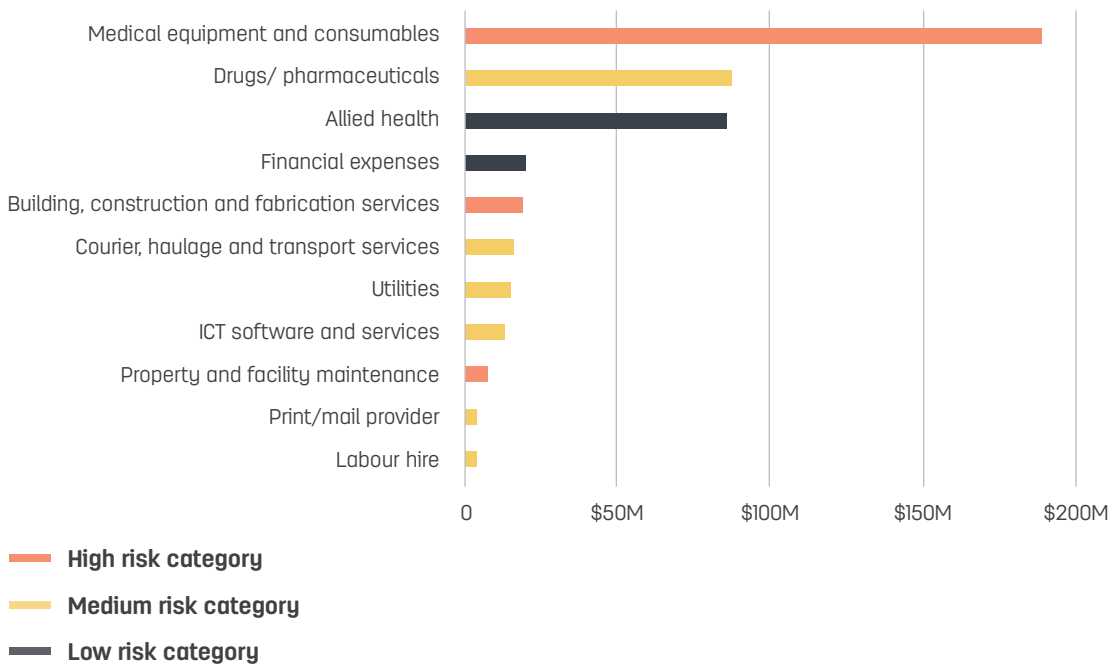
These three highest risk spend categories are made up of 23 suppliers out of our top 50 suppliers.

Our focus for 2020 has been on the high risk categories, with plans in place to extend our focus during the next 12 months.

SUPPLIERS CLASSIFIED ACCORDING TO RISK WITH TOTAL SPEND



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 Emergency Response Group* in January 2020, led by medical services, and comprising all critical functions of the organisation, including the supply and procurement team. This team has led our organisational response to the crisis across infection control, intensive care unit (ICU) capacity, contact tracing, development of telehealth, training and upskilling, clinical education, supply and procurement, communication and a range of other associated initiatives.

The worldwide shortage of personal protective equipment (PPE) has been well documented as a key risk to the health care sector throughout the pandemic. The sourcing of PPE also presented and continues to present the greatest risk of exploitation and modern slavery. 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:

1. Performed an analysis across all new suppliers who claimed that they could provide PPE
2. Reviewed the origin of the products before new suppliers added to our supplier pool
3. Performed a clinical assessment and approval before PPE was made available to frontline staff
4. Requested top 50 suppliers to sign the *Socially 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 2020 across our top 50 suppliers.

Modern slavery gap analysis

We conducted a maturity gap review during July 2020 when we joined ACAN's modern slavery program to identify 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
MANAGEMENT SYSTEMS			
Governance			
Commitment			
Business systems			
Action			
Monitor and report			
RISK MANAGEMENT			
Risk management framework			
Operational risk			
Identifying external risk			
Monitoring and reporting risk			
HUMAN RESOURCES AND RECRUITMENT			
Awareness			
Policies and systems			
Training			
Labour hire/ outsourcing			
CUSTOMERS AND STAKEHOLDERS			
Customer attitude			
Information provision			
Feedback mechanisms			
Worker voice			
PROCUREMENT AND SUPPLY CHAIN			
Policy and procedures			
Contract management			
Screening and traceability			
Supplier engagement			
Monitoring and corrective action			

All of our 2020 initiatives have been achieved since this gap analysis:

MODERN SLAVERY WORKING GROUP

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

PARTNERED WITH OTHER CATHOLIC HEALTH CARE PROVIDERS

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

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

SUPPLIER SURVEYS

As part of ACAN, we undertook a survey of our top 25 suppliers to understand their procurement and sourcing practices. This information is used for risk assessment and vendor management.

RISK ASSESSMENT AND FRAMEWORK

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

We also identified and conducted a risk assessment of our top 50 suppliers and are updating their contract terms to include clauses addressing modern slavery risks.

ETHICAL SOURCING GUIDELINES

We have developed ethical sourcing guidelines and have in place a *Socially Responsible and Ethical Business Practice Statement*, which most organisations doing business with us, are required to sign. This commits them to follow ethical procurement and sourcing practices across labour hire, workforce management, product sourcing and other associated areas.

SUPPLIER CODE OF CONDUCT

We are developing a *Suppliers Code of Conduct*, which will provide guidelines on the practices, behaviour and other requirements we expect of our suppliers, including compliance with ethical sourcing.

MODERN SLAVERY POLICY

We have commenced developing a *Modern Slavery Policy*, outlining underpinning principles, requirements supplier and business partner engagement, reporting and governance.

EDUCATION AND TRAINING

All members of the working group undertook Modern Slavery 101 training, developed by ACAN to commence building organisational understanding and knowledge.

GOVERNANCE AND REPORTING

We have put in place 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 an assessment of changes needed across St John of God Health Care to help us put in place internal changes to identify and address modern slavery.

VENDOR ONBOARDING

We have amended 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*.

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.

YEAR 1 2019 (AWARENESS AND MOBILISATION)	YEAR 2 2020 (APPROACH)	YEAR 3 2021 (EFFECTIVENESS REVIEW AND MONITORING)
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond Tier 1 Suppliers
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 <i>Modern Slavery Policy</i> and processes as required.	Review goals, targets and KPIs
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations.
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
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers
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
Formed working group	Identified KPIs	Revisit Bridge the Gap assessment and show maturity improvement.
	Launched awareness and communication campaign	Identify and address more detailed operational risks.
	Changed the vendor onboarding process and documentation	Identify and document metrics for non-supply chain risks.
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses.	
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	
	Reviewed and updated the <i>Supplier Code of Conduct</i> and published on St John of God Health Care website.	
	Prepared first Modern Slavery Statement	

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
Requirements of the <i>Modern Slavery Act 2018</i> outlined to the St John of God Health Care Board	✓
Requirements of the <i>Modern Slavery Act 2018</i> presented to ARC	✓
General awareness communication shared with the organisation	✓
Modern slavery working group established and formalised	✓
<i>Modern Slavery Policy</i> created and approved	✓
Modern slavery governance and risk framework updated	✓
Modern slavery training for working group members	✓
Top 50 Suppliers identified and risk assessment completed	✓
Engage and work with ACAN and Joint Catholic Procurement Network	✓
First <i>Modern Slavery Statement</i> prepared and approved	✓

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.



ARCHDIOCESE
OF BRISBANE

Modern Slavery Statement 2020

THE CORPORATION OF THE TRUSTEES OF THE
ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE



Disclosure

This statement has been made on behalf of *THE CORPORATION OF THE TRUSTEES OF THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE*. This Statement covers all entities owned or controlled by *THE CORPORATION OF THE TRUSTEES OF THE ROMAN CATHOLIC ARCHDIOCESE OF BRISBANE*.

We respectfully acknowledge Aboriginal and Torres Strait Islander people as the First Peoples of this country and especially acknowledge the traditional owners on whose lands we live and work throughout the Catholic Archdiocese of Brisbane.

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

This acknowledgement affirms our commitment to social justice and the importance of healing and reconciliation between Indigenous and non-Indigenous peoples.

ABN 25 328 758 007 Archdiocese of Brisbane

227 Elizabeth Street, Brisbane, Qld 4000



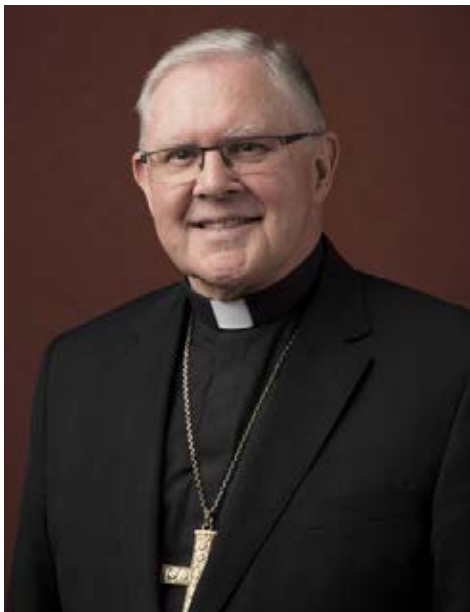
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A brief statement from Archbishop of Brisbane – Mark Coleridge

*“Australia can be a leading
force in the Catholic world in
seeking to eradicate modern slavery,
human trafficking and
forced labour.”*



The formation of the Australian Catholic Antislavery Network (ACAN) was a major achievement within the Church in Australia and far beyond. ACAN has done much in a short time, working to ensure a high level of cooperation and coordination among Australian Catholic entities in dioceses, including education, health and aged care, welfare, finance and investment in response to the Modern Slavery Act.

The Archdiocese of Brisbane has a close ongoing relationship with ACAN as we strive to meet the UN’s Sustainable Development Goal 8.7.

We are committed to playing our part in the effort to eliminate modern slavery in Australia and internationally. That is an essential part of the Church’s mission to “proclaim liberty to captives”

(Isaiah 61:1; Luke 4:18)

Yours sincerely in Christ,

+Mark Coleridge
Archbishop of Brisbane



About us

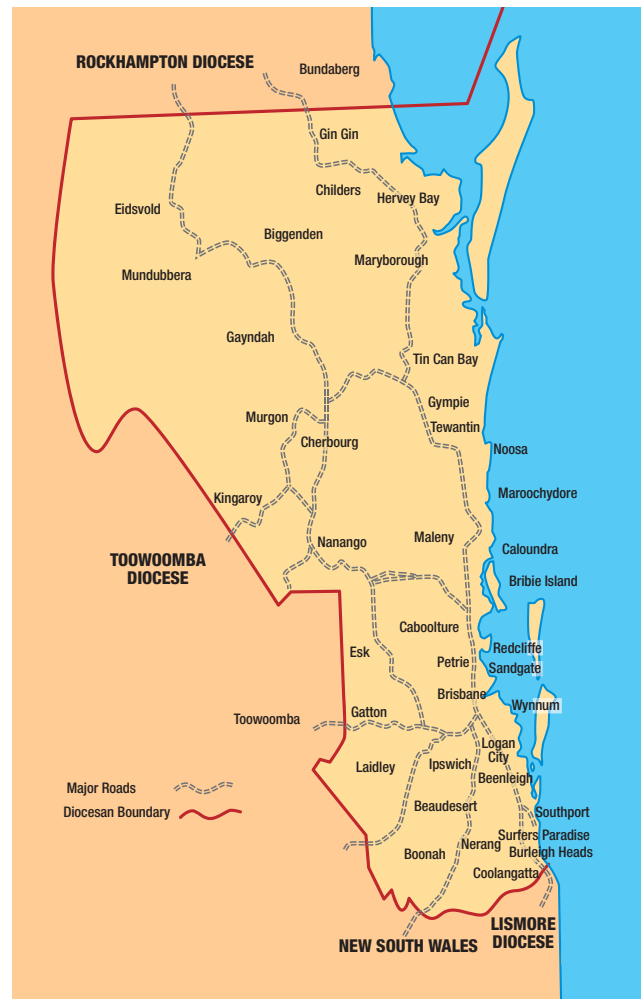
In June 1859 by papal decree the Diocese of Brisbane was erected covering the whole state of Queensland, having previously been part of the Archdiocese of Sydney.

In 1882 the Diocese of Rockhampton was created and in 1887 Brisbane was elevated as an Archdiocese. The Diocese of Toowoomba was excised from Brisbane in 1929 and the Diocese of Cairns was created in 1941.

The Archdiocese is a distinct entity under canon law but held no incorporated status under civil law, until an incorporated entity was established by Letters Patent on 5 July 1935. The Archdiocese was incorporated under the name of “The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane”.

The boundaries of the Archdiocese of Brisbane begin in the south at the Queensland/New South Wales border and run north for about 350 kilometres along the east coast of Queensland to Gin Gin, north of Maryborough, and includes the Gold and Sunshine Coasts.

Reaching from 100-300 kilometres west to Eidsvold and Gatton, the Archdiocese meets the Auburn Range and follows the Great Divide to the Blackbutt Range. From there it runs in a straight line to the junction of the Lockyer and Ma Ma Creeks, to the McPherson Range and to the Queensland/New South Wales Border – a land area of 77,000 square kilometres.





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.



Our Vision

“On a journey led by the spirit”

A synodal Church is a Church which listens, which realises that listening “is more than simply hearing”. It is a mutual listening in which everyone has something to learn. The faithful people, the college of bishops, the Bishop of Rome: all listening to each other, and all listening to the Holy Spirit, the “Spirit of truth” (Jn 14:17), in order to know what he “says to the Churches” (Rev 2:7).

There are four dimensions to this vision:

- We are on a journey of faith into the future
- We do not see the way ahead clearly
- The Holy Spirit leads us on the way
- Together we discern what paths the Spirit is opening before us.

2020 Modern Slavery Risk Management Initiatives

The Archdiocese of Brisbane participated in the inaugural Modern Slavery Conference in July 2019 where delegates from Catholic organisations from around Australia gathered. As a result of the conference, it was agreed by many participants that there were substantial benefits in creating a working party to assist in the planning and development of tools and resources. To meet these needs the Australian Catholic Anti-Slavery Network (ACAN) was established in December 2019.

ACAN brings together 37 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, of which the Archdiocese of Brisbane has been an active member since its establishment.

The Archdiocese established a collaborative working group “The Archdiocesan Modern Slavery Working Group” with representatives from the key areas of the Archdiocese participating. The purpose of this Group was to:

- Develop Modern Slavery documentation for endorsement by Executive and approval by the Archbishop or Vicar General;
- Collate vendor information across each agency and participating office;
- Review ACAN resources and adapt them to the Archdiocese;
- Develop and implement a Modern Slavery staff training awareness program; and
- Develop a risk management program / strategy for implementation.



Our Plans for 2021 and Beyond

The Archdiocese is currently establishing procurement functions both centrally and within its largest agency, Brisbane Catholic Education. These functions will provide assessments on the key procurement areas to be centralised by category, sector or global source. The initiatives which will be implemented in 2021 include:

- 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 144 schools and 94 parishes;
- Develop and implement a Supplier engagement strategy that includes a Supplier Code of Conduct, procurement principles, compliance measures and contract clauses;
- Support the Domus 8.7 reporting framework within the Archdiocese;
- Commence the standardisation of key procurement processes to ensure greater supervision and mitigation of the Archdiocese's risk exposure to Modern Slavery; and
- Operationalise the approved Archdiocesan Modern Slavery Policy and Guidelines across all agencies, parishes and offices.

The Archdiocese's aspirational goal is to identify and eliminate all risks associated with modern slavery from our service providers and suppliers within our supply chains across all the key industries which we engage to deliver our many services to the communities of South-East Queensland.



CRITERIA 1 + 2

About the Archdiocese of Brisbane

Our Organisational Structure

The Corporation of the Trustees of the Roman Catholic Archdiocese of Brisbane (referred to as the Archdiocese of Brisbane in this document), is an incorporated entity established by Letters Patent by *The Religious Educational and Charitable Institutions Act of 1861* and *The Religious Educational and Charitable Institutions Act of 1861 Amendment Act of 1895* in the State of Queensland on 25 July 1935.

The following are Agencies of the Archdiocese of Brisbane:

- The Archdiocesan Development Fund
- Brisbane Catholic Education
- Centacare, incorporating Centacare Administration Services, Catholic Early Edcare and Xavier Childrens' Support Network.

Offices of the Archdiocese includes:

- Archdiocesan Services
- Legal, Governance & Risk
- Financial Administrators Office
- Episcopal Office
- Evangelisation Brisbane

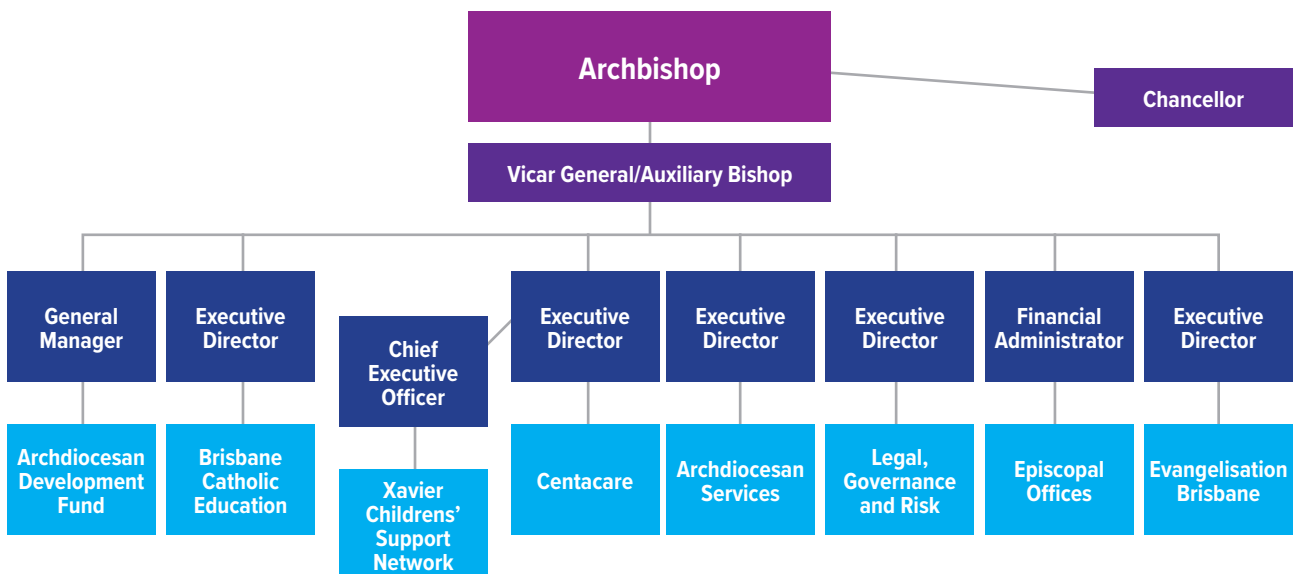


Chart 1 – Organisational Structure of the Archdiocese of Brisbane.



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 of Brisbane.

To assist in his role as Trustee of the Archdiocese of Brisbane, the Archbishop delegates certain responsibilities to the Executive Directors/General Managers of the Agencies. These delegations assist the Archbishop in discharging his canonical duties with respect to:

- Brisbane Catholic Education (BCE);
- Centacare;
- Catholic Early Edcare;
- Archdiocesan Development Fund (ADF);
- Xavier Childrens' Support Network;
- Archdiocesan Services;
- Evangelisation Brisbane; and
- Episcopal & Archdiocesan.

The Executive Directors'/General Manager's role is 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 meet regularly with the Archbishop on matters of operational significance such as modern slavery.

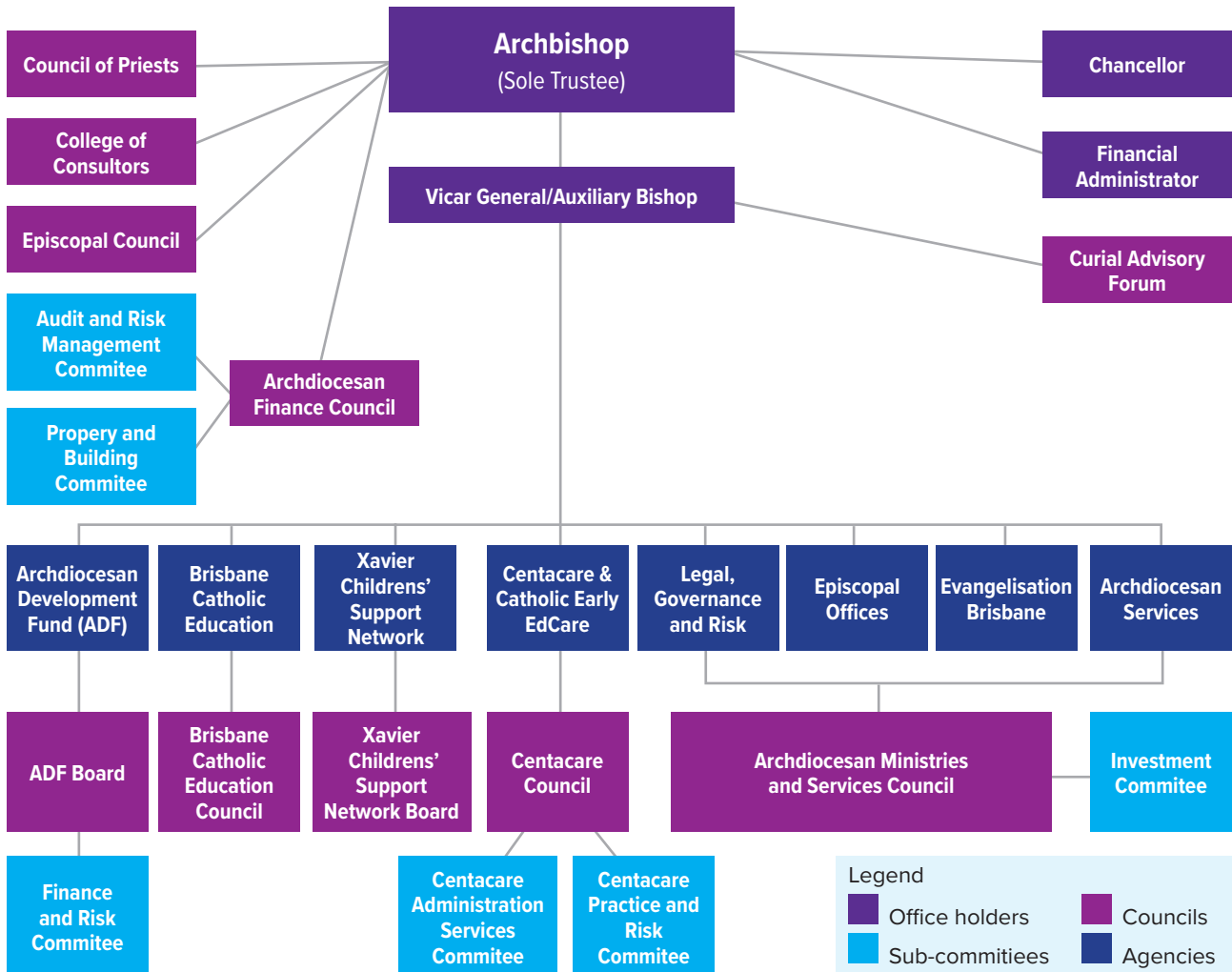


Chart 2 - Governance Structure of the Archdiocese.

Chart 2 above, highlights the governance structure of the Archdiocese of Brisbane. The Archdiocesan Finance Council (AFC) is the senior external advisory group for the Archdiocese of Brisbane and is mandated under Canon Law. This Council comprises experts from the judiciary, law firms and accounting practices who provide their services on a voluntary basis.

The Vicar General of the Archdiocese acts in the name of the Archbishop and with the executive power of the Archbishop in the administration of education, welfare, evangelisation, finance, administration and other works of the Archdiocese. Each agency is directed by an Executive Director, all of whom report to the Vicar General.

The Vicar General also meets regularly with the Executive Directors and the Financial Administrator in the Curial Advisory Forum. This Forum allows for consideration of Archdiocesan-wide strategies and issues including work, health and safety matters, and assists with facilitating collaboration between Agencies. The Archbishop attends these Forums when able to do so.



Religious Councils of the Archdiocese includes:

- Episcopal Council;
- College of Consultors; and
- Council of Priests.

The advisory councils/committees of the Archdiocese includes:

- The Archdiocesan Finance Council (AFC) supported by:
 - The Audit & Risk Management Committee;
 - The Property & Building Committee.
- Archdiocesan Development Fund (ADF) Board supported by;
 - Finance & Risk Committee.
- Brisbane Catholic Education Council (CEC);
- Xavier Childrens' Support Network Board;
- Centacare Council supported by;
 - Centacare Administration Services (CAS) Committee;
 - Centacare Practice & Risk Committee.
- Archdiocesan Ministries & Services Council (AM&SC) supported by;
 - Investment Committee.

The advisory councils are independently chaired with the Executive Directors attending the Archdiocesan Finance Council and their own agency Councils. Executive Directors do not have voting rights in the Archdiocesan Finance Council meetings. The Vicar General is a member of all Councils along with the Financial Administrator of the Archdiocese.

Note: At the request of the Archbishop of Brisbane, a review of the Archdiocese's Governance structure commenced in late 2020, with recommendations to be submitted to the Archbishop by mid-2021 for consideration.

Our Operations

The Catholic Archdiocese of Brisbane contributes to the wellbeing of 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, social services, justice and being there to walk alongside people at critical moments in their lives.

In doing so, we provide employment for more than 16,000 Queenslanders and make a significant contribution to the well-being of South East Queensland communities.



Parishes – There are 94 parishes and 240 mass centres providing the Mission of the Catholic Church to the faithful and the community. This includes religious services, marriages, funerals and support to the local communities that they serve.

Brisbane Catholic Education - In the Archdiocese of Brisbane, the Archbishop has responsibility for Catholic education, assisted by the Catholic Education Council, which makes recommendations about educational policies and priorities. The delivery of services, programs and resources in schools is the responsibility of Brisbane Catholic Education (BCE), led by the Executive Director.

Brisbane Catholic Education is a learning community of all involved in diocesan Catholic schools and the staff of the Brisbane Catholic Education Office. With over 144 schools, Brisbane Catholic Education provides quality teaching and learning outcomes for Prep to Year 12 students. (Refer Organisation Chart Appendix A).

BCE schools are shaping lives, nurturing individuals and encouraging each student to realise their full potential. Through its partnerships with parents, governments and the community, it is providing social responsibility, self-discipline and Christian values for all its students and nurtures and supports the community in their faith journey.

In compliance with the Australian Education Act, BCE utilises funding received from both the Federal and State Governments to provide quality learning outcomes for all students.



Illustration 1 – BCE Schools



Centacare – The Archbishop has responsibility for Centacare’s support services and is assisted by the Centacare Council, which makes recommendations about social service policy and priorities across aged care, disability support, relationship services, child care and pastoral care. The delivery of these services is the responsibility of the Executive Director of Centacare. (Refer Organisation Chart Appendix B).

For 60 years, Centacare has been providing support services to the people of South East Queensland. Whilst they are a Catholic agency, they provide these services to the entire community, regardless of religion, circumstance, ethnicity, economic situation, age, gender or ability.

Centacare services can be found in every corner of South East Queensland. With a team of more than 3,200 staff and volunteers, and operating from more than 200 locations, Centacare provides help and creates hope for tens of thousands of people each year.

With funding from both the Federal and Queensland governments, Centacare provides quality services to those in need including childcare, support services for the aged and people with a disability as well as relationship education, counselling and support.

Centacare Administration Services, including Catholic Early EdCare - In 2019 all of Centacare Child Care Services centres across South-East Queensland was re-branded as Catholic Early EdCare (CEEC). This service has been operating for over 14 years.

Across over 130 services CEEC works with families to watch their children grow from six weeks to high school aged. As a faith-based organisation CEEC recognises the value of diversity and welcomes all families within the community. CEEC works with Brisbane Catholic Education, local schools, and parishes to provide child care services, including long day care, kindergarten and outside school hours care to meet the needs of local communities. CEEC’s educators are committed to supporting children to grow socially, individually, respectfully, spiritually, creatively and confidently, through our play-based programs.

Archdiocesan Development Fund - The Archdiocesan Development Fund has been financing the Catholic Church’s mission for almost 50 years. The ADF operates within the Brisbane Archdiocese.

- The ADF has an exclusive focus on Catholic entities, which allows the ADF to develop a unique understanding of the needs of stakeholders, which creates strong long-lasting relationships, delivering effective and efficient solutions.
- The ADF services a range of Catholic entities including parishes, Religious Institutes, Archdiocesan agencies and other Catholic works approved by the Archbishop. This incorporates initiatives across many ministries including education, aged care, healthcare, welfare, childcare and pastoral programmes.
- All activities are undertaken within the framework of the ADF Governance Policies, the ADF Operating Policies and ADF Risk Management processes.



Archdiocesan Services - Archdiocesan Services provides services to parishes and agencies of the Archdiocese in a range of financial and administrative activities, including:

- Information, communication and technology
- Accounting services
- Communications and engagement
- Property and building services management
- HR Management, employment and industrial relations
- Government relations.

Evangelisation Brisbane - Evangelisation Brisbane provides support to parishes and deaneries for faith formation and mission development.

‘The Church which “goes forth” is a community of missionary disciples who take the first step, who are involved and supportive, who bear fruit and rejoice.’ (Evangeli Gaudium, The Joy of the Gospel, Pope Francis, Apostolic Exhortation on the Proclamation of the Gospel in Today’s World, #24).

By being flexible and responsive, Evangelisation Brisbane is able to provide support to parishes and deaneries for mission, evangelisation and formation by:

- identifying the areas of need
- developing appropriate strategies
- engaging actively in their implementation

To do this Evangelisation Brisbane builds effective relationships and partnerships both within and outside the Archdiocese of Brisbane.

Episcopal Offices – These include the offices of the Archbishop, Auxiliary Bishop as well as:

- The Clergy Office
- Legal Governance & Risk
 - Office for Safeguarding Services
 - Workplace Health & Safety
 - Archdiocesan Archives.

The Archdiocese of Brisbane operates within the state of Queensland and has no offices in any other countries.



Our Agencies

A summary of key information for each of these agencies and offices is provided below:

Archdiocese of Brisbane



ARCHDIOCESAN
DEVELOPMENT
FUND

ABN 25 328 758 007



22
Employees



1,434
members

including Archdiocesan, Parishes, Public Juridic Persons (PJP's) and other Catholic entities and individuals

Income

In 2020 the ADF generated \$49m through the provision of internal church treasury services to catholic entities. Loan income was \$38m and investment income \$11m.



**Brisbane
Catholic
Education**

teaching • challenging • transforming

ABN 49 991 006 857



11,668
Employees
(8,060 FTE's)



6,944
Teachers
(5,286 FTE's)



74,579
students

144 Schools, comprising:
107 Primary Schools
26 Secondary Schools
11 Prep-12 Schools
7 Offices

12.4% of students in the Archdiocese of Brisbane attend a Brisbane Catholic Education school

60.5% of students identify as Catholic

9.7% of students have a language background other than English

2.8% of students identify as Aboriginal or Torres Strait Islander

15.4% of students have a disability*

33 different religious faiths amongst students

Income

In 2020 Brisbane Catholic Education received an income of \$1,181.9 million of which \$925.8 million was recurrent funding.

The main source of this income was Australian and Queensland Government grants for the provision of educational services.

\$925.8m Australian & State Government grants

\$230.3m School fees & levies

\$25.8m Other Income



ABN 35 020 644 975



1,977
Employees



515
Volunteers



86
sites

9,219

community care assistance to older Queenslanders

17,720

people affected by domestic and Family violence provided early intervention and crisis response services

1,624

clients with a disability now have a NDIS plan

14,885

care and disability clients received home maintenance support to help maintain independence

2,519

people living with or at risk of mental illness received a range of support services

2,689,837

hours of support was provided to disability and aged care clients

3,250

Indigenous Queenslanders were supported through healing, education and advocacy across schools, parishes, and remote communities.

Income

To 30 June 2020, Centacare received income of \$237.4 million of which \$76.2 million was from government funding of Aged Care, Family and Relationship Services and Job Keeper payments. In addition there was \$148.9 million from fee income from providing community services (NDIS, Aged Care co-payment and home care service) and childcare fees.

\$76.2m Government funding

\$148.9m Fee Income

\$12.3m Other Income



Catholic Early EdCare

WATCH THEM GROW

ABN 35 020 644 975



1,302
Employees
609
FTE Positions



128
long day care,
kindergartens
and outside
school hours
care services



25,806
children



Archdiocesan Services

ABN 25 328 758 007



130
Employees

130 Employees providing Shared Services across:

- Finance & Accounting
- Parish Finance Services
- People & Culture
- Organisation Development & Training
- Information Communications & Technology
- Procurement
- Planning & Building, Property & Facilities
- Nudgee Cemetery
- Work Health & Safety (Parishes)
- Government Relations
- Communications & Engagement
 - Archdiocesan Communications Office
 - Catholic Foundation
 - Marketing & Engagement
 - The Catholic Leader

Evangelisation Brisbane

ABN 25 328 758 007



36
Employees

36 Employees providing services to:

- Children & Families
- Youth & Young Adults
- Adult Formation
- Inclusion
- Parish Leadership
- Santa Teresa Spirituality Centre
- Vocations Office



Episcopal Offices

ABN 25 328 758 007



47

Employees

47 Employees providing services to:

- Clergy Office
- Episcopal Office
- Legal, Governance & Risk
- Office for Safeguarding Services
- Workplace Health & Safety

Parishes of the Archdiocese

ABN 25 328 758 007



94

Parishes
(including 17 Religious Order Parishes)
with 86 Priests and Administrators



27

Priests in the Overseas Priests Program



361

Parish employees

240 Mass Centres

10,000+ Volunteers

708,466 Catholics in the Archdiocese

57,539 Regular mass attendance

Archdiocesan Operations

Income

In 2020 Archdiocesan Operations (which includes Archdiocesan Services, Evangelisation Brisbane and the Episcopal Offices) received revenues of \$28.3m. This was represented by an internal distribution of \$15m from the ADF, \$9.7 received in Job Keeper payments and other income of \$3.6m.



Our People

The Archdiocese of Brisbane 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 who will engage in direct and regular involvement with children, young people and/or vulnerable adults.

The People and Culture departments of the Archdiocese and Brisbane Catholic Education established a Workplace Equality, Diversity Group (WEDG) who consult with employees on issues concerning gender equality in the workplace. The group meets on a regular basis to identify and discuss workplace issues and undertake activities to address them.

The Executive Directors provide annual certifications that they comply with all legal requirements in the employment of staff and their obligations under Australian employment legislation.

The Stopleveline whistle-blower service was established in 2015 and provides staff, volunteers, and the community with an effective mechanism to identify and escalate concerns including those regarding modern slavery. The Archdiocesan agencies and offices will continue to build human rights awareness and knowledge among staff and volunteers and encourage them to voice their concerns without fear of retribution and with full confidentiality, if required.



Our Supply Chain

The Archdiocese of Brisbane and its agencies currently has a de-centralised procurement model, with the exception of fleet procurement which is undertaken by Archdiocesan Services and Brisbane Catholic Education Office. The Archdiocese has identified approximately 15,000 suppliers engaged throughout the reporting period with some duplication within our decentralised model.

There is no centralised contracts system in place, and contracts can be of short- and medium-term durations with responsibility resting at different levels of the organisation, including:

- Archdiocesan offices;
- Schools;
- Parishes; and
- Service centres.

Complex, higher value contracts are managed within the key offices of the agencies of the Archdiocese of Brisbane (i.e. construction, design, consulting, internet and electricity).

Our key suppliers have been identified in our top 80% of spend, and all purchases are undertaken with Australian representatives domiciled in Australia. A further investigation of vendors will commence in 2021 to identify the geographical sourcing of materials.

To date, a brief analysis of the source of materials on a small number of items has been conducted. The recruitment of procurement managers for BCE and the Episcopal Office in 2021 will focus on vendor engagement concerning material acquisitions in 2021 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 is a high degree of independence within schools, parishes and services to work with local suppliers, which provides support and employment to local communities.

The Archdiocese implemented an external Whistleblower program with Stopleveline in 2015, which is used to receive any disclosures by staff, clients, suppliers and the community including in relation to any modern slavery issues identified. If service contracts were centralised, there is a risk that these providers may sub-contract work out at lower rates, potentially creating modern slavery issues.

Based on the nature of the spend within the Archdiocese, four sectors have been identified as high risk and will be the focus for 2021. These are ICT, building and construction, cleaning and security. Additional sectors will be added as further risk assessments are undertaken.



CRITERIA 3

Modern slavery risks in operations and supply chain

Our operations

The Archdiocese of Brisbane has undertaken a number of steps to identify Modern Slavery risks in its operations.

From an internal perspective, the Archdiocese 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. Archdiocesan offices and agencies address human rights issues in our operations under the various Codes of Conduct, Equal Opportunity Policies and Inclusion Policies.

Other human rights issues that can arise within 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 identified modern slavery risk for the Archdiocese is tier one suppliers not complying with Archdiocesan 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 three factors, including:

Outsourcing – there is an increased risk of unfair working conditions for people when Archdiocesan suppliers outsource activities, and we no longer have a clear line of sight over who is supplying 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	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



Country of sourcing – certain risks have been identified in certain countries

The Archdiocesan offices and agencies understand that direct relationships with tier one suppliers will help in managing these risks and will be focusing on developing these relationships over the coming years. The Archdiocese acknowledges there may be a heightened risk of modern slavery among tier two and three suppliers and others further down the supply chain, where our offices and agencies do not have direct relationships and therefore no visibility of employment practices.

To consider our external operations, the Modern Slavery Working Group (MSWG) extracted data from the various accounting systems across its agencies and undertook an analysis of the top 100 vendors/suppliers by consolidated expenditure. The vendors/suppliers were then categorised into sectors and allocated a risk level by category.

Once categorised and an initial risk assessment applied, each member of the MSWG was tasked with identifying the product or services provided and re-assessing them based on specific vendor/supplier information sourced from their websites and the area within the organisation which is acquiring the goods or services.

The following charts reflect the bulk of the expenditure by category across the agencies and offices of the Archdiocese of Brisbane.

In 2019, an external consultant, SD Strategies, was engaged to undertake an analysis of the top 100 consolidated spend by the Archdiocese and its agencies. The result of the analysis identified the

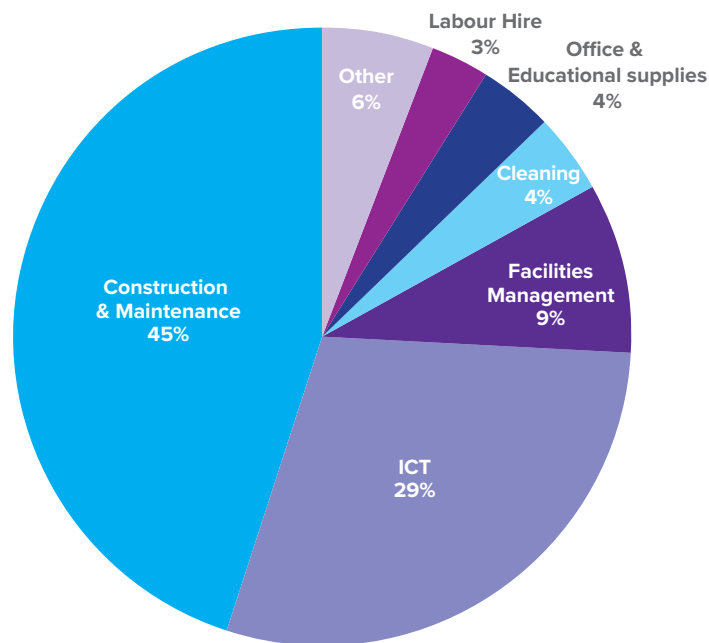


Chart 3 – SD Strategies high risk sector analysis of Archdiocese of Brisbane spend.



risk profile by category/sector on identified key risk sectors within Australia.

In 2020, further analysis of the consolidated spend across all categories of the Archdiocese (excluding parishes) identified that building and construction, information and communications technology, facilities management and cleaning are key risks within the Archdiocese’s supply chain. (Refer Chart 4 below). (Refer Appendix C for agency charts).

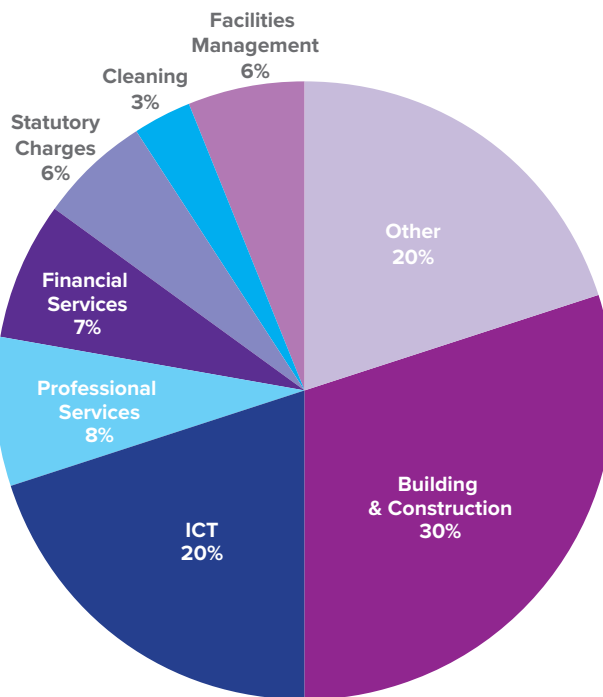


Chart 4 – 2020 Consolidated spend profile of the Archdiocese of Brisbane (excluding parishes).

The Archdiocese has 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 Archdiocese of Brisbane or its agencies are:

- Building & Construction
- Information & Communications Technology (ICT)
- Professional Services
- Facilities Management
- Financial Services
- Cleaning Services
- Labour Hire
- Furniture
- Software Development
- Office Stationary & Supplies
- Educational Materials
- Uniforms
- Security Services
- Printing Services
- Events & Entertainment
- Waste Management
- Fleet Management



Our COVID-19 Response

The disruption caused by COVID-19 presents emerging human rights risks, including increased risks to worker health and safety and modern slavery in key sourcing countries.

For example, BCE was able to keep all 144 schools operating throughout the pandemic, regardless of the number of students attending to ensure that essential workers and vulnerable families could maintain their employment obligations. The impact of this, and the introduction of alternative learning programs, was that BCE experienced increased IT-related costs which potentially impacted those countries using forced labour, etc. to create technology-related componentry.

With agency and office staff working remotely, there was a collaborative effort to ensure all staff were able to work safely in their home environments and regular check-ins were mandated across all agency and office management teams. Staff wellbeing was at the forefront of all decisions relating to working arrangements, and sick leave accruals were increased where necessary to ensure staff were able to be paid if leave was required.

For those staff who were required to attend an Archdiocesan office, additional cleaning services were engaged which in turn placed pressure on these suppliers to ensure they had staff available to fulfil the additional service requirements. Having a direct relationship with these suppliers provided assurances that their staff were being appropriately engaged.

Safeguarding staff, students, clients and the community throughout the crisis has been a key responsibility of the Archdiocese.

Modern Slavery Gap Analysis

As a member of ACAN, the Archdiocese of Brisbane benchmarked its modern slavery journey using a tool developed by SD Strategies called “Bridge the Gap”. The table below measures the journey from July 2019 to December 2020. Although changes are small, they have been moving forward. It was during this process that the need to establish procurement policies and procedures, and hence a procurement function was identified. The establishment of procurement functions was approved in 2020 and will be established in 2021 to minimise the risks of modern slavery in our supply chains and to implement ongoing modern slavery management tools and reporting.

The objective is to reduce the number of high-risk categories below from 11 to less than five.



Bridge the Gap Assessments – Archdiocese of Brisbane

CATEGORY	TOPIC	RESULT 2019	RESULT 2020	CHANGE
Management Systems	Governance	Orange	Red	Downward arrow
	Commitment	Orange	Orange	
	Business Systems	Red	Orange	Upward arrow
	Action	Orange	Orange	
	Monitor/Report	Red	Orange	Upward arrow
Risk Management	Risk Framework	Red	Orange	Upward arrow
	Operational Risk	Orange	Orange	
	Identifying External Risks	Orange	Orange	
	Monitoring & Reporting Risks	Red	Red	
Procurement & Supply Chain	Policy and Procedures	Red	Orange	Upward arrow
	Contract Management	Red	Orange	Upward arrow
	Screening and Traceability	Red	Orange	Upward arrow
	Supplier Engagement	Red	Red	
	Monitoring & Corrective Action	Red	Red	
Human Resources & Recruitment	Awareness	Red	Red	
	Policies & Systems	Red	Red	
	Training	Red	Red	
	Labour Hire/Outsourcing	Red	Red	
Customers & Stakeholders	Customer Attitude	Orange	Red	Downward arrow
	Information Provision	Red	Red	
	Feedback Mechanisms	Red	Red	
	Worker Voice	Red	Orange	Upward arrow



Supply Chain Risks

The areas of risk identified above have been assessed against percentage of annual spend and respective modern slavery potential risk exposure. The category risk taxonomy has been specifically developed for ACAN-based entities based on analysis of participating entity supplier datasets. It includes 22 high level procurement categories identified across various sectors involved in the ACAN network (education, aged care, health care, social services, finance and investment, and Catholic dioceses). The information included in the table below has assisted the Archdiocese of Brisbane to assess potential risk so it can prioritise engagement activities with suppliers.

Risk taxonomy of the Archdiocese

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	30%
Cleaning services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	3%
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	6%
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies.	HIGH	7%



CATEGORY	SPEND DESCRIPTION	RISK	% OF EXPENDITURE
ICT Hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime.</p> <p>Software and application development, support services, call centres (offshore).</p>	HIGH	20%
Uniforms and PPE	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc).	HIGH	1%
Professional services	Other	LOW	8%
Government and agency fees	Other	LOW	6%
Other	Additional analysis required to be undertaken	Unknown	19%



CRITERIA 4

Actions taken to assess and address risk

Throughout the reporting period, the Archdiocese has undertaken an extensive review of its decentralised supply chain to address the modern slavery risks in its operations. Membership and active participation with ACAN and attending the ACAN conference, monthly webinars and e-Learn assessments has assisted the Archdiocese in assessing its operations and initiating 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 organisation. This is undertaken where the MSLO assists in promoting closer collaboration across the Catholic sector and meets monthly with the ACAN Anti-Slavery Taskforce Executive to discuss implementation of the risk management program. The Archdiocese has recognised the importance of the role of the dedicated MSLO to lead the anti-slavery program to minimise and where possible remove the risk from its extensive decentralised supply chain network.
- II. **The establishment of a Modern Slavery Working Group (MSWG):** Through the MSLO, the Archdiocese established the MSWG consisting of key members across the Archdiocese and its agencies in areas of risk, legal, childcare, social services, procurement, education and ICT. 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.

The MSLO and MSWG were the key drivers throughout the reporting period in ensuring that material steps have been undertaken in complying with the Modern Slavery legislation.

- III. **Modern Slavery Policy and Modern Slavery Guidelines:** ACAN membership enabled the production of various tools to support Catholic entities in delivering a modern slavery framework. A draft policy template was made available in mid-2020. The template was then changed substantially to produce a draft Policy which was circulated with a Guidelines document for comment and endorsement. These draft documents were endorsed by all the Agencies of the Archdiocese and subsequently approved in January 2021.



IV. **Training:** ACAN delivered a number of e-Learn training modules in 2020. The ACAN modules have been made available to the Archdiocese's and Brisbane Catholic Education's e-Learn systems for distribution. The following courses have been or will be implemented shortly:

- MS101 – Introduction to Modern Slavery (156 staff completed this training in 2020)
- Business Relevance
- Slavery & Business
- Staff Action
- Supplier Action
- Remedy Pathways

V. **Electricity Contract:** In 2020, the Archdiocese undertook a rigorous and competitive tender process to provide 100% carbon neutral electricity to both large and small assets of the Archdiocese, Centacare and Brisbane Catholic Education. Appropriate modern slavery clauses were included in contracts which are for a period of three years.



Modern slavery action plan and road map

In 2021, the Archdiocese and its agencies will be implementing Supplier Engagement Action Plans with a focus on centralising key procurement functions where our suppliers are identified as high-risk. A robust supplier engagement plan will be the cornerstone to mitigating modern slavery risk and to eliminate modern slavery from our supply chains. This will be supported by our education and awareness program to all our offices and staff who directly engage suppliers for many goods and services.

Modern Slavery Action Plan 2021

ACTION CATEGORY	ACTIONS FOR IMPLEMENTATION
1. Business & Management Systems	I. Establish KPI's for the modern slavery action plan and ways to monitor compliance II. Communicate action plan to the executive III. Expand the MSWG.
2. Risk Management	I. Include modern slavery into corporate risk framework II. Review procurement processes and expectations on suppliers that may increase modern risk exposure III. Develop tools to effectively report and identify actions taken to minimise modern slavery risk
3. Procurement & Supply Chain	I. Establish a procurement framework within Brisbane Catholic Education to reflect legislative requirements and support the engagement of 'pre-qualified' suppliers II. Promote approach to modern slavery internally III. Develop a supplier engagement strategy that includes a code of conduct IV. Ensure all contracts contain appropriate modern slavery clauses V. Map Tier 1 suppliers across all agencies
4. Human Resources & Recruitment	I. Develop a modern slavery communications strategy II. Implement a phased training program for key procurement and support staff
5. Customers & Stakeholders	I. Engage key stakeholders on our modern slavery expectations II. Implement supplier/vendor questionnaires as required III. Implement supplier code of conduct and communicate to suppliers



Domus 8.7

The Archdiocese of Brisbane is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if the Archdiocese of Brisbane 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 Archdiocese of Brisbane, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. The Archdiocese of Brisbane'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 Archdiocese of Brisbane can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our 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 teaches us something about where the risks were not adequately managed, and serve as a feedback mechanism.
- Remediation is NOT only about having a whistle blower policy - it is about righting the wrongs/harm to people.
- Partnership with Domus 8.7 is NOT about outsourcing responsibility – it is about improving the ability to respond.

Where the Archdiocese of Brisbane is directly linked to modern slavery by a business relationship the Archdiocese of Brisbane is 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 the Archdiocese of Brisbane to ensure victim centred remediation processes are implemented to the satisfaction of the Archdiocese of Brisbane.

The Archdiocese of Brisbane 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 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.

The Archdiocese of Brisbane 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 at www.acan.org.au/domus87



Chart 5 - Modern slavery reporting process



CRITERIA 5

Effectiveness Assessment

In 2019 and again in 2020 the Archdiocese completed the “Bridge the Gap” assessments supplied by SD Strategies through our ACAN membership. These assessments gave us the foundations for addressing modern slavery in our supply chain and confirmed the need for the Archdiocese to address these critical components in our procurement framework.

Although only modest improvements have been made to date, they form a key component of our action plan for 2021 and beyond. The target for 2021 is to make improvements over the majority of indicators.

The current review of the Archdiocese’s Governance framework will establish additional mechanisms in 2021 and 2022. These will include:

- Inclusion of modern slavery assessments in annual certifications by Executive Directors;
- Annual reporting to the Archdiocesan Finance Council to include updates on modern slavery;
- Alignment of assurance functions across all Archdiocesan agencies.



CRITERIA 6

Process of consultation with entities owned or controlled

The Archdiocese of Brisbane established a Modern Slavery Working Group in 2020 with representatives from each of the agencies. The Modern Slavery Working Group met fortnightly to discuss the seven criteria set out in the legislation, and how the Archdiocese could implement policies and procedures in order to meet the Modern Slavery Statement reporting requirements. This included:

- Preparation of a draft policy and guidelines;
- Analysis of vendor/supplier spends across all agencies;
- Agreement on contract clauses for major and minor contracts;
- Implementation of the ACAN e-Learn modules;
- Project planning for modern slavery reporting.



Appendices



Appendix A

Catholic Education Council

Archbishop

Archbishop

Archbishop

College of Consultors

Archdiocesan Finance Council

Executive Director

Head of Catholic Identity

Legal Counsel

Strategy & Performance Executive

Learning Services Executive

Corporate Services Executive

Head of Strategy & Sustainability

Head of System Performance & Improvement

Head of School Progress and Performance

Head of Information Technology Services

Head of Learning & Teaching Services

Head of People & Culture

Chief Financial Officer

Head of Financial Sustainability - Schools

Assurance

Strategy

Business Intelligence & Performance

Program Management Office

School Improvement

Senior Leaders - School Progress & Performance

Information Technology Services

Learning & Pedagogy

Inclusive Education & Student Wellbeing

Religious Education

School Delivery

Employee Relations

Health & Safety

Organisational Development

Recruitment Services

Payroll Administrative Services

Professional Standards & Student Protection

Financial Services

Assets & Infrastructure

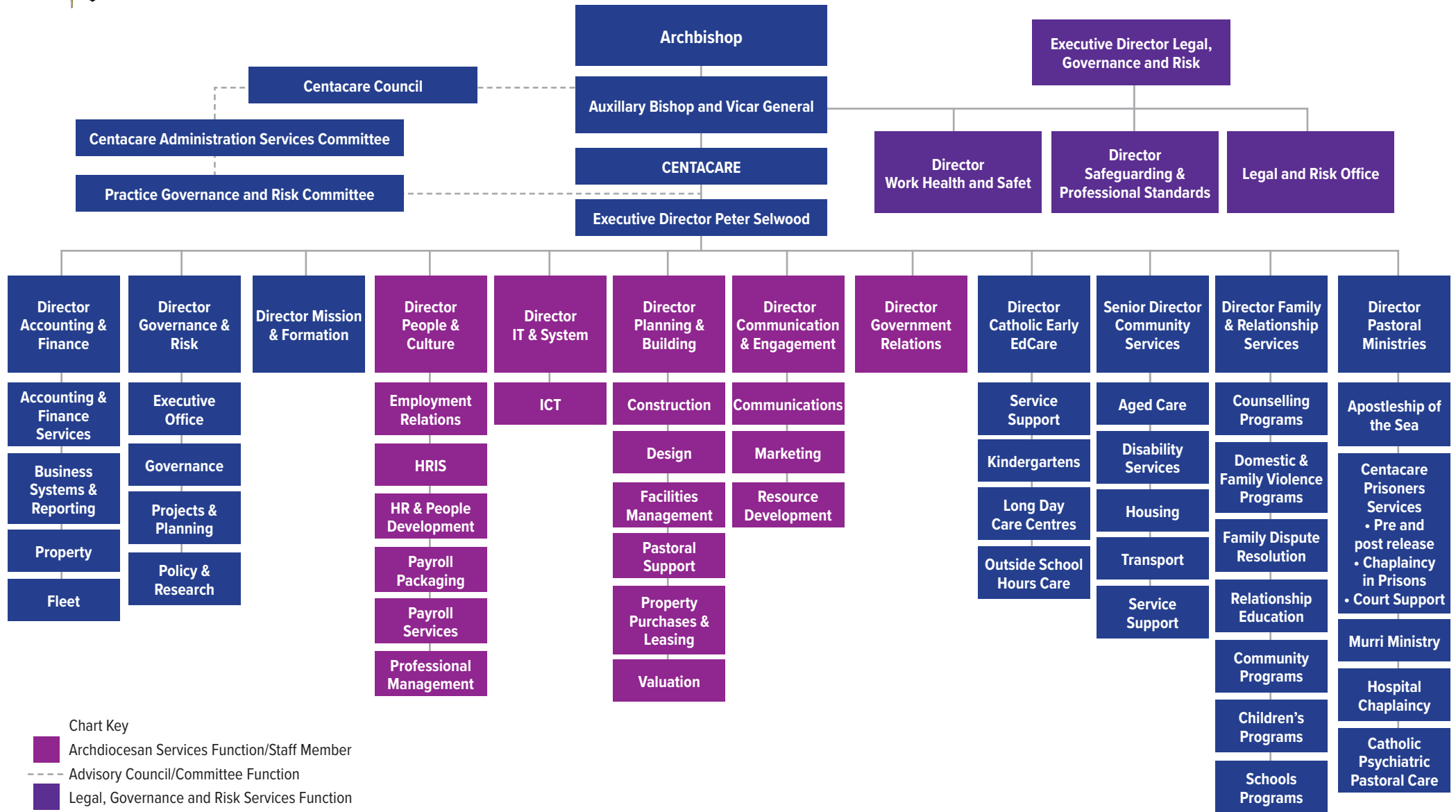
Senior Executive Officer - Corporate

Office Services

— Executive Team
— Leadership Team



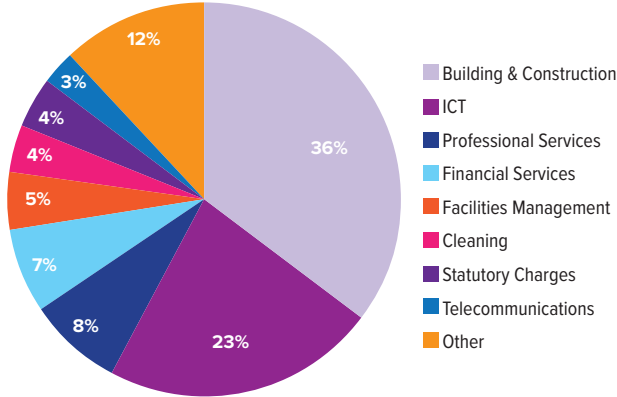
Appendix B – Centacare Structure



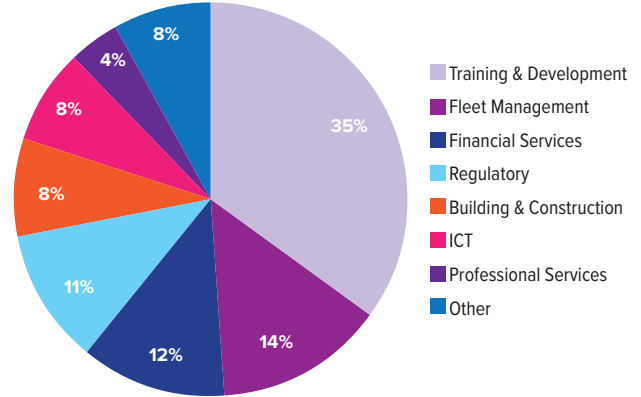


Appendix C – Agency Spend Categories 2020

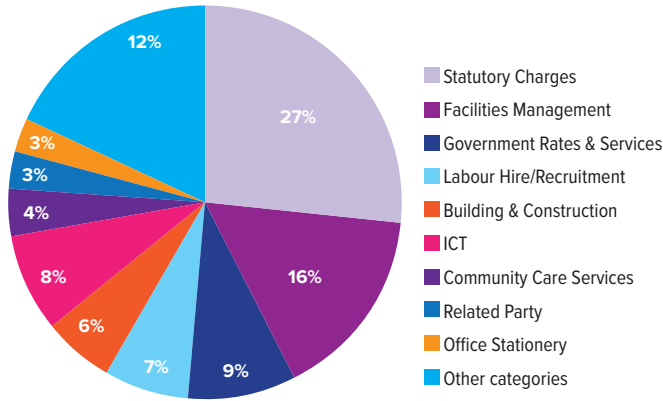
Brisbane Catholic Education



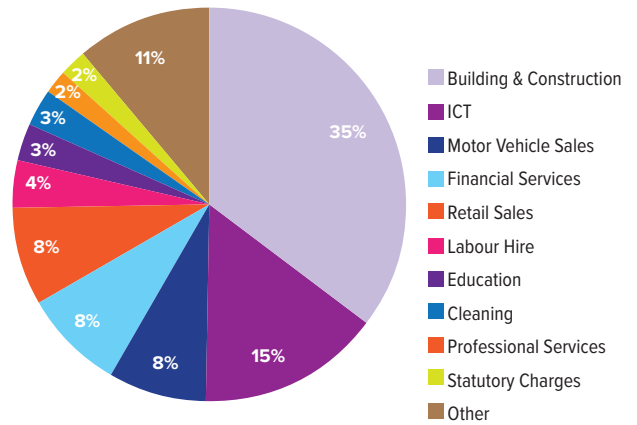
Archdiocesan Services



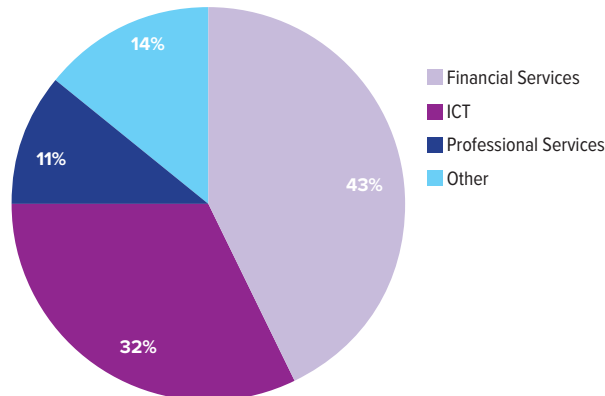
Centacare



Centacare Administration Services



Archdiocesan Development Fund





ARCHDIOCESE
OF BRISBANE

Modern Slavery Statement

2020



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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.

Cover: Calvary Mater Newcastle.

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 six states and territories in Australia with 14 public and private hospitals, 17 Retirement and Aged Care facilities, and a national network of Community Care centres.

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

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

Our Vision and Values

As a Catholic Health, 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



Calvary Adelaide Hospital, South Australia.

2020 Modern Slavery Risk Management Initiatives

Calvary has continued to build on the road map started in prior years to address the risk of slavery in our supply chain. In the 2020 reporting period we have:

- Implemented compulsory training for our procurement staff on Modern Slavery
- Continued to educate our suppliers on our expectations around modern slavery risk management
- Met with our top tier suppliers to communicate and enforce our requirements for modern slavery risk management in our operations and supply chain
- Provided information to all Calvary suppliers of our Modern Slavery Policies
- Strengthened our documentation, policies and risk framework, requiring contracted suppliers adhere to Calvary's ethical sourcing policies and business partner's criteria
- Documented a deeper understanding of our supply chain modern slavery risk profile, including heat mapping of the risks within our supply chain
- Conducted 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 2021

In 2021, we plan to build on the risk management initiatives we have implemented in 2020 by:

- Continuation of our long term road map, to strengthen our risk management of our supply chains
- Build on our Supplier Relationship Management program, to gain a better understanding of our supplier's approach towards managing the risk of modern slavery in our combined supply chain
- 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
- Continuously review the effectiveness of our actions in addressing the risk of modern slavery
- Undergo a second Gap Analysis to determine the effectiveness of the actions taken during the reporting period.

Our Plans Beyond 2021

Beyond 2021, we 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.



Calvary Adelaide Hospital during construction.



Martin Bowles AO PSM, National Chief Executive Officer.

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

In 2020, Calvary celebrated 135 years of providing quality, compassionate health care to the most vulnerable, including those reaching the end of their life. It was a year like no other in recent memory, where businesses, governments and entire populations came together to address a rapidly evolving health crisis. In Australia, and other countries, such as New Zealand, we have continued to demonstrate that by uniting our efforts, we have a much greater ability to address the significant global challenges of our time.

At the end of 2020, perhaps more so than in other years, I am reminded of the Venerable Mary Potter, who, in 1877, founded the Sisters of the Little Company of Mary and began working with women, children and men in Hyson Green, Nottingham, UK. Many of these folk struggled because of poor working conditions, servitude and lack of health care. I am reminded of the six courageous Sisters of the Little Company of Mary, who sailed from Naples to Sydney on the SS Liguria, arriving on 4 November 1885. The very day after they arrived in Australia they began to provide care to the sick, the vulnerable, and to those who were dying.

The work we do today is the same. Our mission extends beyond our direct patients, clients, and residents. It extends to our staff, volunteers, suppliers, contractors, and anyone who provides material support to our business. Calvary maintains a zero tolerance policy to modern slavery in our supply chain and operations, yet enforcing this comes with very significant challenges. Victims of modern slavery exist within complex

supply chains, extending across national borders. They are concealed, hidden in the materials which may be moving through our hospitals, and our facilities.

Achievements this year are detailed in this report, which include the introduction of mandatory training for our procurement staff, raising awareness with our suppliers, and significantly increasing collaboration with other Catholic entities, such as through ACAN and the Catholic Negotiation Alliance.

We have much work left to do, but as we unite our efforts across industries and government, we have a far greater chance of eliminating this atrocity within our lifetimes.

This Modern Slavery Statement has been approved and endorsed by Little Company of Mary Health Care Ltd on 25 March 2021.

Handwritten signature of Jim Birch AM in black ink.

Jim Birch AM
Chair, LCMHC

Handwritten signature of Martin Bowles AO PSM in black ink.

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.

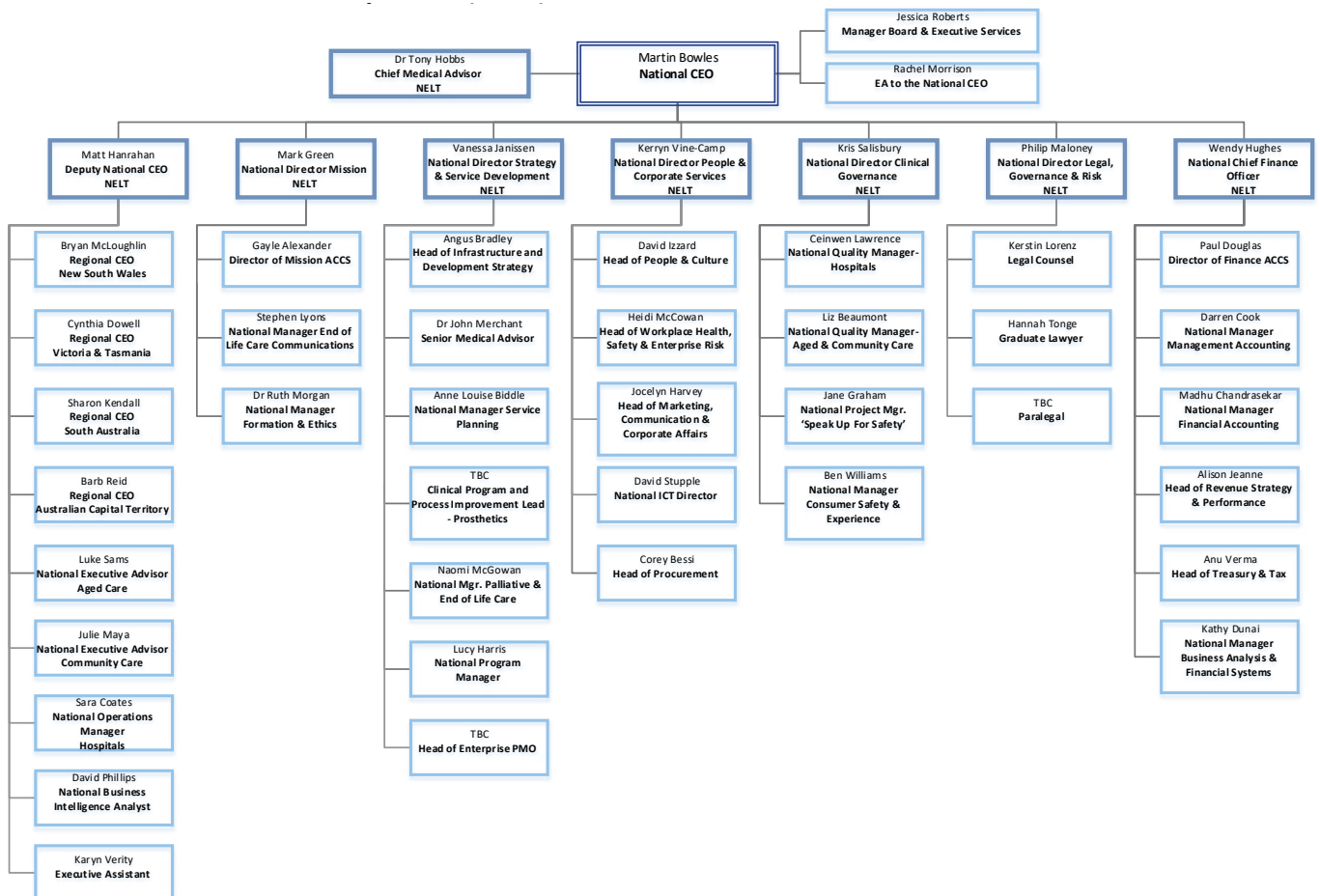
Calvary's Board of Directors is chaired by Mr Jim Birch AM. Calvary Ministries exercises a stewardship role over the health, aged and community care programs and services conducted by LCMHC and its subsidiaries, to improve the health and well-being of the communities they serve. Details of Calvary Ministries and our Board of Directors can be found in our Annual Report 2020.

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, Retirement Communities and Community Care services as controlled entities.

Jim Birch AM at the Calvary Adelaide Hospital Opening Service.

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. Calvary's modern slavery initiatives are 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 teams ensure 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.

Our Operations

Calvary operates 14 Public and Private Hospitals, 17 Retirement and Aged Care Facilities and a national network of 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 12 thousand employees, in FY 20 Calvary delivered care to over 550,000 hospital outpatients, conducted 118,000 surgical procedures, provided home care services to over 9000 Community Care clients and residential aged care services to more than 1000 residents. In 2020, revenue from our operations was \$1,385,102,000.

Calvary has four public and ten private hospitals that provide acute and sub-acute care. Our hospitals cover broad geographical regions in TAS, SA, NSW, VIC, and ACT. Calvary Community Care has been supporting people in their own homes and communities for over twenty years in TAS, SA, NT, NSW, VIC, 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 Retirement Communities provides quality care and services within a supportive environment in which residents are respected for their individuality. Calvary Retirement Communities has 14 residential care facilities and three stand-alone independent living villages across NSW, SA and the ACT.

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 delivery of the organisational restructure to move to a fully regionalised model. This move was implemented in May 2020, combining operational structures across hospitals, aged and community care to support a more integrated regionally coordinated Calvary care system across all services. This will enable us to deliver seamless, safe and quality care, tailored to individual and community needs.

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 2020 reporting period Calvary engaged with a total of 4,701 suppliers.

We procure goods and services in the following primary spend categories:

Calvary's expenditure on externally sourced goods and services in 2020 was \$630 million dollars, which is managed and administered under 120 core 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.

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



Ashleigh Shoults, Registered Nurse, Emergency Department at Calvary Mater Newcastle, New South Wales.

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 2020 and in prior years have been focused on fostering a transparent and collaborative relationship between ourselves 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.

Calvary is a member 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.

The 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 are contained in this report.

Operational Risks

Our COVID-19 Response

This year, Calvary has been challenged in new and unprecedented ways. 2020 will be remembered as the year of the COVID-19 pandemic and the cause of the most serious public health emergency in Australia since the Spanish Flu.

Like many other organisations, we experienced significant supply chain disruptions with our contracted and uncontracted suppliers alike, and their ability to fulfil our requirements for Personal Protective Equipment (PPE) and other clinical products. This required us to look beyond our normal supply lines and establish relationships with alternative suppliers operating in high risk product categories.

Calvary's early work on managing modern slavery risks was able to be rapidly deployed and integrated within our COVID-19 pandemic management response. This included processes for review and approval of new suppliers and the products being introduced to protect Calvary staff, patients and residents. New suppliers were required to submit information on their manufacturers, including source countries, raw materials, and proof that they met appropriate standards.

In line with our governance framework and risk management procedures, and in following the advice of the Australian Border Force for "entities to consider how the impacts of COVID-19 may increase the vulnerability of workers in their global operations and supply chains to modern slavery..." we conducted additional due diligence on our highest use suppliers' ethical sourcing policies and risk management frameworks.

As a result, we have built a large resource of supply chain information, giving us greater transparency into the PPE manufacturing process. This has been extremely valuable in identifying and managing risk within these categories, as the case study below suggests.

Case Study

Calvary had a potential short fall in the provision of critical PPE due to supply chain interruptions. A new supplier ("Supplier"), was identified as a potential source of critical PPE and able to meet some of the short fall in single use face masks.

Leveraging existing modern slavery management practices and integrating with our COVID-19 pandemic management response the organisation was able to rapidly:

- obtain relevant product documentation including source country and manufacturer
- review and validate product testing and certification
- perform physical checks and fit for purpose testing of the goods
- confirm compliance with relevant standards and product registrations
- quality check Supplier's ethical sourcing policies
- access and review the manufacturer's modern slavery policies
- validate the relevant certificates of insurance.

Given the extenuating circumstances Calvary adopted an agile approach to balancing continuity of supply whilst meeting its obligations whereby

- the Supplier agreed to, and secured approval from their manufacturer, to an audit of their manufacturer's operations
- that they would engage an independent third party auditing organisation to conduct the audit on their manufacturer and
- that the results would be made available to Calvary.

This commitment, along with the desktop review, allowed Calvary to proceed with the contracting of the supply of critical PPE whilst remaining confident that Supplier and their manufacture were able to meet their obligations under Modern Slavery.

The results of the third party audit were made available to Calvary during the 2021 reporting period, which confirmed that there were no instances of modern slavery at the manufacturing facility.



Judith Aiston, Registered Nurse at Calvary Wakefield Surgicentre.

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.

As of February 2021, Calvary have 12,718 employees. Of our staff, 10,186 are female, making up approximately 80% 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 insight into areas of improvement which we have since sought to rectify.

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; as outlined below.

Calvary intends to repeat the gap analysis in FY22 to determine the effectiveness of our actions and implement any learning into our future work.

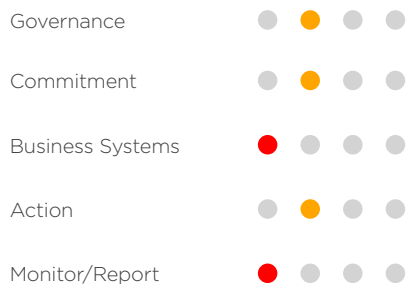


Kerry Bates, Registered Nurse, Calvary Mater Newcastle.

Heat Map

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

Management Systems



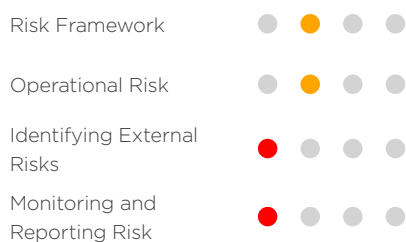
Human Resources and Recruitment



Procurement and Supply Chain



Risk Management



Customers and Stakeholders



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 was 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

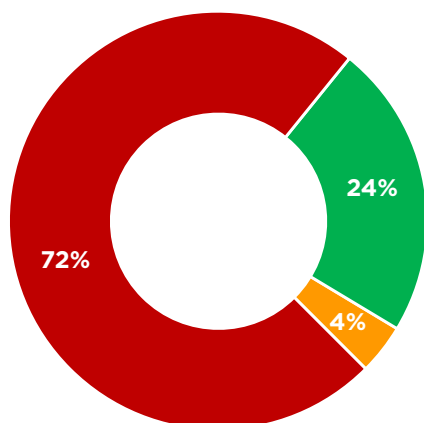
- Medical Supplies
- Waste Management

Although our focus during this reporting period was our high spend and high risk suppliers, our 2021 plan and beyond will examine a broader cross section of suppliers utilising this same risk analysis framework. We recognise that modern slavery risks exist across the supply chain irrespective of the type of spend category or the value of spend with that supplier.

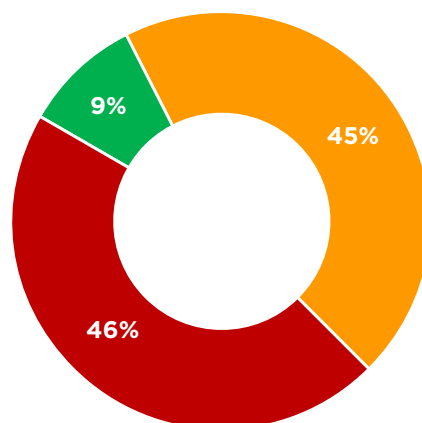


Number of Suppliers	High Risk Suppliers	Spend Categories	High Risk Categories	Total Spend	High Risk Spend
50	36	11	5	\$268,380,362	\$194,497,922

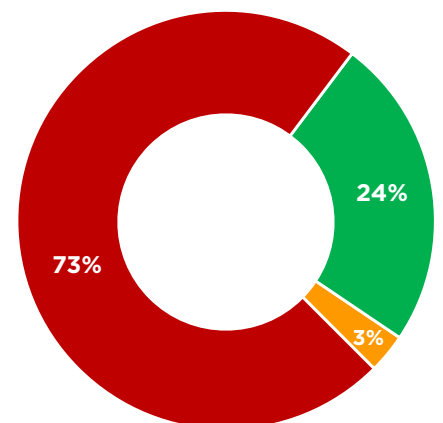
Risk by suppliers



Risk by category



Risk by spend





Geoff Davis, Facilities Manager at Calvary Bruce Private Hospital

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. We engage 4690 suppliers through our network of hospitals, aged care and community care services, and have 12,718 staff members. In October 2019 Calvary partnered with the Australian Catholic Anti-Slavery Network (ACAN) and have worked collectively with the Catholic Negotiating Alliance (CNA). Through these affiliations we share knowledge and resources and have developed more encompassing processes 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 implemented mandatory training for all staff involved in procurement and supplier relationship management. The training is aimed at increasing the awareness of Modern Slavery risks in our supply chain and operations. We are currently implementing a second module and work is already underway on a third module which is expected to be released mid-2021. Over this reporting period we will have collectively completed approximately 100 hours of training either in specific modules or via information sessions for staff.
- Calvary's modern slavery initiatives have also been presented to the organisation's extended leadership team, comprising of over 100 people managers, as part of our Leadership Talks program.
- Electronic communication has been released to all staff from the National CEO. The communication outlined 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 communicated 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.



(L-R): Amir Bekit, Residential Site Manager and Joseph Massih, General Manager at Ryde Retirement Community.

Our Policies and Contract Terms

- Calvary has revised its website to reflect 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.

Sector collaboration

- Calvary is a member of the ACAN and has actively participated in joint activities with other Catholic organisations including the sharing of non-commercial information and analytics as part of a sector wide response to Modern Slavery.
- Calvary attended the 2019 ACAN conference on Addressing the Risk of Modern Slavery, hosted by ACAN.
- Calvary is a member of the Catholic Negotiating Alliance (CNA) and issued supplier self-assessments to our joint top 25 high risk suppliers.
- Calvary is now working with other CNA members to address any identified risks.

Remedy

Calvary 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 entity 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, Calvary, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. Calvary’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 we can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where Calvary 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. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with Calvary to ensure victim centred remediation processes are implemented to the satisfaction of Calvary.

Calvary 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.

Calvary 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 at <https://www.acan.org.au/domus87>



(L-R): Yichao (Alexandra) Sun and Ashleigh Stefanidis, Support Workers at Calvary Community Care Tasmania.



Dr Sarah Latham, Anaesthetist, Calvary John James, ACT.

Reporting Criteria 5: Effectiveness Assessment

Our modern slavery program will be reviewed every 6 months to test the effectiveness of our actions taken.

In 2020 we met all targets as detailed in this report, including:

- assessment of our supplier base to identify high risk categories of spend and affected suppliers
- release of a self-assessment survey to the top 25 high risk 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 2021 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.

In 2021, Calvary will repeat the Gap Analysis conducted in 2019 to determine the effectiveness of the actions taken during the reporting period.

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 NELC manages all entities, owned and controlled through 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 Calvary entities. These were developed in consultation with all entities to ensure the highest level of adoption and compliance.

During the Covid-19 lockdown periods, National CEO, Martin Bowles, has conducted the 'Leadership Chat Series', involving senior management from all areas of the business including all controlled entities. Calvary's modern slavery program was presented to over 100 leaders from the business units, including expectations and KPIs around training.

Reporting Criteria 7: Other relevant information

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 participated in a two day ACAN conference in 2019, providing supplier and spend data, and combining this with other Catholic entities to build a picture of combined supply chain risk.

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

NATIONAL OFFICE**Little Company of Mary Health Care Limited**

Level 12, 135 King Street
Sydney NSW 2000
Ph: 02 9258 1700
www.calvarycare.org.au

AUSTRALIAN CAPITAL TERRITORY**www.calvaryact.org.au****Calvary Public Hospital Bruce**

5 Mary Potter Circuit
Bruce ACT 2617
Ph: 02 6201 6111
www.calvaryact.org.au

Calvary Bruce Private Hospital

30 Mary Potter Circuit
Bruce ACT 2617
Ph: 02 6245 3100
www.calvarybruceprivate.org.au

Calvary John James Hospital

173 Strickland Crescent
Deakin ACT 2600
Ph: 02 6281 8100
www.calvaryjohnjames.org.au

Calvary Haydon Retirement Community

2 Jaeger Circuit
Bruce ACT 2617
Ph: 02 6264 7400
www.calvaryhaydon.org.au

SOUTH AUSTRALIA**www.calvarysa.org.au****Calvary Health Care South Australia
Shared Services**

207 Wakefield Street
Adelaide SA 5000
Hospitals Ph: 08 8405 3305
Community Care Ph: 08 8271 7212
www.calvarysa.org.au

Calvary Adelaide Hospital

120 Angas Street
Adelaide SA 5000
Ph: 08 8227 7000
www.calvaryadelaide.org.au

Calvary North Adelaide Hospital

89 Strangways Terrace
North Adelaide SA 5006
Ph: 08 8239 9100
www.calvarynorthadelaide.org.au

Calvary Wakefield Hospital Surgicentre

Level 3, 120 Angas Street
Adelaide SA 5000
Ph: 08 8405 3600
www.calvarywakefieldsurgicentre.org.au

Calvary Central Districts Hospital

25-37 Jarvis Road
Elizabeth Vale SA 5112
Ph: 08 8250 4111
www.calvarycentraldistricts.org.au

**Calvary Flora McDonald Retirement
Community**

206 Sir Donald Bradman Drive
Cowandilla SA 5033
Ph: 08 8159 7000
www.calvaryfloramcdonald.org.au

Calvary St Catherine's Retirement Community

6-12 Coneybeer Street
Berri SA 5343
Ph: 08 8582 1444
www.calvarystcatherines.org.au

TASMANIA**www.calvarytas.org.au****Calvary Lenah Valley Hospital**

49 Augusta Road
Lenah Valley TAS 7008
Ph: 03 6278 5333
www.calvarylenahvalley.org.au

Calvary St John's Hospital

30 Cascade Road
South Hobart TAS 7004
Ph: 03 6223 7444
www.calvarystjohns.org.au

Calvary St Luke's Hospital

24 Lyttleton Street
Launceston TAS 7250
Ph: 03 6335 3333
www.calvarystlukes.org.au

Calvary St Vincent's Hospital

5 Frederick Street
Launceston TAS 7250
Ph: 03 6332 4999
www.calvarystvincents.org.au

NEW SOUTH WALES**www.calvarynsw.org.au****HUNTER NEW ENGLAND****Calvary Mater Newcastle
Public Hospital**

Edith Street
Waratah NSW 2298
Ph: 02 4921 1211
www.calvarymater.org.au

**Calvary Retirement Communities
Shared Services**

Suite 5, Level 1, 342-344 Main Road
Cardiff NSW 2285
Ph: 02 4954 1800 / 1800 222 000
www.calvaryretirement.org.au

Calvary Cessnock Retirement Community

19 Wine Country Drive
Cessnock NSW 2325
Ph: 02 4993 9000
www.calvarycessnock.org.au

Calvary St Joseph's Retirement Community

240 Maitland Road
Sandgate NSW 2304
Ph: 02 4967 0600
www.calvarystjosephs.org.au

Calvary Cooina Retirement Community

42 Bathurst Street
Singleton NSW 2330
Ph: 02 6572 1537
www.calvarycooina.org.au

Calvary Mt Carmel Retirement Community

9 Dwyer Street
Maitland NSW 2320
Ph: 02 4932 0350
www.calvarymtcarmel.org.au

Calvary Muswellbrook Retirement Community

15 Cassidy Avenue
Muswellbrook NSW 2333
Ph: 02 6542 4800
www.calvarymuswellbrook.org.au

Calvary Nazareth Retirement Community

1 Vincent Street
Belmont North NSW 2280
Ph: 02 4947 0047
www.calvarynazareth.org.au

Calvary St Francis Retirement Community

12 Gleeson Crescent
Eleebana NSW 2282
Ph: 02 4942 7477
www.calvarystfrancis.org.au

**Calvary St Martin de Porres Retirement
Community**

26 Lorna Street
Waratah NSW 2298
Ph: 02 4968 2244
www.calvarystmartindeporres.org.au

Calvary St Paul's Retirement Community

54 River Street
Cundletown NSW 2430
Ph: 02 6553 9219
www.calvarystpauls.org.au

Calvary Tanilba Shores Retirement Community

71-74 Tanilba Avenue
Tanilba Bay NSW 2319
Ph: 02 4984 5922
www.calvarytanilbashores.org.au

Calvary Ephesus Retirement Community

88 Dickson Street
Lambton NSW 2299
Ph: 1800 222 000
www.calvaryephesus.org.au

Calvary St Luke's Retirement Community

204-206 Darby Street
Cooks Hill NSW 2300
Ph: 1800 222 000
www.calvarystlukesretirement.org.au

Calvary Tours Terrace Retirement Community

242 Lawson Street
Hamilton South NSW 2303
Ph: 1800 222 000
www.calvarytoursterrace.org.au

SYDNEY**Calvary Health Care Kogarah
Public Hospital**

91-111 Rocky Point Road
Kogarah NSW 2217
Ph: 02 9553 3111
www.calvarykogarah.org.au

Calvary Ryde Retirement Community

678 Victoria Road
Ryde NSW 2112
Ph: 02 8878 1400
www.calvaryryde.org.au

RIVERINA**Calvary Riverina Hospital**

26-36 Hardy Avenue
Wagga Wagga NSW 2650
Ph: 02 6925 3055
www.calvaryriverina.org.au

VICTORIA**www.calvaryvic.org.au****Calvary Health Care Bethlehem
Public Hospital**

152 Como Parade West
Parkdale VIC 3195
Ph: 03 9596 2853
www.calvarybethlehem.org.au

Calvary Community Care Head Office

551 Blackburn Road
Mt Waverley VIC 3149
Ph: 1300 302 588
www.calvarycommunitycare.org.au

Operates in Victoria, New South Wales, ACT,
South Australia, Tasmania, Northern Territory
and Tiwi Islands



CATHOLIC EDUCATION
WESTERN AUSTRALIA

Modern Slavery Statement

2019–2020

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.

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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 2020, approximately 77,000 students were enrolled in 163 Catholic schools across Western Australia.

CEWA provides employment for approximately 11,400 staff, making it the State's fifth 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. CEWA is committed to making a Catholic education available to any family who seeks it for their child, and CEWA schools and offices strive to support all students, regardless of their individual circumstances, to receive quality education, care and support to enable them to make a positive contribution to society, both now and beyond their school years, in line with the values of Catholic Social Teaching.



Photo: St Anthony's School, Greenmount

Modern Slavery

'Modern slavery' is an umbrella term that 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)*.

This 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 Policy provides information on the types of modern slavery relevant to business.



Statement

The Most Reverend Gerard J Holohan DD,
Bishop of Bunbury and Chair, Catholic
Education Commission of Western Australia



We welcome the *Modern Slavery Act 2018* (Cth) and the increased awareness, requirement for due diligence and responsibility that this legislation brings to Australian organisations, including Catholic Education Western Australia Limited

(CEWA). We hope that this shared commitment will bring real and lasting improvement and change to labour supply and working conditions on a local, national and global scale.

We also welcome the opportunity to give witness to our Catholic faith, to live out our Gospel values, and contribute to a path of hope for the future, for the millions of people who are trapped in modern slavery.

It is important to recognise that modern slavery is a significant, complex and expanding human rights issue that affects tens of millions of lives. The 'crime against humanity'¹ that is modern slavery is inextricably interconnected with other human rights issues.

The decisions and choices we make, as individuals and as CEWA, significantly affect the livelihoods of people and communities, not just in Western Australia, but across the world – to the extent that responsible procurement is critical for the wellbeing and survival of humankind.

Forced labour is a serious violation of human rights that taints many of the goods we buy and the services we use. Our purchasing choices require ongoing vigilance and risk management. As part of the Catholic community, we must use our significant purchasing leverage to work collaboratively towards its eradication.

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

¹ Pope Francis speaking in Rome to RENATE (Religious in Europe Networking Against Trafficking and Exploitation), 7 Nov 2016
<https://www.youtube.com/watch?v=sXwOWTKzHY0>



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 engaged learning environments, inspiring all to actively live the Gospel.

CEWA has a long standing and firm

commitment to giving witness to the principles of Catholic Social Teaching, especially the dignity of the human person. CEWA's broader mission is to make a significant and socially responsible commitment to the world, both through education of the next generation and through leading with our actions today. In reflecting on what actions are demanded by our Catholic values, we are increasingly aware that our responsibility extends to our procurement choices.

CEWA's [Strategic Directions 2019–2023](#) are underpinned by Catholic Social Teaching and other teachings of the Church. They outline priority areas for CEWA, which include creating and maintaining inclusive communities that welcome and support students with diverse learning and social needs. Our Strategic Directions embody the Church's preferential option for the poor and marginalised. We welcome the imperative that the modern slavery legislation provides to

ensure our operations, including procurement, prioritise decision making that ascribes value to considerations other than the financial cost to the purchaser. The legislation is necessary in focusing our decision making towards those participants in our global supply chains who are materially disadvantaged and so often voiceless.

In line with Church teachings, CEWA advocates for eradication of all forms of modern slavery. In a practical way, this articulates the shared commitment of all Catholics to uphold the respect for human rights, the dignity of work, the rights of workers and the advancement of the common good.

I am very pleased to present CEWA's first Modern Slavery Statement, which has been approved by the Catholic Education Commission of Western Australia and is endorsed by CEWA's Executive Team.

As a community, CEWA is committed to participating with other Catholic organisations in the Australian Catholic Antislavery Network (ACAN) collaboration and appreciates the expertise and guidance that has been and continues to be provided to CEWA by the members of the Antislavery Taskforce.

Dr Debra Sayce
Executive Director,
Catholic Education Western Australia Limited



2019–2020 Modern Slavery Risk Management Initiatives

Through 2019 and 2020, modern slavery risk management initiatives became a focus area aligned with the CECWA Strategic Directions 2019–2023. CEWA became a participant 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.

This shared understanding and the risks it presents to CEWA's operations and supply chains has been enhanced throughout 2020 by consultation with experts. In particular, CEWA's action has been enhanced through participation in the Australian Catholic Antislavery Network (ACAN), a collaboration of more than 30 Catholic entities throughout all states and territories of Australia.

CEWA has facilitated state-wide learning to employees through informative and educative webinars and online forums provided by SD Strategies, a consultancy with significant expertise in integrating human rights and sustainability into decision making.

With this support, CEWA has commenced a focused journey to ensure decision making reflects a commitment to mitigate modern slavery risks, with the intent of making a difference for some of the most resource-poor and disadvantaged people working in goods and services supply chains.

Our Plans for 2021

For 2021, CEWA will maintain membership with ACAN. Supported by that engagement, CEWA will:

- Strengthen the consideration of human rights in governance and decision making across relevant CEWA operations and practices
- continue to educate the CEWA community on modern slavery and CEWA's shared, system-wide commitment to the eradication of modern slavery from supply chains and operations
- improve procurement management processes and documentation to guard against slavery or slavery-like practices
- strengthen the ethical considerations in investment analysis and decision making

- implement improved oversight for facilities management services; and
- increase engagement with suppliers to communicate the requirements and effect of CEWA's commitment.

In alignment with ACAN's priorities, CEWA will:

- support Domus 8.7, ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service
- join Sedex, which will enable CEWA to progress supply chain mapping
- enhance supplier risk identification and analysis; and
- continue to provide e-learning courses and webinars across CEWA.



Our Plans Beyond 2021

This statement sets out the steps CEWA has actioned to the conclusion of December 2020.

CEWA has developed a modern slavery prevention implementation plan, which will proactively guide CEWA's strategic actions to undertake this work over the coming years. This document will be submitted to the CEWA Executive Team and the Audit and Risk Committee for endorsement and it will be under regular review and refinement, as appropriate.

The implementation plan outlines CEWA's ongoing commitment to continuous improvement and increased vigilance. Particular focus areas include:

- increasing understanding of CEWA's commitment and program of work
- regularly engaging with suppliers and contractors to communicate CEWA's commitment
- ensuring CEWA's human resources documentation reflects the same commitment to fair work practices that will be expected of contractors and suppliers
- developing and implementing supplier documentation that articulates responsible procurement and the expectation that suppliers and their supply chains operate in a manner consistent with CEWA values, objectives and relevant legislation; and
- providing clear access to a remedy pathway for victims of modern slavery and ensuring CEWA is operating in accordance with the intent of Domus 8.7.





Reporting Criterion 1: About Catholic Education Western Australia Limited

Our Organisational Structure

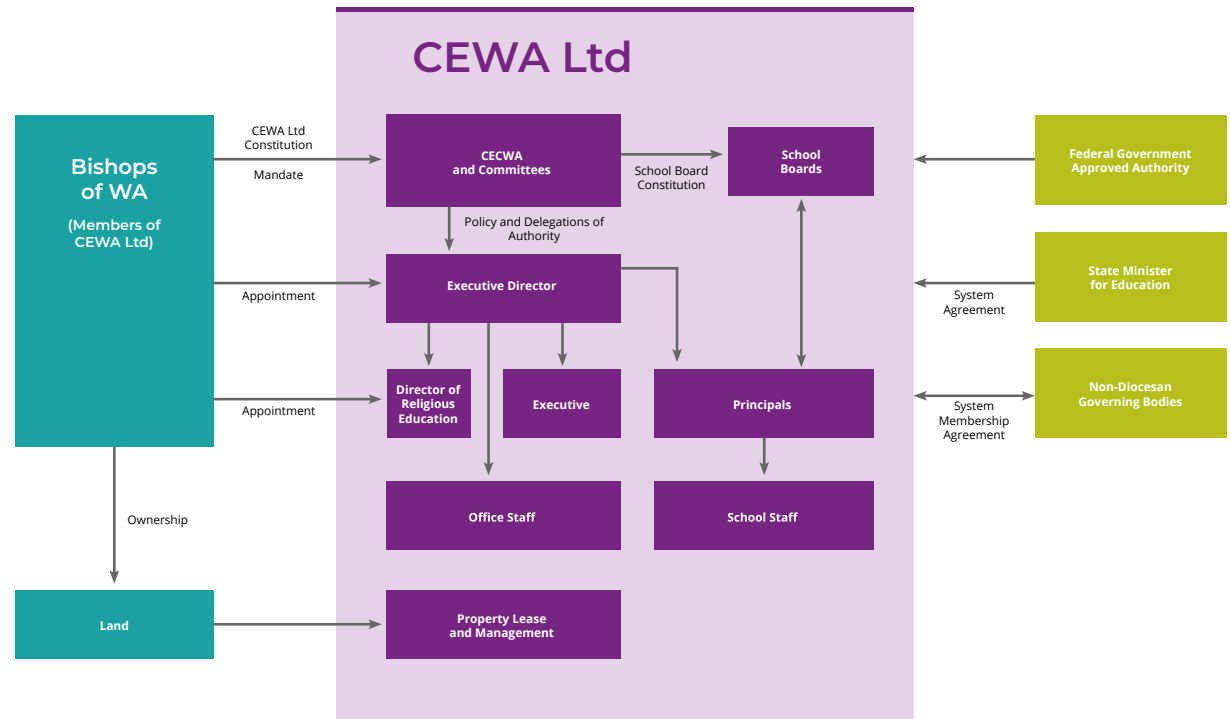
On 1 January 2020, the Bishops of Western Australia formed a new corporate governance structure as an incorporated body for Catholic schools in Western Australia. Catholic Education Western Australia Limited (CEWA) is the governing body for 149 diocesan Catholic schools and provides registration oversight for an additional 14 non-diocesan Catholic schools. The Members of CEWA Ltd are the diocesan Bishops of Western Australia, being the Archbishop of Perth, Bishop of Broome, Bishop of Bunbury and Bishop of Geraldton.

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 Commission (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. These committees are:

- Aboriginal Community
- Audit and Risk
- Catholic Education Community
- Curriculum
- Finance

The new incorporated structure is illustrated below.





Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)

CEWA's latest published *Annual Report (2019)* is available [here](#).

Diocesan and non-diocesan schools

As mentioned above, 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 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 2020, 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 Chris Cotter – Director Religious Education
- Dr Tony Curry – Director Leadership and Employee Services
- Gerry Doyle – Director Finance, Planning and School Resources; and
- Dr Edward Simons – Director Governance, Strategy and Digital Technology.

The CEWA Executive Team is based at CEWA's largest office in West Leederville and is supported by approximately 290 office staff working across the four Catholic dioceses in Western Australia.



Reporting Criterion 1: About Catholic Education Western Australia Limited (continued)



Photo: Majella Catholic Primary School, Balga

Our Governance Framework

CEWA is guided by a robust governance framework that responds to the high expectations of the Australian Securities and Investments Commission (ASIC), Australian Charities and Not-for-profits Commission (ACNC), the Bishops of Western Australia, the Federal Government, the State Government and CEWA's students, stakeholders and community.

The CEWA Code of Ethical Conduct sets out CEWA's expectations for all employees, with Dignity of the Human Person as a core focus area.

CEWA has 40 system-wide policies that meet regulatory expectations and have been approved by CECWA. Of particular note, CECWA approved the Modern Slavery Prevention Policy in November 2020 following a collaborative policy development process. The CECWA Modern Slavery Prevention Policy and associated program of work will be monitored by CECWA's Audit and Risk Committee and Finance Committee. Both committees have oversight of the initiatives that relate to CEWA's commitment to the eradication of modern slavery from all operations and supply chains, although other committees have input as necessary.

A risk management framework has been implemented across the CEWA system – at both enterprise level and individual school level. CECWA has overall responsibility for implementation and oversight of the risk management program and is assisted by the Audit and Risk Committee in this work. The breadth of risks addressed is wide and includes risks relating to modern slavery.

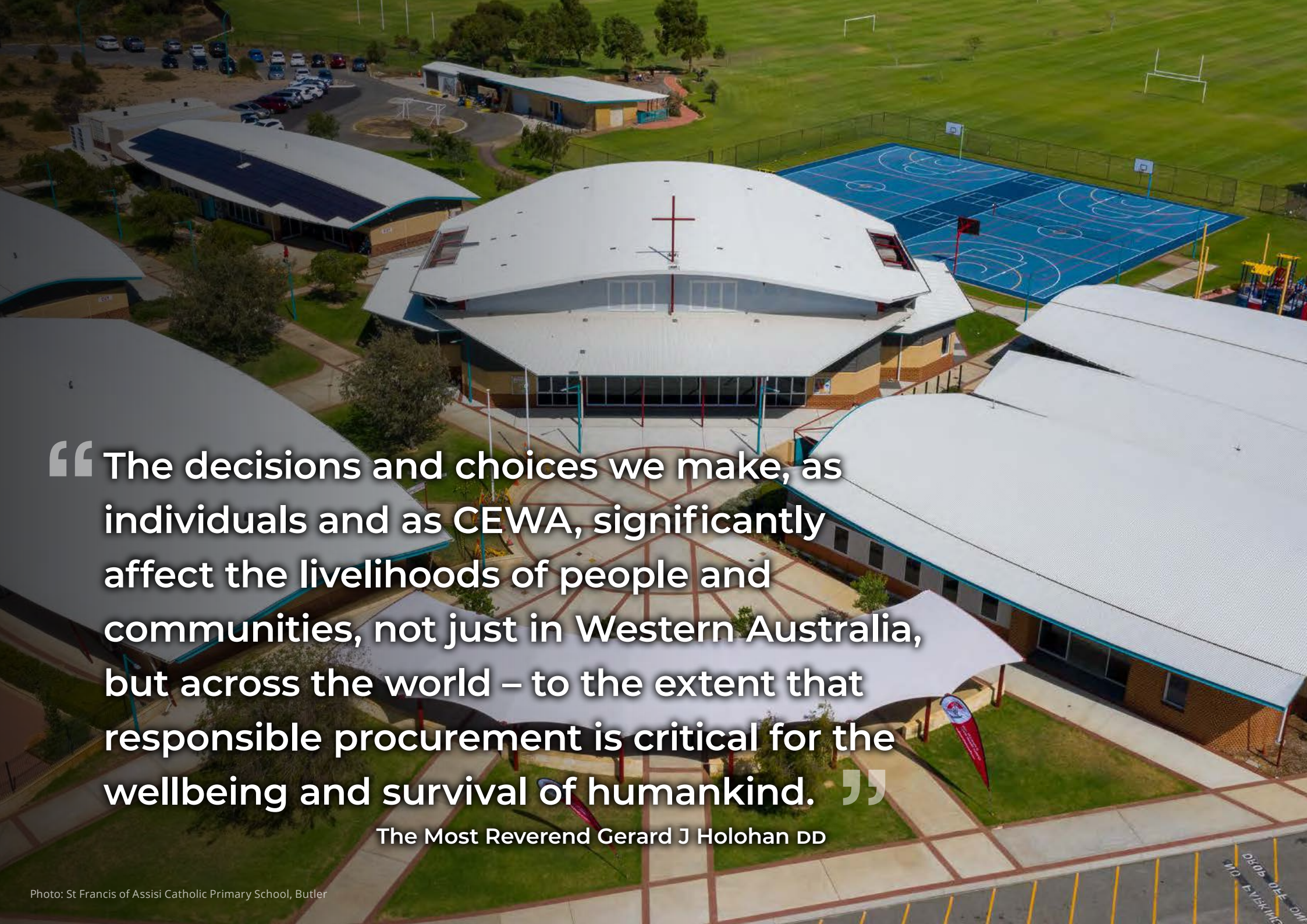
Throughout 2019 and 2020, CEWA undertook a significant policy review focusing on consolidating the complex policy environment for Catholic

schools in Western Australia. The new policy structure has been approved in principle by CECWA, for implementation on 1 January 2021. As a result of this, the Modern Slavery Prevention Policy will be renamed to *Executive Directive – Modern Slavery Prevention*. Other related policy focus areas transferring to the new structure are:

- CEWA's Whistleblower Protection Framework (CECWA Whistleblower Policy in 2020) provides a process for a potential report of modern slavery that would be fully investigated and appropriately actioned.
- The *Executive Directive – Work Health and Safety* will articulate a shared and proactive commitment to the health and wellbeing of one another and ensures everyone goes home safe and well.
- The *Executive Directive – Employment* will outline that bullying, harassment and discrimination are unacceptable and that all staff are to be treated with dignity and respect. This directive provides processes and documentation that ensure employees are paid fairly and in compliance with all applicable labour laws.

An Executive Directive – Procurement is currently under development and will aim to set out principles and practices for ethical acquisition of goods and services.

This is CEWA's first year of reporting under the *Modern Slavery Act 2018* (Cth). CEWA is committed to developing processes to reduce the risks of modern slavery in operations and supply chains, and to improving and enhancing those responses to work towards meaningful change for those most affected.



“ The decisions and choices we make, as individuals and as CEWA, significantly affect the livelihoods of people and communities, not just in Western Australia, but across the world – to the extent that responsible procurement is critical for the wellbeing and survival of humankind. ”

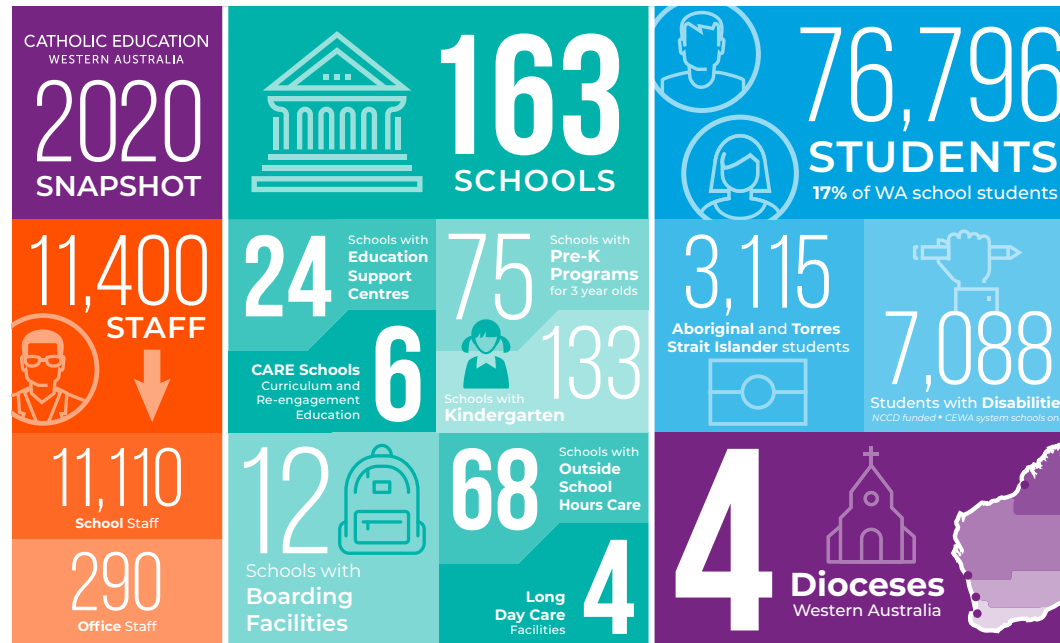
The Most Reverend Gerard J Holohan DD

Reporting Criterion 2: Operations and Supply Chains

Our Operations

CEWA is responsible for the provision of Catholic education throughout the state of Western Australia and is the second largest school system in the state after the Department of Education.

An overview of CEWA's reach in 2020 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 pastoral care and wellbeing support.

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. It is anticipated that due diligence in this area will increase in the coming year with the introduction of appropriate supplier documentation, including a Supplier Code of Conduct that ensures contractors

adhere to fair work practices and pay at least the national minimum wage or applicable Award pay rate, as appropriate. The documentation is also expected to set out social, environmental 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, and the provision of new and upgraded facilities. Known to be high-risk areas because of the prevalence of labour hire, spend in these areas will also be subject to the same improved due diligence processes.



Reporting Criterion 2: Operations and Supply Chains (continued)

Our Supply Chains

Across CEWA, purchases are made at a system level and this report is focused on purchases that are driven by decisions made centrally. However, school principals are responsible for a large proportion of their purchasing decisions, including building-related purchases.

Through further system alignment as a result of incorporation, including the planned appointment of a 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 not system managed, 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 in the areas listed below:

- construction services and suppliers
- cleaning and security
- electronics
- furniture and stationery
- food and catering supplies
- travel and accommodation services; and
- books and printing.

In 2019 CEWA procured \$202,130,000 of goods and services from approximately 6,179 direct suppliers², predominantly Australian suppliers. These purchases include 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 our extended supply chains present our highest risks for modern slavery.

CEWA is committed to working with highest risk, highest spend Tier 1 suppliers during 2021 and providing due consideration to known geographic, commodity and industry modern slavery indicators. In time, CEWA anticipates extending that oversight to the extended supply chain.



In 2019 CEWA procured

\$202.13M

of goods and services


These goods and services were sourced from approximately

6,179

predominantly Australian suppliers

² Figures relate to 3rd party suppliers to diocesan schools and CEWA offices.

Photo: St Mary's College, Broome



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains

As of December 2020 CEWA supported

11,423

teaching and non-teaching jobs

\$1.64bn

GVA contribution in 2019; 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 is aware that the COVID-19 crisis is having 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 PPE 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 staff and students and maintained educational continuity in line 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 particular note is the speed at which CEWA staff necessarily 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 detected within a CEWA site. The tender that was issued specifically required tenderers to respond to questions that provided surety against modern slavery risks.

Improved oversight of CEWA's suppliers' exposure to modern slavery risks as a result of COVID-19 will be incorporated into a process of increased vigilance and supplier review and engagement that will be developed during 2021.

CEWA's people

As of December 2020, CEWA supported 11,423 teaching and non-teaching jobs, approximately 80% of which were female.³ It is estimated that the total Gross Value-Added contribution to the WA economy is approximately \$1.64 billion, which represents almost 17% of the WA Education and Training sector per year.

³ These figures include staff in diocesan schools and offices, including casual staff.

Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)



Photo: St Thomas More Catholic Primary School, Margaret River

CEWA recognises the need for heightened due diligence across areas that are known to be at high risk of modern slavery, including cleaning contractors, and aims for employment documentation and contractor/subcontractor engagement documentation to reflect the same commitment to ensuring due diligence and active monitoring. CEWA has well documented and communicated policies and processes in place to ensure compliance with national and state employment law and legislation throughout the system. All employment related policies and processes are 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 were 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 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 – especially 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.

Similarly, 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



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

organisations will also have repercussions on the lives and vulnerabilities of people engaged at various stages of their operations and supply chains; as such there is a real ethical, safety and human rights issue. CEWA recognises there is a direct stewardship responsibility that results from this potential risk that requires assessment and management of potential modern slavery risks in investment portfolios.

CEWA’s investment activities account for the management of \$172,360,000 worth of assets.⁴ CEWA is committed to an 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 policy, which summarises the organisation’s approach to investments, all 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 proposes a review of those considerations in the coming year to ensure they remain fit for purpose.

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. Several areas of improvement were identified. The comparative results are presented below in a heat map.

Category	Topic	Result 2019	Result 2020	Change
Management Systems	Governance	●	●	↑
	Commitment	●	●	-
	Business Systems	●	●	-
	Action	●	●	↑
	Monitor / Report	●	●	-
Risk Management	Risk Framework	●	●	-
	Operational Risk	●	●	-
	Identifying External Risks	●	●	↑
	Monitoring and Reporting Risk	●	●	-
Procurement and Supply Chain	Policy and Procedures	●	●	-
	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

CEWA investment activities account for the management of
\$172.36M
worth of assets.

⁴ As of 31 December 2020. Does not include cash and term deposits invested with the Catholic Development Fund.



Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

Supply Chain Risks

During the second half of 2019 and throughout 2020, CEWA engaged external expertise to help identify potential risks in supply chains. In addition, CEWA has accessed publicly available research and media reports.

This research and analysis have led to the opportunity to consider procurement actions including the appointment of a procurement manager in 2021. The findings will also enable CEWA to engage effectively with suppliers in two ways:

- educating and providing information around modern slavery risks, and
- embedding appropriate oversight and documentation into the process to onboard new suppliers, increase due diligence of existing suppliers and pre-qualify companies tendering for work.

In considering supply chain risk, CEWA focused on the following areas:

- **Industry sector** – CEWA 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.

- **Commodity/product** – Specific products and commodities are deemed high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials. CEWA recognises, for example, that electronic equipment contains metals and minerals that may be sourced from regions known to be at high risk of modern slavery practices.
- **Geographic location** – The risk based on geographic location is based on the estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI. While CEWA predominantly engages Australian suppliers, it is recognised that goods and associated services may come from countries other than those of suppliers’ headquarters, CEWA recognises, for example, that electronic goods from Malaysia would be considered to be at high risk of modern slavery.
- **Workforce profile** – In undertaking the supplier analysis, CEWA 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).



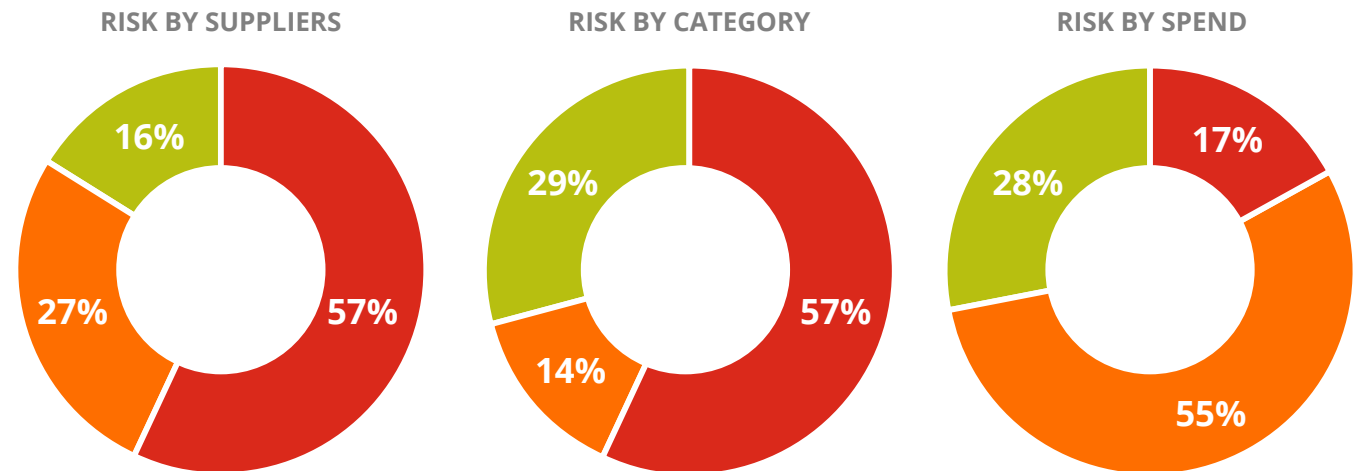


Reporting Criterion 3: Modern Slavery Risks in Operations and Supply Chains (continued)

Supplier risk identification and prioritisation

In July 2019, CEWA worked with a team of external experts to conduct a spend data analysis of the top 50 suppliers by spend as well as suppliers of key high-risk goods and services, regardless of the level of spend. Analysis of these data produced the results shown in the Supplier Risk Dashboard below.

● Low Risk
● Medium Risk
● High Risk



Actual risk has not been determined as CEWA has not yet conducted detailed investigation or analysis of the results of any investigation. The review highlighted the need to analyse supply chains especially for high-risk products and geographies, particularly for areas of highest spend. The new procurement manager will have oversight of the supply chain management.

This will be a focus of work to be undertaken in 2021.

CEWA's risks were assessed against the Risk Taxonomy document provided by external advisors.

From that assessment, CEWA recognised that the highest risks are:

- 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's focus for 2019 and 2020 was on strengthening CEWA's shared understanding of modern slavery and assessing the potential risks in CEWA's operations and supply chains.

Specific actions undertaken are depicted in the table below:

FOCUS AREA	ACTIONS	FOCUS AREA	ACTIONS	
Building CEWA's understanding of MS risk	<ul style="list-style-type: none"> Attendance at the Eradicating Modern Slavery from Catholic Supply Chains conference in Sydney, July 2019. Active participation in ACAN. Production of a video to demonstrate CEWA's shared commitment, including involvement from several groups across the Archdiocese and dioceses, including all four WA Bishops. Webinars that addressed different aspects of modern slavery. Expert guest contributors presented on webinars 2–4. <ul style="list-style-type: none"> Webinar 1: Introduction to Modern Slavery Webinar 2: The Modern Slavery Act (with Alison Rahill, Anti-Slavery Taskforce, Archdiocese of Sydney) Webinar 3: Modern Slavery: Closer than you may realise (with Nicole D'Souza, Ethical Sourcing Manager at Konica Minolta; and Katy Welch, Senior Supervising Solicitor at The Humanitarian Group) Webinar 4: Forced Marriage (with Laura Vidal from Good Shepherd Australia New Zealand). Laura prepared a Tip Sheet for Responding to Forced Marriage in Australia, which was shared with participants and more widely through the dedicated CEWA-wide Modern Slavery Team. 	Incorporating Modern Slavery Prevention into the governance structure	<ul style="list-style-type: none"> Development and promulgation of a Modern Slavery Prevention Policy. Inclusion of modern slavery in CEWA's risk framework and register, and also in the CEWA school risk management framework. Development and promulgation of CEWA's Whistleblower Policy providing a process for modern slavery issues or risks to be raised confidentially and/or anonymously by those covered by the whistleblower legislation. CEWA Executive Team approved the CEWA offices registration as Fairtrade workplaces. Preliminary work to develop a suite of documentation, including a Supplier Code of Conduct, to facilitate a consistent approach to engaging with suppliers that will most effectively manage modern slavery risks in contracts and procurement. 	
			Engaging with our contractors and suppliers	<ul style="list-style-type: none"> Hosted a supplier engagement forum. Attendance at the Building Links seminar. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>CEWA 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.</i></p> </div>
			Committing to strengthen CEWA's response	<ul style="list-style-type: none"> Development of an implementation plan, with appropriate project governance. Implementation of the Executive commitment to transition to Fairtrade staffrooms in CEWA offices. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><i>In response to the Executive commitment to offices transitioning to Fairtrade workplaces, CEWA has worked closely with the existing supplier of coffee, tea and hot chocolate to Perth offices. The supplier is currently not Fairtrade accredited but CEWA is working with the incumbent supplier to explore how to uphold the Fairtrade commitment.</i></p> </div> <ul style="list-style-type: none"> Promotion of the introductory e-learning module to all staff and tracking participation. Integration of additional e-learning modules, including <i>Business Relevance, Staff Action and Supplier Action</i>.

Reporting Criterion 4: Actions Taken to Assess and Address Risks (continued)



Photo: Liwara Catholic Primary School, Greenwood

Modern Slavery Action Plan and Road Map

It is CEWA's commitment that the future action plan would be a collaboration across all Catholic schools and offices. The implementation plan will assign certain deliverables to different teams or groups within CEWA.

In order to progress this implementation plan effectively, CEWA intends to establish a working party, with appropriate expertise and Executive sponsorship to develop and progress CEWA's response to modern slavery. Additional oversight will be provided by the CEWA Executive Team and the CEWA Audit and Risk Committee. It is expected that CEWA's immediate next steps will be:

- continuing to work in collaboration with ACAN, engaging in the modern slavery risk management program. Participation in this program will support CEWA in:
 - respecting the priority to provide appropriate and timely remedy to people impacted by modern slavery
 - through Sedex membership, understanding our supply chains more fully to best engage, manage and onboard suppliers
- working to increase uptake of the offered e-learning courses and webinars to educate all staff on the shared commitment to modern slavery eradication from operations and supply chains
- improving procurement management processes and documentation to guard against slavery or slavery-like practices; and
- increasing engagement with suppliers to communicate the requirements of CEWA's modern slavery commitment.

Provision of Remediation Solution Through ACAN

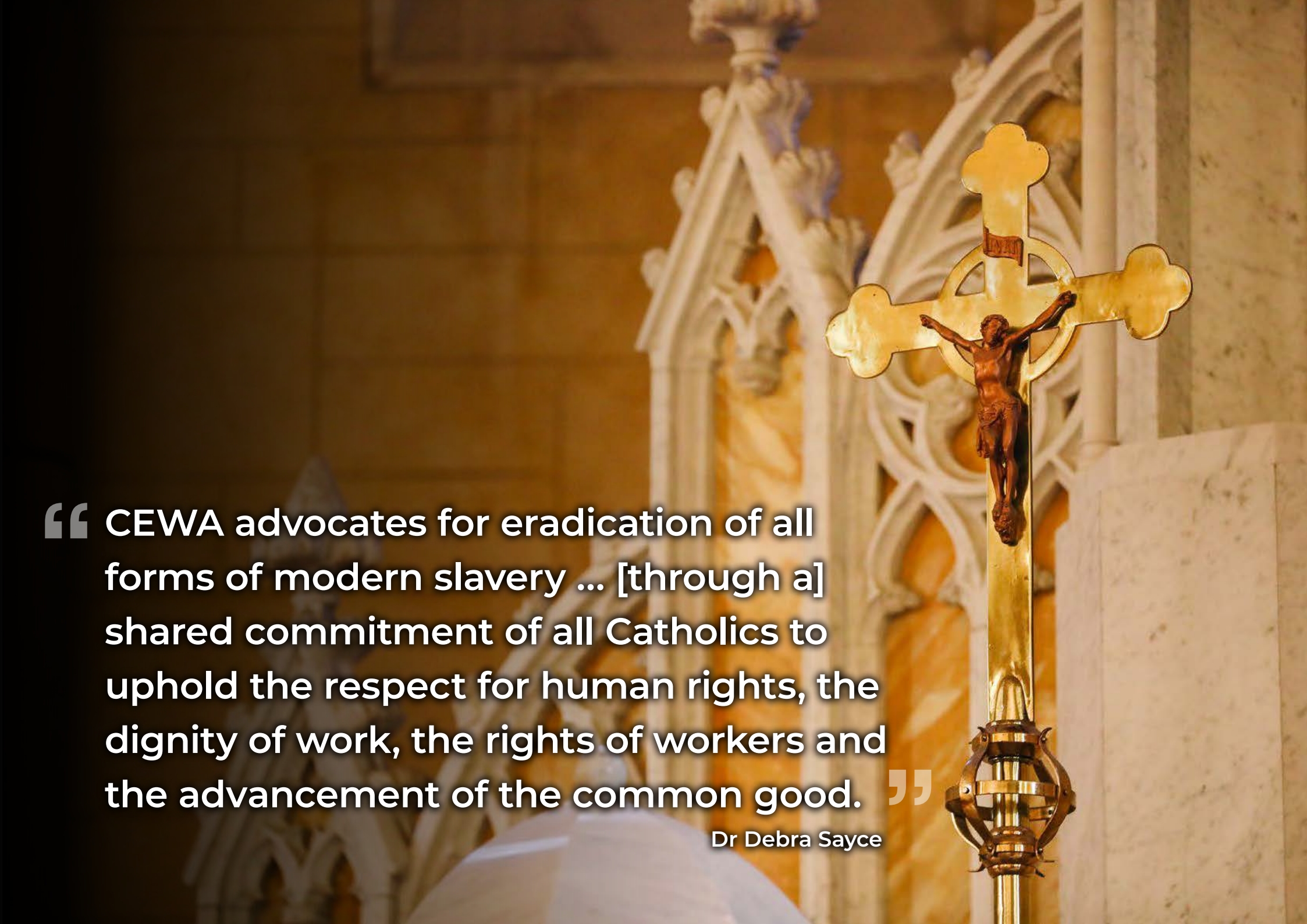
CEWA is committed to ensuring provision of appropriate and timely remedy to people impacted by modern slavery, in accordance with the [United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities](#) and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if CEWA 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, CEWA, is a founding partner of [Domus 8.7](#), an independent program to provide remedy to people impacted by modern slavery.

Where CEWA is directly linked to modern slavery by a business relationship, CEWA is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.


When suspicions of modern slavery practices come to CEWA's attention through a whistleblower disclosure or another channel, staff will contact relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

CEWA has funded a 'Remedy Pathways' module in its modern slavery e-learning course that will be available to staff and other stakeholders in 2021.



“ CEWA advocates for eradication of all forms of modern slavery ... [through a] shared commitment of all Catholics to uphold the respect for human rights, the dignity of work, the rights of workers and the advancement of the common good. ”

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 will need to be developed and this will be an area of focus for the working party. 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. As such, collaboration, communication, time and sustained engagement are key to reducing the risk and ultimately effecting lasting change.
- CEWA can either cause, contribute to or be directly linked with modern slavery practices.
- As an education community of over 11,000 staff, and almost 77,000 students, CEWA recognises that raising awareness of this important issue and providing appropriate opportunities for staff and stakeholders to increase knowledge on modern slavery is critical.
- Supply chains are CEWA's greatest risk meaning that the greatest risk of modern slavery is through direct linkage with modern slavery practices. Considerable work is required to understand CEWA's supply chains more fully; there is the potential for modern slavery in all aspects of operations and many small but significant steps CEWA can take to mitigate the risk.

- Although there is increasing media and publicly available information on the existence of modern slavery, many people do not recognise the gravity of the situation, or that CEWA may play a part in it. 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 to CECWA, Audit and Risk Committee, Catholic Education Community Committee, Finance Committee and the CEWA Executive Team as appropriate
- Engaging with the CEWA community through staff meetings, announcements and information shared through the modern slavery Microsoft Team, and also 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 2020 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'; every school and office is each a part of the CEWA system and a certain level of 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 shared opportunities for learning, sharing of ideas and support for implementing local initiatives within schools.





Reporting Criterion 7: Other

In addition to the reporting criteria, CEWA has considered in 2020 and is considering for 2021:

- opportunities to embed modern slavery into the curriculum in a seamless manner; and
- opportunities to create an online student showcase, which could highlight the work of CEWA students on the subject of modern slavery.

During 2020, 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 2021.

This Modern Slavery Statement 2020 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 9 April 2021, 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
Dr Graeme Gower	Chair, Aboriginal Community Committee
Mr Wojciech Grzech	Chair, Audit and Risk Committee
Ms Mary Woodford	Chair, Catholic Education Community Committee
Professor Joan Squelch	Chair, Curriculum Committee
Professor Glenda Scully	Chair, Finance Committee
Dr Debra Sayce	Executive Director, CEWA
Dr Edward Simons	Company Secretary

CEWA Executive Team 2020

Dr Debra Sayce	Executive Director
Mr Wayne Bull	Deputy Executive Director
Ms Mandy Connor	Director Teaching and Learning
Dr Christopher Cotter	Director Religious Education
Dr Tony Curry	Director Leadership and Employee Services
Mr Gerry Doyle	Director Finance, Planning and School Resources
Dr Edward Simons	Director Governance, Strategy and Digital Technology



**CATHOLIC
EDUCATION**
WESTERN AUSTRALIA



(08) 9380 1800
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MODERN SLAVERY STATEMENT 2020



DISCLOSURE NOTE

This statement has been made on behalf of Sydney Catholic Schools Trust.

This Statement covers all entities owned or controlled by Sydney Catholic Schools Trust.

ABN 26 158 447082

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ABOUT US

Sydney Catholic Schools (SCS) is a system of 150 Catholic primary and secondary schools operating across the Archdiocese of Sydney providing more than 70,000 students with a Catholic education.

The Mission of Sydney Catholic Schools is 'to know and love Christ through learning'.

Our Vision is to create 'thriving Catholic communities through excellent teaching and learning'.

The Values of Sydney Catholic Schools are:

- Truth - seeking to know and live the truth
- Curiosity - nurturing the search for meaning
- Collaboration - engaging respectfully and meaningfully with others
- Excellence - striving to achieve one's potential
- Empathy - appreciating and responding to the views and needs of others.



BRIEF STATEMENT FROM THE MOST REV ARCHBISHOP

At its heart, the call to eradicate modern slavery is a call to make a choice for respecting the intrinsic and inalienable dignity of every human person. Pope Francis has been tireless in championing this cause, referring to it as an

‘open wound on modern society’ and a ‘crime against humanity.’

Whilst we might each take individual actions motivated by our faith and compassion, Australia’s Modern Slavery Act 2018 squarely places responsibility with organisations such as businesses, governments, and churches because they have such great purchasing power. As the largest reporting entity in the Catholic Archdiocese of Sydney, Sydney Catholic Schools has completed its foundational 2020 Modern Slavery Statement through collaboration with the Archdiocesan Anti-slavery Taskforce (ASTF) and the Australian Catholic Anti-slavery Network (ACAN). The Sydney Catholic Schools Board and staff remain committed to continuous improvement in managing modern slavery risks and achieving Sustainable Development Goal 8.7 – the eradication of child labour, forced labour and modern slavery by 2030.



A handwritten signature in black ink that reads "Anthony Fisher OP".

Archbishop Anthony Fisher OP

BRIEF STATEMENT FROM TONY FARLEY



Sydney Catholic Schools reaffirms its commitment to ensure the eradication of modern slavery from all aspects of our organisation. We not only strive to adhere to the requirements of the Modern Slavery Act, we aim to support those who are marginalised due to modern slavery.

As an organisation, we work with our staff and other Catholic entities in order to improve procurement practices and raise awareness of modern slavery.

Catholic Social Teaching, based on the dignity of each and every person, compels us to take action against modern slavery. Sydney Catholic Schools is dedicated to eradicating modern slavery from our supply chains, putting policies and processes in place to minimize risks and avoid businesses that rely on modern slavery in the provision of goods and services.

A handwritten signature in black ink that reads "Tony Farley".

Mr Tony Farley
Executive Director

2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

Sydney Catholic Schools (SCS) is a partner of the Catholic Archdiocese of Sydney Anti-slavery Taskforce (ASTF) and participant in the Australian Catholic Anti-Slavery Network (ACAN). ACAN brings together 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 ASTF in the Catholic Archdiocese of Sydney. SCS, in collaboration with the ASTF and ACAN have developed clear guidelines in understanding the impact of modern slavery in the education sector.

SCS staff have been appointed by the Most Rev Archbishop Anthony Fisher OP to the ASTF Advisory Committee since 2017 and have continuously engaged with and supported the mandate of the ASTF.

In 2020, SCS took actions to address modern slavery risks in the school cleaning supply chain. According to the ACAN Procurement Risk Taxonomy cleaning category is considered a high risk category due to the labour conditions and prevalence of sub-contracting in the market. Activities undertaken include:

- Informing SCS suppliers of our intent to eradicate modern slavery from our supply chain.
- Evaluation of tendered pricing and reconciling pricing based on modern award rates, ensuring compliance with industrial laws.
- Preferring suppliers with their own employees rather than subcontractors.



PLANS FOR 2021 AND BEYOND

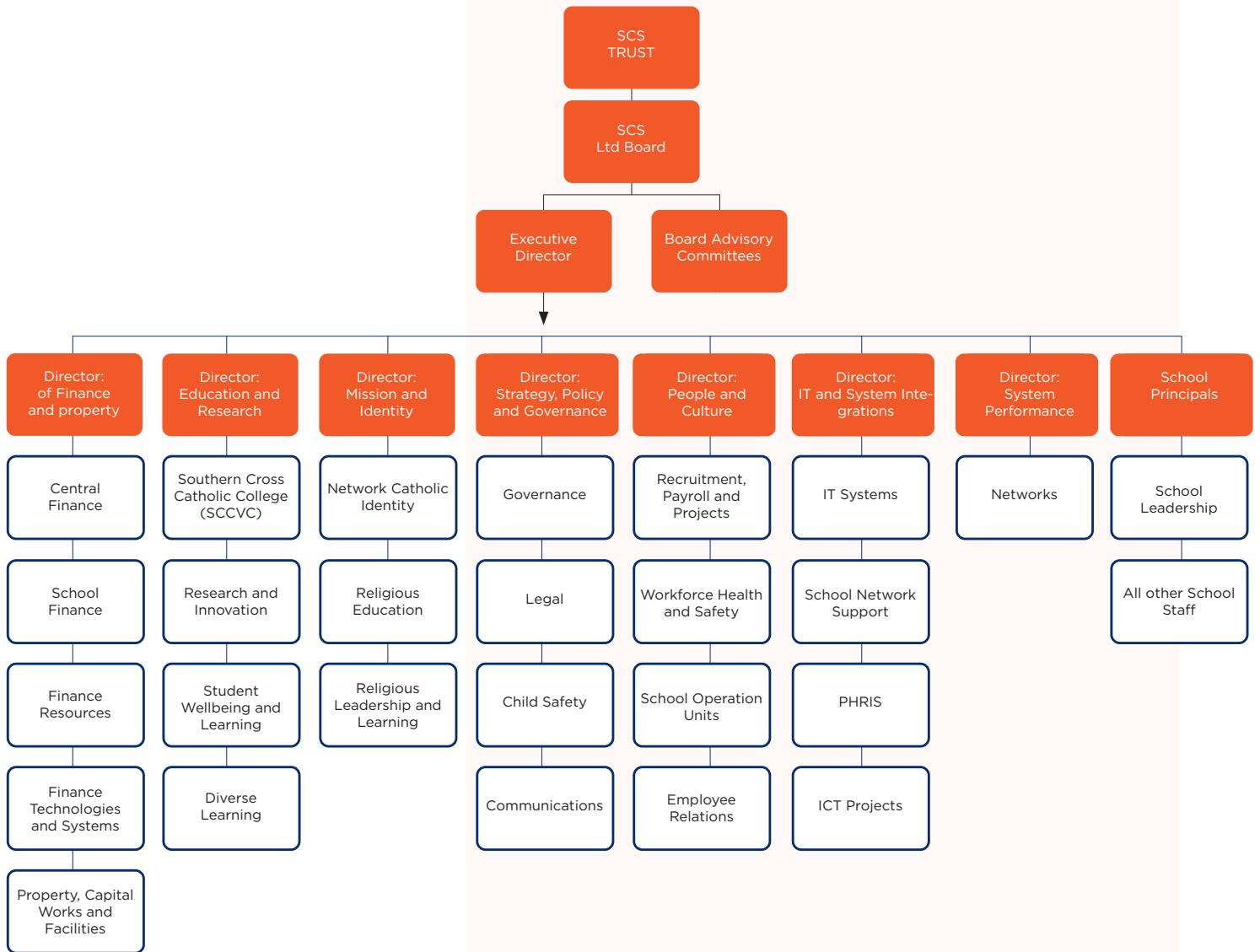
SCS will deliver the following initiatives:

- Analyse spend data to increase visibility of modern slavery risks.
- Develop a review process for suppliers which includes a risk assessment of current, evolving and future risks.
- Increase awareness of SCS staff and suppliers to modern slavery risks.
 - SCS staff: All employees should have opportunities to engage with modern slavery awareness-raising resources and access to training via e-learning modules.
 - Suppliers: SCS Anti-Modern Slavery Policy to be shared and obligations communicated to high risk suppliers. SCS will work closely with the ASTF and ACAN participants to approach common suppliers via the Sedex platform and other activities.
- Provide further guidance on SCS Anti-Modern Slavery Policy and management plan for staff in schools.
- Standardise measurements to actively monitor supplier engagement.
- Prioritise key suppliers for due diligence activities such as self-assessment questionnaires and auditing.
- Provide guidance for suppliers including how to remedy to modern slavery concerns.
- Continued participation in ACAN.



SYDNEY CATHOLIC SCHOOLS

ORGANISATIONAL STRUCTURE



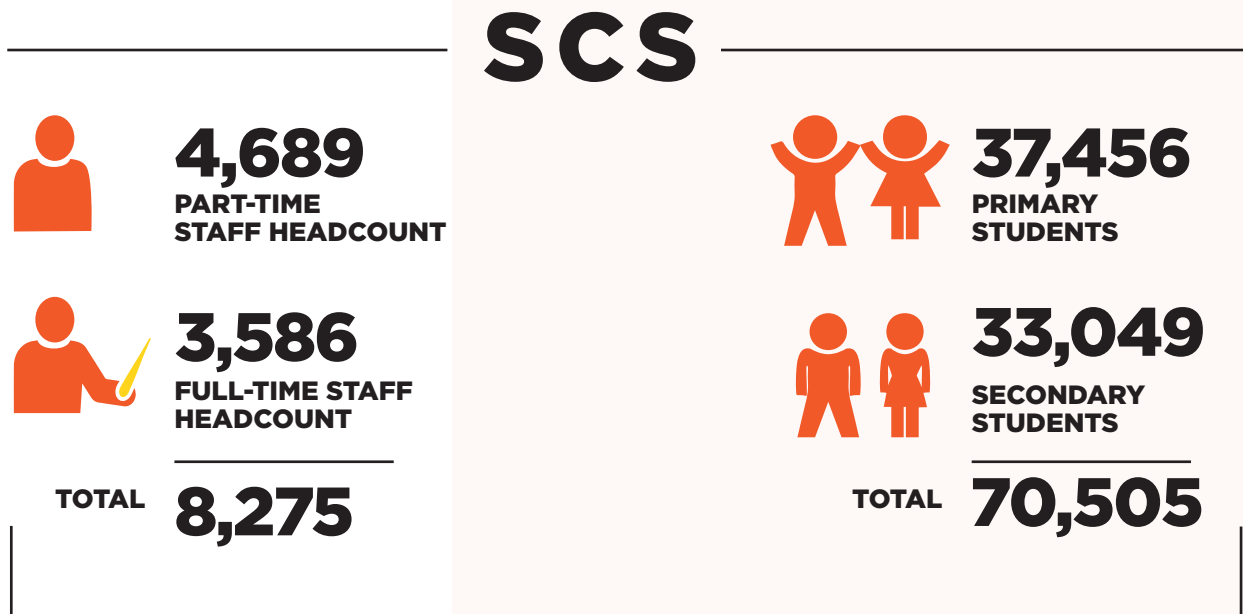
SCS STAFF AT MASS IN ST MARY'S CATHEDRAL

PERSONNEL

SCS has two Enterprise Agreements that apply to the majority of our workforce who are employed within our schools.

SCS also aligns all remuneration and employment conditions with the Fair Work Act 2009 and Modern Award requirements.

SCS recruitment practices ensure a fair and transparent merit-based process of appointment as well as the use of the Human Resources Management System to capture all required legislative information such as NSW Education Standards Authority accreditation and Working With Children Checks across all our employees, contractors and volunteers.



GOVERNANCE FRAMEWORK

Sydney Catholic Schools is governed by the Sydney Catholic Schools Board of Directors. 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 Board of Directors is supported by the Executive Director, the Executive Leadership team and Board Advisory Committees.

An important element of the SCS governance framework is the SCS policy framework which consists of a comprehensive list of policies and supporting documents.

This includes a recently updated Anti-Modern Slavery Policy that emphasises its importance within SCS.

This policy applies to all SCS staff, and suppliers including their employees, agents, volunteers, contractors, consultants and business partners.

OPERATIONS

Sydney Catholic Schools comprises of 150 Catholic Schools across the Catholic Archdioceses of Sydney educating over 70,000 students in both primary and secondary education.

Schools are supported through the a central office providing support services to schools that include:

- IT Services
- Property and capital works
- HR Services
- Educational Curriculum
- Finance Support
- Governance and Legal
- Marketing and Communication

Schools focus on providing education to students and procure goods and services on behalf of the school such as:

- Teaching resources
- Cleaning, uniforms and
- Other school based services.



SUPPLY CHAIN

Throughout the reporting period SCS engaged with over 8,000 suppliers across its 150 schools. The services provided by suppliers are extensive.

Key categories of spend include:

- IT Equipment/Services
- Construction
- Facilities Maintenance
- Cleaning
- Uniforms
- Transport Services
- Canteens
- Stationery & Consumables
- Professional Services

Although schools have autonomy to engage suppliers, consolidation across the network has increased benefits and oversight for schools. For certain categories the central office procurement team engages with suppliers on behalf of the school network. Categories such as IT services, waste management, utilities and capital works are examples of such activity.

SCS procurement has established and continues to maintain a preferred suppliers list that allows schools to actively use the listed suppliers for engagement. The suppliers on the list are vetted according to SCS requirements. The list is reviewed and updated on a regular basis.

SCS stipulates a policy of using standard SCS contracts for all third party engagements unless there is a unique circumstance. Standard SCS contracts include Terms and Conditions relating to modern slavery. Through ACAN, SCS has access to more comprehensive clauses for high-risk contracts.



MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

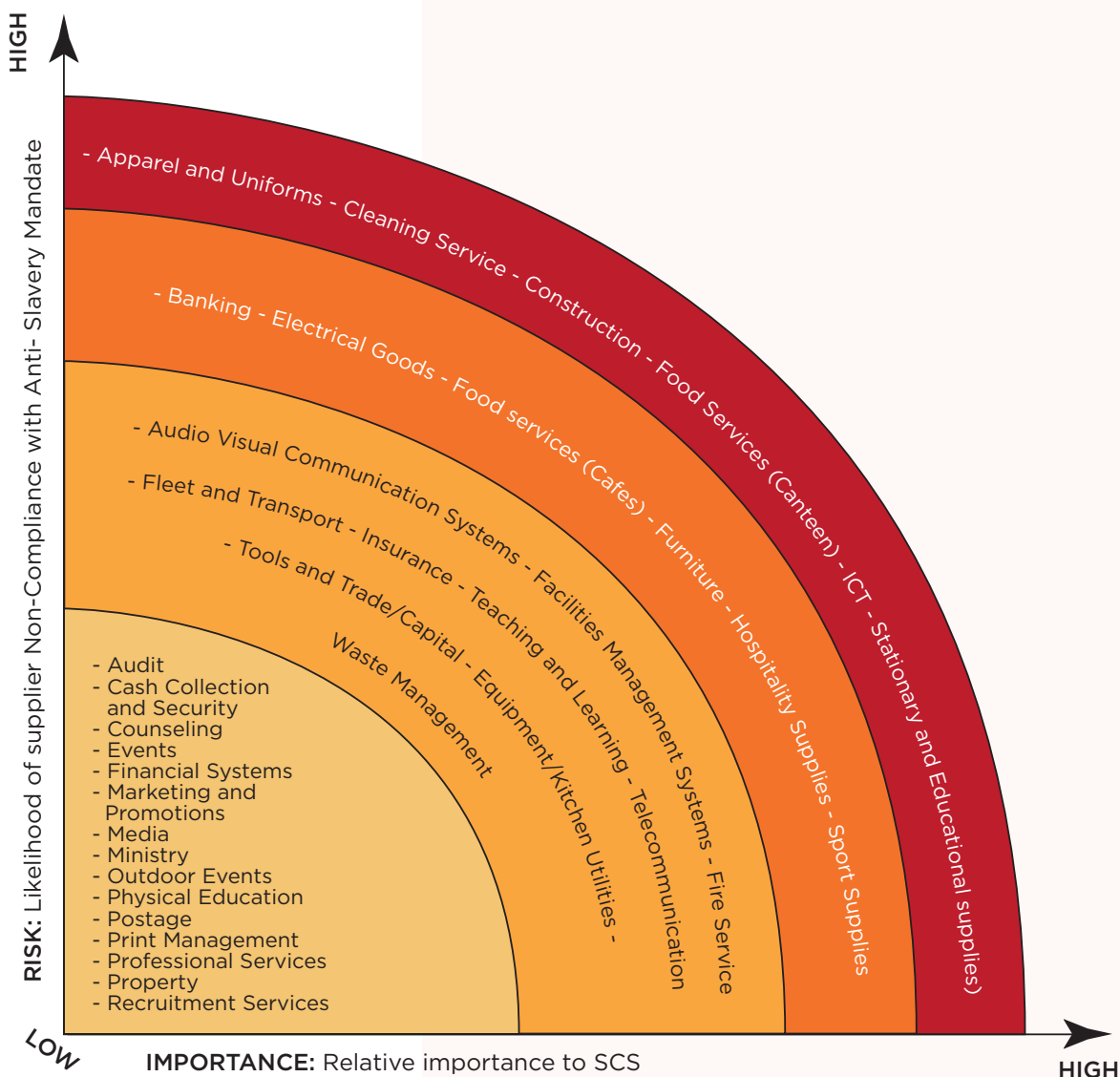
Sydney Catholic Schools has undertaken a number of steps in identifying modern day slavery across its supply chain including:

- Engaging on modern slavery with key stakeholders such as the ATSF and ACAN participants (particularly with entities in the education sector) and key suppliers which has provided a foundational understanding of operational risks within SCS and its supply chain.
- Conducted a risk review of categories, in order to determine where categories sit within a risk matrix. The risk matrix considers:
 - 1) the likelihood of a supplier’s non-compliance to the Anti-Modern Slavery Policy, and
 - 2) the level of importance of the category to SCS. If both considerations are determined to be high then the category is considered to be high risk.

The results of SCS risk review are shown below with seven categories considered high risk.

These seven categories can be further simplified into two key areas:

- 1) imported goods, and
- 2) contracted labour services.



The wall features a variety of educational content:

- Alphabet and Number Charts:** Large colorful charts for letters (A-Z) and numbers (1-9).
- MOON ROCK CAFE:** A menu-style poster with items like 'Moon Rock', 'Space Salad', and 'Planet Smoothie'.
- EXPLORING A LAUNCH DATE:** A card with a space background and text.
- WHAT PLANET WILL I GO TO?:** A card with a space background and text.
- MARS - PRACTISE:** A card titled 'Mastery Move' with instructions for a practice task.
- EARTH - CONTINUE WITH THE TASK:** A card with a space background and text.
- VENUS - SOLVE SIMILAR PROBLEMS:** A card titled 'Follow Through Move' with instructions for a problem-solving task.
- MERCURY - BEGIN A NEW CHALLENGE:** A card with a space background and text.



IMPORTED GOODS:

- Building & Construction – schools are continuously being built and/or renovated and many of the inputs for construction are manufactured overseas. Some examples of building materials include concrete, steel, timber, plaster products, glass, plastics, quarried stone and electrical equipment.
- Stationery & Consumables – schools are a major user of stationery consuming high volume low cost equipment such as pens, workbooks, stationery, paper products, small office machines, labels, ink, toner, furniture, chairs, tables, workstations, filing cabinets, shelves, first aid supplies etc.
- ICT Hardware – According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The GSI highlights that the most at-risk electronics imported to Australia are from China and Malaysia and this includes the inputs to manufacture silicon chips, motherboards and other components.
- Uniforms – The textile industry has known to be proponents of using sweat shops to produce garments.

Imported goods are identified as high risk due to **where goods are sourced**. A majority of goods are sourced from countries with low cost manufacturing capabilities (low labour costs) such as China, Vietnam or India and where unfair work practices contribute to increased risk of forced labour.

Another risk associated with imported goods lies in the **sourcing of input material** to produce the goods. The raw materials used to create the goods have the potential to be sourced through acts of modern slavery.



CONTRACTED LABOUR SERVICES:

- Cleaning
- Canteen Services
- Building & Construction

An additional risk identified by SCS is the **volume of suppliers** engaged by SCS across 150 school sites. SCS is currently transitioning all schools from multiple accounting systems to a single system by the end of 2021. This will allow for consolidated reporting on suppliers. SCS will have the capability to conduct comprehensive supplier risk analysis once full integration is complete.

Although some key suppliers are Modern Slavery Act reporting entities, the management of many smaller suppliers by multiple individuals at school sites will require a modern slavery guidance program and management plan to empower site managers to manage risk and be accountable to the modern slavery policy.

In an attempt to identify risk within the SCS supply chain a review of the top 49 suppliers was conducted during 2019-20. The outcome of the review can be seen on the below table. This identified that a majority of our high spend suppliers fit into the high risk categories such as Building construction and ICT hardware.

49
NUMBER OF SUPPLIERS

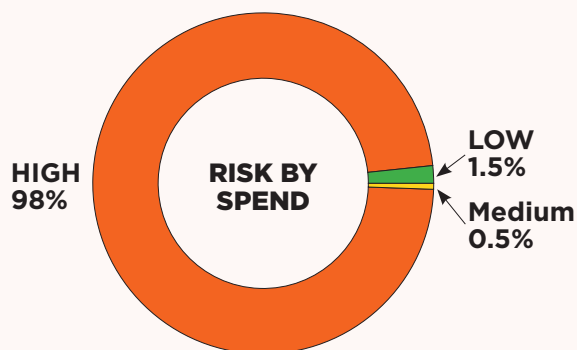
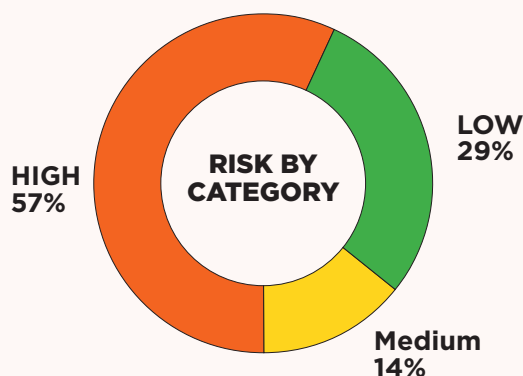
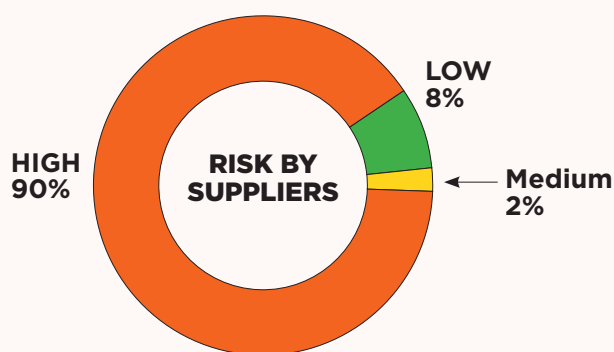
42
HIGH RISK SUPPLIERS

7
SPEND CATEGORIES

4
HIGH RISK CATEGORIES

\$ 240,786,943
TOTAL SPEND

\$ 236,340,888
TOTAL SPEND



COVID-19 RESPONSE

SCS is aware of the potential for exploitation in the current COVID environment such as:

- Cleaners being exploited into long hours due to additional demand.
- Sourcing of personal protective equipment (PPE) from untested overseas suppliers.

SCS endeavoured to only source PPE from trusted suppliers and only engaged with cleaners that were already contracted and have in place modern slavery policies.

SCS provided PPE for the school network centrally thereby reducing the potential for schools to engage with risky suppliers.



WASH
HANDS



USE A
FACE MASK



DISINFECT
SURFACES



USE
RUBBER
GLOVES



DISINFECT
HANDS

**COVID-19
PREVENTION**



ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

Throughout the reporting period, SCS has completed a number of actions to address modern slavery and the risks it imposes.

ACTIONS COMPLETED DURING REPORTING PERIOD:

- The appointment of a **Modern Slavery Liaison Officer** (MSLO) to drive modern slavery risk management initiatives across SCS, liaise with the ASTF and ACAN.
- Established a Modern Slavery **Working Group** within SCS. Each directorate has been assigned an individual support person for the directorate. That individual is intended to be the SME for modern slavery for their directorate.
- 17 central office staff completed ACAN e-learning modules on Modern Slavery and Business Relevance which includes information about Modern Slavery Act compliance.
- 13 employees from the Modern Slavery Working Group participated in ACAN Modern Slavery Supplier Engagement Strategy Workshop and completed a draft supplier engagement strategy.
- Initiated the review process to the existing SCS **Modern Slavery Policy** for an update in 2021. Once the new policy is approved in July 2021 it will be communicated across SCS and replace the old policy. The policy reaffirms SCS's stance on Modern Slavery and provides guidance and for employees and expectations of suppliers.
- Staff and suppliers participated in Building Links seminar to increase awareness of modern slavery in SCS capital works team and in relation to construction projects.
- The development of contractual clauses for standard contracts. SCS will access ACAN comprehensive clauses for high-risk contracts.
- Completed a risk assessment of its supplies base.
- Completed a risk review of the cleaning expenditure category.



MODERN SLAVERY ACTION PLAN AND ROAD MAP

Sydney Catholic Schools will be implementing modern slavery action plans focusing on five key pillars:

1. Systems Management
2. Human Resources & Recruitment
3. Procurement & Supply Chain
4. Risk Management, and;
5. Customers & Stakeholders.

The overarching activities include:

- **Educating** internal and external stakeholders,
- **Creating** a platform to measure and monitor performance, and:
- **Implementing** category specific activities to counter modern slavery.



SUPPORTING THOSE IMPACTED BY MODERN SLAVERY

Sydney Catholic Schools is committed to providing appropriate and timely support for those impacted by modern slavery in accordance with the Modern Slavery Act 2018 (Cth). In the case of a determination being made that SCS has caused, contributed or is linked to modern slavery through a supplier a response by SCS may include:

- Supporting people that have been directly impacted by modern slavery.
- Cooperating in actions to support people that have been directly impacted by modern slavery.
- Cooperating in addressing the root cause and mitigating future risks to prevent modern slavery.

The nature of such support is specialised and requires specific resources to facilitate appropriate support. Therefore, SCS has supported Archbishop Anthony Fisher's modern slavery remedy pathway, Domus8.7, an independent program to provide a remedial solution to people impacted by modern slavery.



Services provided to SCS by Domus8.7 include:

- Guidance and advice in relation to modern slavery concerns in operations and supply chains.
- Direct support, referrals and practical assistance to people impacted by modern slavery.
- Access to Domus8.7 online reporting tool.
- Assessment on prevention/risk mitigation.

Where SCS has been directly associated with modern slavery in its supply chain, SCS will engage with Domus8.7 to provide remedy.

Domus8.7 follows three key elements for a remedial pathway:

- Victim Safety Protection and consent - Ensuring victims are safe is the primary focus.
- Human rights based approach - fundamental human rights are protected and respected.
- Independent advice and support - support is not contingent upon cooperation with law enforcement and authorities.

Additional information can be found on <https://www.acan.org.au/domus87>

EFFECTIVENESS ASSESSMENT

Sydney Catholic Schools with support from ASTF and ACAN completed a benchmarking assessment designed by SD strategies called “Bridge the Gap”. Bridge the Gap measures progress in key areas over time. The table provides the SCS grade at initial starting point in late 2019 and then a comparative score for 2020. As a whole, SCS made incremental improvements by the end of 2020 particularly in risk management and policy development.

Modern Slavery Mitigation Implementation Category	2019	2020	Variance
Management			
Governance	Leading Practices	Leading Practices	■
Commitment	Making Progress	Making Progress	■
Business Systems	Starting Out	Making Progress	▲
Actions	Making Progress	Making Progress	■
Monitor report	At The Start	At The Start	■
Risk Management			
Risk Framework	Making Progress	Making Progress	■
Operational Risk	Starting Out	Making Progress	▲
Identify External Risks	Starting Out	Making Progress	▲
Monitoring and Reporting Risk	At The Start	At The Start	■
Human Resources and Recruitment			
Awareness	Making Progress	Making Progress	■
Policies and Systems	At The Start	Starting Out	▲
Training	At The Start	Starting Out	▲
Labour Hire/ Outsourcing	Starting Out	Starting Out	■
Customers and Stakeholders			
Customers Attitude	Starting Out	Starting Out	■
Information Provision	Starting Out	Starting Out	■
Feedback Mechanics	At The Start	At The Start	■
Worker Voice	At The Start	At The Start	■
Procurment and Supply Chain			
Policy and Procedures	Starting Out	Making Progress	▲
Contract Management	Starting Out	Starting Out	■
Screening and Traceability	Starting Out	Starting Out	■
Supplier Engagement	Leading Practices	Leading Practices	■
Monitoring and Corrective Action	Starting Out	Starting Out	■

■ At The Start
 ■ Starting Out
 ■ Making Progress
 ■ Leading Practices

OTHER RELEVANT INFORMATION

Not applicable.



MODERN
SLAVERY
STATEMENT
2020



Modern Slavery Statement 2020





This Modern Slavery Statement was approved by the Board of Mater Misericordiae Ltd.

Francis Sullivan

Executive 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.

All patient and spend statistics referred to within this report are based on our 2019/2020 Financial Year. However, in order to align our Modern Slavery Statement to other ACAN members, our modern slavery risk mitigation strategies are reported for the calendar year 1 January 2020 to 31 December 2020.

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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.

2020 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 business and supply chain over the financial year ending 30 June 2020 and beyond.

The practice of medicine 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 of 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.

By engaging external expertise and aligning ourselves with the Australian Catholic Anti-Slavery Network (ACAN), in 2020 Mater implemented numerous strategies to mitigate the risk of modern slavery within our operations and supply chain. Key areas of focus include:

- **Our supply chain**
We strengthened our supply chain risk assurance mechanisms by setting our minimum standards of behaviour within our Ethical and Sustainable Procurement—Supplier Code of Conduct and working with suppliers who provide high-risk commodities.
- **Our operations**
We conducted a governance gap analysis and updated policies and procedures to assess and mitigate the risk of modern slavery.
- **Our people**
We provided training for staff to recognise, prevent and respond to concerns of modern slavery.

Our plans for 2021

- Continuing to support our suppliers to implement modern slavery risk mitigation strategies and to further our understanding of our suppliers' supply chain.
- Working with our partner Catholic Negotiating Alliance (CNA) hospitals to undertake more in-depth assessments of our common high-risk suppliers.
- Promoting further awareness and training for our operational team, including focusing on our English Second Language Speakers—both staff and volunteers to recognise signs of potential modern slavery victims.

Our plans beyond 2021

- Continually improving our approach to identifying, assessing and managing modern slavery risks in our operations and supply chains. We have identified measurable actions to address modern slavery risks beyond 2021, including a commitment to improve our understanding of the categorisation of our expenditure data throughout our supply chain and mapping suppliers of key, high-risk medical consumables such as masks, gloves and isolation gowns.
- Delivering modern slavery awareness online training modules for all staff and targeted training for management. These online modules will aim to increase knowledge of the impacts of modern slavery on a global economy and examine how modern slavery affects healthcare in Australia.



Brief statement from our Executive Chair

As a not-for-profit Catholic ministry in healthcare, Mater is committed to ethical business practices. We take our responsibility to the broader community seriously and seek to ensure ethical and sustainable practices are inherent in our business partners.

Mater's commitment to transparent, fair and responsible procurement practices must naturally extend through to our suppliers in the responsible sourcing and trading of goods and services.

Working together to identify and understand the risks of modern slavery, including in operations and supply chains, is crucial to mitigating modern slavery and related practices.

We look forward to working with our supply partners in 2021 and beyond to tackle these important ethical issues and establishing best practice in mitigating modern slavery and preserving human dignity.

Francis Sullivan AO

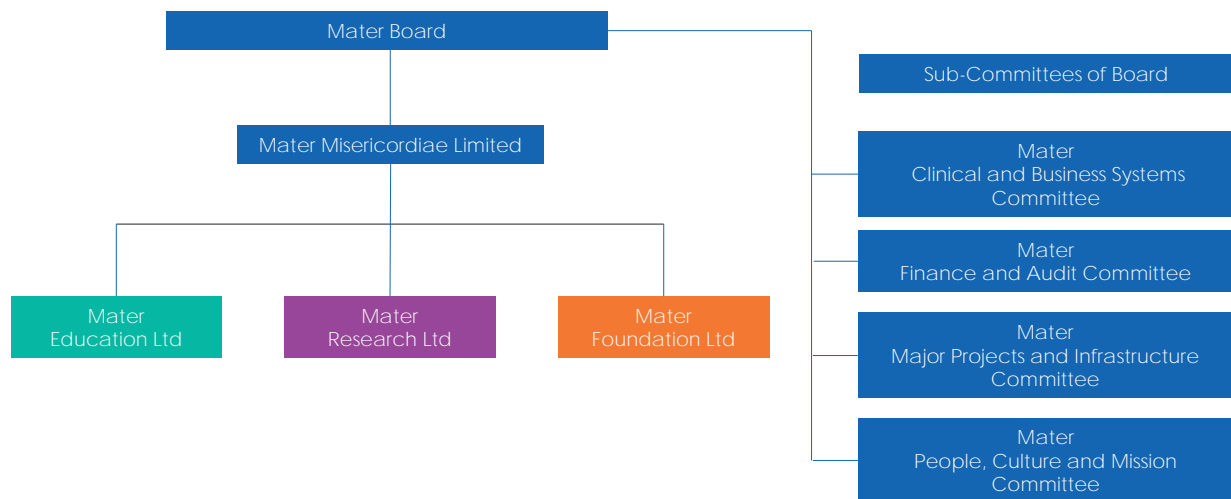
Executive Chair – Mater Misericordiae Limited Board of Directors

Reporting criteria 1 & 2: About Mater

Our organisational structure

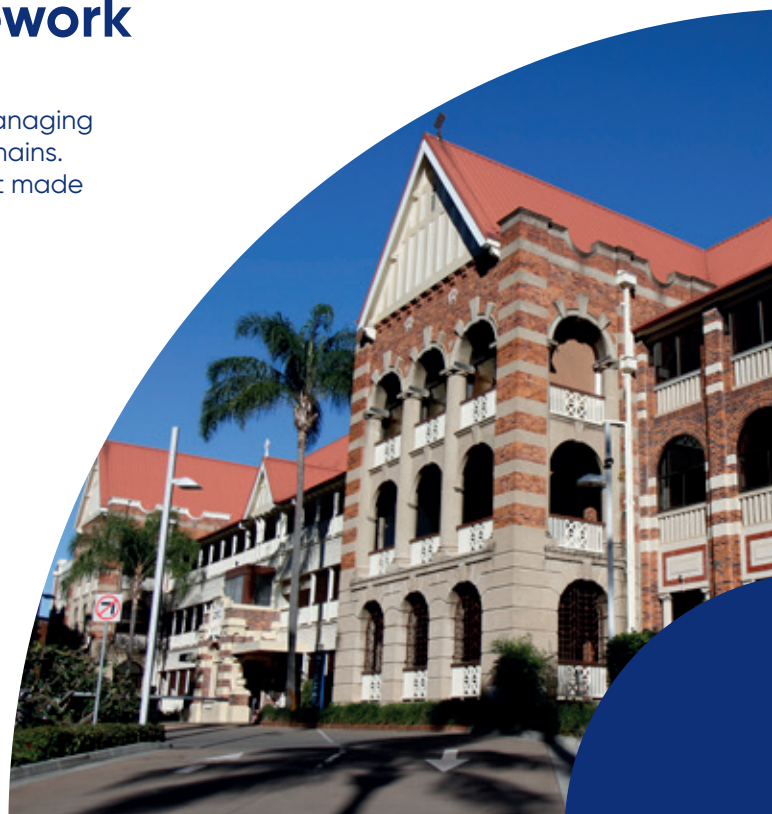
Mater’s organisational structure reflects our commitment to the strategic and consistent integration of health, education and research.

In July 2019, 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 Brisbane, Queensland.



Our governance framework

Mater takes 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 of an extensive network of both public and private hospitals, health centres and related businesses, a nationally accredited education provider, a world-class medical research institute and philanthropic support.

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 to continue to fulfil our Mission to meet the healthcare needs of our community in delivering safe, high-quality, compassionate care.

Mater's Chief Executive Officer has 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 philanthropy opportunities.

Operations during 2020



Figure 1: Mater locations across Queensland



599 459
patients seen



10 439
babies born



68 298
emergency
attendances



\$18 311 004
Mater Research
secured funding



996 students
graduating
from Mater
Education's RTO



7041 paid
employees



58 888 hours
contributed by
Mater volunteers

Figures are for SEQ only.

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.

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



~5 000 Suppliers during FY19/20

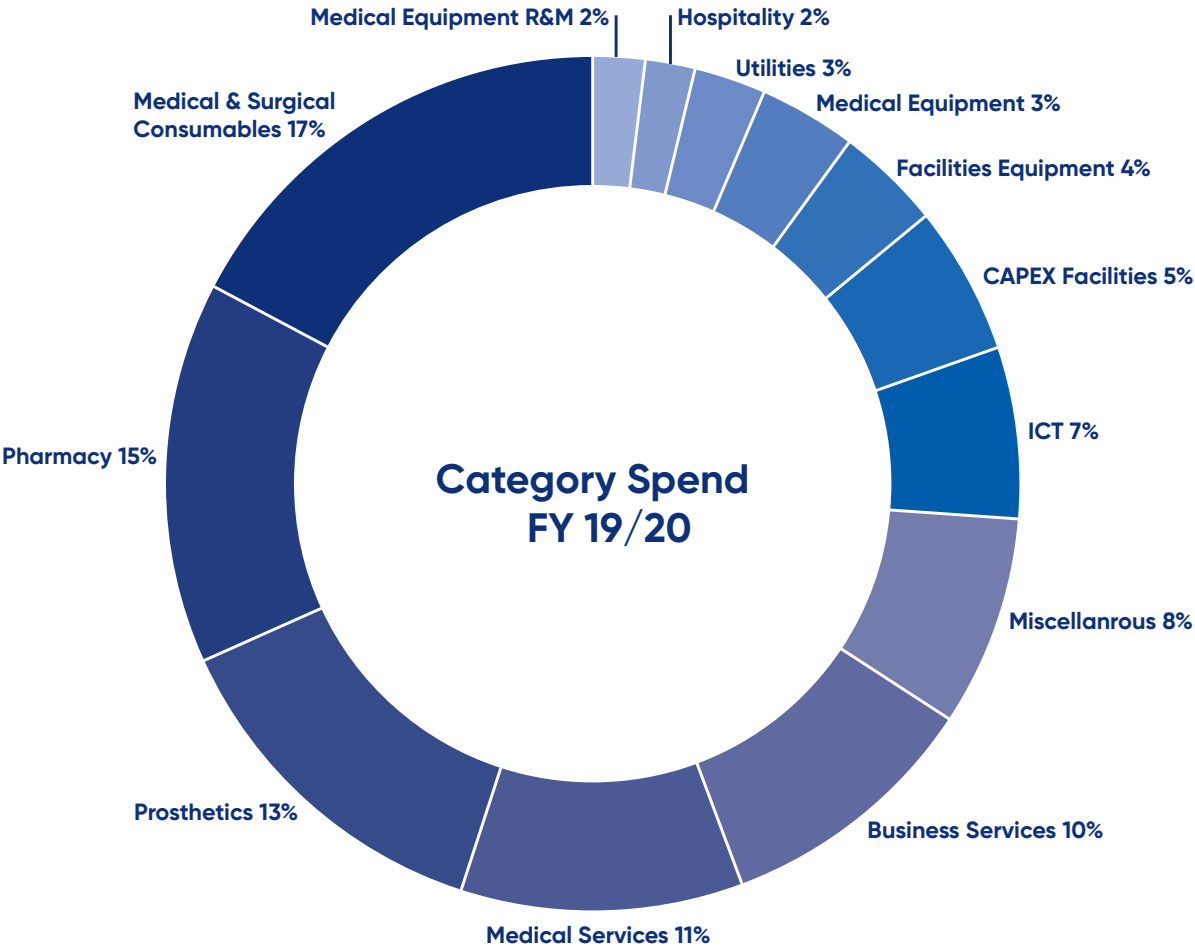


~\$500 M Total addressable spend FY19/20



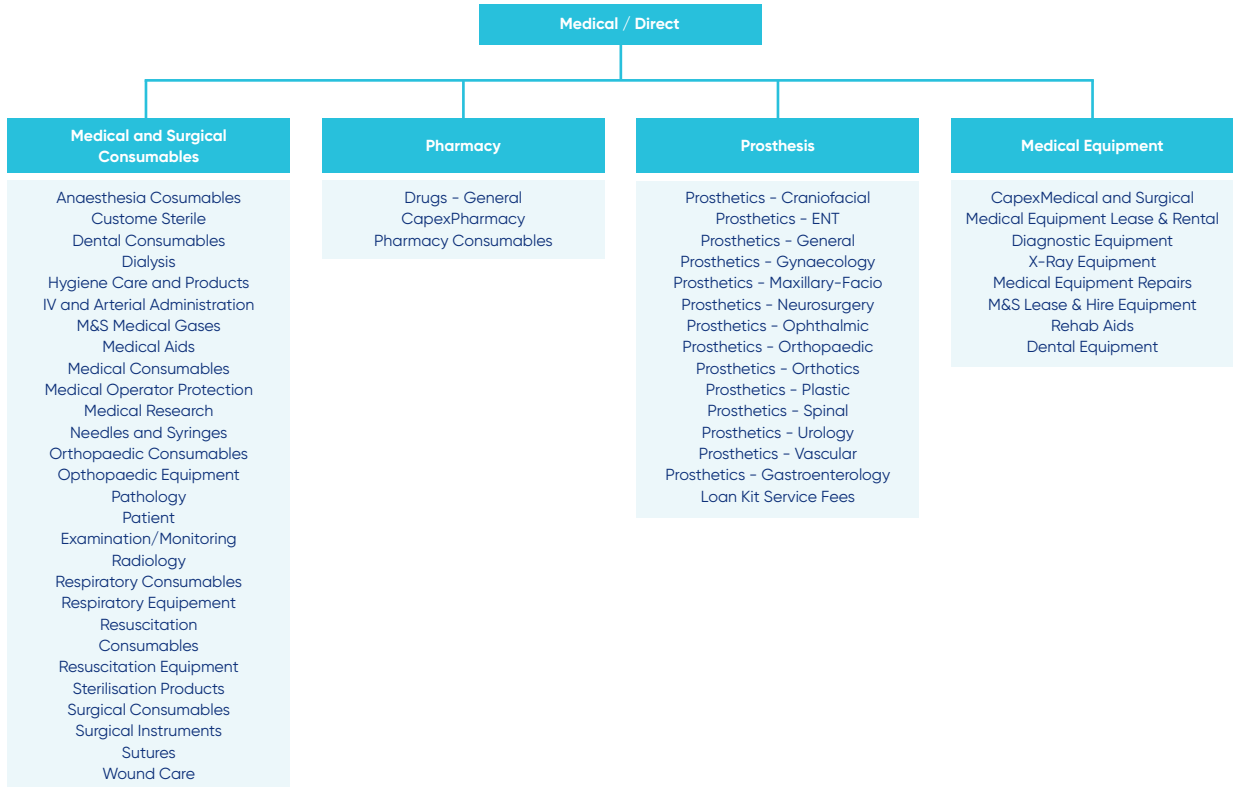
43 Suppliers engaged through CNA contractual arrangements

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



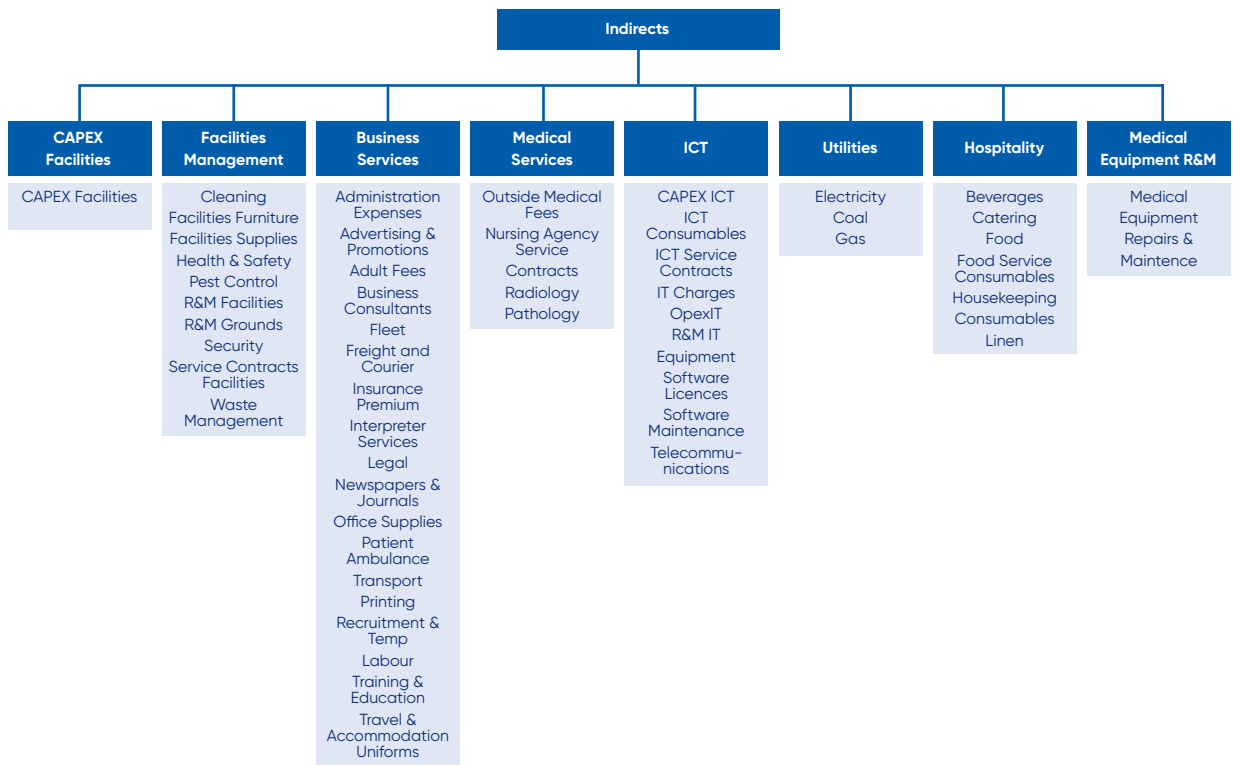
Our largest categories of supplier spend (56 per cent) involves the purchasing of medical and surgical consumables, pharmacy, prosthetics and medical services. An overview of the products procured under each category has been listed below:

What we buy—clinical:



The remaining 44 per cent of expenditure consists of 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 commitment extends to suppliers sharing a consistent view to the ethical sourcing and trading of goods and services. We require that all suppliers comply with our Ethical and Sustainable Purchasing—Supplier Code of Conduct. New suppliers are selected based upon 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 norms 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 affecting 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 that 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, COVID-19 impacted our operations substantially. In a short space of time, our clinical consumable supply chain was placed under significant stress. The safety and wellbeing of our staff and patients were our highest priority and obtaining sufficient supplies of high-quality personal protective equipment (PPE) became challenging.

In addition, the increase in demand resulted in an unprecedented increase in cost. Regular monthly orders of gloves, face masks and isolation gowns were placed at risk as some countries diverted shipments to their own shores and others were forced into lock-down. We worked tirelessly to mobilise new COVID-19 wards and ensure they were adequately stocked.

Through this time, we were cognisant that the unprecedented pressure on global supply chains meant we had to be twice as vigilant in our approach to identify and manage the risk of modern slavery in our operations and supply chain. We responded to these challenges by continuing to purchase, where possible, consumables through known, long term suppliers who had publicly stated their zero-tolerance position towards modern slavery.



Our people

Mater has more than 9 500 full-time, part-time and casual employees, and volunteers throughout Queensland.

Agency suppliers

As a healthcare provider, we engage a range of agency healthcare professionals daily to ensure we have adequate resources.

Our nursing agency spend during 2020 was \$2.648 M, distributed over six suppliers throughout Queensland. Our agency suppliers have been provided with a copy of the Mater Ethical and Sustainable Procurement—Supplier Code of Conduct. All contracts from January 2020 onwards 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 September 2019, our Procurement and Supply Chain Operations division established a cross-functional working group for Mater to develop and implement our Modern Slavery Risk Mitigation Strategy.

In February 2020, Mater joined the Australian Catholic Anti-Slavery Network (ACAN). As part of this membership, Mater undertook a review of its existing processes and practices and was provided with a gap-analysis report which helped us understand our areas for improvement.

In March 2020, COVID-19 escalated dramatically with significant impacts on operations. Resources within Procurement and Supply Chain Operations

were diverted to focus on responding to the pandemic including sourcing personal protective equipment to protect staff and patients from the spread of the virus.

Due to Mater's response to COVID-19, a number of operational and strategic programs were delayed including Mater's implementation of the Modern Slavery Risk Mitigation Plan. Despite this setback, many of our strategies were able to be successfully implemented. More work will be undertaken in 2021, during the second reporting period, as we progress the remaining initiatives. A gap analysis demonstrating implementation progress of our Modern Slavery Risk Mitigation strategies is shown in the table below:

Table 1: Risk Mitigation Modern Slavery Gap Analysis

Category	Topic	Result Feb 2020	Result Jan 2021
Management Systems	Governance	○	●
	Commitment	◐	●
	Business System	○	●
	Action	◐	◐
	Monitor/Report	○	◐
Risk Management	Risk Framework	◐	◐
	Operational Risk	◐	●
	Identifying External Risks	○	◐
	Monitoring and Reporting Risks	○	◐
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

To assess our supply chain risks and as part of our ACAN membership, we provided information to understand the level of modern slavery risk within our supply chain. The information provided for analysis included categorisation of the types of goods and services of our top fifty suppliers (by expenditure). We also provided information about suppliers outside the top fifty that we believed may have a higher level of modern slavery risk.

To determine the suppliers' level of risk, the following key indicators were applied:

- **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**
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).
- **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.

The information which ACAN provided to Mater included a customised supplier risk assessment that identified high risk, medium risk and low risk categories of expenditure (refer to Tables 2 and 3 on the next page).

High risk categories are indicated by red , medium risk categories are indicated by orange  and low risk categories are indicated by green .

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

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

Medical equipment and medical supplies are Mater's highest-risk categories and we recognise that further work needs to be undertaken to understand more about these suppliers and the countries in which they manufacture their products.

In 2021, we will be focusing on improving categorisation of our suppliers and expenditure. This will provide us with clearer insights into which areas of our supply chain should be mapped as a priority.

CNA supplier self-assessment survey

The Catholic Negotiating Alliance (CNA) members (of which Mater is a member) agreed to collectively issue a supplier self-assessment survey to 25 of their shared, high-risk suppliers. Responses from the survey were collated and scored. Many of our international shared suppliers have been reporting their modern slavery position in California and the United Kingdom for several years and were able to provide significant evidence into their understanding of their supply chains. However, some suppliers were unable to demonstrate their commitment to mitigating the risk of modern slavery and their scores were reflective of this. CNA members agreed to provide support to these suppliers throughout reporting period two. This will include tools and training as well as an agreed management plan to ensure accountability.

Mater Health Modern Slavery Supply Chain Risk (July 2020)

Table 2: Modern Slavery Risk by Spend Category (\$M)

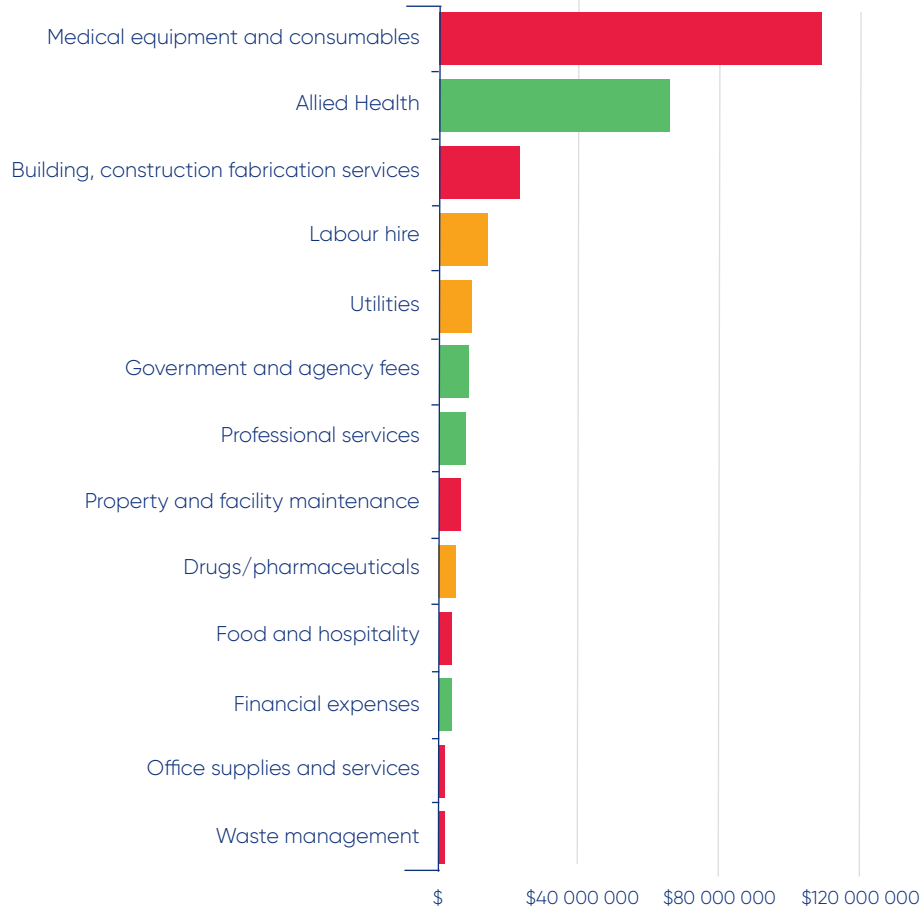
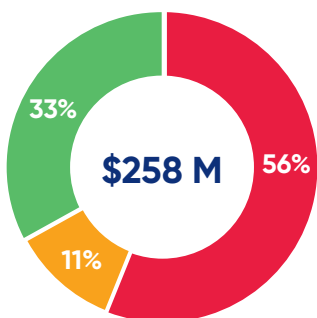


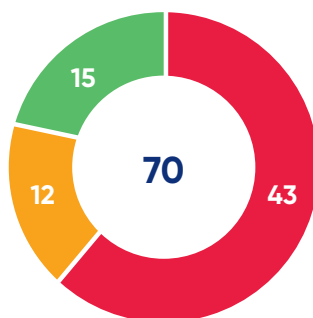
Table 3: Modern Slavery Risk Analysis by Spend %, by Supplier Numbers and Category Numbers

	High Risk Categories	Medium Risk Categories	Low Risk Categories	TOTAL
Spend Risk (\$AUD)	\$144 636 482	\$28 796 049	\$84 685 348	\$258 117 879
Supplier Risk (No.)	43	12	15	70
Category Risk (No.)	6	3	4	13

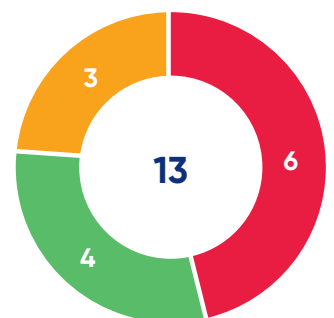
Risk by spend (\$AUD)



Risk by supplier number



Risk by category number



Legend: High risk categories | Medium risk categories | Low risk categories

Reporting criteria 4: Actions taken to assess and address risk

In 2020, Mater focused on strengthening its understanding of potential modern slavery risks in our operations and supply chain and implementing modern slavery risk mitigation strategies.

We reviewed our Procurement Governance Framework and updated policies and procedures, evaluation guides and tendering templates, tendering and contract terms and conditions. We drafted our remediation policy and regularly provided the Executive Leadership team with implementation updates.

Procurement and Supply Chain Operations worked with Human Resources to update our Behavioural Guidelines and we provided face-to-face training to our operational staff on how to recognise the signs of a potential modern

slavery victim. We updated our mandatory orientation training material and we are currently progressing the implementation of online Modern Slavery training modules for all staff and material on the impacts of Modern Slavery in the health industry for managers.

We published and sent our Ethical and Sustainable Code of Conduct to our suppliers. We publicly stated our zero-tolerance position to modern slavery on our external and internal websites and we raised awareness of modern slavery throughout Queensland by participating in several speaking engagements.

We provided specialised training to our procurement, purchasing and finance teams and we will follow up with information sessions throughout 2021.

Modern slavery action plan and road map

Our 2021 action plan and road map will continue to build upon the foundations laid during 2020.

We have scheduled more training for our operational staff throughout Queensland, both face-to-face and by encouraging the completion of on-line modules. We will continue to work closely with our procurement and purchasing team to increase awareness and due diligence activities in our supplier engagements.

We are committed to improving our supply chain data analytics. This will provide improved insights into our high-risk suppliers for targeted discussions and desk-top audits.

We will continue to work with our fellow ACAN and CNA members to support high-risk suppliers to mitigate modern slavery risks.

We will continue to deliver awareness and updates throughout the state and provide regular updates to our Board and Executive Leadership team on our progress.

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. Measurements include the number of internal awareness communication initiatives delivered, the number of supplier engagement conversations held, the number of participants engaging in face-to-face or online training for the month and key performance indicators focusing on suppliers responsive to modern slavery throughout the tender process.

We will continue to consider how we can better define measures of our effectiveness as part our 2021 program.



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

Our Board also governs Holy Cross Laundry, a world-class, leading commercial laundry and linen hire service for the aged and personal care, commercial and medical industry.

Representatives from Holy Cross were consulted throughout reporting period one and support, tools, guidance and training were provided.

Reporting criteria 7: Other

Mater commits 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

Executive Chair, Mater Misericordiae Limited Board of Directors



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.

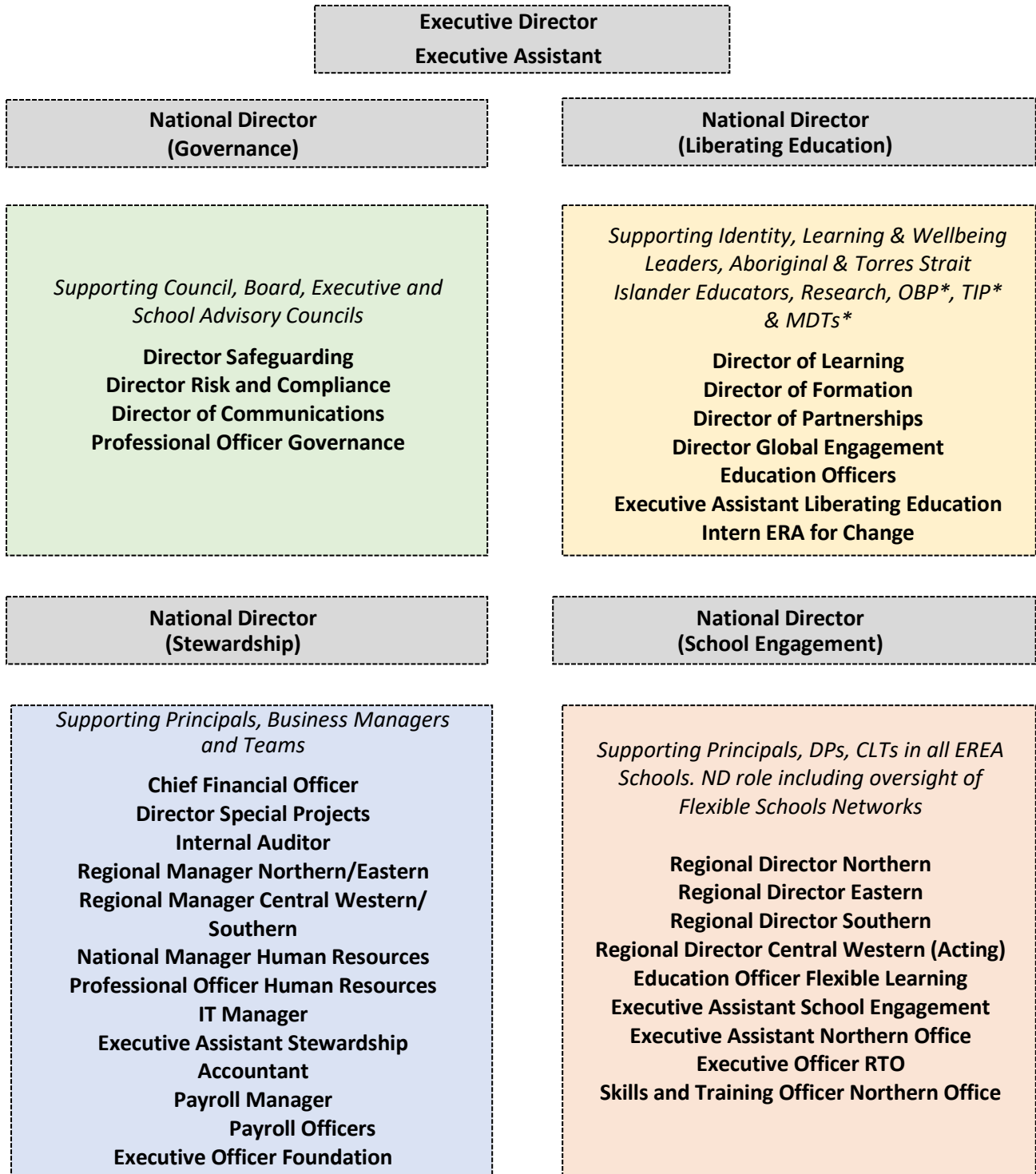
A fundamental component of flexible learning is an emphasis on relationship development. Complementing this process is the provision of a values and relationship education program, which draws on the common ground principles and relates to the life experiences of young people.

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.

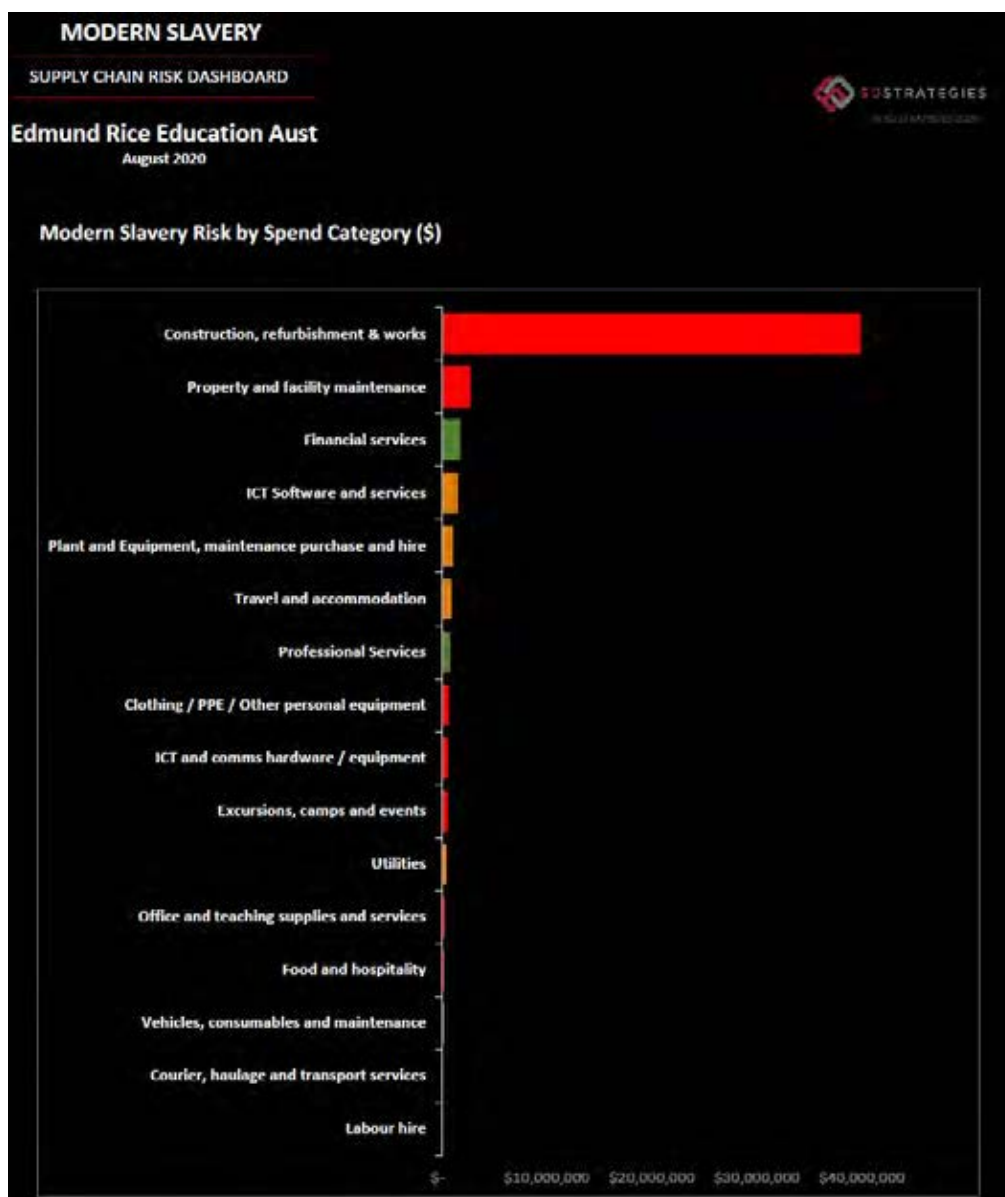
Our Organisation Chart



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"> • Approving our Modern Slavery Policy • Ensuring our policy is reviewed and updated as needed • Reviewing compliance with our policy • Ensuring our policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.
EREA Executive Director	<ul style="list-style-type: none"> • Developing procedures and guidelines supporting adherence with our policy • Ensuring our Policy is implemented
Principals	<ul style="list-style-type: none"> • Implementing our Policy and any associated procedures and guidelines

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

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.
- 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 2021 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 22 June 2021.

Signed,



Bobby Court
Board Chair
Edmund Rice Education Australia
22 June 2021

Edmund Rice Education Australia offers a liberating education, based on a gospel spirituality, within an inclusive community committed to justice and solidarity

For further information please contact:

Edmund Rice Education Australia

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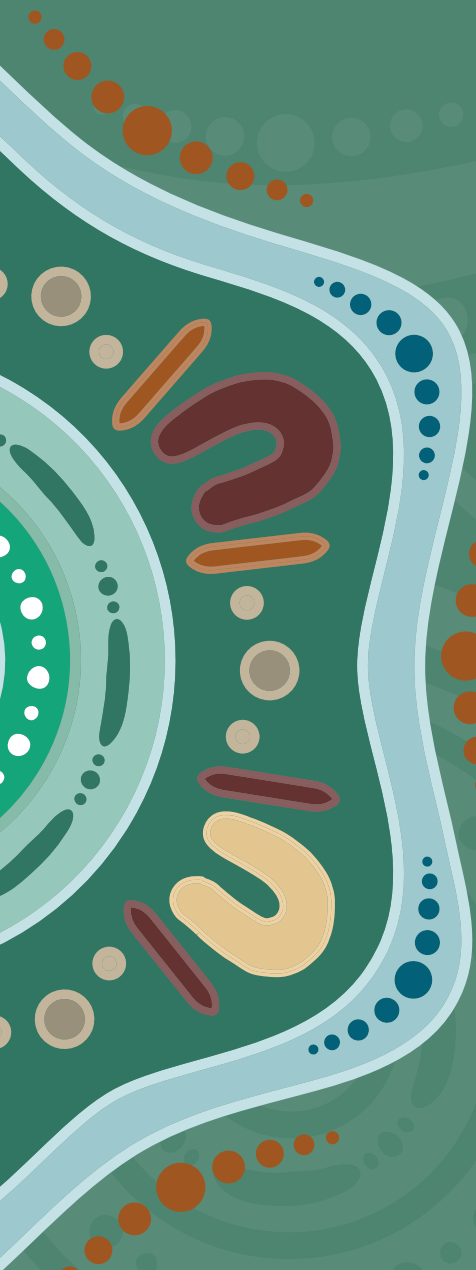


Mercy Health

Care first

Mercy Health

Modern Slavery Statement 2020



The Mercy Health reconciliation story in images

The *Mercy Health Modern Slavery Statement 2020* features original artwork by Yorta Yorta and Gunnai artist Dixon Patten. Dixon is Director and Designer of Bayila, an Aboriginal-owned graphic art company founded in Melbourne (Nairn). Dixon's own story is entwined with Mercy Health, having been born at the Mercy Maternity Hospital in East Melbourne. Dixon was also present for the birth of his two nieces at Mercy Hospital for Women in Heidelberg.

Here, Dixon explains the narrative and symbolism of the artwork:

This artwork represents Mercy Health's commitment to reconciliation and honours the connection and dedication to the communities it serves.

The central motifs represent the founding Sisters and the Mercy heritage story. The figures represent strong women and honouring the maternal roots of Mercy's identity. The hands represent Aboriginal people and honouring them as the First Peoples of Australia. The feet represent Aboriginal and non-Aboriginal people walking together in reconciliation and exchanging energy, knowledge and perspectives.

The formations to the left and right of the Sisters' represents the various branches of Mercy Health beyond maternity. The various circles

represent the different communities and the pathways depict our connection to each other.

The boomerangs represent returning to culture principles for guidance while on the reconciliation journey. The shields represent resilience. The 'birthing' trees represent traditional Aboriginal birthing practices; where a woman's placenta was placed in a tree and that tree was sacred to the newborn and during their lifetime. The gum leaves represent being 'Welcomed to Country'.

The coolamon was used for many traditions: babies were carried in them as a nurturing practice and they were also used in smoking ceremonies, which are a spiritual cleansing ritual. The message sticks were used as a 'passport' to allow others to cross the different countries, this allowed for exchange of dialogue and education.

The ancestors are wrapped in their possum-skin cloaks, a tradition in which a person had one cloak from birth to death.

Mercy Health was formed in Nairn (Melbourne). In the artwork, Bunjil and Waa, two creator beings for the Kulin (traditional owners of Melbourne) fly overhead, guiding and protecting us on our life's journey.

Title: wabung-ngetel

Call of Country
Gunnai Language

Artist

Dixon Patten
Bayila Creative
Gunnai and Yorta Yorta



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About Mercy Health

Mercy Health is a Catholic not-for-profit organisation that provides a range of health, aged and community care services to communities in Victoria, the Australian Capital Territory, New South Wales, Western Australia and Queensland. We care for people throughout life from conception to death. We are focused on the whole person: their health, their wellbeing and their capacity and freedom to thrive.

Mercy Health operates at all times as part of the mission of the Catholic Church in conformity with canon law and the ethical framework of the Institute

of Sisters of Mercy of Australia and Papua New Guinea. In the tradition of the first Sisters of Mercy and based on the founding vision of their founder, Catherine McAuley, we are an organisation dedicated to action. We employ people who 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



Mercy Health was established by Sisters of Mercy in Australia and continues as a Ministry of those Sisters.

The Sisters have distinguished themselves by working against human trafficking, which is one aspect of modern slavery.

It is in that tradition that Mercy Health presents our first modern slavery statement under the *Modern Slavery Act 2018* (Cth).

The advent of the *Modern Slavery Act* is consistent in its objectives with the values that form part of the Sisters' mission and vision.

This statement is made together with a range of Australian Catholic organisations. Mercy Health is pleased to be a part of the Australian Catholic Anti-Slavery Network (ACAN), and for our modern slavery statement to form part of the 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, from discerning the issue and our commitment to action, to delivering the final statement. I look forward to leading and supporting our ongoing efforts to eliminate modern slavery.

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 as required by the *Modern Slavery Act* on behalf of Mercy Health Australia Ltd, Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd for the period 1 January to 31 December 2020.

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.

This statement covers all entities owned or controlled by Mercy Health Australia Ltd, known together as ‘Mercy Health’.

Our organisational structure

Mercy Health is comprised of Mercy Health Australia Ltd ABN 89 614 115 856 and its subsidiaries.

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

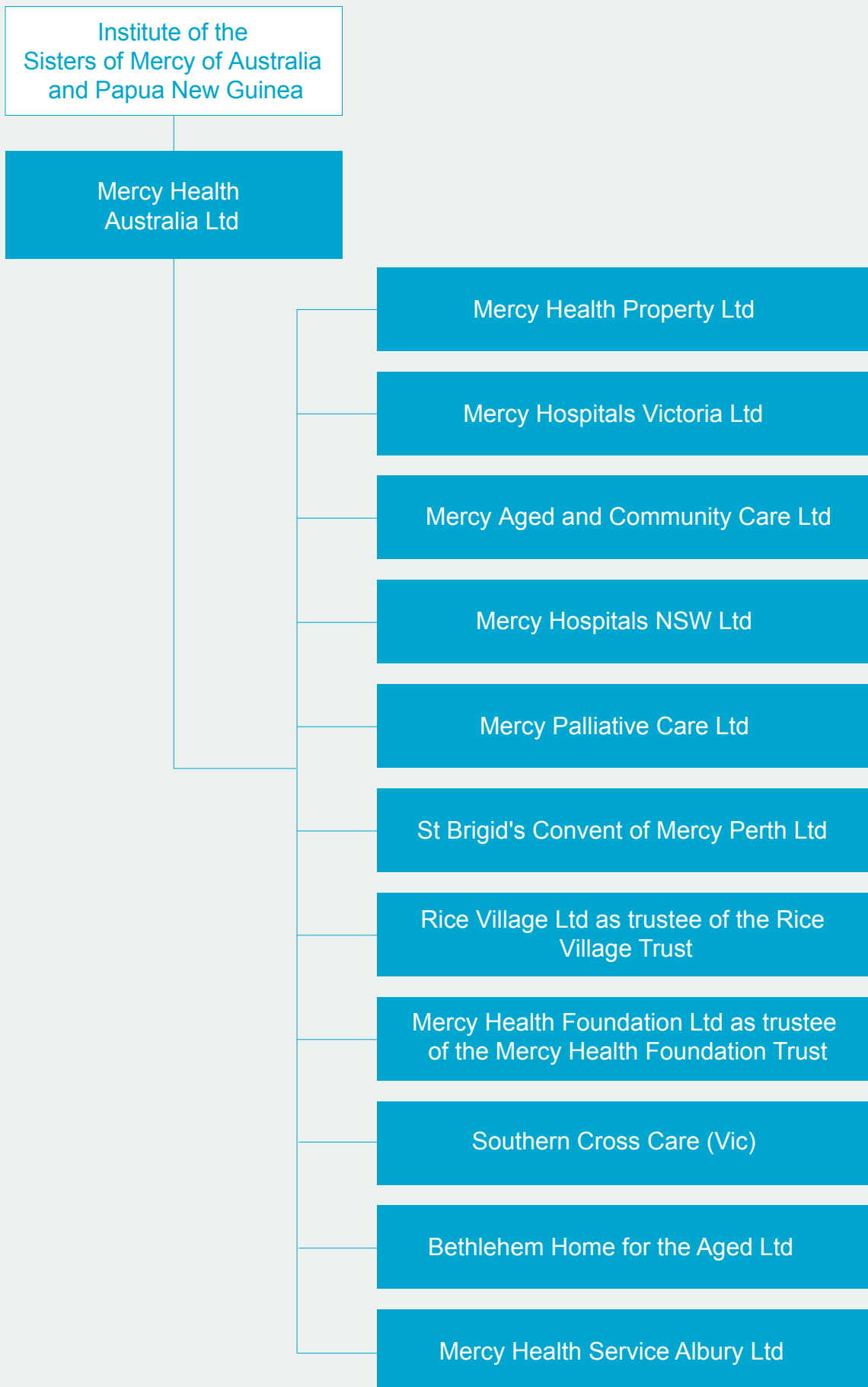
Mercy Health Property Limited	ACN 082 093 150	ABN 26 412 756 615
Mercy Hospitals Victoria Ltd	ACN 614 116 013	ABN 74 762 230 429
Mercy Hospitals NSW Ltd	ACN 075 648 350	ABN 53 075 648 350
Mercy Palliative Care Ltd	ACN 614 116 148	ABN 77 896 699 763
St Brigid’s Convent of Mercy Perth Ltd	ACN 617 402 767	ABN 57 714 505 919
Mercy Aged and Community Care Ltd	ACN 088 254 460	ABN 77 191 901 062
Rice Village Limited as trustee for the Rice Village Trust*	ACN 089 460 935	ABN 58 089 460 935
Mercy Health Foundation Limited as trustee for the Mercy Health Foundation**	ACN 107 275 230	ABN 73 107 275 230
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 Limited	ACN 068 291 234	ABN 82 068 291 234

* A trust established in accordance with the wills of Hannah Kathleen Moylan and Margaret May Rice administered cy-pres in accordance with Orders made by the Supreme Court of Victoria on 19 November 1993 and leave pursuant to section 63 of the *Religious Successory and Charitable Trusts Act 1958* (Vic) given in Orders made by the Supreme Court of Victoria on 30 November 1994.

** A trust established by deed made 30 March 2005 and as amended.

Home Care client Ray and his carer Anna





The leadership team of the Institute of the Sisters of Mercy of Australia and Papua New Guinea are members of Mercy Health Australia Ltd.

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 companies that make up Mercy Health are supported by our Executive team. Support Services functions are also shared across the organisation. For example, human resources and procurement teams support the organisation as a whole.

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; Executive Director Marketing, Communications and Stakeholder Relations; and Executive Director Leadership and Mission. The Group also includes representatives from procurement, health services, aged care and risk teams.

The Executive endorsed the proposal to establish the Working Group. The proposal was supported by the Mercy Health Board.

Consultation within Mercy Health

The entities owned or controlled by Mercy Health Australia Ltd were consulted as follows:

- The Mercy Health Board supported the establishment of the Working Group and approved the giving of this statement.
- The Mercy Health Foundation Board was consulted following a presentation about modern slavery and the Working Group.
- 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.



Support Services staff from Richmond (L-R) Aditya, Lucille and Ahmed

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 101,000 people in our Victorian hospitals in 2020. In that year, nearly 10,000 babies were born in those Victorian hospitals, 556 families were supported by our early parenting centre and more than 1,000 people received mental health services.

At the end of 2020, Mercy Health was operating 34 residential aged care homes across four states, providing care to about 3,400 people.

Mercy Health also supports people to live independently at home. In 2020, we provided care for more than 10,000 people in their own homes.

Supply chain

To deliver a wide range and scope of care, Mercy Health relies on products, 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, given the specialist nature of the services we provide, many of our providers are international suppliers with head offices based all around the world. Key countries include Australia, New Zealand, China, the United Kingdom, the United States of America and Germany.

Mercy Health's suppliers manufacture or source from manufacturers all over the world. Manufacturing occurs in a number of countries including Australia, the United States of America, Germany, Turkey, Japan, China, Malaysia, Mexico, Columbia and Sri Lanka.



*Werribee Mercy Hospital
surgical team*

Modern slavery risks in our operations and supply chain

Operational risk

About 10,000 people — 85 per cent of whom are women — worked for Mercy Health in 2020.

While Mercy Health employs people from approximately 134 countries, including India, the Philippines, Nepal and the United Kingdom, the vast majority of our employees are engaged in Australia.

Eight medical practitioners and one nurse commenced employment in our Health Services in 2020 having immigrated to do so. 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.

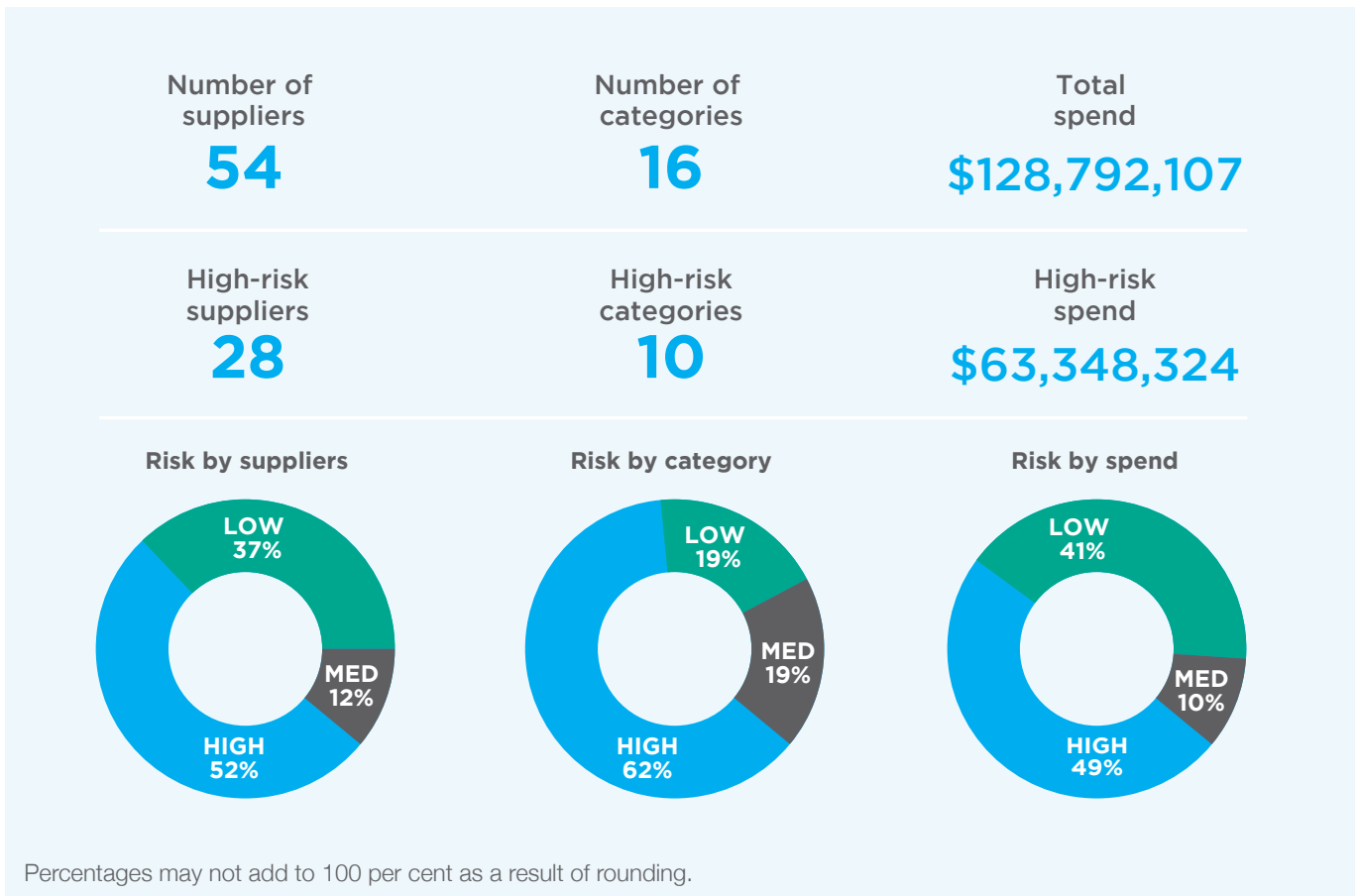
Supply chain risks

In 2019 in conjunction with the ACAN, Mercy Health undertook a supplier risk analysis of our top 54 suppliers by spend.

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. Identification of the high-risk categories was informed by the ACAN's Category Risk Taxonomy (see next page).

The high-risk spend categories for Mercy Health were identified as:

- 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.



Actions taken to assess and address the risks

As set out in more detail below, Mercy Health established the Working Group to liaise with management to assess and address modern slavery risks. In turn, the Working Group was guided by the ACAN. The Working Group oversaw the establishment and updating of guiding documents, training and education for relevant staff and a process for engagement with significant suppliers. Mercy Health’s activities were hampered by the impact of the COVID-19 pandemic and this remains an impediment to supply in some areas of our operations.

Australian Catholic Anti-Slavery Network (ACAN)

In 2019 Mercy Health joined the ACAN, made up of more than 30 Catholic organisations around Australia including large Catholic health and aged care providers.

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

Mercy Health undertook the ACAN ‘Bridge the Gap Analysis’, which generated a 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. We intend to repeat that analysis to guide our efforts in 2021.

Mercy Health worked with the ACAN to develop our organisational commitment; internal education and training; procedural tools and resources; and business systems.

Achievements of the Working Group

The Working Group was established and modern slavery liaison officers appointed to work with the ACAN to support and enhance our organisational responses to the risks of modern slavery.

Working in conjunction with the ACAN and under the supervision of the Working Group, the following goals have been achieved in 2020:

- We finalised a Modern Slavery Policy for Mercy Health employees and suppliers.
- We developed a Supplier Code of Conduct Policy and Supplier Code of Conduct for employees and suppliers.
- We implemented a detailed modern slavery questionnaire, which is designed to identify direct supplier risk as well as risk in at least second tier supply chains.
- Mercy Health procurement teams attended the ACAN’s intensive supplier engagement training workshop.
- We developed a Modern Slavery Risk Management Approach Procedure, which aligns to the overall Mercy Health Risk Management Framework.
- We developed a corrective action plan template to track the progress of suppliers asked to complete the questionnaire.
- We updated our Recruitment and Selection Policy to refer to modern slavery.
- The following tools have been developed or modified to respond to the risk of modern slavery:
 - Standard letters to suppliers providing the Mercy Health Supplier Code of Conduct and Modern Slavery Policies and requesting a commitment to the Code and Policies.
 - Inclusion of the Code and Policies in tender documentation and the requirement for tenderer acknowledgement.
 - Inclusion of modern slavery clauses in significant Mercy Health supply contracts and tender documentation.

The actions taken to address supply chain risk within Mercy Health are identified below.

Process	1. Risk stratify inventory	2. Risk-based engagement	3. Appropriate remediation
Risk management activities	Maintain inventory of suppliers with information regarding their potential modern slavery risk (high, medium or low) (ACAN Risk Taxonomy)	Assess the level of strategic and value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy) Develop Engagement Strategy based on the Strategic/Value impact of the high-risk supplier. (ACAN Supplier Engagement Strategy)	Where instances of modern slavery are identified, a prioritised risk management approach is taken: <ol style="list-style-type: none"> i. Modern slavery risk caused by our Entity ii. Contributed to by our Entity iii. Directly linked to our Entity
Scope	Mercy Operations; Suppliers/ Vendors and their Suppliers; Emerging Suppliers		
Foundation	Core Internal Controls; ACAN Supplier Engagement Strategy; ACAN Risk Taxonomy; Modern Slavery Act 2018		
Objective	Care First: We will care for, and about, marginalised and disadvantaged groups		

Internal education and awareness

The Mercy Health Board, the Mercy Health Foundation Board and the Mercy Health Executive were briefed about modern slavery. Some members of the Working Group and procurement teams received training on the risks of modern slavery and effective supplier engagement and remediation.

Remediation

Mercy Health is committed to ensuring it provides 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.

Our partnership with Domus 8.7 complements the remediation obligations and expectations in our new contract templates for high-value contracts.

Mercy Health has funded an E-Learning ‘Remedy Pathways’ module that will be available to staff and other stakeholders in 2021.

Impact of COVID-19

COVID-19 has been challenging for the Australian community as a whole, including our employees and the people we serve. The effects of the pandemic

were worst felt in Victoria, where most of our health, aged and community care operations are based.

Led by an incident response team, Mercy Health provided hospital care to patients infected with COVID-19. Meantime, we continued to care for people in our aged care homes and those living independently within significant regulatory restrictions to care.

COVID-19 posed a particular challenge for our procurement team, which was engaged in sourcing and deploying essential personal protective equipment in a difficult procurement environment.

While COVID-19 has not prevented us from developing our response to modern slavery, it has delayed our implementation and engagement with suppliers.

We look forward to pursuing our implementation and engagement with suppliers in what we hope will be a more settled environment in 2021.

Effectiveness assessment

The Modern Slavery and Ethical Purchasing Working Group meets quarterly 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 Working Group will establish a plan for action in 2021.

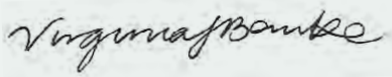
*Linette and baby
Marcella at Mercy
Hospital for Women*



Approval

Mercy Health Australia Ltd is in a position to influence or control Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd, and approves this statement as the 'higher entity' as permitted by section 14(2)(d)(ii) of the *Modern Slavery Act*.

This modern slavery joint statement for Mercy Health Australia Ltd, Mercy Hospitals Victoria Ltd and Mercy Aged and Community Care Ltd was approved by the Board of Mercy Health Australia Ltd at its meeting on 2 March 2021.



Signed in accordance with section 14(2)(e)(ii)
of the *Modern Slavery Act*
Virginia Bourke
Chair, Mercy Health Australia Ltd



Left: Werribee Mercy Hospital Special Care Nursery midwives Jenny (L) and Claire (R) with mum Danielle and baby Flynn

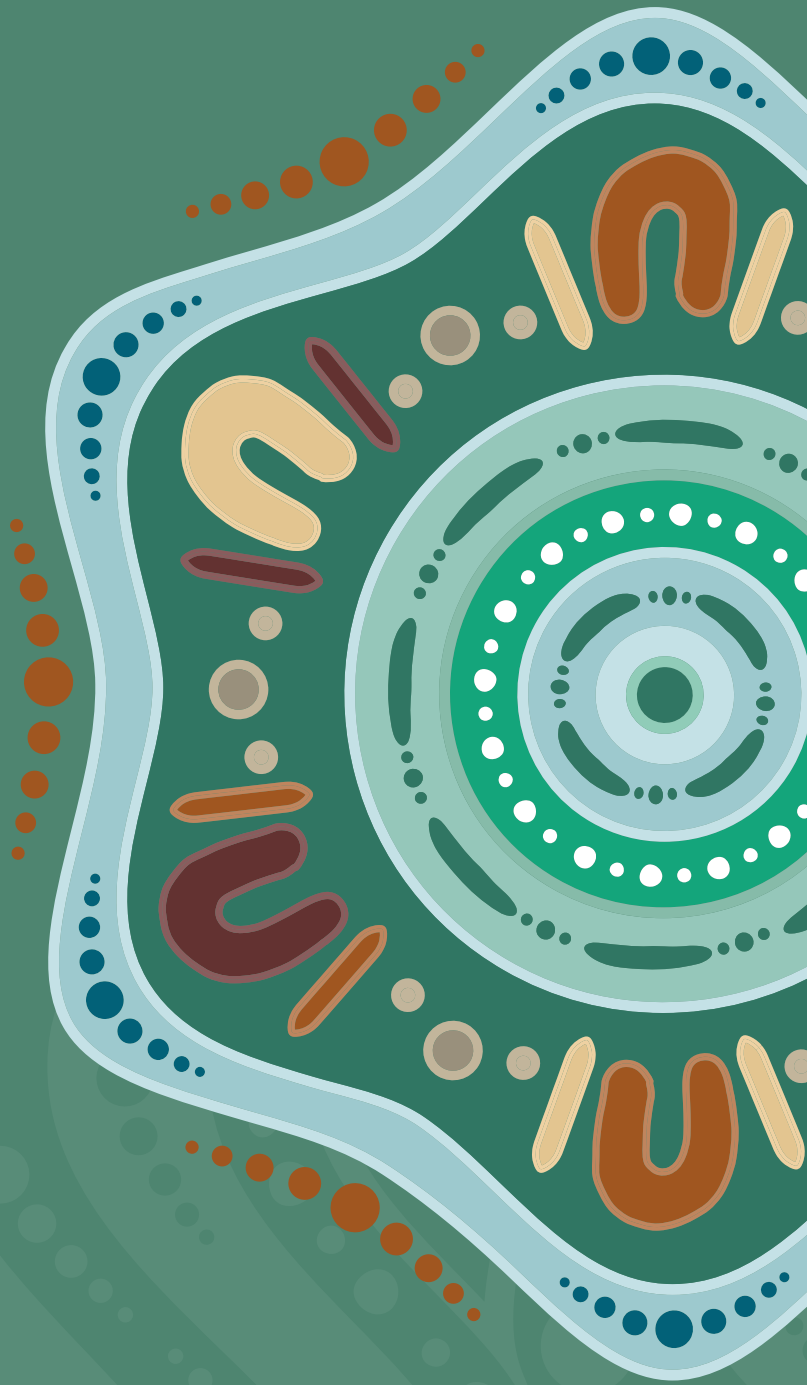
Opposite: Mercy Place Mandurah staff and residents





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.



Modern Slavery Statement 2020

Disclosure Note

This statement has been made on behalf of the Diocese of Parramatta. For 2020, the statement focuses on work performed within the Diocese's largest agency, *Catholic Education Diocese of Parramatta*. Included in this statement is work performed in 2019-2020. Subsequent statements will focus on work performed within the last calendar year only.

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.

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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 annual operating revenue for 2019 was \$665m. Operating expenditure for 2019 was \$635m. Revenue and expenditure for 2020 are estimated to be \$676m and \$670m, respectively¹.

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 is 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 a 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
4. Everyone is a leader

2020 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.

The Australian Catholic Anti-Slavery Network (ACAN) was formed in December 2019 to bring together major Catholic entities to work collaboratively towards eradicating modern slavery. ACAN, of which CEDP is a participating entity, is at the forefront of efforts to eradicate modern

¹ Figures as of December 2020.

slavery both nationally and globally, supporting participating entities 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
3. provision of templates for policy and other documentation
4. risk assessment
5. action planning
6. completion of Modern Slavery Statements.

The Diocese of Parramatta participated in a world-first conference in July 2019 to discuss practical steps to end slavery. Convened to coincide with the United Nations World Day Against Trafficking in Persons on 30 July, the conference drew participants from over 40 Catholic institutions across Australia. CEDP registered as a participating entity of ACAN for 2020.

The Modern Slavery Statement covering the work that CEDP has performed to date with its suppliers will be issued using a compendium approach together with the other ACAN entities. As CEDP is the Diocese's largest agency, the focus for 2020 was on the supply chains of this key agency.

ACAN participating entities are united in the belief that action against Modern Slavery is a fundamental Catholic Social Teaching. As a participating entity, CEDP and the Diocese cooperate with other Catholic entities, collaborate through monthly teleconferences, and keep up to date with the requirements of the Modern Slavery Act. Through membership of ACAN, CEDP has liaised with other Catholic education offices, building close working partnerships around supplier engagement and procurement, as well as completion of our Modern Slavery Statements.

In both 2019 and 2020, CEDP completed its 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. cleaning - characterised by the employment of low skilled (often migrant) workers with significant language barriers and a lack of understanding of their rights. Unclear subcontracting arrangements are also common
 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
 4. ICT hardware - it is notable that electronics are the highest risk product for modern slavery in supply chains, according to the 2018 Global Slavery Index
 5. School uniform - characterised by forced labour, child labour and human trafficking in the textile industry
-

6. Furniture - characterised by the importation of items produced in industry sectors exhibiting high risk of modern slavery. These include manufacturing, forestry, metal, and plastic production.

Endorsement by CEDP Directors

CEDP Directors recommended in 2019 that a Modern Slavery Working Group be set up to address the requirements of the Act. The Working Group comprises representation from Mission, Procurement and Administration Services, and Chancery.

Supplier Rationalisation

CEDP has rationalised the number of suppliers in high-risk expenditure categories such as cleaning and uniforms over the period leading to 2020, positioning itself to be better placed to manage suppliers with regards to modern slavery.

Modern Slavery Policy

Throughout 2020, the Working Group developed a Modern Slavery Prevention policy for CEDP. This has highlighted the need to engage all stakeholders in its development and consider who has carriage of the policy. Once this policy is ratified, Procedures and Guidelines will also be developed. Using the template for the Statement, as well as the stakeholder and supplier workshops provided by ACAN, the Working Group has met regularly to develop this Statement.

Anti-Modern Slavery conditions - CEDP Tenders

Modern Anti-Slavery conditions are now included in all CEDP tenders for centralised expenditure categories, including uniforms, cleaning services, canteen licences and waste management services. Prospective suppliers are required to comply with the Modern Slavery Act (2018) to the extent that the Act applies to them. As evidence of their compliance to the Act, CEDP may request from the supplier:

1. a list of programs or policies currently in place to ensure that human trafficking and slavery do not exist in its operations and supply chains
2. details of the methods used when working with third parties to identify the overall risks of slavery and human trafficking in its supply chains
3. evidence of independent, unannounced audits of its operations and suppliers
4. certification that all materials incorporated into its products or services were sourced, processed, and manufactured in compliance with the human trafficking and slavery laws of the country or countries in which they operate
5. evidence of training provided to employees, customers or suppliers on slavery and human trafficking in supply chains
6. declaration of any instances of known or suspected modern slavery in its supply chain or claims or adverse media attention in relation to its human rights practices.

These requirements have been included in CEDP's Procurement Policy.

Modern Slavery Conditions - CEDP Supplier Agreements

CEDP supplier agreement templates for the above-named centralised expenditure categories have been amended to include clauses on modern slavery. All new contracts for these categories are now based on the amended templates. For all current centralised contracts, CEDP has issued addenda incorporating modern slavery provisions. Such contracts will be replaced with the new templates upon their respective expiry dates.

Participation in Building Links Modern Slavery Webinar

CEDP was a participant in the Building Links Modern Slavery in Australian Construction Webinar on 2 December 2020, organised by ACAN. The workshop focused on modern slavery risk in the Australian construction industry, emphasising the need for ACAN entities to have full visibility over their construction projects. Included in the discussion were tools to assist entities gain such visibility, placing them in a better position to identify vulnerable workers on site. Of the 120 registrations including suppliers, 98 attended the webinar, including suppliers who also contract for CEDP. The Diocese of Parramatta was represented by four staff from Chancery, Mission, Infrastructure and Development, and Procurement.

eLearning (Modern Slavery 101)

To support this work over 2020, an online learning module was undertaken to create awareness among the leaders responsible for the procuring of high-risk goods and services across CEDP. This eLearning was organised by ACAN and held on 3 July 2020.

Our Plans for 2021

The Diocese intends to undertake the following further steps during 2021 to minimise the risk of modern slavery occurring in our supply chains by 31 December 2021.

Management Systems Action Plan 2021	
Topic	Actions
Governance	<ul style="list-style-type: none"> • Educate Board of Directors on modern slavery risks and legislative requirements
	<ul style="list-style-type: none"> • Update senior management on the modern slavery program and ensure responsibilities are understood
	<ul style="list-style-type: none"> • Establish governance framework for managing modern slavery risks
Commitment	<ul style="list-style-type: none"> • Assign responsibilities for managing modern slavery risks
	<ul style="list-style-type: none"> • Educate senior management on modern slavery risks and legislative requirements
Actions Taken	<ul style="list-style-type: none"> • Establish modern slavery working group to oversee and implement the action plan
	<ul style="list-style-type: none"> • Develop a detailed action plan for addressing modern slavery risks
	<ul style="list-style-type: none"> • Engage key business units and stakeholders to implement priority actions

	<ul style="list-style-type: none"> ● Risk based focus – Focus on the following categories: <ul style="list-style-type: none"> ○ security and cleaning ○ uniforms ○ canteen ○ ICT ○ construction
--	--

Human Resources and Recruitment Action Plan 2021

Topic	Actions
Awareness	<ul style="list-style-type: none"> ● Share internal modern slavery awareness program
Policies and Systems	<ul style="list-style-type: none"> ● Develop and promote modern slavery policy internally and externally
Training	<ul style="list-style-type: none"> ● Create instructional materials- from all stakeholder perspectives PRIORITY
	<ul style="list-style-type: none"> ● Identify opportunities for sharing information and training resources across your industry sector
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Deliver modern slavery training to priority labour hire companies and contractors at tendering process (monitor sub-contracting) PRIORITY

Customers and Stakeholder Action Plan 2021

Topic	Actions
Attitude	<ul style="list-style-type: none"> ● Develop customer and stakeholder communications strategy

	<ul style="list-style-type: none"> • Develop awareness raising programs for customers and stakeholders
Information	<ul style="list-style-type: none"> • Publicly state the organisation’s position on modern slavery
	<ul style="list-style-type: none"> • Develop Employee/Supplier Code of Conduct and publish on website
	<ul style="list-style-type: none"> • Develop targeted information for key stakeholders including regulators

Risk Management Action Plan 2021

Topic	Actions
Risk Framework	<ul style="list-style-type: none"> • Develop team and process to commence action planning

Procurement and Supply Chain Action Plan 2021

Topic	Actions
Policies and Procedures	<ul style="list-style-type: none"> • Incorporate modern slavery requirements into existing policies and procedures
	<ul style="list-style-type: none"> • Include general clauses on modern slavery in all supplier contracts
Screening and Traceability	<ul style="list-style-type: none"> • Identify and undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow

	<ul style="list-style-type: none"> • Undertake gap analysis of procurement policies and procedures
Supplier Engagement	<ul style="list-style-type: none"> • Develop targeted communications & engagement programs for high-risk suppliers
	<ul style="list-style-type: none"> • Engage all Tier 1 suppliers in modern slavery awareness programs

Our Plans Beyond 2021

The Diocese intends to undertake the following further steps during 2022 and beyond to minimise the risk of modern slavery occurring in our supply chains.

Management Systems Action Plan 2022 and Beyond	
Topic	Actions
Commitment	<ul style="list-style-type: none"> • Showcase the actions taken to address modern slavery risks across industry networks
Business Systems	<ul style="list-style-type: none"> • Engage key internal stakeholders to review existing business processes
	<ul style="list-style-type: none"> • Review existing business systems against the requirements of modern slavery legislation
	<ul style="list-style-type: none"> • Integrate modern slavery risk management into existing business systems
	<ul style="list-style-type: none"> • Integrate modern slavery risk management into supplier review processes

	<ul style="list-style-type: none"> • Ensure elements of modern slavery risk management systems are reflected across the business
Actions Taken	<ul style="list-style-type: none"> • Establish goals, targets and KPIs to effectively address modern slavery risks
	<ul style="list-style-type: none"> • Monitor the effectiveness of actions to directly reduce the incidents of modern slavery in operations & supply chain
Monitor and Report	<ul style="list-style-type: none"> • Undertake a review of modern slavery risks in your industry sector
	<ul style="list-style-type: none"> • Identify opportunities for leadership on modern slavery data collection and reporting processes
	<ul style="list-style-type: none"> • Integrate modern slavery risk findings into monthly management reports
	<ul style="list-style-type: none"> • Expand data collection process to include modern slavery data from national and international sources
	<ul style="list-style-type: none"> • Continuous improvement

Human Resources and Recruitment Action Plan 2022 and Beyond

Topic	Actions
Awareness	<ul style="list-style-type: none"> • Incorporate modern slavery information into induction programs
Policies and Systems	<ul style="list-style-type: none"> • Incorporate modern slavery risk management specific responsibilities into position descriptions
	<ul style="list-style-type: none"> • Encourage lowering tolerance approach to modern slavery among all staff and contractors

Training	<ul style="list-style-type: none"> ● Incorporate modern slavery awareness training into induction programs
Labour Hire & Outsourcing	<ul style="list-style-type: none"> ● Incorporate measures to manage modern slavery risk in outsourcing and labour hire contracts
	<ul style="list-style-type: none"> ● Assess labour hire contractors and outsourcing programs for modern slavery risk <ul style="list-style-type: none"> ○ Individual Schools ○ HR and Facilities
	<ul style="list-style-type: none"> ● Regularly review and update hiring and on-boarding processes
Customers and Stakeholder Action Plan 2022 and Beyond	
Topic	Actions
Attitude	<ul style="list-style-type: none"> ● Develop curriculum appropriate to <u>stage</u> around the issue <ul style="list-style-type: none"> ○ Parent ○ Teacher
Feedback Mechanisms	<ul style="list-style-type: none"> ● Train staff and stakeholders on modern slavery feedback mechanisms, using appropriate reporting systems
	<ul style="list-style-type: none"> ● Establish systems and processes to evaluate and take immediate action on feedback received
	<ul style="list-style-type: none"> ● Establish stand-alone confidential modern slavery hotline for staff and contractors
	<ul style="list-style-type: none"> ● Engage external third- party labour-rights auditors to validate worker voice data

Worker Voice	<ul style="list-style-type: none"> ● Run pilot project worker voice program for high-risk suppliers
	<ul style="list-style-type: none"> ● Implement worker voice data collection and reporting system
	<ul style="list-style-type: none"> ● Review worker voice data collection options for at-risk workers in the supply chain
	<ul style="list-style-type: none"> ● Develop a comprehensive modern slavery remediation program that is well resourced and supported

Risk Management Action Plan 2022 and Beyond

Topic	Actions
Risk Framework	<ul style="list-style-type: none"> ● Educate stakeholders in the concepts of Modern Slavery and how it impacts upon our work
	<ul style="list-style-type: none"> ● Establish systems and processes to evaluate and take immediate action on identified risks
	<ul style="list-style-type: none"> ● Include modern slavery risk review into risk management policies and procedures
	<ul style="list-style-type: none"> ● Incorporate modern slavery risk assessment into existing risk framework
Operational Risk	<ul style="list-style-type: none"> ● Map operations against potential risks of modern slavery or Exploitation
	<ul style="list-style-type: none"> ● Develop action plan to address risks of modern slavery in internal operations
	<ul style="list-style-type: none"> ● Enhance internal capacity to identify and manage operational risks

	<ul style="list-style-type: none"> ● Implement actions to mitigate or eliminate operational risks
	<ul style="list-style-type: none"> ● Implement a due diligence process to continuously identify, manage and mitigate modern slavery risks
External Risk	<ul style="list-style-type: none"> ● Develop risk management plan to address modern slavery risks among priority suppliers
	<ul style="list-style-type: none"> ● Undertake modern slavery risk review of priority direct (Tier 1) suppliers
	<ul style="list-style-type: none"> ● Assign resources to identify, prioritise and manage operational and supply chain risks
	<ul style="list-style-type: none"> ● Map modern slavery risks and vulnerabilities along extended supply chain
	<ul style="list-style-type: none"> ● Develop and monitor implementation of corrective action plans
Monitor & Report	<ul style="list-style-type: none"> ● Identify opportunities to monitor and report on modern slavery risks
	<ul style="list-style-type: none"> ● Develop procedures to effectively report and take action where modern slavery risks are identified
	<ul style="list-style-type: none"> ● Integrate modern slavery risk management into business evaluation and reporting processes
	<ul style="list-style-type: none"> ● Integrate modern slavery risk reporting with stakeholder feedback mechanisms
	<ul style="list-style-type: none"> ● Transparently report on modern slavery risks- both internally and externally

Procurement and Supply Chain Action Plan 2022 and Beyond	
Topic	Actions
Contract Management	<ul style="list-style-type: none"> • Incorporate performance standards and contract evaluation criteria for high-risk contracts
	<ul style="list-style-type: none"> • Conduct desktop review of high-risk suppliers
Screening and Traceability	<ul style="list-style-type: none"> • Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow (continuation of 2021 activities)
Monitor & Corrective Action	<ul style="list-style-type: none"> • Establish a supplier monitoring program
	<ul style="list-style-type: none"> • Develop a monitoring system to assess ongoing performance
	<ul style="list-style-type: none"> • Develop corrective action plans to address modern slavery risks among high-risk suppliers
	<ul style="list-style-type: none"> • Work with suppliers to identify gaps and address barriers to implementation

Brief Statement from our Bishop

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,

Our Catholic faith teaches that we are all made in the image and likeness of God.

Indeed, Catholic Social Teaching proclaims that our dignity, that is, the inherent value of each person is based on this truth and our worth comes from God.

We treat life as precious and with sanctity from conception until natural death as divine grace is within us all. Modern slavery is an attack on this God-given dignity and grace. Indeed, the scourge of slavery is directly opposite to the love of God.

Through the types of modern-day slavery may differ from that of Roman times, all slavery is itself the exploitation of the weak and vulnerable. It is the power of the strong over the weak.

These days, modern day slavery includes child marriage, unpaid wages, withheld wages, physical violence, and migrant worker exploitation.

As the Catholic Church in Australia is the largest non-government producers of goods and services, we have an important and unavoidable role to play in the eradication of modern slavery in Australia.

I commend and fully support this report for the work it does in attempting to confront and eliminate slavery.

As the Bishop of Parramatta, I am committed to ensuring all our 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 absolutely committed to ensuring that we work with government and other organisations to work towards the dismantling of modern slavery, and that our supply chains respect the dignity and value of each person.

We will work towards fostering pathways across the political and religious divide to build not only a rich and strong Australia but also an inclusive and humane society and a responsible global citizen.

Pope Francis has declared the feast of St Josephine Bakhita on February 8 the International Day of Prayer, Reflection and Action against Human Trafficking. Let us mark this day by joining the world community in prayer and by committing to do something in our own life to end slavery.



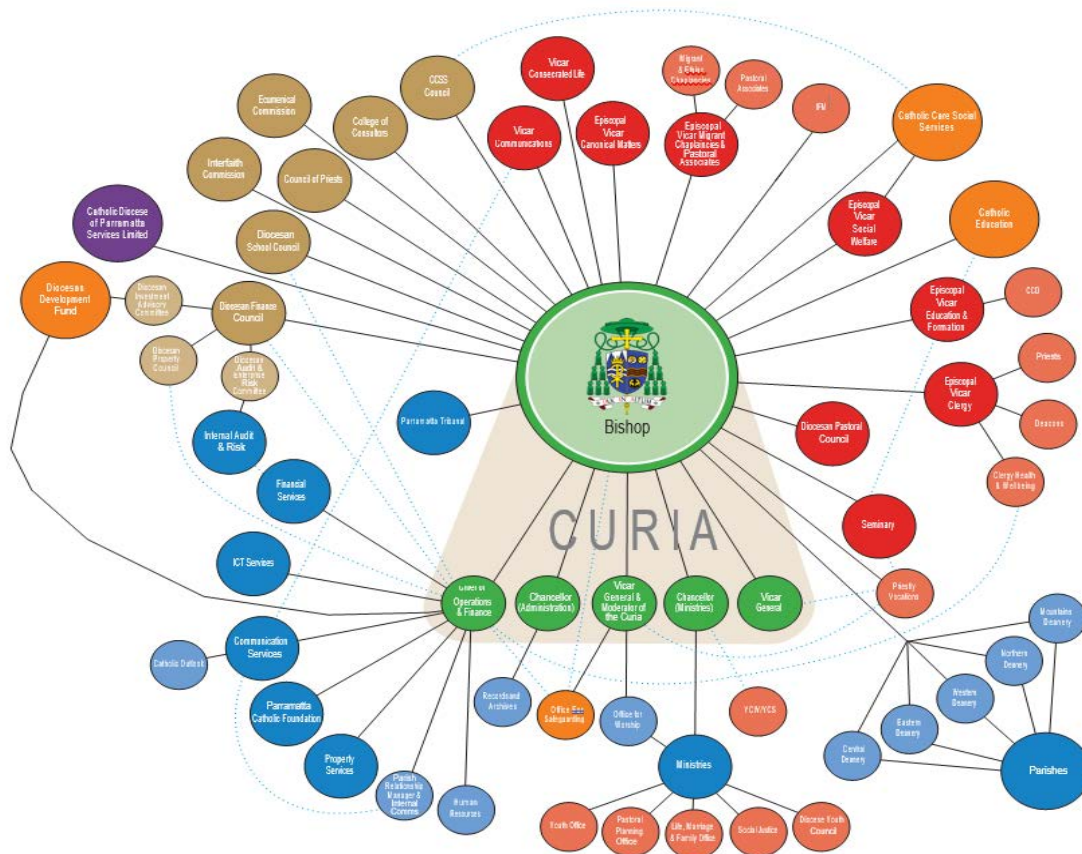
Bishop Vincent Long OFM Conv
Bishop of Parramatta



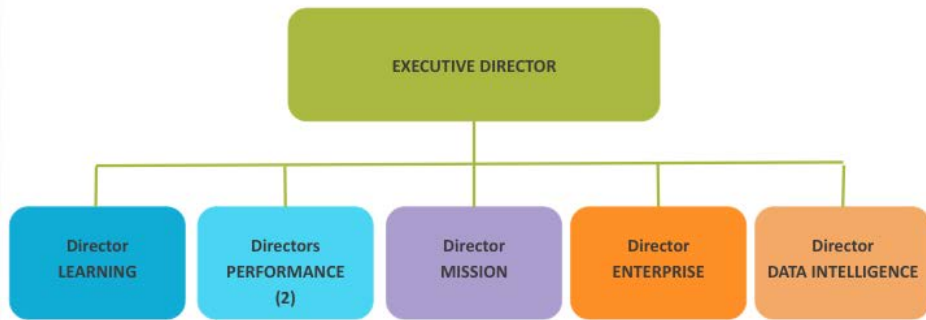
Reporting Criteria 1 & 2: About Diocese of Parramatta and Catholic Education Diocese of Parramatta

Our Organisational Structure

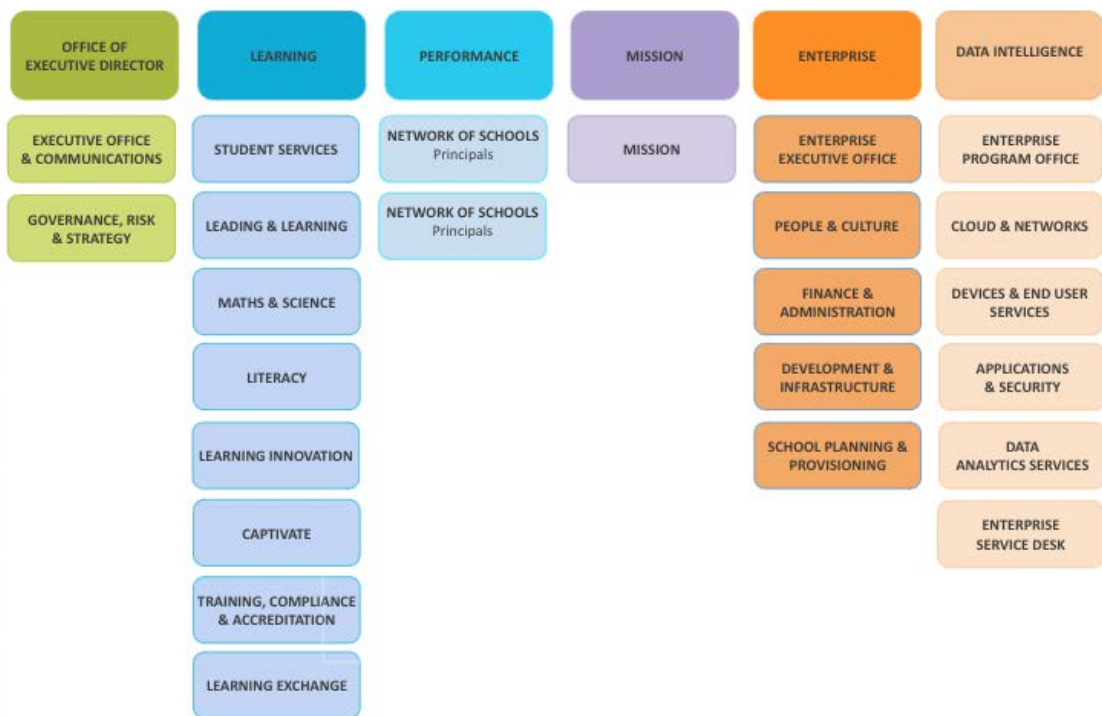
A graphic of the organisational structure of the Catholic Diocese of Parramatta follows. For the purpose of this Statement, the Diocese’s largest agency, Catholic Education Diocese of Parramatta (CEDP), is also outlined below.



CEDP Executive Team



CEDP Service Areas



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.

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.

CEDP is the Diocese's largest agency. During the period leading to 2020, focus was placed on the supply chains of this key agency. Activities undertaken in relation to suppliers included:

1. rationalising the supplier base through tendering processes. This has had the effect of reducing the number of suppliers in the relevant categories, making CEDP's supplier engagement with respect to modern slavery more manageable. Expenditure categories included were ICT devices, uniforms, office stationery, multifunction devices (MFDs) and cleaning services
2. inclusion of modern slavery clauses in CEDP agreements for centralised expenditure categories
3. Inclusion of modern slavery provisions in tendering processes for centralised expenditure categories.

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

Our COVID-19 Response

In response to COVID-19, CEDP took the following key measures to support workers and maintain our Tier 1 supplier relationships, for the mutual benefit of both supplier employees and CEDP:

1. extension of contracts due for retendering after March 2020
2. 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. An 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 and DDF²

	Fulltime	Part-time	Casual	Total
Male	19	0	8	27
Female	27	11	15	53
Total	46	11	23	80

Staff Allocation CEDP³

	Fulltime	Part-time	Casual	Total
Male	863	158	125	1,146
Female	2,298	1,662	808	4,768
Total	3,161	1,820	933	5,914

Modern Slavery Gap Analysis

Bridge the Gap (BtG) is an online tool created by SD Strategies to assist organisations to track and manage their modern-day slavery risks. CEDP completed its first BtG analysis as part of the July 2019 Catholic Modern Slavery Conference. A further BtG analysis was completed for 2020 from the original Bridge the Gap Heat Map. The results are presented below and demonstrate that some actions have been implemented following the initial BtG analysis.

² Chancery and DDF numbers as of December 2020

³ CEDP staff numbers as of December 2020

Category	Result 2019	Result 2020	Change
Management Systems			
Governance	Red	Yellow	↑
Commitment	Yellow	Yellow	-
Business Systems	Yellow	Yellow	-
Action	Yellow	Yellow	-
Monitor / Report	Red	Yellow	↑
Risk Management			
Risk Framework	Yellow	Yellow	-
Operational Risk	Yellow	Yellow	-
Identifying External Risks	Red	Yellow	↑
Monitoring and Reporting Risk	Red	Yellow	↑
Procurement and Supply Chain			
Policy and Procedures	Red	Yellow	↑
Contract Management	Red	Yellow	↑
Screening and Traceability	Yellow	Yellow	-
Supplier Engagement	Red	Yellow	↑
Monitoring and Corrective Action	Red	Yellow	↑
Human Resources and Recruitment			
Awareness	Red	Red	-
Policies and Systems	Red	Red	-
Training	Red	Yellow	↑
Labour Hire / Outsourcing	Yellow	Yellow	-
Customers and Stakeholders			
Customer Attitude	Yellow	Yellow	-
Information Provision	Red	Red	-
Feedback Mechanisms	Red	Red	-
Worker Voice	Red	Red	-

Our Supply Chain

CEDP's Tier 1 suppliers are located in Australia, with the exception of very few foreign-based consultancies.

Goods and services obtained from our suppliers include:

1. uniforms - Tier 1 supplier base rationalised to five who source predominantly from China
 2. end user computer devices - tender completed in December 2020. Included in the tender were questions on modern slavery. Primary source countries are China, Malaysia, and Japan
 3. multifunction devices - tender completed in December 2020. Included in the tender were questions on modern slavery. Japan (components would be sourced from elsewhere e.g., China). The primary source countries are Japan and China
 4. cleaning services - CEDP engages contract cleaners across a majority of our schools. Our cleaning service agreement template includes clauses on modern slavery, recognising that this is one of the high-risk expenditure categories.
-

Supply Chain Risk

CEDP's highest risk suppliers for 2020 are the same as those identified in 2019, i.e., in the uniform supply, building and construction, cleaning services and ICT hardware categories. 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 Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials	Forced labour in the production of building and construction materials
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"> ● potential for exploitation of workers, 70% of whom are women ● 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.
Cleaning services	Cleaning	<ul style="list-style-type: none"> ● vulnerable or migrant labour is used, work is deemed as '3D' work (dirty, dull, or dangerous) ● below award wages ● docking of wages
Technology/ICT hardware	Inputs into ICT hardware from conflict mineral areas e.g., tungsten, tantalum and gold from Central Africa (Republic of the Congo)	<ul style="list-style-type: none"> ● worker exploitation in source countries of inputs into ICT hardware from conflict mineral areas e.g., tungsten, tantalum, and gold from Central Africa (Republic of the Congo).

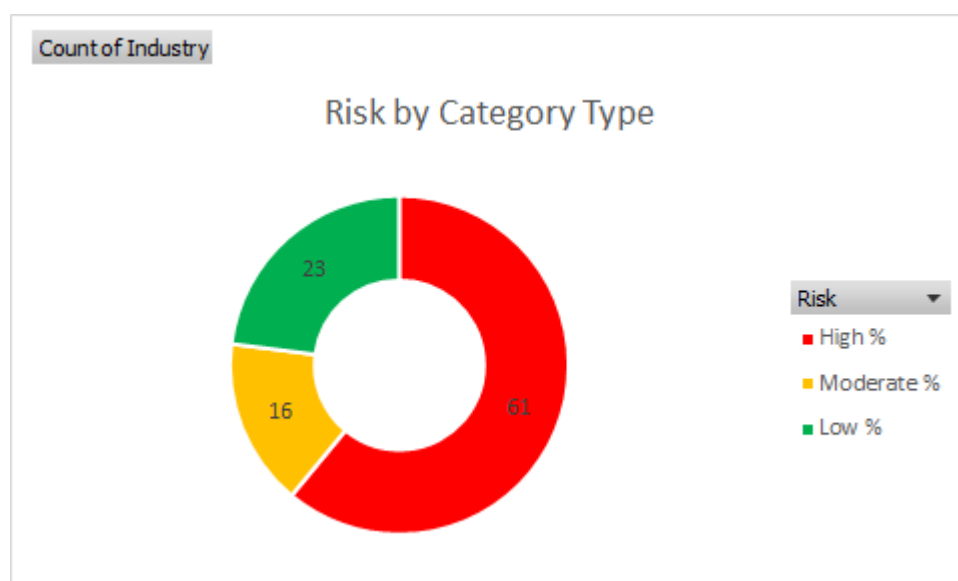
Using organisational spend data generated for the period 31 July 2019 to 30 June 2020⁴, the top 100 suppliers made up 70% of total spend. There were 14 categories across the top 100 companies that CEDP engaged. Of the 14 categories identified, three risk categories were assigned based on ACAN recommendations of high, moderate, and low risk (red, amber and green).



The high risk categories for CEDP are:

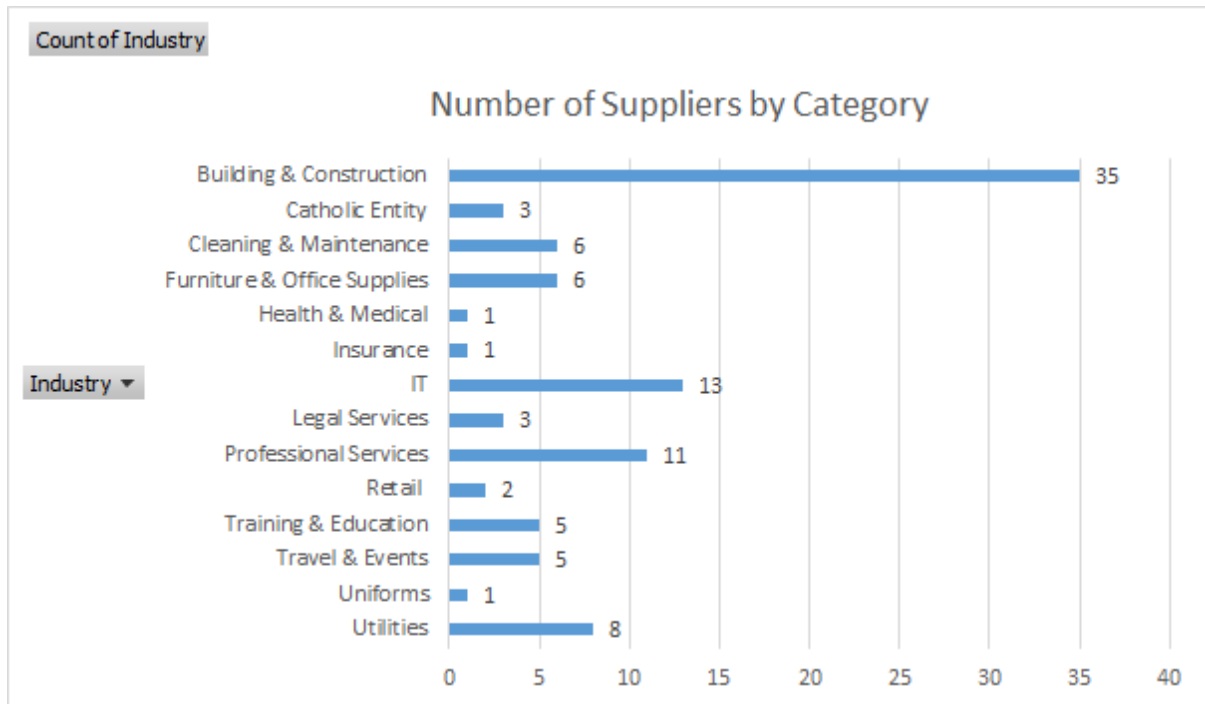
- building and construction - 65% of spend
- furniture and office supplies - 2.31%
- cleaning and maintenance - 1.68%
- uniforms - 0.32%

The graph below shows that 61% of CEDP’s top suppliers were in the high-risk category. A further 16% had moderate risk and the remaining 23% had a low level of risk attached to their operations.



⁴ Generated in December 2020

The majority of the top suppliers are from CEDP’s building and construction partners at 35 providers. The building and construction suppliers include builders, architects, consultants, engineers, plumbers, air-conditioning technicians, electricians, and associated providers. IT and Professional Services follow with 13 and 11 providers respectively and include IT hardware, software and support suppliers, consulting, and labour hire services.



Reporting Criteria 4: Actions taken to assess and address risk

Throughout 2020, the Diocese of Parramatta Modern Slavery Working Group was involved in a number of ventures to better understand the modern slavery risk to the organisation. The following measures were taken:

1. continued the collaborative work of the Modern Slavery Working Group, comprising representation from Mission, Procurement and Chancery. The work included completion of the 2020 Modern Slavery Statement
 2. 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 monthly teleconferences
 3. engaging with the internal stakeholders of the organisation to seek their input in addressing the risk of modern slavery
 4. across the organisation, Directors and Heads of Business Units completed the modern slavery online unit (Modern Slavery 101) developed by ACAN to raise awareness of the issues relating to modern slavery risk in CEDP and develop an understanding of the requirements of the Commonwealth Modern Slavery Act. Participants were drawn broadly from across CEDP Business Units.
 5. participation in the Building Links Modern Slavery in Australian Construction webinar, aimed at enabling suppliers to better understand customers' expectations with regards to the requirements of the Modern Slavery Act
 6. participating in organising the St Bakhita Mass on 8 February 2020 concerning the plight of the victims of modern slavery
 7. completion of a Draft Modern Slavery Policy, to be finalised in 2021
 8. 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
 9. completion of data gathering and spend analysis to assist with performing the second BtG analysis
 10. completion of the 2020 BtG analysis, identifying areas in which progress has been made as well as areas requiring further attention in 2021 and beyond. These will be addressed in accordance with the Action Plans for 2021, 2022 and later years
 11. conducted selected sector-based action planning in the uniforms expenditure category by rolling out the contract to the consolidated supply base comprising five uniform suppliers. The contract includes provisions for modern slavery. Over 90% of the rollout
-

had been completed by December 2020. The remaining 10% are targeted for completion in 2021

12. introduction of modern slavery provisions in all tendering processes conducted centrally for categories including ICT hardware and canteen services. Uniform supply base consolidation and contract rollout
13. further engaged with Chancery in completing the Modern Slavery Statement for 2020 and laying out a roadmap for the completion of subsequent statements
14. mapped out approach and timelines for implementing CEDP's action plans for modern slavery, including engagement with internal stakeholders, school communities and suppliers
15. updated agreement templates for goods and services high risk categories to include clauses on modern slavery
16. broadened the use of CEDP agreements across the supply base, wherever possible. The new CEDP agreement templates were used in place of supplier templates to ensure inclusion of appropriate modern slavery provisions.

Modern Slavery Action Plan and Road Map

CEDP's Modern Slavery Action Plan and Road Map for 2021, 2022 and beyond are summarised under the headings "Our Plans for 2021" and "Our Plans for 2022 and Beyond". 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 effectiveness of the work performed around modern slavery will 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



CABRINI AUSTRALIA LIMITED
MODERN SLAVERY REPORTING STATEMENT

1 JANUARY - 31 DECEMBER 2020

“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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This modern slavery statement is for Cabrini Australia Limited for the 2019-20 financial year. This statement is made in accordance with the Modern Slavery Act 2018 (Cth) and was approved by the Cabrini Australia Limited Board on 25 May 2021.

Disclosure note

This statement has been made on behalf of *Cabrini Australia Limited*. This statement covers all entities owned or controlled by *Cabrini Australia Limited* (references to “Cabrini” in this document are to Cabrini Australia Limited and all those entities).

Statistics referred to within this report are based on 2019-20 financial year data.

Modern slavery risk mitigation strategies are reported for 1 January – 31 December 2020 calendar year.

ABN 42624828306

STATEMENT FROM THE CHAIRMAN AND CHIEF EXECUTIVE

We first became aware of the tragedy of human trafficking from the Missionary Sisters of the Sacred Heart of Jesus (Cabrini Sisters) in 2005.

The Cabrini Sisters were one of the early members of UNANIMA, a coalition of congregations of religious sisters formed in 2002 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 that each of us has a role to play in stopping the exploitation.

Cabrini welcomed the passing of Australia's Modern Slavery Act and recommitted to playing our part in mitigating the risks of modern slavery.

We are proud to be a member of the ACAN, which enables us to work collaboratively with other major Catholic entities towards eradicating modern slavery.

We recognise the importance of working together to address slavery and related practices and we have taken steps to ensure the responsible engagement of suppliers and ethical business practices, and to engage employees in responding to this cause.

Playing our role in mitigating and managing the risk of modern slavery is core to our mission, our Cabrini heritage and our Catholic tradition, which are guiding our response.



Sylvia Falzon
Chairman, Cabrini Australia



Sue Williams
Chief Executive, Cabrini Australia

ABOUT US

Founded in Malvern in 1948, Cabrini is a large, Catholic, private, 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.



Values

Our values form the base of our mission, are built around what we believe and drive how we act. They are drawn from Mother Cabrini's life and reflect her heart, her spirit, her conviction and her approach.

- **Compassion:** Our drive to care is not just a professional duty to provide excellent quality care but is born of a heartfelt compassion for those in need, motivated by God's love for all people.
- **Integrity:** We believe in the power of hope to transform people's lives and remain faithful to the bold healing mission and legacy of Mother Cabrini.
- **Courage:** We have the strength, determination, vision and conviction to continue the work of Mother Cabrini and the Missionary Sisters.
- **Respect:** We believe that every person is worthy of the utmost respect and the best possible health care. We know that our resources are entrusted to us to use for the benefit of others.

Cabrini employs more than 4470 employees and engages more than 1600 medical practitioners, and is supported by 230 volunteers.

Divisions and services

- **Cabrini Health** provides a comprehensive range of acute, subacute, palliative care, primary care, residential aged-care, diagnostic and community-based health services.
- **Cabrini Research** supports research and education activities across the health service, as well as health promotion activities on behalf of Cabrini. Senior medical staff and researchers oversee a diverse research program and developments in clinical education.
- **Cabrini Foundation** helps Cabrini to deliver essential healthcare services, provide medical equipment and fund programs through workplace giving, major campaigns, direct mail and individual/community donors.
- **Cabrini Outreach** is the social services division of Cabrini. Its mission is to address social disadvantage and contribute to the development of more inclusive, equitable and compassionate communities.
- **Cabrini Technology Group (CTG)** provides an innovative, independent IT and health technology equipment and services to organisations throughout Australasia. It comprises of ALTER, AWA Technology Services, Chemtronics Biomedical Engineering, Hospitech, Chemtronics Direct and AxisHealth.



2020 modern slavery risk management initiatives

Cabrini remains committed to embedding ethical practices into every aspect of our business.

This statement, pursuant to the Modern Slavery Act 2018 (Cth), details the actions taken by Cabrini to address modern slavery in our business and supply chain during the financial year ending 30 June 2020 and outlines plans for the coming year(s).

Cabrini has engaged expertise and ongoing support from the Australian Catholic Anti-Slavery Network (**ACAN**).

In 2020 Cabrini focussed on three key areas of activity.

- **Supply chain** – Cabrini conducted a complete upgrade to policies, templates and sourcing protocols to ensure they align with our position on modern slavery and relevant legislation. We conducted a high-level risk assessment on key suppliers and categories of supply.
- **Policies** – Cabrini has updated key policy documents to ensure compliance. This created a vehicle for broader Board and Executive engagement and led to the development of Cabrini’s social policy position statement on modern slavery.
- **People** – online training was mandated for key personnel and made available for all employees.

Further actions taken are outlined in this document under reporting criteria 4.

Our plans for 2021

- Embed Cabrini’s ethical sourcing code into all tender and supplier engagements, ensuring this ethical position remains a highly weighted criteria in our decision making.
- Look further into our supply chain to better understand the areas and supplies of risk and work with our suppliers to mitigate these.
- Continue collaborating with partner Catholic Negotiating Alliance hospitals to undertake analysis and mitigation of shared, higher-value suppliers.
- Continue engaging staff to broaden their understanding of modern slavery and the risks within our operations, and improve their ability to recognise warning signs at the hospital frontline.
- Ongoing promotion of Cabrini’s social policy position statement and embedding this throughout the organisation.

Our plans beyond 2021

Cabrini is committed to continually reviewing the processes in place to identify, assess and manage modern slavery risks in our operations and supply chains, and to take remedial action where necessary.

We have taken initial steps to identify high-risk categories and associated suppliers, however we recognise further work, including a deeper look into our supply base, is needed. The ongoing implementation of our seven-step remediation process will play a key role in ensuring supply chain risks are managed and actions are taken to further support the elimination of modern slavery.

We understand there are potential risks associated with overseas suppliers to AxisHealth and will work towards taking further steps to implement more formal risk mitigation processes in this area.

Increasing staff awareness and extending modern slavery training, particularly for frontline workers, to assist them in identifying potential instances of slavery will occur. We will continue including relevant clauses in all contracts as they are executed and take action to retrofit these clauses into existing/in flight contracts.

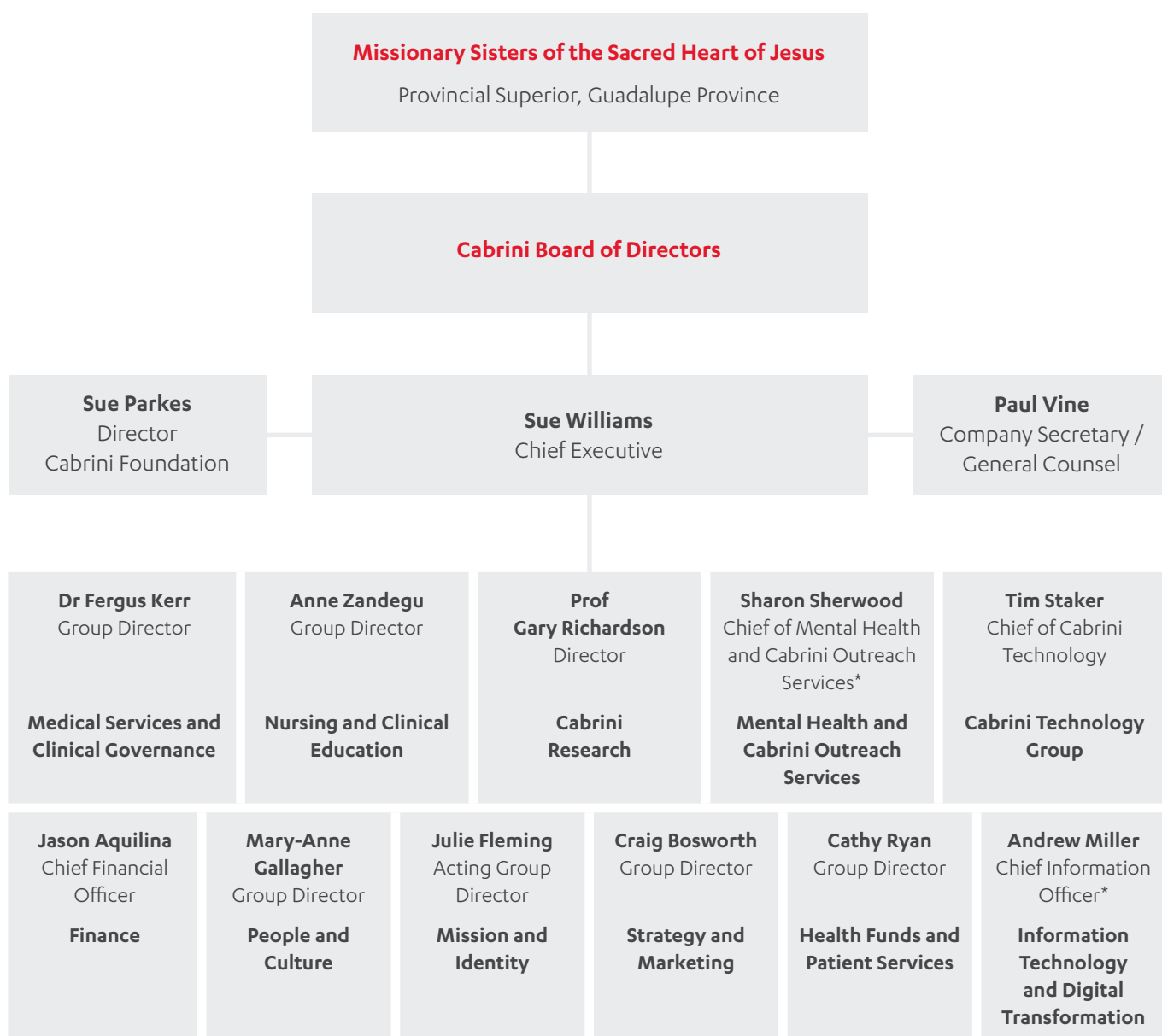
Our ongoing governance process will include regular updates to the Cabrini Board, to ensure the highest levels of control are in place.

REPORTING CRITERIA 1 & 2: ABOUT CABRINI AUSTRALIA LIMITED

Organisational structure

Cabrini Australia Limited, came into operation on 1 July 2018 (ABN - 42624828306) and has three subsidiary companies – Cabrini Outreach Limited, Cabrini Health Limited and Cabrini Property Limited. All are limited by guarantee and report as a consolidated entity as Cabrini Australia Limited with the Australian Charities and Not for Profits Commission (ACNC).

The Boards of Directors for all parent and subsidiaries are the same.



Organisation chart as at May 2021.

* Commencing May 2021



Governance framework

Cabrini has taken an organisation-wide approach to managing modern slavery risks in its operations and supply chains.

A modern slavery working group was established to support a coordinated effort in understanding, identifying, mitigating and addressing the risk of modern slavery across the organisation and supply chain. The modern slavery working group is chaired by the Chief Financial Officer (who is responsible for procurement activity) and the Group Director Mission and Cabrini Outreach. It comprises of representatives from procurement, finance, legal, engineering, internal communications, mission integration, Cabrini Outreach and Cabrini Technology Group.

The Chief Financial Officer reports on the outcomes of the working group to the Cabrini Board and the Audit and Risk Management Board sub-committee.

Operations

Cabrini provides a comprehensive range of high-quality acute, subacute, palliative care, primary care, residential aged-care, diagnostic and community-based health services. Cabrini's services span cancer care, chronic disease, emergency medicine, general practice, health promotion, heart services, homecare and community-based care, maternity services, paediatric care, palliative care, rehabilitation and residential aged care, as well as education, health promotion and research.

2019-20 operations

- 85,641 episodes of inpatient care
- 41,710 surgical operations*
- 1808 babies delivered
- 23,679 emergency department attendees
- 10,291 emergency admissions
- 23,297 rehabilitation patient bed days
- 141,044 medical imaging procedures
- 50,566 day cases
- 23,363 day oncology patient treatments

**non-urgent surgical activity was postponed during the COVID-19 pandemic, in line with Victorian Department of Health and Human Services guidance.*

Locations

Based in south-east Melbourne, Victoria, Cabrini Health's patients are predominately from seven local government areas: the cities of Bayside, Boroondara, Glen Eira, Kingston, Monash, Moreland, Port Phillip and Stonnington. The Cabrini Asylum Seeker and Refugee Health Hub draws clients from the Moreland, Hume and Whittlesea councils.

Cabrini's patient population is diverse and includes people of various ages, cultural heritage and socio-economic status.

Cabrini Malvern

181-183 Wattletree Road, Malvern VIC 3144

Cabrini Brighton

243 New Street, Brighton VIC 3186

Cabrini Palliative and Supportive Care

646 High Street, Prahran VIC 3181

Cabrini Residential Aged Care

54 Queens Parade, Ashwood VIC 3147

Cabrini Hopetoun (rehabilitation)

2-6 Hopetoun Street, Elsternwick VIC 3185

Cabrini Rehabilitation and Allied Health

494 Glen Huntly Road, Elsternwick 3185

Cabrini General Practice

992 Glen Huntly Road, Caulfield South VIC 3162

Cabrini Asylum Seeker and Refugee Health Hub

Ground Floor, 503 Sydney Road, Brunswick VIC 3056

Patricia Peck Education and Research Precinct (research, education and corporate support)

154 Wattletree Road, Malvern VIC 3144

Cabrini Hawthorn East (corporate services)

Level 2, 141 Camberwell Road, Hawthorn East VIC 3122

Cabrini Technology Group works from 14 locations across Australia and three in New Zealand, and is embedded within client sites, to provide a wide range of quality technology services and products.

Cabrini Technology Group is the only division of Cabrini that works outside of Victoria and has systems in place to monitor variances in legislation across different states and in New Zealand. Labour hire licenses have been successfully obtained in Victoria and Queensland, where the nature of our work may fall within prescribed categories. It is expected this licensing will be required for the Australian Capital Territory in the immediate future. Cabrini Technology Group complies with all state-based work health and safety legislation and obligations.



Supply chain

Cabrini's procurement function for the health-related business is largely centralised with lower-value purchasing undertaken at a site/local level. All higher-value procurement, including critical medical and information technology supplies, are managed under a single procurement director.

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.

Cabrini has developed and documented an Ethical Sourcing Code which is adopted by all divisions of Cabrini.

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

In 2019-20, Cabrini had dealings with 2238 suppliers and transacted \$301,170,000 on purchased goods and services. Of this, more than 95 per cent was subject to either a contract or purchase order. Cabrini's contracts are progressively being updated to ensure compliance with Modern Slavery Act and our own Ethical Sourcing

Code. Purchase order terms and conditions have been updated to include these references.

While Cabrini's procurement policy has specific reference to support of local industry, it is noted the majority of medical and clinical supplies, including pharmaceuticals, are manufactured overseas. Many larger volume suppliers are significant, multinational providers. This is not unique to Cabrini but the healthcare industry more broadly. All major suppliers are contracted, and most have expressed their compliance to their own home country's slavery legislation. This means Cabrini's legislative and ethical positions with these suppliers are somewhat easier to manage and control, however, it does not mean we will take these organisations compliance for granted. Continued diligence will be required especially where higher-risk components or geographies are involved.

It is noted that Australia's Therapeutic Goods Administration (**TGA**) has an active "agenda to address global therapeutic goods manufacturing as it diversifies and moves into lower cost developing countries". Australia's national reliance on imported medical devices became evident during the COVID-19 pandemic, so Cabrini will continue to monitor the TGA, and other government activity, in this space and work collaboratively with other CNA members to ensure we are alert to changes as they occur.



REPORTING CRITERIA 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

Cabrini is committed to ensuring that our acquisition of goods and services is ethical, transparent, fair and responsible. However, we recognise addressing modern slavery issues is difficult due to supplier's complex supply chains, and multiple levels of raw and finished goods being incorporated into a finished product prior to our acquisition.

This can often require deep analysis to understand and makes addressing key issues challenging, particularly as the majority of health devices are imported.

Operational risks

COVID-19 response

As a healthcare provider, COVID-19 impacted Cabrini's operations substantially. In a short space of time, our clinical consumable supply chain was placed under significant stress. The safety and wellbeing of our employees and patients were our highest priority and obtaining sufficient supplies of high-quality personal protective equipment (PPE) became a consumer endeavour.

In addition, the increase in demand resulted in an unprecedented increase in cost. Regular monthly orders of gloves, face masks and isolation gowns were placed at risk, as some countries diverted shipments to their own shores and others were forced into lockdown.

During this time, we were cognisant that the unprecedented pressure on global supply chains meant we had to be more vigilant in our approach to identify and manage the risk of modern slavery in our operations. We responded to these challenges by continuing to purchase, where possible, consumables through known, long-term suppliers who had publicly stated their zero-tolerance position towards modern slavery. It is acknowledged that, at times, this approach was difficult to effectively monitor.





Our people

As at 30 June 2020, Cabrini had 2869.7 full time equivalent employees (FTE), comprised of more than 4470 employees, and engaged more than 1600 visiting medical officers. Nurses make up the greatest proportion of our workforce (40 per cent).

Cabrini has in place policies, procedures, systems and processes to comply with labour, employment, immigration and whistleblower laws in all states and territories of Australia and New Zealand. These policies are regularly reviewed as part of Cabrini's legislative compliance program.

Cabrini Technology Group operates differently to the health operations due to the nature of its various business units. Detailed policies and procedures are used throughout the business to ensure quality, consistency and compliance with legislation. Cabrini Technology Group undergoes external audits for compliance with a range of standards including ISO9001, ISO55001, ISO45001, ISO17020 to ensure completeness and that the policies are adhered to. All policies and procedures reference Cabrini-wide policies where applicable.

Modern slavery gap analysis

In September 2019, Cabrini's procurement team established a cross-functional working group to develop and implement Cabrini's modern slavery risk mitigation strategy. In April 2020, Cabrini joined the ACAN, where we supported an analysis to understand our areas of highest risk, be that by specific commodity, supplier or geography.

In March 2020, the COVID-19 pandemic placed significant impacts on operations within Cabrini. Resources were diverted to focus on sourcing critical medical supplies.

The challenges experienced during the first modern slavery reporting period have delayed some elements of our response during this reporting period.

Supply chain risks

In 2020, Cabrini identified our highest risk suppliers to the health business according to the key 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 Labour's 2018 List of Goods Produced by Child and Forced Labour, 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).

Of our identified high-risk categories, our highest spend is in the following areas:

- Medical equipment and consumables
- Information technology and telecommunications hardware/equipment
- Engineering plants
- Drugs and pharmaceuticals
- Some food items

The Catholic Negotiating Alliance members, including Cabrini, agreed to collectively issue a supplier self-assessment survey to 25 of their shared, high-risk suppliers. Responses from the survey were collated and scored. Many of our international shared suppliers have been reporting their modern slavery position in California and the United Kingdom for several years and were able to provide significant evidence into their understanding of their supply chains. However, some suppliers were unable to demonstrate their commitment to mitigating the risk of modern slavery and their assessment is reflective.

The Catholic Negotiating Alliance members agreed to provide support to these suppliers throughout reporting period two. This will include tools and training as well as an agreed corrective management plan to ensure accountability.

Cabrini is implementing a seven-step modern slavery remediation process to ensure supply chain risk is managed:

-  1. Agree taxonomy for categories of supply that represent the highest risk of slavery and exploitation.
-  2. Identify suppliers in each of the highest risk categories.
-  3. Communicate with suppliers requesting copies of their governance framework and/or modern slavery statements – noting some of our major global suppliers will be experienced at providing this information as a consequence of them being required to comply with other countries’ legislation.
-  4. Identify high-risk suppliers that are unable to provide satisfactory governance and mitigation frameworks.
-  5. Conduct audits of supplier’s operations, noting this can be conducted by a third party such as Business Social Compliance Initiative (Amorfi BSCI).
-  6. Issue a corrective action report to non-compliant suppliers requiring their remediation to key outstanding findings.
-  7. Move business from non-compliant suppliers to alternate sources.

We recognise that medical equipment and medical supplies are high-risk categories, and that we need to understand more about our Tier 2 and Tier 3 suppliers, who are manufacturing the products we use. Mapping our supply chain will be challenging due to the complexities of suppliers providing many different types of medical products, services and equipment – often all three categories are supplied simultaneously.

In 2021, we will focus on improving categorisation of our suppliers and spend. This will provide us with clearer insights into which areas of our supply chain should be mapped as a priority.

REPORTING CRITERIA 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

In 2020, we focused on strengthening our understanding of potential modern slavery risks in our operations and implementation of the immediate risk mitigation actions.

We reviewed our governance framework, updated policies and procedures, evaluation guides and tender templates, tendering and contract terms and conditions with a focus on the acquisition of goods and services. All contract templates and standard terms and conditions of trade have now been updated to reflect our commitment to mitigating the risk of modern slavery and include a requirement for suppliers to comply with Australia’s modern slavery legal requirements.

We worked with People and Culture to update policies and learning. We provided face-to-face training with procurement and supply employees and mandatory online training material for sourcing, buying and managerial employees. These learning modules are also available to all employees.

We published our ethical sourcing code for our suppliers, which sets out Cabrini’s commitment to the responsible engagement of suppliers who share a consistent view to ethical sourcing and trading of goods and services. All requests for tender issued by Cabrini now include mandatory compliance with this policy and suppliers are required to acknowledge their compliance prior to evaluation. Suppliers who are selected to contract with Cabrini will be required to provide evidence of their due diligence and all offshore manufacturing service contracts will require regular auditing of this certification.

A modern slavery working group was established to support a coordinated effort in understanding, identifying, mitigating and addressing the risk of modern slavery across Cabrini’s operations and supply chain.

Modern slavery action plan and road map

Cabrini reviewed its current operational model to provide recommendations for a modern slavery risk mitigation strategy. The Board of Cabrini approved implementation of a multi-divisional strategy that would address the risk of modern slavery both within our operations and supply chain.

Actions undertaken by Cabrini

- Updated corporate risk profile.
- Developed and published Cabrini's social policy position statement – modern slavery.
- Developed and published an ethical sourcing code, which is now used in all contracts and purchase order terms and conditions.
- Updated relevant internal policies, templates and sourcing protocols.
- Obtained ACAN membership and participated in ACAN's conferences, forums and discussion, aimed at improving understanding, sharing knowledge, and reducing duplication of effort.
- Mandated online training for key employees working in procurement, purchasing and supply, and made available for all employees.
- Pre-employment commencement mandatory training modules now include an expanded ethics section, highlighting the risk of modern slavery.
- Undertook a risk analysis of key suppliers, including an initial assessment of the likelihood that key suppliers source goods and services from at-risk geographies and/or use at-risk commodities. *It is acknowledged this was compromised to some degree during the COVID-19 pandemic when accessing critical supplies became difficult.*
- Surveyed major suppliers to understand their level of compliance.
- Modified all Cabrini contract templates to include mandatory compliance to the Modern Slavery Act.
- Modified tender and supporting evaluation criteria to ensure compliance and appropriate weighting is given to potential supplier's compliance to the law.

Regular briefings were provided to the Board and senior Executive during the year to drive awareness and engagement. A modern slavery risk mitigation communications plan, which incorporated awareness and education strategies, was developed. Cabrini's intranet and external website were updated to reflect our position regarding modern slavery.

Remediation and due diligence

Cabrini 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 harm to people and root causes to mitigate future risks if Cabrini is found to have caused or contributed to modern slavery.

Due to the complexity of remediation and the need for specialist resources, and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, Cabrini, through its membership of ACAN, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery.

By partnering with Domus 8.7, Cabrini can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response. If Cabrini is directly linked to modern slavery by a business relationship, Domus 8.7 will support the responsible entity to ensure remediation and mitigation of its recurrence.

Cabrini contributed funding, through its ACAN membership, to the development of a "Remedy Pathways" module in its modern slavery e-learning course that will be available to staff and other stakeholders in 2021.

REPORTING CRITERIA 5: EFFECTIVENESS ASSESSMENT

Cabrini has implemented a governance framework to evaluate and report process to the Chief Executive and Group Executive. Measurements include the number of communication initiatives delivered, the number of supplier engagements and key performance indicators focusing on supplier responsive to modern slavery throughout the tender process.

Procurement, in conjunction with the Catholic Negotiating Alliance, and also with ACAN, undertook a high-level risk assessment of our suppliers. A selection of suppliers who were deemed to be either high-risk or high-spend, or a combination of both, were invited to complete a supplier self-assessment questionnaire. The results of this questionnaire provided insight into the maturity of our supply chain.

Most of our suppliers had well formulated, fully implemented modern slavery risk mitigation strategies. Cabrini engaged with suppliers who did not, to implement corrective action plans that will be followed up quarterly during the next reporting period.

Cabrini has also established a three-year review timeline to understand and assess the effectiveness of our modern slavery risk mitigation approach. Our plan, with Executive and Board sponsorship, includes annual review of our risk assessment processes and conducting internal audits to ensure that prequalification checks of new suppliers have been obtained. Cabrini will continue communicating with suppliers to support them in their progress in implementing their own risk mitigation strategies.

Cabrini intends to further improve its response to managing to modern slavery risks by continuing a relationship with ACAN and using the resources and support provided by ACAN and Domus 8.7.

We will continue to consider how we can better define measures of our effectiveness as part our 2021 program and on an ongoing basis.

REPORTING CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

Cabrini's structure is set out on page 6. All Cabrini entities summarised in that structure have the same Board and the organisation-wide approach to consultation across the group is described on page 7.

REPORTING CRITERIA 7: OTHER

Cabrini is part of The Australian Catholic Anti-Slavery Network (ACAN) who brings together Catholic entities to leverage their collective purchasing spend, share resources and coordinate action to manage modern slavery risk across their industry sectors.

CLOSING STATEMENT

The progress made throughout 2019-20 marks an early, but significant, stage in Cabrini's response to eradicating modern slavery.

We recognise that ongoing effort is required to build on this foundation, and we remain committed to further collaborating with our employees, suppliers and stakeholders to identify modern slavery risks and practices, and take steps to bring these to an end.

This statement was approved by the Cabrini Australia Limited Board on 25 May 2021.



Sylvia Falzon

Chairman,
Cabrini Australia
Limited Board

25 May 2021



Sue Williams

Chief Executive,
Cabrini Australia

25 May 2021



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

**Australian
Catholic
University
(ACU)**

**Modern
Slavery
Statement
2021**



Disclosure note

This statement has been made on behalf of the Australian Catholic University.
This statement covers all entities owned or controlled by ACU.

ABN 15 050 192 660

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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 2,300 staff, across eight Australian campuses: Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney, Strathfield and Adelaide, with one international campus in Rome. ACU headquarters are 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 from across the globe.

Our research institutes collaborate with strategic partners across Australia and the world 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



Mission, identity and values

As a Catholic university, we're 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 statement

Within the Catholic intellectual tradition and acting in Truth and Love, ACU is committed to the pursuit of knowledge, the dignity of the human person and the common good.

Our mission is at the heart of everything we do at ACU. It guides our approach to learning and teaching, our welcoming and engaging on-campus culture, and our commitment to building a better society by producing graduates willing to invest in this same commitment.

In this mission, we engage the Catholic intellectual tradition to bring a distinct perspective to higher education.

This statement is the text on the landing page wallpaper on all ACU issued PCs and laptops as a constant reminder to all ACU staff of their, and ACU's, obligations to the values and mission driving all their interactions. Please refer below:





Mission, identity and values

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.'



2020 and prior modern slavery risk management initiatives

ACU is committed to tackling modern slavery practices at every level and is working closely with the Australian Catholic Anti-Slavery Network (ACAN) and the Australian University Procurement Network (AUPN) to achieve desired outcomes.

Steps taken in, and prior to, 2020 include:

- **Membership of key affiliated associations**
Membership of both ACAN and AUPN Anti-Modern Slavery Working groups.
- **Eradicating Modern Slavery (EMS) Working Group**
This group was established in the latter part of 2020. Establishment of the ACU Eradicating Modern Slavery (EMS) Working Group comprised members of the ACU senior executive and other key ACU personnel. The objectives of the EMS Working Group 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.
- **Round-table meeting**
ACU via the Thomas More Law School and in conjunction with the Anti-Slavery Taskforce of the Archdiocese of Sydney, hosted a round-table meeting with Kevin Hyland OBE titled, *The State of Play with Attempts to Defeat Modern Slavery and Human Trafficking*.
Kevin Hyland OBE was the United Kingdom's first Independent Anti-Slavery Commissioner and led efforts in the United Kingdom to tackle modern slavery and human trafficking.
Mr Hyland also helped to establish the Santa Marta Group, a body comprising the Catholic Church, international law enforcement agencies, civil society entities and various non-government organisations. It was launched in the Vatican by Pope Francis in April 2014. In the 2015 New Year's Honour List, HM The Queen appointed Mr Hyland as an Officer of the Order of the British Empire for services in combatting human trafficking.
- **Core Curriculum**
ACU's Core Curriculum is 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.

- **Sustainability**

ACU's Sustainability Week was held 4 – 10 October 2020 and highlighted support for the United Nation's Sustainability Development Goals, including discussions exploring the contributions of noise, greed, slavery and ugliness.

- **Student and Community Engagement**

ACU via its student and community engagement initiatives help to promote organisations dedicated to educating people about and abolishing modern slavery, such as **A21 Advocates Against Human Trafficking**.

On Monday 8 February 2021, an ACU event took place and was reported in Catholic News 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.”



- **ACU's Strategic Plan**

Modern slavery has been included as an important objective in ACU's Strategic Plan 2020 –2023, under the headings:

- o **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.

- o **6. Service, stewardship and sustainability**
6.8. Take bold and decisive action on environmental, social and economic sustainability, and the eradication of modern slavery.

- **Workshops and conferences**

ACU 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. These include those organised by the Federal Department of Home Affairs, Sydney Catholic Archdiocese (including the original Saint Josephine Bakhita's Day at St Mary's Cathedral in 2019), the AUPN, PASA and others. ACU has been represented on the Archdiocese of Sydney Anti-Slavery Taskforce since May 2019.

- **Other initiatives related to modern slavery**

The establishment of new research centres to enhance ACU's research profile and to enable collaboration between ACU's school-based and institute-based researchers. The Research Centre for Refugees, Migration, and Humanitarian Studies will explore the historical and contemporary displacement of refugees across the world, bringing together researchers with expertise in government policy on refugees and humanitarian agencies, the role of non-state actors including missionaries and churches, child refugees, and modern slavery.

- **Sourcing processes and related documentation**

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 have recently been 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

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 in an apparel contract was 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."

Our plans for 2021

ACU initiatives and developments for ACU 2021

ACU's Vice-Chancellor and President Professor Zlatko Skrbis has recently been appointed to the Domus 8.7 Committee. Domus 8.7 is an Australia-wide network that assists 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.

Saint Josephine Bakhita, the patron saint of modern slavery victims and human trafficking, has been named as the patron

saint of ACU's new Blacktown Campus. Saint Josephine Bakhita herself was sold into slavery as a child. The ACU Blacktown Campus welcomed its first students in 2021.

On Monday 8 February 2021 ACU marked the Feast Day of Saint Josephine Bakhita with an article in its staff newsletter and website news portal. The article was written by Professor Skrbis, who hoped the university community would draw inspiration from the example Saint Josephine Bakhita set of faith, courage and dignity in fighting for her freedom in the later part of her life.

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 the Australian Catholic Anti-Slavery Network (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**.

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. Prior to 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 establish, 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.

2. 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 introductory 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 is working 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 currently been developed and another three are in development.
- ACAN, via their consultant agent, has provided Bridge the Gap, an online self-assessment tool to assist participating ACAN entities to assess where additional education and action from different sections may be required. This Bridge the Gap assessment has been completed for ACU (once in 2019 and again in 2021) 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 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.
- A SharePoint site is in the process of being developed which will contain all the initiatives that ACU is currently undertaking in response to modern slavery. This site, once completed will be made available to all ACU personnel.

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 has submitted its recent data and spend and the relevant risk categorisations are available from both organisations for key areas of spend.

A supporting software tool is being investigated by both ACAN and the AUPN, the purpose of which may broadly be 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.

This tool will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

It is ACU's intention to engage with at least one of these software tools during 2021.

ACTION: ACU to review, select and then sign up to at least one of the tools offered by ACAN and the AUPN.

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.

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 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.

Our plans beyond 2021

Our plan for beyond 2021 is to consolidate the implementation of actions outlined for 2021 in the previous sections.

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.

Consistent with these endeavours is the activities associated with ACU's recently opened campus at Blacktown, referred to in the article published in the monthly ACAN Newsletter below:

ACAN entity activities

Australian Catholic University (ACU) has opened its **new campus in Blacktown**.

“This campus is proudly named after Saint Josephine Bakhita, whose life is a testimony for human suffering and reminder of modern forms of slavery. Now, ACU is one of the first to adopt an anti-slavery policy and lead the national conversation around the anti-slavery agenda. I acknowledge the members of the Anti-Slavery Task Force in particularly the Archbishop of Sydney, the Most Reverend Anthony Fisher OP, for establishing it to lead the Australian Catholic Church's response to ending modern slavery,” said Vice Chancellor Professor Zlatko Skrbis at the opening ceremony.

Anti-Slavery Taskforce Chair, John McCarthy QC, has given an interview to the **This Catholic Life podcast** highlighting how Pope Francis was instrumental in ensuring forced labour was included in the UN Sustainable Development Goals, the work of the Taskforce and challenges ahead in tackling modern slavery.

Other actions planned for beyond 2021 are the consolidation of activities referenced under Reporting Criteria 4: Actions Taken to Assess and Address Risk.



Statement from Professor Zlatko Skrbis, Vice-Chancellor and President

In July 2020, while ACU's Acting Provost, I was delighted to attend the launch of the inaugural ACAN Annual Report, an event hosted by the Catholic Archbishop of Sydney, Most Rev. Anthony Fisher OP.

It was an absolute privilege to join the esteemed company at the launch, which coincided with the United Nations World Day Against Trafficking in Persons held on 30 July, with the goal of highlighting the greater scrutiny Catholic organisations are playing in supply chain decisions to help protect the rights of vulnerable workers and to combat modern slavery.

ACAN, which was formed in December 2019, brings together 32 Catholic entities including dioceses, schools and universities, and organisations across the finance and investment, health, aged care and welfare sectors, including ACU. It is coordinated by the Anti-Slavery Taskforce of the Archdiocese of Sydney.

ACU's aims into the future are to ensure we amplify the important work of ACAN and continue to support the anti-slavery agenda.

As a Catholic university, ACU is not only committed to the pursuit of knowledge and academic excellence, but guided and informed by Catholic Social Teaching. We recognise the dignity of each person and look for ways to work for the common good.

This is why it is important that ACU, along with many other Catholic organisations, participate in the modern slavery risk management program through the Australian Anti-slavery Network.

As a member of the program, it is fitting that on the 200th anniversary of Catholic Education in Australia, ACU opened the doors of its newest campus, the Saint Josephine Bakhita Campus in Blacktown, on Friday 12 March. ACU's new campus is dedicated to St Josephine Bakhita, who was kidnapped at the age of nine and sold into slavery.

On 8 February 2021, ACU had marked the Feast Day of St Bakhita, who is the patron saint of victims of modern slavery and human trafficking. Her example and inspiration serve as an important reminder that slavery is not something of the past, but a tragic reality of modern society.

The university community draws inspiration from St Bakhita as it works to address these issues in today's world.

I am also pleased to have recently been appointed to the Domus 8.7 Committee. Domus 8.7 is an Australia-wide network that assists 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 name Domus 8.7 comes from the combination of the Latin word 'Domus',

meaning 'home' and 'target 8.7' of the United Nations' Sustainable Development Goals.

My appointment to Domus 8.7 further supports the efforts of ACU's dedicated Eradicating Modern Slavery working group. This group works with ACAN to assess and mitigate the risk of modern slavery practices in the university's supply chain. In living the ACU mission, we are called to do what we can as an organisation, and as individuals, to promote awareness and to take action on modern slavery practices.

Millions of people around the world are caught in conditions of modern slavery, often in the poorer regions. What we may not realise is that there are also many victims closer to home. An estimated 15,000 people are affected by modern slavery in Australia alone.

In living the ACU mission, we are called to do what we can as an organisation, and as individuals, to promote awareness and to take action on modern slavery practices.

It is important to understand how to identify and assist people who may be victims of these practices.

We all have a part to play in honouring the inherent dignity of each human being, and this includes acting to ensure fair treatment and decent working conditions for all people. Education is an important aspect of this work and the university looks forward to working closely with ACAN and Domus 8.7 to further these aims."

ACU is committed to tackling modern slavery practices at every level and is working closely with ACAN.

On Behalf of myself as Vice-Chancellor and President, 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:

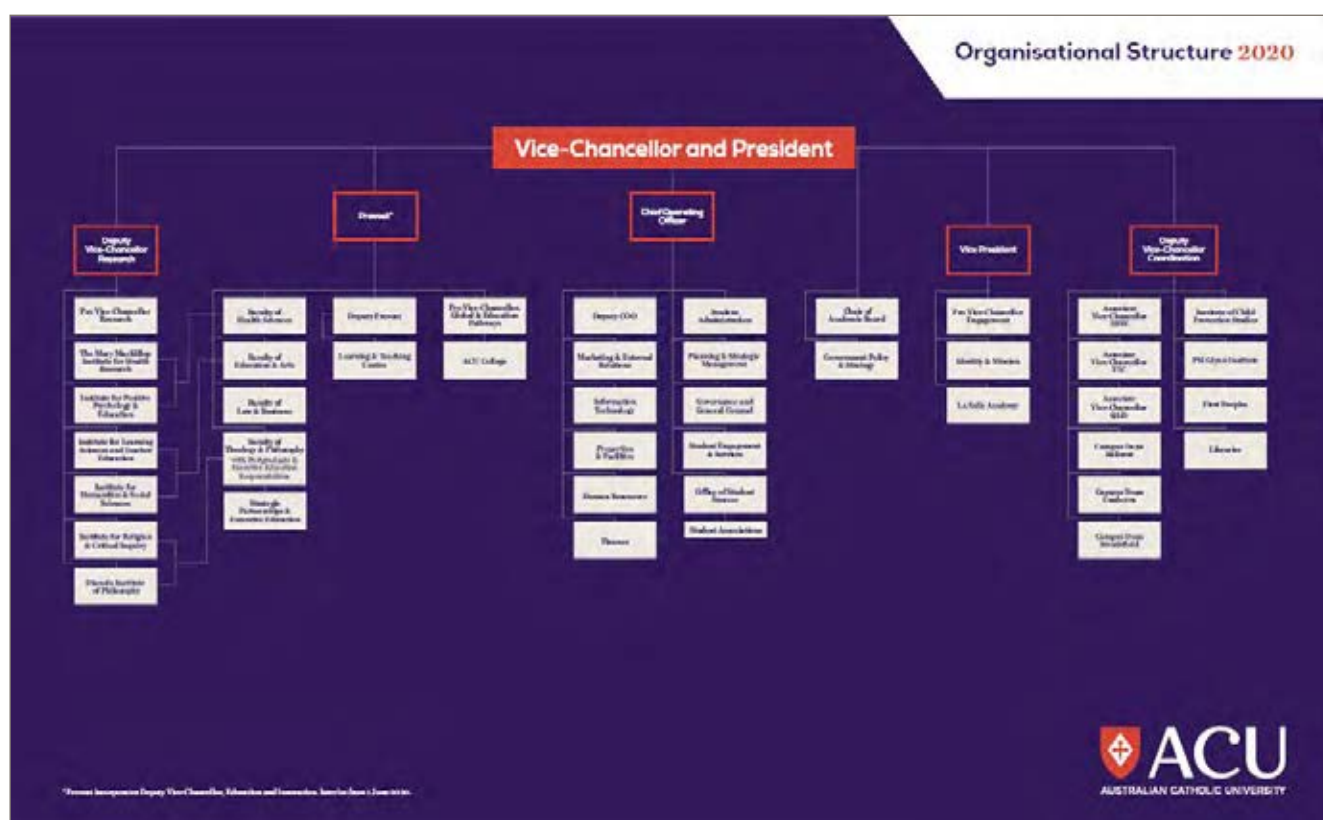


Professor Zlatko Skrbis,
Vice Chancellor and President,
Australian Catholic University
9 June 2021.

Reporting criteria 1 and 2: About ACU

Our organisational structure

The diagram below represents ACU's organisational structure at the end of the calendar year 2020.



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 Standing and Finance 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 program.

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 will be 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 will be chaired by the Chair of Academic Board. This committee will meet twice per year, once virtually and once in person providing the opportunity for strategic discussion, information sharing and engagement.

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)

The Deputy Vice-Chancellor (Research) 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.

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.

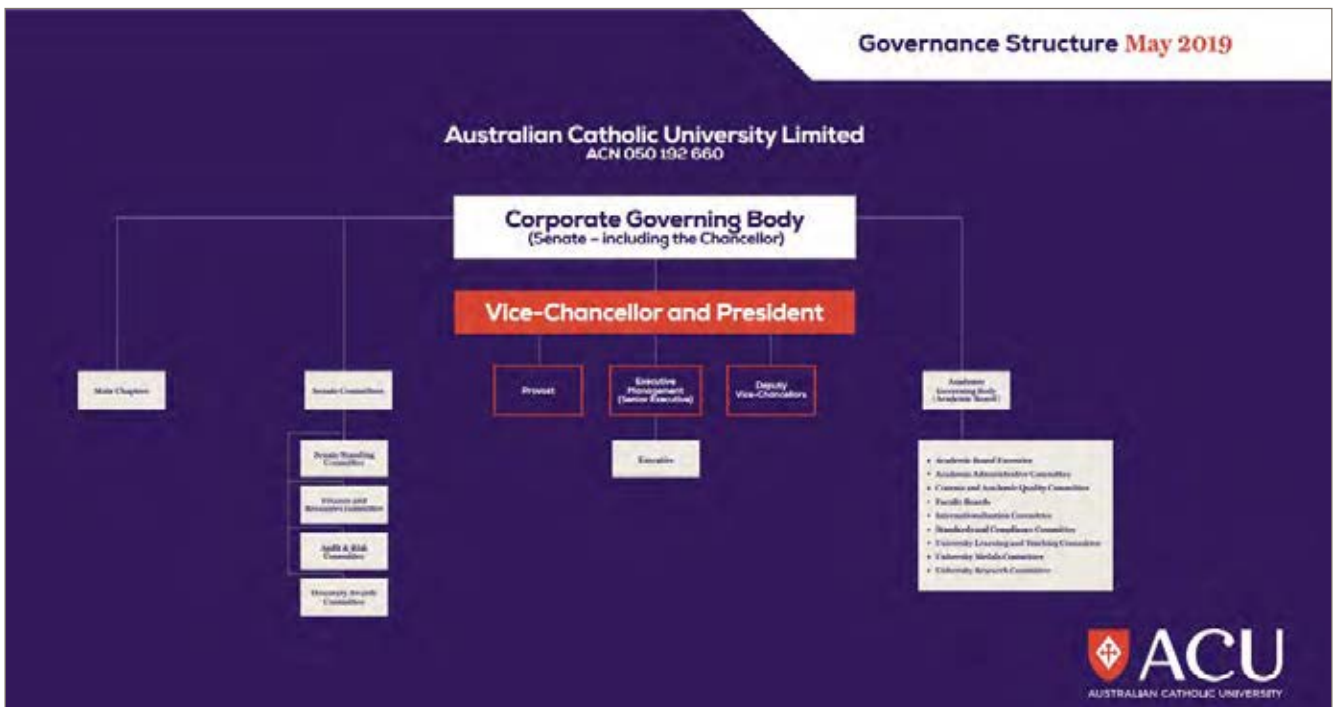
SENATE AND BOARD ELECTIONS

Elections are held to appoint members to the Senate and Academic Board from the university’s academic body. The Senate also holds elections to appoint a professional staff member and a student.

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 eight Australian campuses: Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney, Strathfield and Adelaide, 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 2,200 staff (FTEs).

- Approximately 2,300 staff (FTEs).
- More than 33,000 students .
- More than 119,000 alumni .
- Approximately 4,600 international students enrolled .
- More than 200 international partners.
- 1,000 ACU students have studied at our Rome Campus.
- One in five of our domestic bachelor's students study abroad.
- First in Australia for graduate employment.

ACU is positioned among the top universities in the world, as follows:

- Ranked in the top two per cent of all universities worldwide.
- Ranked in the top 80 in the Asia-Pacific region.
- Ranked 251–300 in the Times Higher Education World University Rankings.
- Ranked as one of the top 70 young universities in the world.
- Included in the top 25 of Generation Y universities.
- One of the top 10 Catholic universities globally.

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 ten 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.

GLOBAL RECOGNITION

ACU is recognised globally as a leader in a range of subject specialisations, as follows:

- Ranked fourth in sport science in Australia and 22nd globally.
- Ranked 18th in the world for nursing, and seventh in Australia.
- One of the top 60 universities in the world for education, and fourth in Australia.
- One of the top 200 universities in the world for psychology.
- Ranked 201–250 in the world for arts and humanities.

STUDENT SATISFACTION

ACU has recorded the following with respect to student satisfaction:

- Top five for skills development and top six learner engagement.
- Awarded five stars for learner engagement and skills development.
- Campuses regarded as exceptional and have received five stars for facilities.
- With a global focus, ACU has received five stars for internationalisation.

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.
- First 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 101–200 in the world for our positive impact on society.
- Ranked 8 globally for good health and wellbeing (SDG 3).
- Ranked 86 globally for quality education (SDG 4).
- Ranked 23 globally for gender equality (SDG 5).
- Ranked 46 globally for peace, justice and strong institutions (SDG 16).

EMPLOYEE SATISFACTION

ACU routinely undertakes MyVoice surveys to measure and respond to employee satisfaction. This survey is used to identify issues and initiate corrective actions. The results of these surveys and actions planned or undertaken are documented and shared with all employees.

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 tenth consecutive year by the Workplace Gender Equality Agency (WGEA).

Our supply chain

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 180 Million AUD in 2019, the major spend categories that represent the top 80% of spend are as follows:

LEVEL 1 SPEND CATEGORY	2019 APPROX.SPENDING \$'000
Building and Construction	\$50,802
Information Technology - Equipment and Services	\$15,388
Property and Realty Services	\$13,221
Health - Health Consumables and Services	\$12,211
Facilities Management	\$11,159
Professional Services	\$10,902
Travel and Accommodation	\$9,045
Financial Services	\$6,604
Utilities - Energy and Water	\$4,812
Education Services	\$4,003
Human Resources Services	\$3,596
Marketing and Media Services	\$3,457
Audio Visual - Equipment and Services	\$1,946
Telecommunications Services	\$1,563
Library - Books, Systems and Services	\$1,243
Architectural Design Services	\$1,015
Business Systems - Systems and Services	\$856
Event Management Services	\$775
Office Supplies including Furniture	\$722
Insurance Services	\$379
Printing Services	\$360
Waste Management Services	\$314
Transportation and Logistics Services	\$251

Activities from the various areas referred to in the previous section 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.

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 focussing 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.

Our Covid-19 response

ACU developed a Covid Task Force for the management of operations, students and staff in response to the Covid-19 crisis.

This includes the provision of latest advice from government and health authorities, instructions to personnel, ensuring social distancing measures were implemented on-site in relation to workplace re-design, closing campuses to students and staff where and as required, insisting that only critical staff were allowed on campus during lock-down periods, providing new and updated flexible working arrangements to allow personnel to work from home during the worst days of Covid-19, and providing the necessary equipment to allow them to be effective when working from home.

All workplaces were provided with disinfectant and Covid-19 instructions for safe personal interactions.

Special arrangements were made with key suppliers to alter delivery patterns and to concentrate delivery to key central locations thus minimising personnel interactions across the campuses. The requirements for receipt of goods was altered to allow for minimum physical contact, such as removing the need to sign devices or paperwork.

Specific Covid-19 issues were addressed on a case-by-case basis with key suppliers and ACU business owners. An example is the special arrangements made for student fit-out by ACU's supplier of health sciences uniforms.

Additional potential operational risks associated with Covid-19 were developed by Facilities Management and are referenced under Criterion 4 – Actions Taken To Address Risk.

Our people

ACU has a diversified workforce of nationalities, ethnicities and gender.

There is a large suite of HR policies designed to assist personal in all aspects of the work at ACU.

These are documented and available on the ACU website. These policies and reviewed are updated in accordance with quality review protocols and as needed.

Included in this suite of HR policies is a policy relating to whistle-blower protection.

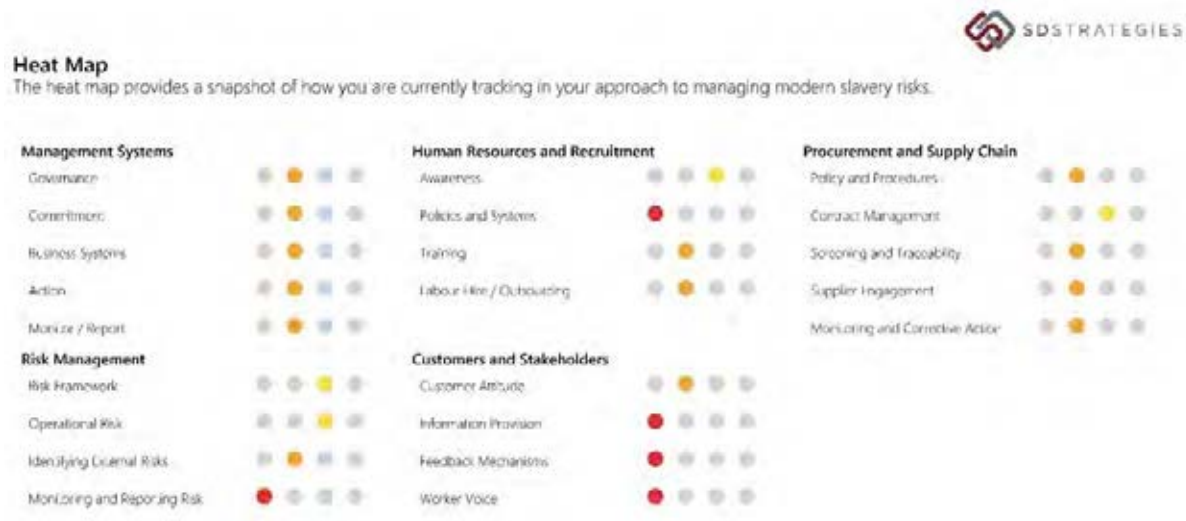
Further information may be found in the latest ACU annual report:

[ACU Annual Report 2020](#)



Modern slavery gap analysis

To assess the level of maturity required across all areas of ACU, a Bridge the Gap analysis has been performed. This Bridge the Gap analysis document is provided by ACAN. The result for ACU based on this preliminary assessment is as follows:



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, both ACAN and the AUPN.

Further detailed breakdown of this spend 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.

ACAN assessment – Top 50 suppliers only



AUPN assessment – minimum of 80 per cent on supplier spend



Country of origin-based risk assessment for supplier spend amalgamated for all universities by the AUPN is indicated in the graphical representation below.

ACU would have a similar geographical supplier risk as for other universities.



The above risk assessments based on both categorisation of spend and country of origin for the suppliers used by ACU are not atypical and are representative of the general experience of other university and ACAN entities.

Reporting criteria 4: Actions taken to assess and address risk

The following actions taken to-date have generally been referred to in earlier sections of this report, but are again here summarised:

- membership of ACAN and AUPN working groups to assess compliance requirements and risk, including the participation in the ACAN year 2 modern slavery risk management program.
- collation and submission of spend data, including supplier information, to both ACAN and AUPN risk assessment systems developed by their respective consultants
- 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 Bridge 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 Tier1'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 correctness of the information by a suitably valid process.
- Five contractors have been identified for the submission of documentation for the first half of 2021.

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 Organisational 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

ROAD MAP OF AREAS REQUIRING FURTHER ACTIVITY IN REPOSE TO BRIDGE THE GAP ANALYSIS

The road map 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 of ACU 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 training workshops. Online training modules are being developed and deployed to all staff. It is expected these will be available to all ACU staff by the end of 2021.	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 to be used 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 the 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

This section is not applicable to ACU.

Reporting criteria 7: Other

ACU has been a keen supporter of government legislation, at both federal and state level, aiming at eliminating slavery practices in our modern world.

Please refer to the submission below made in 2018 when current legislation was being developed, below:

- Federal Govt Modern Slavery Bill 2018 - Submission 44 - Stephen Weller

Modern Slavery Bill 2018 [Provisions]
Submission 44



20 July 2018

Dr Sean Turner
Committee Secretary
Legal and Constitutional Affairs Legislation Committee

via email: legcon.sen@aph.gov.au

Dear Dr Turner,

I write with regard to the inquiry by the Legal and Constitutional Affairs Legislation Committee into the Modern Slavery Bill 2018.

The submission by Australian Catholic University (ACU) is enclosed for consideration by the Committee.

Thank you for the opportunity to contribute to this inquiry and the subsequent report on the Modern Slavery Bill 2018.

Yours sincerely,

Dr Stephen Weller
Acting Vice-Chancellor and President

cc. Dr Nigel Zimmermann, Associate Director, Church Policy

Dr Stephen Weller
Chief Operating Officer & Deputy Vice-Chancellor

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Australian Catholic University

Submission to the Senate Legal and
Constitutional Affairs Committee:

Modern Slavery Bill 2018

July 2018



Australian Catholic University (ACU) Submission to the Senate Legal and Constitutional Affairs Committee: Modern Slavery Bill 2018

July 2018

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Australian Catholic University (ACU) Submission to the Senate Legal and Constitutional Affairs Committee: Modern Slavery Bill 2018

In principle support for the Modern Slavery Bill 2018

Australian Catholic University (ACU) has fully endorsed and collaborated with the efforts of the Catholic Archdiocese of Sydney in facing the scourge of modern slavery, and expresses in principle support for legislation seeking to do the same, including the proposed Modern Slavery Bill 2018.

The ACU mission states: “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.”¹ Because we are a public university, we understand our commitment to the “dignity of the human person and the common good” to be effected within the larger context of Australian society and our shared life, and we are committed to the wellbeing and protection of all people regardless of their beliefs. Many of our courses and programs have offered support for students who have experienced modern slavery either in their home country away from Australia, or in their family, or occasionally in their own life, so it is not something with which we are unfamiliar.

In contemporary Australia, modern slavery is a sad reality and it is appropriate the Commonwealth of Australia acts with courage on this issue. Even sourcing precise data on the situation can be difficult. Between 2004 and 2015 there were 588 referrals for assessment in human trafficking made to the Australian Federal Police.² Largely however, it is thought that many instances of exploitation of immigrant workers and forms of sexual slavery go unreported.

As a university, ACU is committed to ensuring its teaching delivery builds a comprehensive awareness in our graduates of the challenges and opportunities facing them in the contemporary workforce, and that they show a capacity for impacting Australian society and policy through concrete expressions of empathy for their fellow Australians. To this end, ACU includes relevant teaching on the plight of people caught in the grip of modern slavery and effective measures to counter slavery in:

- Our Core Curriculum, including the work of Caritas on UNCC300, and we discuss how Caritas has combatted human trafficking and the importance of advocacy on the part of students.
- The Thomas More Law School (TMLS) has a long-standing relationship with Australian Catholic Religious Against Trafficking in Humans (ACRATH). Among other things, ACRATH has partnered with TMLS to deliver Intensive Pro Bono Programs for law students. The programs include research, engagement, advocacy and preparation of submissions to government on issues concerning slavery, trafficking and exploitation. Recently, ACRATH and TMLS prepared a joint submission to the Joint Standing Committee on Foreign Affairs, Defence and Trade Inquiry into Human Organ Trafficking and Organ Transplant Tourism (2017). The curriculum of the Thomas More Law School includes the issue of modern slavery in teaching units on Criminal Law, International Trade Law, International Criminal Law, International Human Rights Law, Employment Law. Human rights violations associated with slavery, labour and sexual exploitation and human trafficking are a strong research focus of the TMLS.³
- In our Business units, modern slavery is raised as a discussion topic and/or case study in a number of teaching units including: Strategic Management, International Business, Managing Diversity and Conflict, Industrial Relations, International Marketing and Ethical Leadership.
- In our Arts teaching units, modern slavery is covered in subjects such as Race and Ethnicity: Australian and Global Perspectives, Humanitarian Work and Development Aid, World Politics and Justice, Rise of the United States, Precarious States Development Geopolitics and Livelihoods, Refugees and Forced Migration, Human Rights in History.
- In our engagement and immersion programs overseas our students and staff encounter the effects of modern slavery and bring that learning to their home and work contexts in Australia.

ACU shares the concerns of other organisations who have made submissions regarding the Modern Slavery Bill 2018, including those of the Australian Catholic Bishops Conference and the Josephite Counter-Trafficking Project, because the anti-slavery project is one in which we all have a share.

The need for embedding anti-slavery processes

¹ Australian Catholic University, ‘Mission and Profile’: http://www.acu.edu.au/about_acu/our_university/mission_and_profile.

² Statistics: Investigations and prosecutions, TC Beirne School of Law, University of Queensland, 24 November 2015: <https://law.uq.edu.au/research/research-activities/human-trafficking/statistics>.

³ Catherine Renshaw. “Human Trafficking in Southeast Asia: Uncovering the Dynamics of State Commitment and Compliance” 37 (4) Michigan Journal of International Law (2017).



While ACU supports the Modern Slavery Bill, it is a modest start to a necessarily more detailed and far-reaching process in eradicating modern slavery. At the heart of this proposed legislation is an important but rudimentary approach to a complex problem, which consists in introducing a compulsory reporting measure for entities with at least an annual revenue turn over of \$100,000,000. Internationally, Australia is committed to a comprehensive treatment of modern slavery and not merely a yearly reporting cycle only applicable to the largest organisations and companies. Many have argued that a similar scheme in the United Kingdom, the UK Modern Slavery Act 2015 (particularly section 54), is one of the weakest and least effective means of combatting modern slavery thus far attempted, and therefore does not serve as a useful model in Australia.

As the Catholic Archdiocese of Sydney noted in their submission to a consultation by the Attorney General, Australia is a prominent signatory to the Sustainable Development Goals adopted unanimously by the United Nations on 25 September 2015.⁴ This commitment, made in the presence of Pope Francis, includes taking “immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour.”⁵ Such an effort is significant for its far-reaching implications as much as for the moral message it sends to every level of political influence domestically and internationally, a goal that is intended to be in operation until 2030.

Because this goal is comprehensive, it offers a broader policy context in which to evaluate any other legislation tabled in the Parliament, and in this light the present Bill clearly does not go far enough. Specifically, the introduction of an instrument by which large organisations will publicly report on how their procurement policies have taken efforts to counter modern slavery fails to address the need for real processes of eradicating modern slavery in supply chains. Anti-slavery efforts are toothless unless they are embedded practices within the systems of procurement in organisations, including both private corporations as well as public service administration both at the Federal and the State/Territory level.

ACU will continue to exercise in principle support for steps towards a Modern Slavery Act, but endorses efforts to implement embedded anti-slavery practices that are ethical and sustainable, as well as appropriately mandated. Without embedding practices in this way, an annual cycle of reporting for a limited number of organisations, without either incentive or disincentive, can achieve little.

⁴ Catholic Archdiocese of Sydney, *Modern Slavery in Supply Chains Reporting Requirement: Submission by the Catholic Archdiocese of Sydney to the Australian Attorney-General's Department's Public Consultation*, October 2017, 1.02.

⁵ UN General Assembly (2015), *Transforming our world: The 2030 Agenda for Sustainable Development* A/RES/70/1. □

Global leadership in fighting against modern slavery

Moves towards State and Federal legislation opposing modern slavery are welcome, but to dis-incentivise the interest in human trafficking and gross exploitation of human beings, particularly women and children, a partnership between Government and non-government entities will be necessary. The Catholic Church is a global network of communities that is fundamentally opposed to modern slavery in all its forms and, under the leadership of Pope Francis and his predecessors, has taken up the burden of calling other leaders to account on this issue. The Church, both abroad and in the Australian context, has collaborated with religious and non-religious entities for many years to reach out pastorally to those who carry the scars and abuses of modern slavery, and with those seeking to put strong policies in place to reduce the possibility of cooperation with modern slavery practices. ACU collaborates with Church organisations and agencies wherever possible.

Moreover, the Catholic Church has led by example, including actions to “slavery proof” the supply chains of the Vatican.⁶ His Holiness Pope Francis has equated modern slavery with climate change as two great challenges before us, and has spoken at numerous occasions on the need to avoid complacency and half-measures to combat what is effectively organised crime on a global level.⁷ Australia is a country proud of its inherent freedoms and opportunities, but it also benefits profoundly from cheap labour and products sourced in countries with a record of dubious ethics and superficial protections to low-wage workers and children. Many Australians find it hard to believe that what they purchase might be implicated in modern slavery, or that neighbours and immigrants to our land could be experiencing slavery conditions in our cities and suburbs.

Mindful of the need to overcome our patterns of ignorance in this regard, ACU has clear policy and procedure documents that guide us on how to source goods and services with an ethical basis, including expectations placed on companies with which we work that their own policies are in accord with anti-slavery, fair and safe working conditions, anti-corruption, human rights and environmental sustainability, and how their policies inform their business practices, to safeguard the wellbeing of all the people working along their supply chain.

After the lead of Pope Francis, we view the fight against modern slavery as connected to the need for sustainable practices, and so we investigate the sustainability factors incorporated into any goods being supplied with respect to:

- Whether or not they are produced by sustainable processes.
- Whether or not they help minimise, or are made by processes that minimise, energy and water consumption.
- Whether or not they are made from recycled material.
- Whether or not they may be re-used or recycled.
- Whether or not they are non-polluting and contribute to improved land, air, and water quality.

Both the world in which we live and the treatment of our fellow human beings are part of a human ecology in which we depend on one another and on our natural environment, and both are owed appropriate respect and diligence.

⁶ George Pell, “Cardinal Pell: Vatican will ‘slave-proof’ supply chain,” Vatican Radio, January 19, 2016, http://en.radiovaticana.va/news/2016/01/19/cardinal_pell_vatican_will_slave-proof_supply_chain/1202111.

⁷ Ashley McGuire, Crux. *Pope Francis leads the charge against 21st century slavery*, April 20, 2016 <https://cruxnow.com/church/2016/04/20/pope-francis-leads-the-charge-against-21st-century-slavery/>.



Conclusion

In principle, ACU supports the Modern Slavery Bill 2018 because the objective of combatting modern slavery practices in procurement and supply chains is good and achievable. It aligns to the Australian democratic ideal of fairness and to our own mission of “truth and love” with special regard for the human dignity of every fellow human being.

The truth that slavery exists in any form today, including in our own Australian communities, is a revolting reality that should stir outrage and effect strategies of elimination. This Bill rightly engages our sense of injustice at the evils of exploitation, especially with regard to women and children, but it engages only a tentative first step in the direction of effective strategies to eliminate modern slavery. We are conducting our own internal review of policies and procedures to take up the lead of Pope Francis and, more locally, the Catholic Church in Sydney and beyond, to combat modern slavery, and to teach a new generation of leaders how to understand it and fight against it. However, we strongly encourage any proposed legislation to include mandated processes that ensure modern slavery is not given cooperation or encouragement, regardless of the size or revenue of any entity in Australia.



Attachment A: Australian Catholic University Profile

Australian Catholic University (ACU) is a publicly-funded Catholic university, open to people of all faiths and of none and with teaching, learning and research inspired by 2,000 years of Catholic intellectual tradition.

ACU operates as a multi-jurisdictional university with seven campuses across four states and one territory. Campuses are located in North Sydney, Strathfield, Canberra, Melbourne, Ballarat, Brisbane and Adelaide. ACU also shares a campus in Rome, Italy with the Catholic University of America.

ACU is the largest Catholic university in the English-speaking world. Today, ACU has more than 33,000 students and 2,300 staff.⁸

ACU graduates demonstrate high standards of professional excellence and are also socially responsible, highly employable and committed to active and responsive learning. ACU graduates are highly sought-after by employers, with a 94 per cent employment rate.⁹

ACU has built its reputation in the areas of Health and Education, educating the largest number of undergraduate nursing and teaching students in Australia¹⁰ and serving a significant workforce need in these areas. Under the demand driven system, ACU sought to focus and build on these strengths.

Since 2014, ACU has had four faculties: Health Services; Education and Arts; Law and Business; and Theology and Philosophy. The consolidation of the previous six faculties has created a more efficient and competitive structure focused on the needs of industry and employment partners.

As part of its commitment to educational excellence, ACU is committed to targeted and quality research. ACU's strategic plan focuses on research areas that align with ACU's mission and reflect most of its learning and teaching: Education; Health and Wellbeing; Theology and Philosophy; and Social Justice and the Common Good. To underpin its plan for research intensification, ACU has appointed high profile leaders to assume the directorships, and work with high calibre members, in seven research institutes.¹¹

In recent years, the public standing of ACU's research has improved dramatically. The 2015 Excellence in Research for Australia (ERA) assessment awarded ACU particularly high ratings in the fields of research identified as strategic priorities and in which investment has been especially concentrated. These include selected areas of Health, as well as Education, Psychology, Theology, and Philosophy, in which ACU's research was rated as "above" or "well above" world standard.

⁸ Student numbers refer to headcount figures while staff numbers refer to full-time equivalent (FTE).

⁹ *Graduate Outcomes Survey (GOS) 2016*.

¹⁰ Department of Education and Training, *2014 Higher Education Data Collection – Students, Special Courses* (31 July 2015) <<https://docs.education.gov.au/node/38139>>.

¹¹ Australian Catholic University, *ACU Research* <http://www.acu.edu.au/research/research_institutes_and_programs>.

**Australian Catholic
University (ACU)**
**Modern Slavery
Statement 2021**

Modern Slavery Statement 2020

CATHOLIC DIOCESE OF MAITLAND-NEWCASTLE



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.

The work of the Diocese to address the risks of modern slavery in its supply chain is an ongoing program of work; activities are implemented and monitored frequently with regular review and update.

Eradicating modern slavery will take time and will be a process of constant improvements. As such this Statement is only the first step in this direction.

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: The Diocesan Synod of 1992-93, acting on behalf of the diocesan community, resolved to embrace and promote the Vatican II understanding of the Church's mission contained in the following:

The Church, because it is the People of God and the Body of Christ enlivened by his Spirit, is called to be a sign and instrument of communion with God and of unity among all people (LG1). The Church exists to promote the Kingdom of God on earth (LG5). This it does by proclaiming Christ – the Good News of God's love for all people – and by working in the world for justice, peace and reconciliation.

This mission finds its source and summit in the Eucharist (LG11) which, when lived in everyday life and celebrated in the liturgy, is both the living symbol of

Christ's life, death and resurrection and celebrates the deepest identity of the Church as a communion of life, love and truth (LG9).

All those who, through baptism, have been initiated into the community of the Church, have the right and duty to participate in its life and mission as a response to the Spirit in their lives (LG3).

We are called to live out the commandment of Jesus: 'Love one another as I have loved you' (Jn 15:12) .

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Our approach

This Statement sets out the steps taken by the Catholic Diocese of Maitland-Newcastle to identify and address modern slavery and human trafficking risks in our operations and supply chain for the period ending 31 December 2020.

This is our first Modern Slavery Statement and describes the actions we have taken to establish a modern slavery framework and policies. In addition, we share our efforts to understand and detect modern slavery and human trafficking in our organisation along with the measures we have in place to respond to this risk.

We are committed to continuous improvement and addressing modern slavery risks.

Our strategy is underpinned by the Catholic Social Teaching¹ values in respect to human rights and modern slavery:

- Human dignity
- Respect for Human life
- Preferential Protection for Poor and Vulnerable
- Human Equality
- Common Good

Key milestones in 2019 and 2020

Strengthening our approach by establishing a Modern Slavery Liaison Committee to initiate and coordinate due diligence in our organisation and supply chains.

Conducted expenditure analysis, developed risk profiles for these suppliers across the Diocese and subsequently identified top 50 suppliers.

High level engagement strategy initiated for identified high risk suppliers.

Adopted Modern Slavery contract provisions for new contractors.

Delivered targeted briefings to Diocesan leadership and incorporated modern slavery policies in staff on-boarding to build greater awareness of modern slavery and our approach to address modern slavery across our organisation and operations.

¹<https://www.americamagazine.org/faith/1998/10/31/10-building-blocks-catholic-social-teaching>

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 150,000 Catholics. Through its parishes, pastoral groups, and its agencies of Catholic Schools, CatholicCare, St Nicholas Early Education and other agencies, the diocese provides pastoral, educational, social welfare, and community development. The Diocese employs more than 4,000 people across these agencies.

Our services

58 schools with over **20,100** students

29 St Nicholas OOSH services with
1,182 students enrolled

9 St Nicholas Early Education centres serving
more than **800** children

Training by the Office of Safeguarding provided to
over **1,100** staff

186 children and young people in case
supported through CatholicCare

Close to **8,000** counselling and assessment
sessions provided by CatholicCare



154,481

Catholics in the region
(2016 census)



4,192

Employees in our
Diocese



38

Parishes in our
Diocese



10

Deacons

40

priests



6,000+

volunteers

Modern slavery risk management initiatives

The Catholic Diocese of Maitland-Newcastle (“the Diocese”) is an active member of the Australian Catholic Anti-Slavery Network (ACAN). Formed in December 2019, ACAN brings together 32 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.

Across our agencies, we source a diverse range and significant amount of goods and services, ranging from stationery to uniforms, furniture and office supplies, construction and building equipment.

The Diocese has commenced considerable efforts to understand and detect the risk of modern slavery in our supply chains. We have conducted expenditure analysis and identified our top 50 high-risk suppliers; we have developed risk profiles as well as a high-level engagement strategy for these suppliers. We are aiming to progressively extend this program as we continue to develop a deeper understanding of our supply chains.

Modern Slavery contract provisions are included for all new contracts and supplier engagements. The diversity of our services can potentially expose the Diocese to a 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 Modern Slavery training. We have also incorporated modern slavery as part of our corporate induction for new starters and we will continue to roll-out this training to staff to build greater awareness of modern slavery along with our approach to address modern slavery across our organisation and operations.

Our efforts will continue as we proactively seek to eliminate modern slavery from our supply chain and contribute to the global eradication of modern slavery and human trafficking.



Our plans for 2021

The Diocese intends to continue its work to address the risks of modern slavery within its supply chain. Over the course of 2021 we will expand our efforts with specific focus on assurance practices such as monitoring and reporting external risk, enhancing our modern slavery activities in Human Resources and recruitment activities as well as engaging with our customers and stakeholders, including small-scale rural, regional and remote suppliers.

We are currently working on a number of initiatives, including:

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)

Beyond 2021

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 2021:

WORKSTREAM	ACTIVITY
Governance	Our Leadership and Senior Management teams are highly engaged with the issue, have specified targets and KPIs for modern slavery risk management, and tracks the organisation's performance in implementing our Modern Slavery program.
Commitment	Our Leadership and Senior Management teams drive our program and are fully engaged with its implementation both inside and outside our organisation
Business Systems	Managing modern slavery risk is a business priority and is reflected in all parts of our business systems, policy, strategy and supply chain.
Action	Goals, targets, KPIs and minimum standards have been set to address modern slavery risks and progress is regularly reported to senior management.
Monitor and Report	Regularly collecting, analysing and reporting information on modern slavery is an integral part of our continuous improvement system. Information on modern slavery is continuously collected from a wide variety of sources and reported to senior management for actions
Awareness	Key managers and staff are aware of modern slavery issues, understand our policy and know they are responsible for taking action to address risks. A dedicated staff member or team drives our modern slavery awareness program delivered to staff, suppliers, and other businesses in our sector and beyond.



WORKSTREAM	ACTIVITY
Policies and Systems	<p>Our modern slavery policy is included in all position descriptions and key managers/contractors have specific accountabilities and deliverables to prevent or manage it.</p> <p>Modern slavery objectives and accountabilities are included in our recruitment processes, performance management and remuneration policies and practices.</p>
Training	<p>A wide range of targeted training courses and education program on modern slavery are regularly delivered to staff and contractors.</p> <p>Our training and professional development strategy ensures all staff and contractors have the knowledge and skills to implement our modern slavery policy and programs</p>
Labour Hire and Outsourcing	<p>We actively enforce and monitor our modern slavery due diligence requirements with all external recruitment and labour hire agencies.</p> <p>We actively work with and support labour hire companies to identify and eliminate modern slavery risks from their operations.</p>
Procurement and Supply Chain	Detailed procurement policies, guidelines, and processes to eliminate modern slavery in our supply chain are in place and staff are trained in their use.
Contract Management	Performance standards and contract evaluation criteria are in place for at-risk contracts and mechanisms are in place to enforce them.
Screening and Traceability	<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>
Supplier Engagement	<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>
Monitoring and Corrective Action	<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>
Risk Framework	<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>Modern slavery is an identified risk category in our corporate risk framework and we regularly assess and take action both internally and externally.</p>

Statement from Bishop Bill Wright

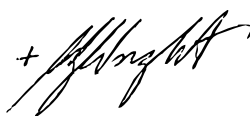
This is our first Modern Slavery Statement and describes the actions we have taken to establish a modern slavery framework and policies.

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 as it generates confidence in our service to the community.

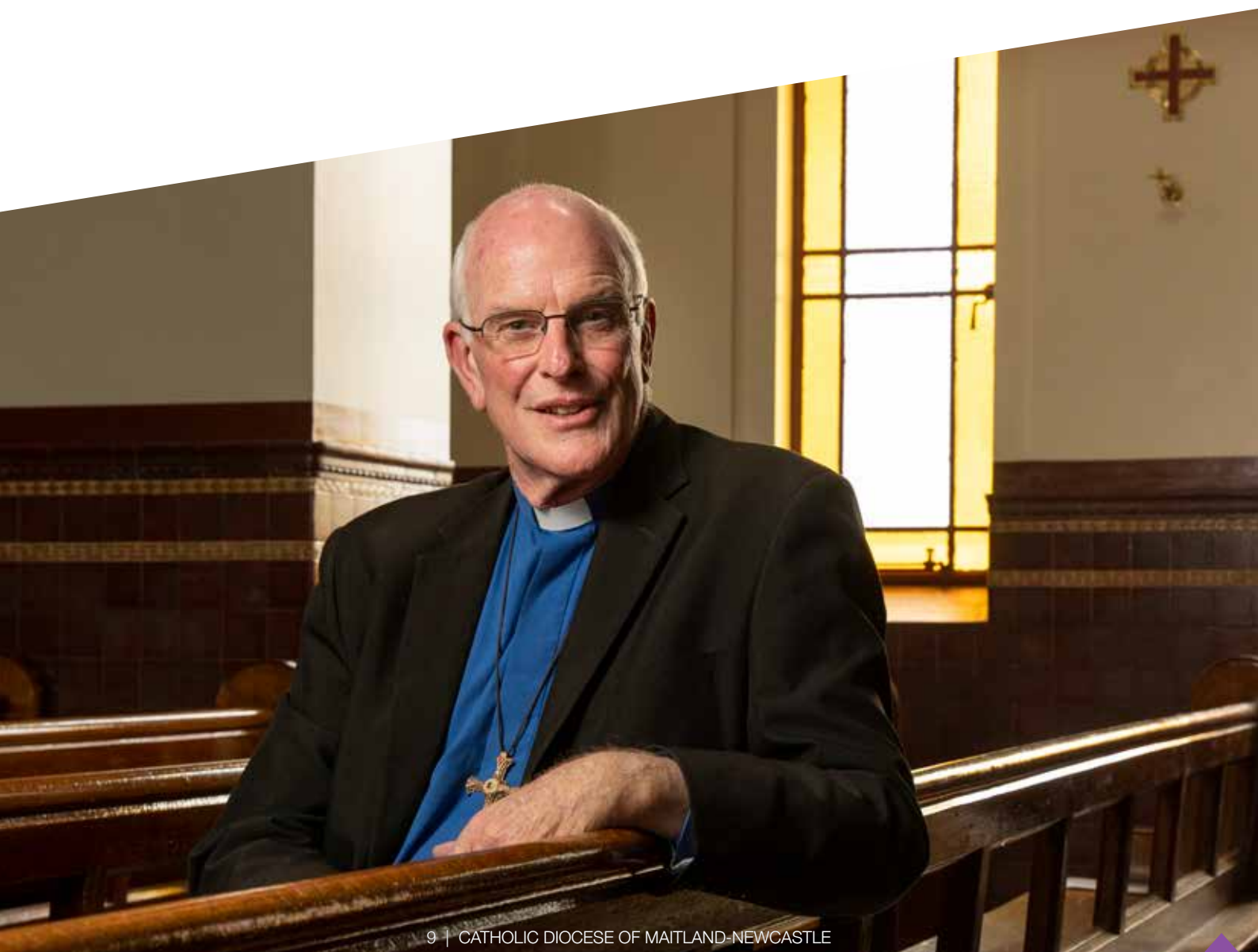
We acknowledge the impact that commercial activities, including ours, can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk in our operations and supply chains.

Our Modern Slavery Policy outlines the steps The Diocese of Maitland-Newcastle will take to work with other Catholic entities, suppliers, business partners and community stakeholders to fulfil a common goal of ending modern slavery globally.

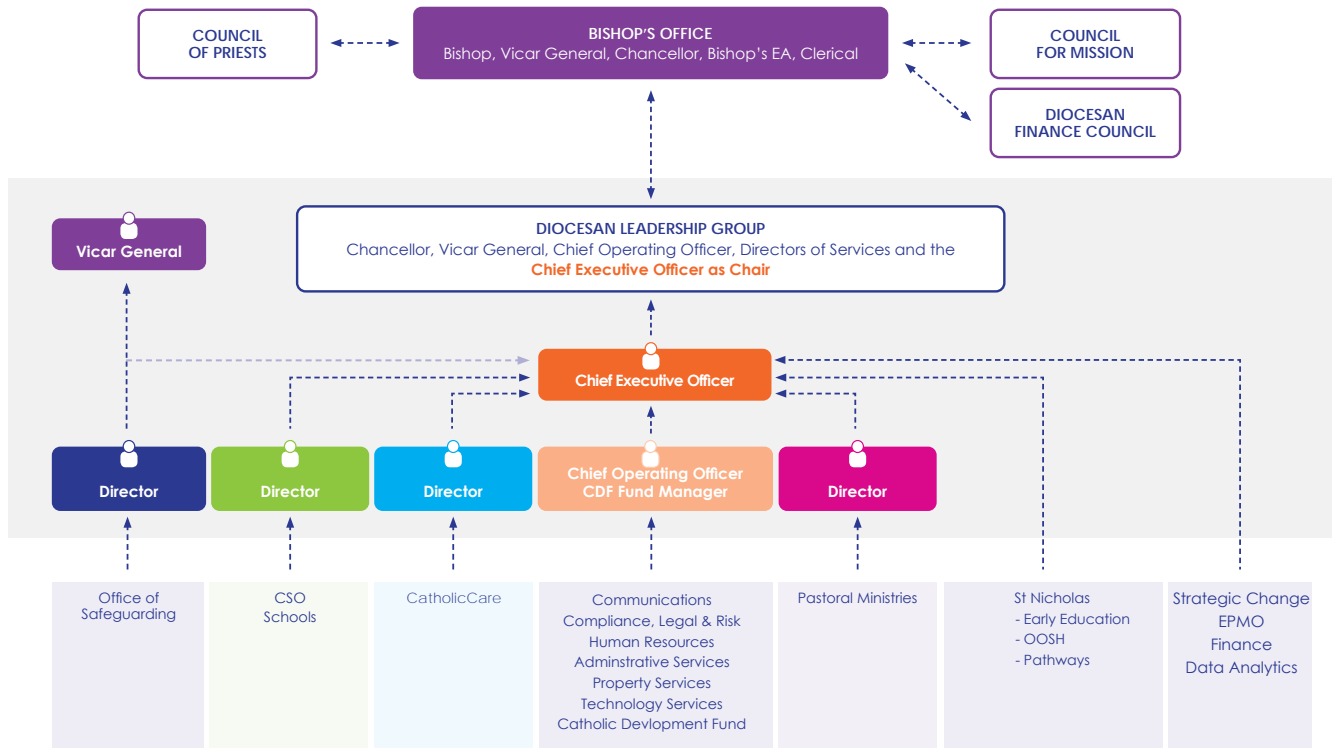
We expect all of our employees, contractors and suppliers, both current and those who seek to have a future business relationship with us, to comply with all aspects of our policy and strive to protect and respect the freedom and dignity of people everywhere.



Bishop Bill Wright, Bishop of Maitland-Newcastle
23 March 2021



Organisational overview



Workforce data:

Agency	FTE	Part time/ Casual / Fixed term employees	Volunteers
Diocese including St Nicholas, Office of Safe Guarding and the Catholic Development Fund	248	478	1,353
CatholicCare	59	77	211
CSO	1,106	2,225	4,859
Total	1,413	2,780	6,423

Workforce composition (estimated)

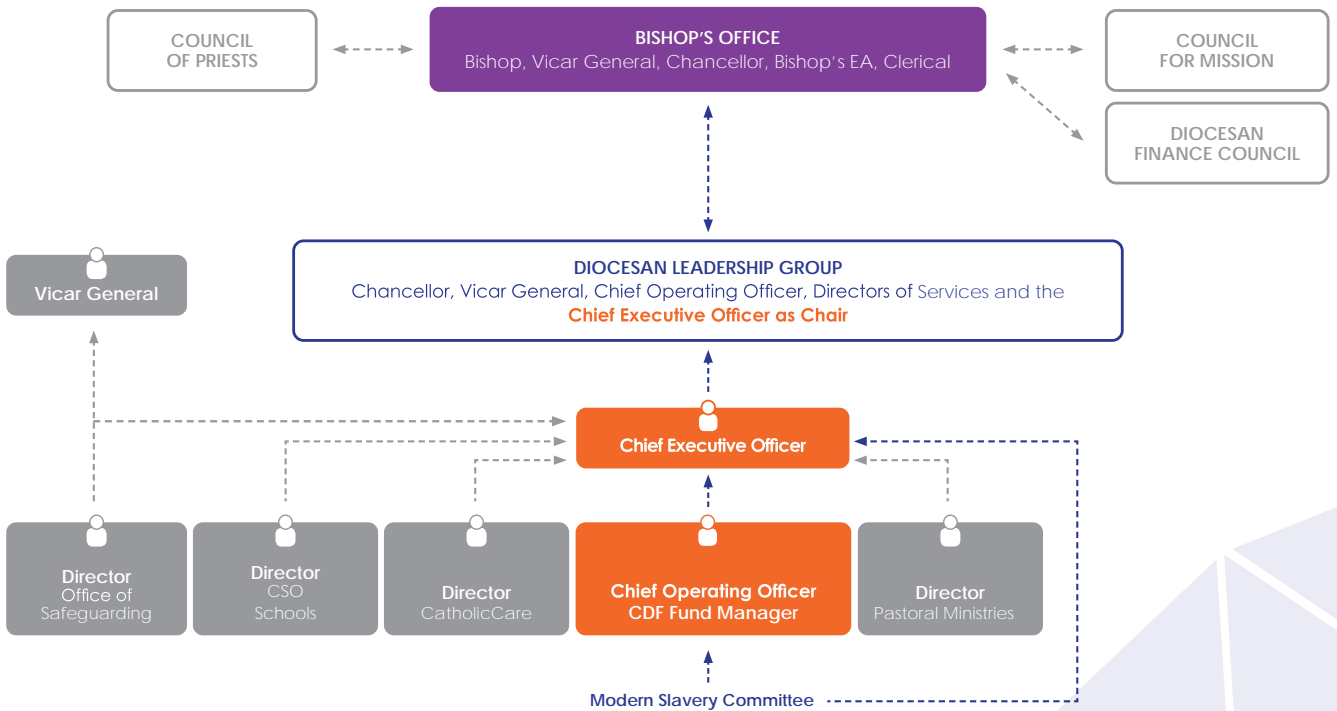
Agency	% female	% male
CatholicCare	85%	15%
CSO	80%	20%
Diocese including St Nicholas	84%	16%

Governance framework

Overarching responsibility for compliance with the Modern Slavery Act lies with the Compliance, Legal and Risk division 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 centralised Modern Slavery Liaison Committee, a centralised committee attended by senior stakeholders from across the Diocese.

The Modern Slavery Liaison Committee acts as an advisory only 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 150,000 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:

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.

Catholic Schools Office, educating more than 20,000 students in our 58 schools.

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.

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.

St Nicholas Early Education, providing care and education for more than 800 children across nine centres.

St Nicholas OOSH, 29 services providing out-of-school-hours care for over 1,100 primary school students.

Catholic Development Fund, assisting with the management of Diocesan finances and providing retail clients a small range of investment products.

The Diocese employs more than 4,000 people and is supported through a central shared services team providing support in the following areas:

Administration Services

Human Resources

Communications

Compliance, Legal and Risk

Data and Analytics

Property

Enterprise Project Management Office

Technology Services

Finance

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.

School supply chain

We are currently implementing an enterprise level system capable of identifying suppliers and related expenditure across our schools. This will enable suppliers to be identified at a 'whole of system' level to enable us to strategically approach modern slavery activities. Implementation is scheduled to be completed in early 2022.

Currently we have the capacity to analyse our data for six pilot schools where implementation has already

occurred. Given the minor variation in the goods and services procured by schools along with the commonality of suppliers to our schools, the data provided by the pilot schools will be indicative of the larger sample and may also indicate areas for reduced modern slavery risks and reduced costs.





CRITERION THREE

Modern slavery **risks** in operations and supply chains

The Diocese has taken a number of steps to identify the Modern Slavery risks in its operations and supply chains.

Operational risks

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 a number of processes in place to ensure our employees are fairly recruited and appropriately

remunerated. Our staff is also able to access an independent and anonymous whistleblower service as needed. An internal audit program has been underway for three years and the schedule of auditable risks is currently under review.

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 2,000 suppliers has been undertaken at a high level with suppliers being categorised into the following areas:

Building & Construction	Licence & Membership Fees
Events & Event Management	Cleaning & Security Services
Finance & Investment	Facility Management & Maintenance
Furniture & Office Supplies	Food & Catering Services
Labour Hire	ICT Hardware
Waste Management	Uniforms
ICT Software and Network Services	Marketing & Advertising Services
Travel & Accommodation	Utilities
Professional Services	Printing / Mail Services
Financial Expenses	Government & Agency Fees



High risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Building & Construction	Building materials (eg concrete, steel, timber, plaster products, glass, plastics, quarried stone etc) sub-contracting and labour hire services, demolition, painting and landscaping.	37.02%
Cleaning & Security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	0.39%
Events & Entertainment	Promotional products, venues, bar and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables	0.49%
Facility Management & property management	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	0.71%
Food & Catering Services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit and vegetables), wine grapes, beverages, general catering for conferences, lunches, events etc and hospitality services.	0.42%
Furniture & Office Supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	1.11%
ICT Hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime</p>	0.52%
Uniforms & PPE	Uniforms (workwear, schoolwear, sportswear), footwear and PPE (eg gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	0.21%
Waste Management	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	0.04%
Finance & Investments	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	9.33%



Medium risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk)	3.12%
Fleet management, Consumables and Maintenance	Vehicle, components, consumables, mechanical and crash repairs, servicing, waste disposal (e.g. tyres, oil)	1.74%
ICT software & network services	Software and application development, support services, call centres (offshore)	5.52%
Travel & Accommodation	Travel booking services, hotels, accommodation. Orphanage trafficking/voluntourism	0.31%
Community & Home Care Services	Allied health services, home nursing, home care and social support.	0.56%
Print / Mail Provider	Printing services, printers, ink, paper, other printing consumables	0.11%
Advertising & Marketing	Advertising services, campaigns, branding, media collateral, outsourced business operations	0.38%



Low risks

CATEGORY	SPEND DESCRIPTION	% BY SPEND
Government & Agency Fees	Other	8.92%
Financial Expenses	Other	10.52%
Professional Services	Other	18.58%

CRITERION FOUR

Actions taken to manage risk

Our immediate focus for modern slavery action has been in strengthening our understanding of potential modern slavery risks in our operations and supply chain, joining ACAN, forming a Modern Slavery Liaison Committee and identifying gaps and assessing high level supplier risks.

Steps we have taken to understand, assess and mitigate the risk of modern slavery in our supply chain during this reporting period include:

	ACTIONS
Diocesan leadership on Modern Slavery	<p>Established a Modern Slavery Liaison Committee with diverse membership and formalised Terms of Reference</p> <p>Regular meetings established to:</p> <ul style="list-style-type: none"> • Provide input and advice on issues related to Modern Slavery. • Set direction, targets and develop the Diocese’ approach to Modern Slavery. • Ensure the Diocese meets the requirements of the Modern Slavery Act (Cth).
Building staff awareness and sharing information	<p>All new employees are provided with information on Modern Slavery and the independent Whistleblower Service.</p> <p>Modern Slavery intranet page established and Policy made available to all staff.</p> <p>E-Learning MS 101 is available to staff of the Catholic Schools Office.</p> <p>Articles published in Aurora magazine, distributed to circa 45,000 people in the Hunter-Manning area.</p>
Governance and policy	<p>A robust Modern Slavery Policy was developed and approved.</p> <p>Modern Slavery contract provisions are developed for all new contracts.</p> <p>Commenced issue of the Model Supplier Code of Conduct to all new contractors.</p> <p>Procurement Policy developed and currently under review</p>
Training	<p>Training has been provided to the following areas of the Diocese:</p> <ul style="list-style-type: none"> • Council of Priests • Diocesan Leadership Group • Responsible Persons under the Education Act <p style="margin-left: 20px;">Shared Services</p> <ul style="list-style-type: none"> • Finance team • Administration Services • Property team • Data and Analytics team • Technology Services team • CatholicCare refugee service staff • CSO staff <p>Finance team was provided with ethical procurement resources.</p> <p>A webinar was hosted and available to staff and interested members of the public.</p>



ACTIONS

Analysis and assessment

Expenditure analysis for the Catholic Schools Office undertaken to assess and prioritise suppliers to the Diocese's largest purchaser.

Subsequent analysis of expenditure for whole of Diocese to prioritise suppliers for Modern Slavery engagement.

Modern Slavery risk assessment undertaken to identify elevated risk areas.

Bridge the Gap Surveys conducted in 2019 and 2020

Stakeholder engagement and collaboration

Engagement with external consultants to develop risk profile based on expenditure analysis.

High-level Supplier Engagement Strategy developed for the top 50 suppliers and high-risk suppliers

Supplier engagement commenced with initial Modern Slavery questionnaire provided to suppliers

Capacity building

Members of the Modern Slavery Committee:

- Attended the 2019 ACAN Modern Slavery Conference
 - Joined regular ACAN / MSLO teleconference
 - Attended ACAN workshops
 - Collaborated with ACAN members
 - Participated in Supply Chain Sustainability School E-Learning; Building Links webinar and Ethical Sourcing seminar
-



200+

staff trained in Modern Slavery risk



45

suppliers engaged in our strategy



>200

hours spent on modern slavery compliance

Responding to a **global pandemic**, COVID-19

COVID-19 increased the risks of modern slavery across supply chains in both local and global operations. Over the course of 2020, we took a number of steps to ensure those at risk in our communities were not disadvantaged, including:

- Keeping our schools open, regardless of how few students were attending. This ensured we were able to support vulnerable and essential workers.
- Fee support or concession was offered to all school families to ensure the financial and social impact of the pandemic was reduced.

Taking into consideration the potential impacts of COVID-19 on the vulnerable workers within our supply chains, we provided our top 50 suppliers with a document developed by Australian Border Force - Modern Slavery Act Information Sheet: Coronavirus.

Modern slavery **action plan**

The Diocese of Maitland-Newcastle has commenced its modern slavery maturity journey by focusing on management systems, risk assessment, staff training and supplier engagement.

In 2021 we intend to consolidate our learning about supply chain risks and focus on:

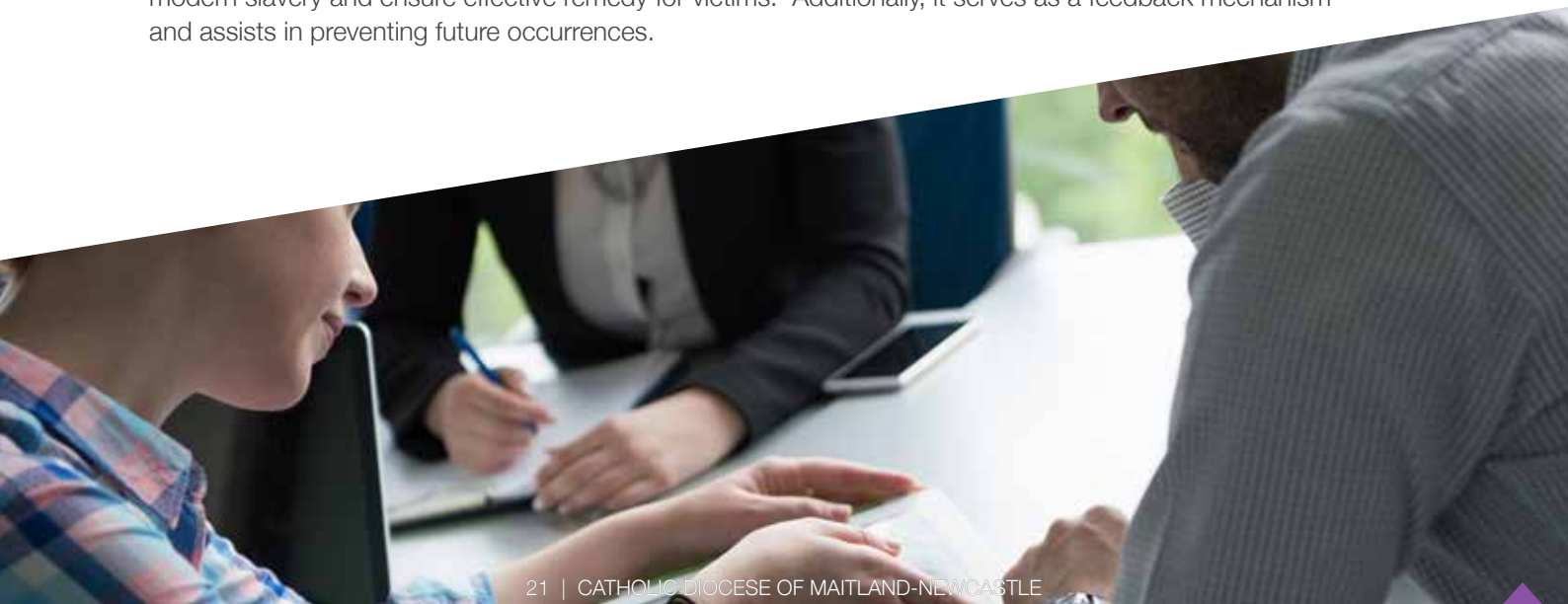
1. Monitoring and reporting external risk (Assurance)
2. Enhancing our modern slavery activities in HR and recruitment (HR practices)
3. Engaging with customers and stakeholders including small-scale rural regional and remote suppliers (Stakeholder dialogue)

PRIORITIES	ACTIVITIES
Assurance (1-3 years)	<ul style="list-style-type: none"> Establish targets and assign responsibilities for the management of modern slavery risks. Explore and establish mechanisms to measure the effectiveness of actions undertaken to address modern slavery. Integrate modern slavery risk management into existing business systems eg supplier review process; data management. Develop a detailed action plan to address modern slavery risks.
HR practices (1-2 years)	<ul style="list-style-type: none"> Incorporate relevant modern slavery KPIs and risk management activities in to all new and updated position descriptions. Identify training needs; develop and provide relevant training for staff, including provision to external contractors as required. Assess and incorporate ways to measure and manage modern slavery risks in labour hire contractors and outsourcing programs. Promote and encourage zero tolerance approach to modern slavery among all staff and contractors. Regular review and update hiring and onboarding processes.
Stakeholder dialogue (1-2 years)	<ul style="list-style-type: none"> Engage relevant stakeholders in our efforts to mitigate and eliminate modern slavery in our supply chains. Continue and broaden stakeholder dialogue to include the wider organisation to build awareness of modern slavery risks and legislative requirements. Continue to work with our partners to build engagement and share knowledge re modern slavery.

Remediation

Whilst the Diocese has not yet had an instance of modern slavery in our supply chain, we recognise it is only a matter of time given the prevalence in our society.

Remediation is about the victim, first and foremost, and will be complex. Due to this complexity, the Diocese is partnering with Domus8.7, an independent program providing access to specialist services such as legal, social, psychology, human rights and more, to provide remedy to people impacted by modern slavery. This partnership is focused on improving the ability of the Diocese to respond to instances of modern slavery and ensure effective remedy for victims. Additionally, it serves as a feedback mechanism and assists in preventing future occurrences.



CRITERION FIVE

Measuring effectiveness

The Diocese undertook an initial assessment of its approach to Modern Slavery risks in 2019 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.

Throughout the reporting period, the Diocese has made modest improvements over the past 12 months, with improvements across the majority of indicators.

The heat map below provides a snapshot of how the Diocese is currently tracking in its approach to managing modern slavery risks.

MODERN SLAVERY MITIGATION IMPLEMENTATION CATEGORY	2019					2020				
Management Systems	At the starting line	Starting out	Starting out	Making progress	Leading practice	At the starting line	Starting out	Starting out	Making progress	Leading practice
Governance	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Commitment	At the starting line	Starting out	Starting out	Starting out	Starting out	At the starting line	Starting out	Starting out	Starting out	Starting out
Business Systems	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Action	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Monitor / Report	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Risk Management										
Risk Framework	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Operational Risk	At the starting line	Starting out	Starting out	Starting out	Starting out	At the starting line	Starting out	Starting out	Starting out	Starting out
Identifying External Risks	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Monitoring & Reporting Risk	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Human Resource & Recruitment										
Awareness	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Policies & Systems	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Training	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Labour Hire / Outsourcing	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Customer & Stakeholders										
Customer Awareness	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Information Provision	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Feedback Mechanisms	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Worker Voice	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Procurement & Supply Chain										
Policies & Procedures	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Contract Management	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Screening & Traceability	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Supplier Engagement	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out
Monitoring & Corrective Action	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	At the starting line	Starting out	Starting out	Starting out	Starting out

Although progress has been made, there is still significant work needed to be undertaken across the Diocese’ 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.

CRITERION SIX

Process of **consultation** with entities owned or controlled by the Diocese

The Diocese of Maitland-Newcastle controls the following two entities:

1. CDFMN AFSL Limited - This entity holds the financial services licence for the Catholic Development Fund Diocese of Maitland-Newcastle. The Fund Manager is the Diocesan Chief Operating Officer to whom the Modern Slavery Liaison Committee is accountable.
 2. Access Newcastle Hunter-Manning Limited – This entity provides professional supervision and counselling. The Managing Director is a member of the Modern Slavery Liaison Committee. In early 2021 Access will be re-named to be The Rosewood Centre.
-

CRITERION SEVEN

Any other relevant information

Nothing to report.



Modern Slavery Statement 2020



Archdiocese
of Hobart

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 later elevated to an Archdiocese in 1888.

The Archdiocese seeks to make Jesus Christ the centre of all that it does. All works and agencies of the Archdiocese give expression to their Catholic identity and seek to serve the broader mission of the Church. The Archdiocese and its agencies also endeavour to embody the principles of Catholic Social Teaching including respect for the dignity of the human person. All those employed within the Archdiocese are encouraged to reciprocate and demonstrate respect, truthfulness, integrity, hospitality, forgiveness and justice towards each other, and those that they serve in their respective roles. The eradication of modern slavery in the Archdiocese's operations and supply chains is an extension of the Archdiocese's mission and Catholic identity which it seeks to reflect in its operations and supplier relationships.



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: 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

Modern slavery is an affront to the dignity of the human person. Coercive employment practices like modern slavery lead to the exploitation of vulnerable people especially women and children in all parts of the world. The goods and services produced by the victims of modern slavery are embedded in our global supply chain. Pope Francis has called for the eradication of modern slavery: "We call to action all people of faith, leaders, governments, businesses, all men and women of good will, to give their strong support and join in the action against modern



slavery in all its forms. Sustained by the ideals of our confessions of faith and by our shared human values, we all can and must raise the standard of spiritual values, common effort and the vision of freedom to eradicate slavery from our planet." (Pope Francis, *Ceremony for the signing of the Faith Leaders Universal Declaration against Slavery*, 2/12/2014) The Archdiocese of Hobart joins in this common effort to commit to eradicating modern slavery from its supply chain and operations.

A handwritten signature in black ink, appearing to read "Julian Porteous".

Archbishop Julian Porteous
Archbishop of Hobart

Statement from Chris Ryan

The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart, "the Trust", is the legal entity under the Corporations Act (2001) that takes responsibility for the inherent legal obligations pertaining to the activities of the Archdiocese and its agencies. The consolidated annual revenue of all the agencies controlled by the Trust is \$428.66 million ensuring that we are required to report due to our obligations stemming from the Modern Slavery Act (2018). Across all our entities we spend \$103 million annually. 61% of this spending is with our top 100 suppliers.

The Archdiocese has developed over a number of years a governance and risk management framework that supports each of our agencies and their own governance structure at management and board level. Each agency is responsible for developing approaches to comply with the Modern Slavery Act and to support a coordinated approach we have appointed the Director for the Archdiocese's Office of Justice & Peace to be the Modern Slavery Manager to

coordinate this important project.

It is a privilege to oversee the initial phase of the Archdiocese's efforts to eradicate modern slavery from its operations and supply chain. This work will be further integrated over time into the fabric of the governance structure and the culture of the organisation to ensure that the dignity of the human person is respected both in Australia and within our global supply chain.

This statement was approved on 30 May 2021.

A handwritten signature in black ink, appearing to read "Chris Ryan".

Chris Ryan
Executive Director, Administration & Finance



2020 Modern Slavery Risk Management Initiatives

Since the *Modern Slavery Act (2018)* became operational on January 1, 2019, the Archdiocese has conducted due diligence on its operations and our 'top 100' suppliers.

It has formed the Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) composed of representatives from across Archdiocesan agencies and its entities. AMSACC has been developing a Modern Slavery Prevention policy to cover the Archdiocese's operations and supply chain. The Archdiocese joined the Australian Catholic Anti-slavery Network (ACAN), who have helped the Archdiocese to establish the initial stages of an e-learning program and awareness raising activities.

ACAN has also provided members of AMSACC with training on supplier engagement which has helped with the initiation of discussions with suppliers in potentially high-risk categories. Slavery-free staff room information resources have been developed and released throughout the Archdiocese and its entities.

Our Plans for 2021

In 2021 the Archdiocese plans to finalise its Modern Slavery Prevention Policy and an associated set of Anti-Slavery Guiding Principles. The approval of these policy documents will be widely communicated across the Archdiocese and become a living document. The supplier engagement program will be stepped up with a focus on suppliers in high risk categories. ACAN resources will help to enable this process.

ACAN e-learning modules will be made available to all employees to assist their understanding of modern slavery and to raise awareness of its importance. Relevant compliance-based modules will be available to senior managers & board members. Awareness kits will be developed for parishes and schools for use in 2022.

Finally, an initial framework for monitoring modern slavery actions and risks across the Archdiocese will be developed in 2021.

Our Plans Beyond 2021

Beyond 2021, the supplier engagement program will be expanded to also include a focus on suppliers from medium risk categories. In the case of high-risk suppliers, tier 2 supply chain mapping for key items will be commenced and expanded. ACAN's partnership with Sedex will facilitate this mapping work.

The ACAN e-learning modules, as developed, will continue to be deployed to staff of the Archdiocese and the 'supplier module' will be discussed and distributed. Parish and school modern slavery awareness resources will be utilised more broadly. Modern slavery curriculum resources will be developed for use in Catholic Education Tasmania (CET) schools.

A remediation pathway for potential victims of modern slavery associated with the Archdiocese's supply chain will be implemented and expanded in collaboration with ACAN's Domus 8.7 program.

ACAN's network of participants will be leveraged to help Archdiocesan agencies access ethical buying groups to minimise risks and maximise volume discounts.

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 (a joint venture between the Archdiocese and Evolve Housing Ltd)
- Blueline Laundry Inc.
- St Joseph Affordable Homes Inc.

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

The Diocesan Finance Council (DFC) is the principal Archdiocesan advisory body for matters connected with finance and administration. Advice and recommendations from Agency bodies are first directed to the DFC as matters to be considered, before being presented to the Archbishop for his approval.

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

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

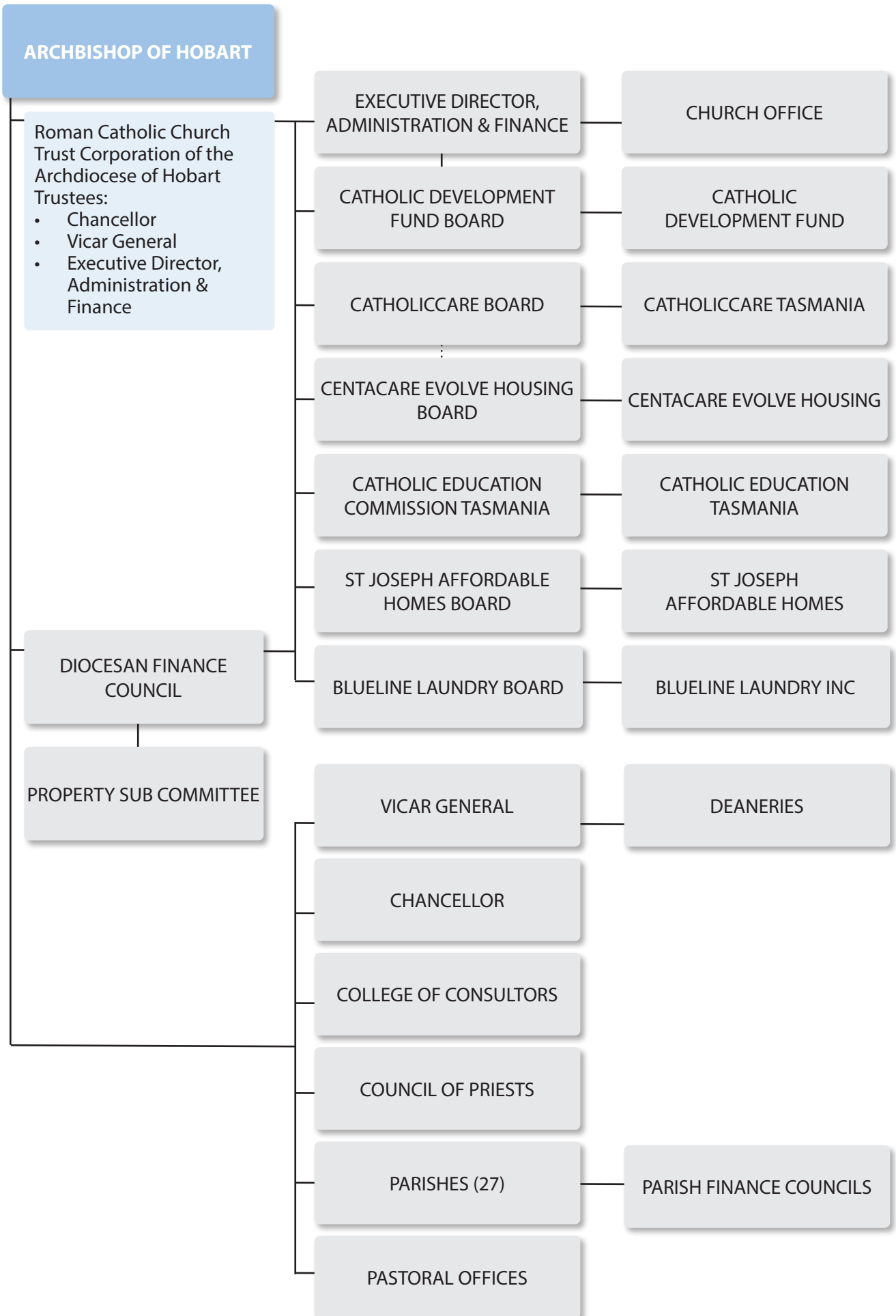


Figure 1 Displays the governance structure of Archdiocese of Hobart.

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, 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 reporting period. 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
- Providing education and resources to staff, boards and volunteers
- Overseeing efforts 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 35 staff with FTE staff being 20.5. 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 16,207 students across Tasmania. In 2020, CET had 2463 staff 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 415 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. CCT has a number of long term suppliers in the area of professional services, building and construction and maintenance services. They have short term supply arrangements in place in the food and beverage area.





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. The 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 and construction and maintenance.



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 2020 to improve life and employment outcomes (including apprenticeships) for disengaged young Tasmanians. In its first year of operation it aims to build around 100 homes in Southern Tasmania for CCT and CEH and provide an in-house apprenticeship scheme for 12 young people, across a range of trades, primarily carpentry. It is in the process of establishing a supply chain involving long-term suppliers for key building materials and other trades.



Blueline Laundry Inc (BLL)

BLL is a registered Charity with a long and proud history of service to 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 offers employment, training and personal development for people with disabilities and from disadvantaged backgrounds through the operation of commercial laundries in Launceston and Hobart. Its head office is located at New Town, Tasmania. BLL has 240 employees with 35% working with a disability. 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, building and construction, maintenance services, office supplies, cleaning services, 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 began conducting due diligence of its operations and supply chain by reviewing its top 100 suppliers by potential risk and by spend. Two Archdiocesan Finance Managers and the Archdiocesan Modern Slavery Manager, who conducted this due diligence, attended the *Eradicating Modern Slavery from Catholic Supply Chains* Conference in Sydney, in July 2019. This Conference provided some deep insights into the nature of modern slavery risks in high risk sectors such as building and construction, clothing and cleaning. This due diligence process and the Conference helped to crystallise the initial focus on suppliers in the categories of Building and Construction, Facilities Management and Property Maintenance, Cleaning and Security Services and Uniforms. Preliminary analysis has been conducted to identify key suppliers that the Archdiocese will work with in the next phase of the supplier engagement process.

Operational Risks

Our COVID-19 Response

- During the Tasmanian lockdown the head office facilities for Church Office, CCT, CET and CDF were kept open with minimal staff working onsite. The majority of our workforce worked from home. To support this, items including laptops and other office ICT equipment were relocated to a number of employee homes so that they could function productively. Whilst in the early stages there was some disruption, services continued to be offered to the full extent.
- CEH remained open with reception and the main office fully functional under COVID restrictions. Arrangements were made for tenancy officers to work from home.
- The construction program of CCT and CEH continued during the lockdown period, with various controls adopted to ensure that workers were kept COVID safe.
- CCT received additional Tasmanian state government funding in July 2020 to respond to the urgent need caused by the pandemic. The emergency relief funding for temporary visa holders was distributed directly to individuals and families through supermarket vouchers and the payment of utilities, rent and medical bills.
- CET schools remained open during the lockdown but most students engaged from home online.
- In support of government requirements, the Archbishop of Hobart issued a decree that all Parish Churches were to be closed for a period of time. Masses were celebrated privately and the Cathedral live streamed the Sunday Mass. A number of other parishes livestreamed weekend Mass for their parishioners. A COVID-19 Safety Action Plan was developed to be used in parishes when Churches eventually reopened. This included the need to maintain social distancing, implement cleaning protocols and other measures aimed to reduce the risk of the spread of COVID-19.
- Senior Management and the advisory Boards for the Archdiocese and its agencies devoted a considerable amount of time to dealing with the impact of the lockdown and the resulting restrictions particularly from an operational point of view. This significant focus on operational issues made it difficult for the modern slavery issue to gain momentum in 2020 at a time when ACAN was releasing new resources.

- Despite the disruption that resulted from COVID-19 around 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.
- BLL experienced a major change in the nature of its business due to the COVID-19 pandemic. The hibernation of the hospitality sector and state border closures meant that Blueline Laundry lost 83% of its customer base in a matter of days. BLL made immediate and temporary adjustments to its business to ensure long-term viability. Unfortunately, they had to stand down 60% of their workforce, including reshaping its management and administrative functions.
- However, BLL became an advisor to Public Health as they adapted their procedures to identify, control and manage the laundering of infectious linen and suppress community transmission. They ensured the health and safety of their workforce with enhanced workplace protocols implemented to protect their staff as the business continued to serve primary health providers and quarantine hotels. BLL also partnered with another Tasmanian social enterprise to ensure continuity of employment for those working with a disability to produce alginate bags that are used for infection control, to collect, transport and safely wash contaminated linen.
- During the pandemic, BLL focussed on employee wellbeing. They checked in regularly with their employees to ensure that they had an ongoing place to live, with adequate heating and that they had enough provision for the basic human needs, including food and security. They were able to provide resources on several occasions where minimum needs were not able to be met.

Our People

The Archdiocese employs 3,235 FTE 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. A dedicated team in the Church Office oversees all the Archdiocese's immigration requirements.

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 AoH 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 and then again in December 2020. The results of this analysis are displayed in the table 2 in relation to five categories.

In terms of management systems category, progress has been made in the area of governance and the level of action that will be detailed in the section that addresses Reporting Criteria 4.

In the area of the risk management category, there has been some further work in the area of the supply chain for school uniforms and cleaning services. This work provided a deeper understanding of the varying approaches used to clean our facilities. It also gave clarity of the workings of the top five suppliers of our school uniforms across the school system. The monitoring and reporting of modern slavery risks has become part of the agenda for the bi-monthly CCT Board meetings and is on the risk register of the Archdiocese.

Progress has been made in the procurement and supply chain category of our organisation with the development and approval of the first procurement policy in CEH that commissions the construction of homes used for social housing and the maintaining of its stock of over 2,000 houses. Furthermore, BLL has initiated conversations with some of its key suppliers. Discussion was initiated with school uniform suppliers both in Tasmania and on the mainland to assess the nature of their supply chain and their work practices, work is ongoing in this area.

In terms of the human resource and recruitment category, some e-Learning and Development employee workshops were organised for staff to provide a broad introduction to modern slavery. Some formal on-line training was also commenced.

The focus of the modern slavery prevention program has been mainly internal and so the customer and stakeholder category of the program has not seen any substantial progress compared to the other dimensions.

Category	Topic	Result 2019	Result 2020	Change
Management Systems	Governance	Starting Out	Making Progress	^
	Commitment	Starting Out	Starting Out	—
	Business Systems	Starting Out	Starting Out	^
	Action	Starting Out	Making Progress	^
	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	Making Progress	^
	Monitoring and Reporting Risk	Starting Out	Starting Out	^
Procurement & Supply Chain	Policy & Procedures	Starting Out	Making Progress	^
	Contract Management	Starting Out	Starting Out	—
	Screening and Traceability	Starting Out	Starting Out	—
	Supplier Engagement	Starting Out	Starting Out	^
	Monitoring and Corrective Action	Starting Out	Starting Out	—
Human Resource & Recruitment	Awareness	Starting Out	Starting Out	^
	Policies and Systems	Starting Out	Starting Out	—
	Training	Starting Out	Starting Out	^
	Labour Hire/Outsourcing	Starting Out	Starting Out	—
Customer & Stakeholders	Customer Attitudes	Starting Out	Starting Out	—
	Information Provision	Starting Out	Starting Out	—
	Feedback Mechanisms	Starting Out	Starting Out	—
	Worker Voice	Starting Out	Starting Out	—

Table 2 Modern Slavery Gap Analysis

Legend	
No Progress	Starting Out
Starting Out	Starting Out
Making Progress	Making Progress
Leading Practice	Leading Practice

Supply Chain Risks

A due diligence exercise was performed in 2019 by reviewing the top 100 suppliers 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. These ratings were determined using a combination of factors outlined in 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 *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, it was identified that over 71% of the total spend across the top suppliers was in the high risk spend category of Building and Construction as indicated in Figure 2. Other high-risk categories that rated in the top ten were Information Technology, Linen and Manchester and Maintenance. Vehicle and Vehicle Maintenance along with the Utility spend category were identified as medium risks also ranked in the top ten spend categories.

Top 10 spend categories by percentage spend

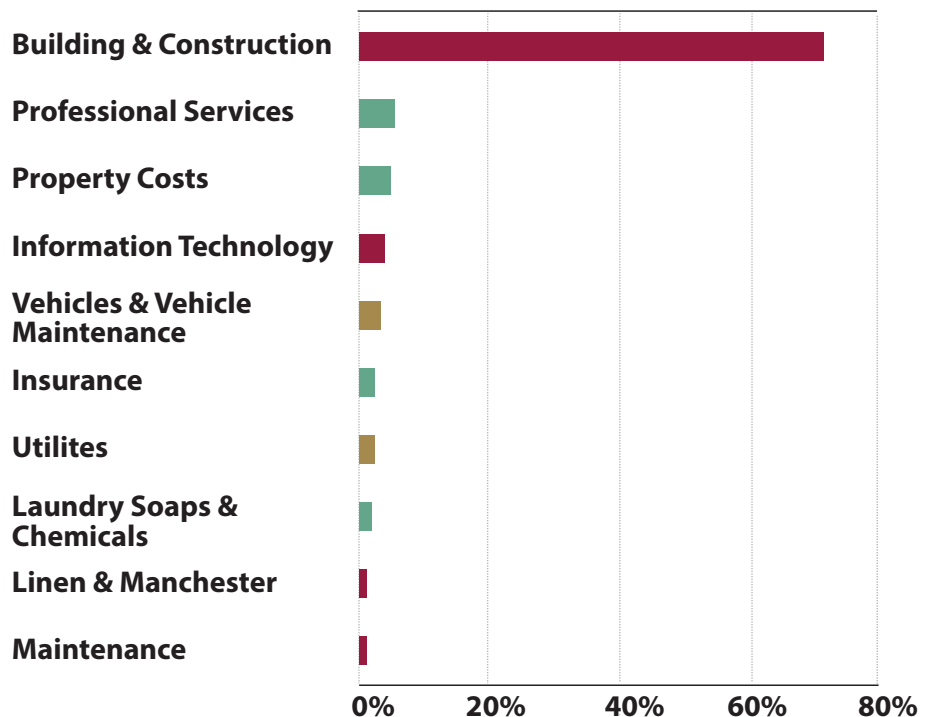


Figure 2: Displays the percentage spend and risk associated with the top ten spend categories. Red indicates high risk, yellow indicates medium risk and green indicates low risk.

The risk profile of our top 100 suppliers was reviewed and 76% could be identified with a high risk spend category as identified in Figure 3. While this group was dominated by suppliers in the Building & Construction category, suppliers in the Information Technology, Linen and Manchester, Maintenance, Food and Beverage, Furniture, Security, Facilities Management and Waste Management spend categories also contributed to this statistic. These nine high-risk spend categories constituted 60% of all the 15 spend categories. The spending across these 9 categories represented 79% of the total spend on the 100 suppliers assessed.

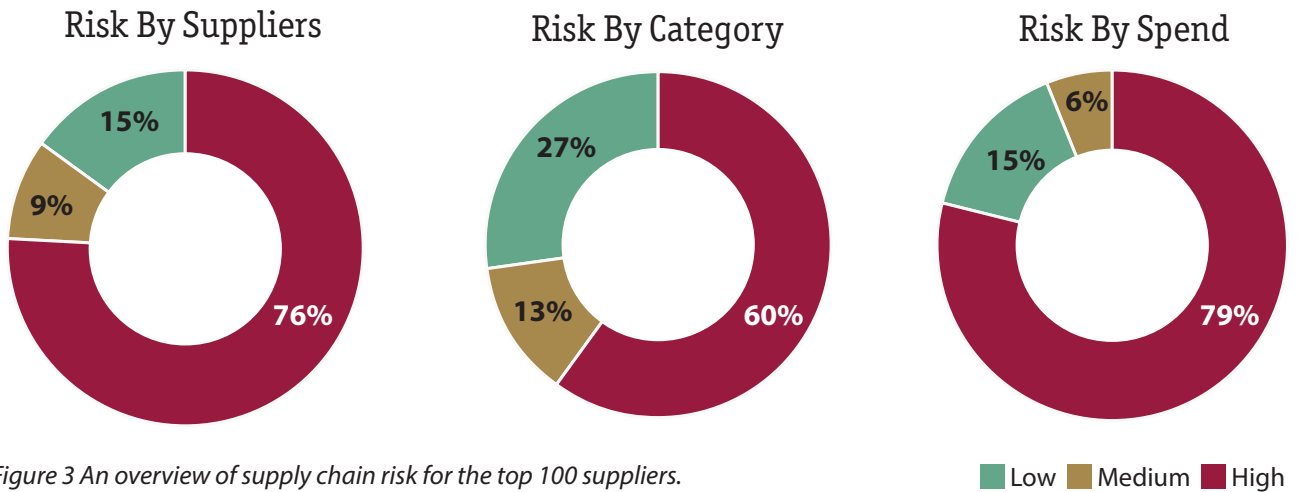


Figure 3 An overview of supply chain risk for the top 100 suppliers.

There were some limitations to this initial due diligence exercise. One limitation is that it did not capture the smaller suppliers that are involved with each of our schools in the provision of uniforms, ICT devices and educational supplies. Some of these involve transactions directly with the parents of students.

The Building and Construction spend category is likely to be impacted by the establishment of SJAH that began its operations in July 2020. It was still ramping up its capacity at the end of 2020 to build houses for CCT and CEH. The full impact of this development will be more visible in 2021.

Reporting Criteria 4:

Actions taken to assess and address risk

Modern slavery Actions in CY2019 & CY2020

After conducting the initial due diligence in respect to the Archdiocesan supply chain and the gap analysis on its operations in mid-2019, three senior managers (pictured right) attended the *Eradicating Modern Slavery from Catholic Supply Chains Conference* in July 2019. This conference highlighted the nature of modern slavery risks in various industries and also associations that are attempting to improve working conditions in these industries.



L-R: Ben Smith, Cody Burdon and Peter Stone at the *Eradicating Modern Slavery from Catholic Supply Chains Conference* in July 2019

On returning from this conference, management developed an initial set of actions as follows:

Action	Progress in CY 2019/CY2020
Form a Steering Committee to develop an initial policy and procedure framework and guide the implementation of compliance activities.	The Archdiocesan Modern Slavery Act Compliance Committee (AMSACC) was formed and held its first meeting on November 4, 2019. The membership of the Committee expanded in 2020. Terms of Reference have been established.
Develop a policy and the supporting framework concerning the eradication of modern slavery from our operations and supply chain.	A number of draft versions of a Tier 1 Modern Slavery Prevention policy & anti-slavery guiding principles were developed. The guiding principles will act as a Supplier Code of Conduct.
Take a closer look at our suppliers for our construction and building maintenance activities.	This action was impacted by the management focus required to commence the operation of SJAH in mid-2020. The insourcing of a significant percentage of our building program will give the Archdiocese more control over the practices involved in home construction. A procurement policy has been developed and approved in October 2020. A compliance and risk coordinator was recruited in 2020 by CEH and they have been appointed to AMSACC.
Review the suppliers of cleaning services to our Church Offices, schools and CatholicCare offices.	A survey of School Business Managers was undertaken. The approach taken varied by school. The Church Office contracted a new cleaner and ensured that the new supplier's employment practices complied with employment law.

<p>Review the suppliers of school uniforms.</p>	<p>A survey of School Business Managers was undertaken. This exercise has helped identify 5 major suppliers to CET schools. Some initial supplier engagement has been conducted to assess the operational and supply chain risk for modern slavery associated with these suppliers.</p>
<p>Introduced the use of certified chocolate, tea and coffee in staff room and canteens across the Archdiocese.</p>	<p>Slavery-free staff room buyers guide and signage was developed and launched at a slavery-free morning tea on February 13, 2020. This initiative customised resources developed by ACRATH who are part of the Victorian – Tasmanian Modern Slavery Taskforce of which the Archdiocese is a member.</p>
<p>Build the awareness of employees, students, suppliers, clients, parents and parishioners of the existence and nature of modern slavery and how they can make sound purchasing decisions.</p>	<p>A Modern Slavery Awareness Roadshow in 9 secondary colleges took place in May 2019 and was attended by around 1,300 students and a number of teachers. Staff awareness seminars have been held across CET, Church Office, CCT and CEH. The CCT Board has been briefed on multiple occasions on modern slavery. Articles on modern slavery have been published in the Archdiocese's Newspaper, <i>The Catholic Standard</i>.</p>
<p>Join the Australian Catholic Anti-slavery Network (ACAN)</p>	<p>Joined on 8 November 2019. The ACAN sample modern slavery policy was helpful in the development of the Archdiocesan draft policy. A number of the members of AMSACC have completed some of ACAN's e-learning modules. All members of AMSACC attended an ACAN Supplier Engagement Workshop on August 5, 2020. The Archdiocese's Modern Slavery Manager attended almost all the ACAN monthly video-conferences in 2020.</p>



Left: The poster developed to promote the Archdiocese's slavery-free staff room initiative.

Above: Archbishop Julian Porteous and representatives of Archdiocesan Agencies attended a slavery-free morning tea for the launch of a slavery-free staff room kit.

There were other actions undertaken across the Archdiocese to assess and address modern slavery risks:

- The Modern Slavery Manager has attended a Labour Exploitation in a COVID-19 Environment seminar organised by Red Cross in July 2020.
- The Modern Slavery Manager purchased copies of Vannak Anan Prum's *The Dead Eye and the Deep Blue Sea: A Graphic Memoir of Modern Slavery* book. One has been gifted to the CET teacher resource library and another has been promoted at a staff seminar on modern slavery.
- The Compliance and Risk Coordinator for CEH attended the ACAN Building Links seminar.
- A number of modern slavery presentations have been given to CET student groups.
- Content has been developed for incorporating modern slavery and ethical consumerism into the Year 8 Religious Education curriculum and the Year 9 Business Studies curriculum.
- Ethical purchasing of sporting equipment for CET schools has been initiated in one school.
- BLL has initiated discussions with its linen and laundry chemical suppliers to source their modern slavery policies and how they were positioned to investigate the next tier of their supply chain.



Modern Slavery survivor, Vannak Anan Prum, signs copies of his book, "The Dead Eye and the Deep Blue Sea: A Graphic Memoir of Modern Slavery" for the Archdiocese at the Australian book launch in July 2019.

After AMSACC was established, the level of understanding of modern slavery across all the agencies increased. The biggest challenge for AMSACC in 2020 was in establishing momentum for change in a year that was full of management distraction due to the COVID-19 pandemic. Even though the management focus was largely diverted to managing through the pandemic, some actions were taken based on the new resources that emerged from ACAN during 2020.

Modern slavery action plan for CY 2021

Action	Responsible Agencies	Timeframe
Finalise Tier 1 Modern Slavery Prevention Policy and its associated Anti-Slavery Guiding Principles.	All	By the end of April 2021
Modern Slavery Agency Action Management plans developed and implemented.	All	By end of June 2021
Provide modern slavery update to all Archdiocesan agency boards once Tier 1 policy is approved.	All	By end of June 2021
Contact the top 5 school uniform supplier to communicate the Archdiocesan modern slavery policy.	CET	By end of June 2021
Renew membership of ACAN.	All	By end of June 2021
Initiate supplier engagement activities with suppliers in high risk categories.	All	By end of July 2021
Incorporate modern slavery clauses in building and construction supply contracts.	CET, CEH, CCT and SJAH	By the end of August 2021
Circulate ACAN Modern Slavery 101 e-learning module for all staff and members of Archdiocesan boards.	All	By end of September 2021
Develop CET Modern Slavery School kit for implementation in 2022.	CET	By end of October 2021
Develop Modern Slavery Parish kit for implementation in 2022.	Church Office	By end of November 2021
Develop systems for monitoring modern slavery actions and risk.	All	By end of November 2021
Conduct a comprehensive review of all high-risk Tier 1 suppliers across the supply chain of the Archdiocese and its agencies	All	By end of November 2021
Circulate ACAN Business Relevance e-learning module for all Archdiocesan Boards.	All	By end of November 2021

3 year Roadmap

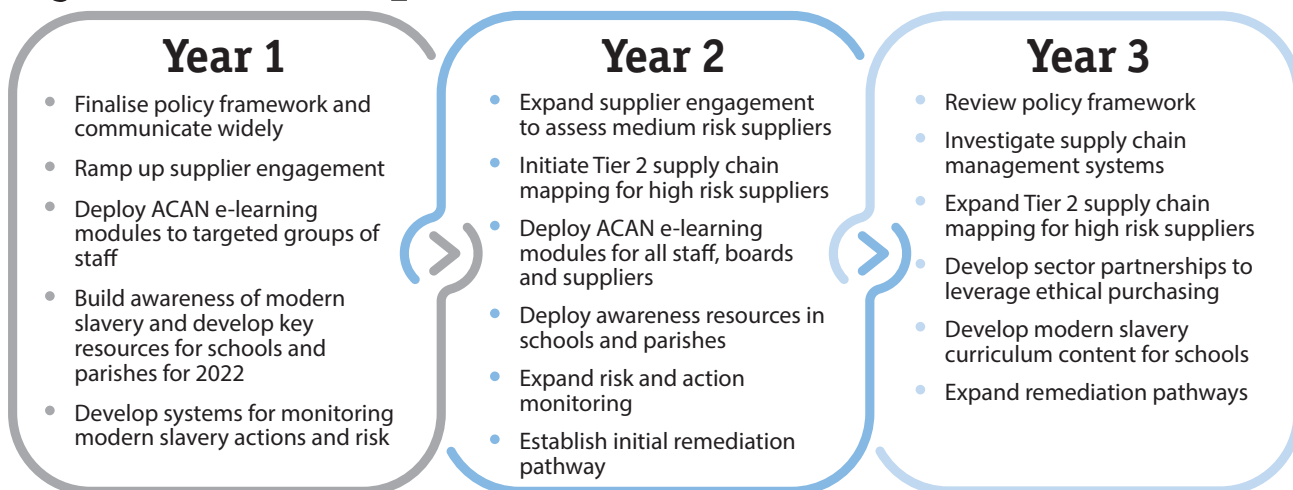


Figure 8

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 2021.

Additional information about Domus 8.7 and the process applied can be found on 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 completion of e-learning modules on modern slavery will further enhance the thoroughness of these review processes.

AMSACC will be able to keep track of the 2021 action plan through regular meetings during the year.

The CCT Board has requested an update on modern slavery at each of its 6 annual meetings. It also has an Audit and Risk Subcommittee that will monitor the progress of modern slavery compliance activities in CCT.

CET has a significant governance program with oversight from the Catholic Education Commission of Tasmania.

An annual presentation will be made to the Diocesan Finance Council detailing work undertaken and future planned work. Members of the DFC include the Archbishop, Vicar General, Chancellor and Executive Director, Administration & Finance.

Some specific measures of effectiveness of the Archdiocese's modern slavery compliance are evidenced by:

- The ACAN Modern Slavery 101 E-learning module was completed by 8 members of AMSACC in 2020.
- The ACAN Modern Slavery Business Relevance E-learning module was completed by 2 members of AMSACC in 2020 and a further 3 members completed this module by the end of January 2021.
- Over 100 staff have attended modern slavery awareness sessions in 2019 and 2020.
- 1,300 CET students attended introductory modern slavery presentations in 2019.
- 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.
- 9 ACAN teleconferences attended by Modern Slavery Manager.
- AMSACC held 3 meetings and a training session in CY2019 & CY2020.

Reporting Criteria 6:

Process of consultation with entities owned or controlled

The modern slavery policy framework being developed 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 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 Archdiocesan Modern Slavery Manager has met with the Tasmanian branch of the Red Cross to understand the scope of its modern slavery work and has attended some of the seminars that they have hosted.

The Modern Slavery Manager provided some initial feedback to Madeleine Ogilvie, 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. The existence of this Bill has been promoted to the ACAN Head Office.

The Archdiocese of Hobart hosted the National Diocesan Financial Administrators Conference in October 2019. A presentation on the Modern Slavery Act was provided at this event by Mr John McCarthy QC, Chair- Catholic Archdiocese of Sydney, Anti-Slavery Taskforce. This was the first presentation of the ACAN Modern Slavery Risk Management Program to Diocesan Financial Administrators and generated essential support from across the country to help ACAN gain momentum in its start up phase.



Mr John McCarthy, QC



National Diocesan Financial Administrators Conference 2019

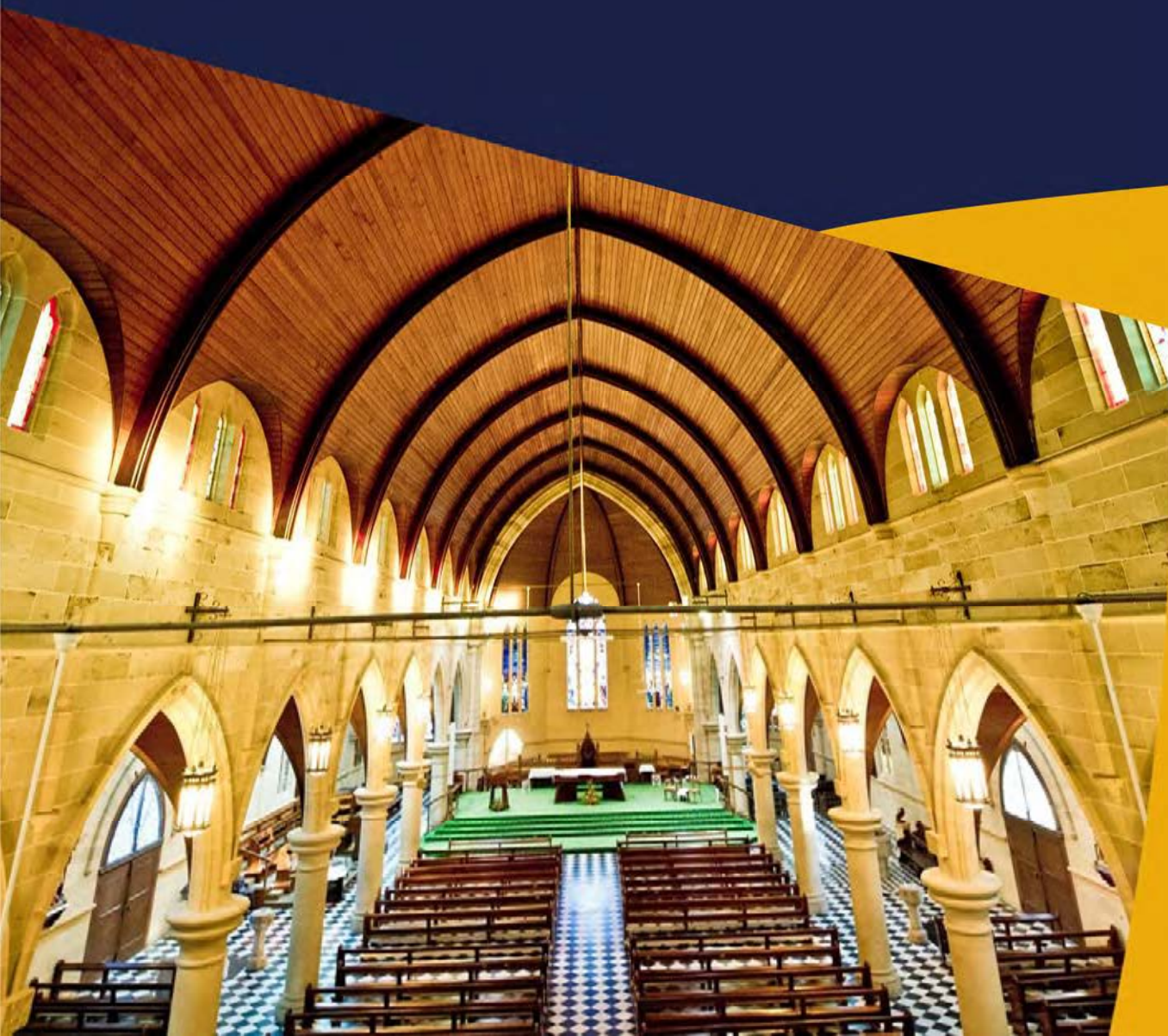


Archdiocese
of Hobart



CATHOLIC DIOCESE
OF ROCKHAMPTON

2020 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 or controlled by the Roman Catholic Trust Corporation for the Diocese of Rockhampton.

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About us

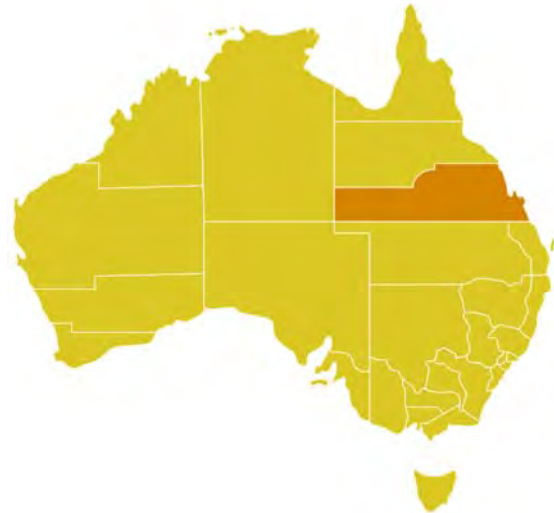
The Roman Catholic Diocese of Rockhampton ('Diocese'), established in 1882, is a suffragan Latin Church diocese located in central Queensland, covering an area of 414,400 square kilometres from Bundaberg in the south to Mackay in the north and west to the Northern Territory border.

'The Roman Catholic Trust Corporation for the Diocese of Rockhampton' (RCTC) was incorporated by Letters Patent on 8th July 1915 under the now-repealed *Religious Educational and Charitable Institutions Act 1861 (Qld)* but it is still in force by virtue of the *Roman Catholic Church (Incorporation of Church Entities) Act 1994*. The RCTC is the civil legal entity under which the Diocese operates.

Our Vision Statement

The Diocese's Vision Statement is:

As a community of disciples of the Risen Christ, we live out the call of Baptism through personal faith in Jesus, witnessing together to the Good News of the Kingdom, co-responsible for the mission.



Our Values

The values of the Diocese reflect Catholic Social Teaching. These include:

The Dignity of the Human Person

Every human being is created in God's image and likeness and therefore has inherent dignity. No person should have their dignity or freedom compromised.

The Common Good

Every person should have access to the goods and resources of society so that they can live fulfilling lives. The common good is reached when we work together to improve the wellbeing of people in our society and the wider world.

Subsidiarity and Participation

Everyone has the right to participate in decisions that affect their lives.

Solidarity

Everyone belongs to one human family, regardless of their national, religious, ethnic, economic, political and ideological differences. We are called by the principle of solidarity to take the parable of the Good Samaritan to heart (Luke 10:29-37), and to express this in how we interact with others.

Preferential Option for the Poor

Preferential care should be shown to poor and vulnerable people. Jesus taught that God asks each of us what we are doing to help the poor and needy: "Truly I tell you, whatever you did for one of the least of these brothers and sisters of mine, you did for me." (Matthew 25:40).

Economic Justice

Everyone capable should be involved in economic activity and should be able to provide for themselves and their family.

Stewardship of Creation

We must all respect, care for and share the resources of the earth, which are vital for the common good of all living beings.

Promotion of Peace

Peace is more than just the absence of war. It is a positive movement towards equality and justice between all people, regardless of differences.

2020 Modern Slavery Risk Management Initiatives

ACAN Modern Slavery Conference

Two delegates from the Diocese attended the *Eradicating Modern Slavery from Catholic Supply Chains Conference* in Sydney in July 2019. This heralded the start of the Diocese's campaign to address the risk of modern slavery occurring in its supply chain.

Modern slavery working group

The Diocese formed a working group made up of representatives from the Diocesan Administration, Catholic Education and CentacareCQ, which meets regularly.

Operational gap analysis

A gap analysis was performed in 2019 to provide a baseline for modern slavery risk management in the Diocese. The Diocese will revisit the gap analysis at regular intervals to evaluate its progress over time.

Supplier risk identification and prioritisation

Within each of the following three organisational groupings:

- Diocese & Parishes
- Catholic Education
- CentacareCQ

the top 20 suppliers by spend were identified and the suppliers were looked at to determine whether any of them were in a high-risk category. The top 3 spends in each high risk category were also identified.

Education and training

Various Diocese personnel have participated in a *Supplier Engagement Strategy Workshop* and a *Modern Slavery Statement Writing Workshop*. In addition, the Diocese's Modern Slavery Liaison Officer (MSLO) participated in regular videoconferences with other MSLOs.

Our Plans for 2021

Embedding anti-slavery in organisational governance

The Diocese will update the terms of reference for its various governance bodies to include anti-slavery as a key consideration in organisational decision-making. We will develop and promulgate an organisation-wide Modern Slavery Policy and will also update our Code of Conduct to ensure that it is explicit about our expectations in respect of modern slavery.

Risk management

Organisational risk registers will be updated to ensure that modern slavery risks continue to be monitored.

Supplier engagement

A supplier engagement and communications strategy will be developed and engagement and awareness-raising initiatives with high-risk suppliers will be conducted.

Capability building

Modern slavery risk management training will continue to be delivered to staff.

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

Terms of reference for a permanent Modern Slavery Committee will be signed off by the Bishop and committee members formally appointed.

ACAN Program

The Diocese will continue to be a member of ACAN and will participate in Year 2 of its program to continue to build on its modern slavery risk management efforts.

Our Plans Beyond 2021

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 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 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.

The Diocese has funded a “Remedy Pathways” module in it’s 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.

Statement from our Bishop



The Catholic Church has a history of action against slavery and, for its part, the Catholic Diocese of Rockhampton is strongly committed to meaningful action against modern slavery. Modern slavery refers to situations of exploitation including forced labour, child labour and human trafficking. Pope Francis has called modern slavery “an open wound on ... contemporary society, a scourge upon the body of Christ” and “a crime against humanity.”

In 2019, the Diocese joined the Australian Catholic Anti-slavery Network (ACAN), a body whose purpose is to give participating organisations the tools they need to assess and act on modern slavery risks in their own supply chains. The Diocese has now well and truly begun to play its part in the fight against modern slavery; work that Pope Francis reminds us will require courage, patience and perseverance.

I endorse this, the Catholic Diocese of Rockhampton’s first ever Modern Slavery Statement, and I commit the Diocese to continuing its efforts to eliminate modern slavery in fulfilment of Catholic Social Teaching.

A handwritten signature in black ink that reads "Michael McCarthy".

Most Rev. Michael McCarthy
Bishop of Rockhampton

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. 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 Catholic Diocese of Rockhampton ('Diocese') based at 170 William Street, Rockhampton QLD 4700, headed by the Bishop of Rockhampton, which encompasses 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

Catholic Education – Diocese of Rockhampton, 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. Catholic Education – Diocese of Rockhampton educates approximately 16,000 students in its:

- 31 primary schools
- 9 colleges
- 10 kindergartens, and
- 16 Outside Schools Hours Care services

ABN: 90 507 529 241

CentacareCQ has headquarters at 10 Bolsover Street, Rockhampton QLD 4700. It employs more than 200 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;

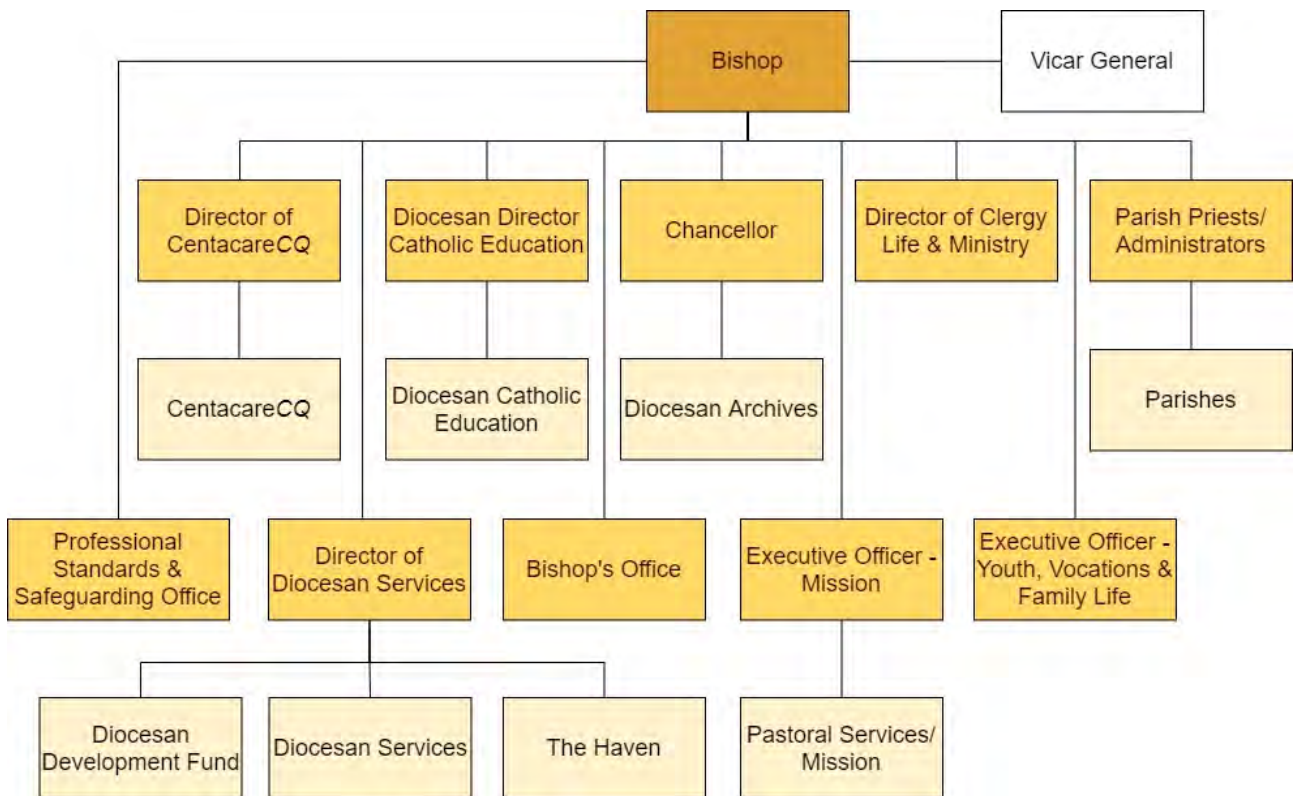
- (d) Provide stress-relieving recreational activities and services for seafarers;
- (e) Promote the physical, intellectual, emotional, psychological and spiritual development and wellbeing of seafarers, guided by Christian moral principles.

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*'.

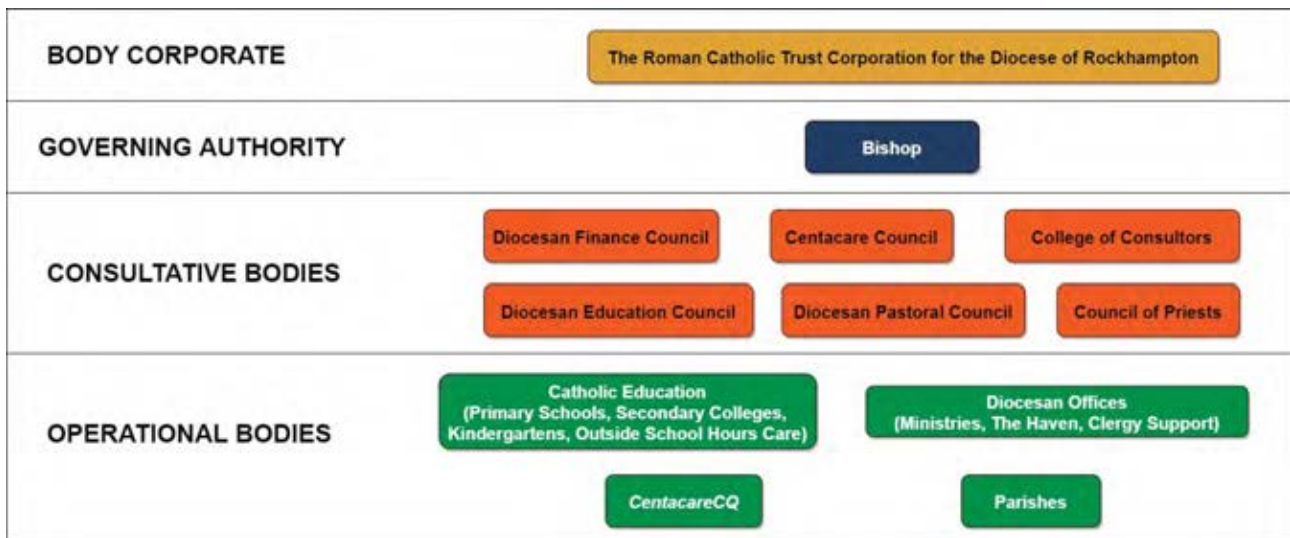
Following is a high-level organisation chart of the Diocese:



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
- Centacare Council



Apart from the Council of Priests and the College of Consultors, the meetings of each other council are chaired by a lay person.

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. Given that the Diocese is still in the early stages of addressing Modern Slavery, the Diocesan Finance Council has not yet specifically identified Modern Slavery on its risk register. Similarly, the issue of Modern Slavery has not been incorporated into the terms of reference of any of these councils nor has it been identified on any risk registers.

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 meetings or conferences.

The Diocese employs more than 3800 people in total across the organisation. Approximately 651 suppliers make up the top 80 percent of the Diocese's suppliers. The Diocese's turnover in 2020 was approximately \$381 million.

Long-term relationships are in place with suppliers with the vast 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.

Diocesan Catholic Education

Diocesan Catholic Education 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)

Diocesan Catholic Education educates approximately 16,000 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.

CentacareCQ

From its seven offices across the Diocese, CentacareCQ 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. CentacareCQ serves all people, without regard to religion, race, age, economic circumstance or ethnic background.

The Centacare Council is an advisory body to the Bishop in matters pertaining to the works of Centacare. The Council makes recommendations to the Bishop as to the role, development and management of Centacare.

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's efforts to better understand the issue of Modern Slavery began in 2019 when it became a member organisation of the Australian Catholic Anti-Slavery Network (ACAN). In July 2019, two Diocesan executives attended an *Eradicating Modern Slavery from Catholic Supply Chains Conference* in Sydney. The conference was attended by over 100 delegates representing 45 Catholic entities.

As part of ACAN, the Diocese appointed a Modern Slavery Liaison Officer (MSLO) and various Diocese personnel have participated in workshops offered by ACAN since the Diocese joined the network.

The Diocese has rolled out e-learning on Modern Slavery and, to date, 14 employees have completed the first module and 9 have completed the second module.

The Diocese has formed a Modern Slavery Working Group, which has begun the task of analysing its supply chain to ascertain potential modern slavery risks.

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 3800 people. The Directors of Catholic Education, CentacareCQ, 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, Catholic Education and CentacareCQ, each employ professionally-qualified Human Resources personnel to manage human resource matters and to ensure compliance with relevant industrial instruments and legislation.

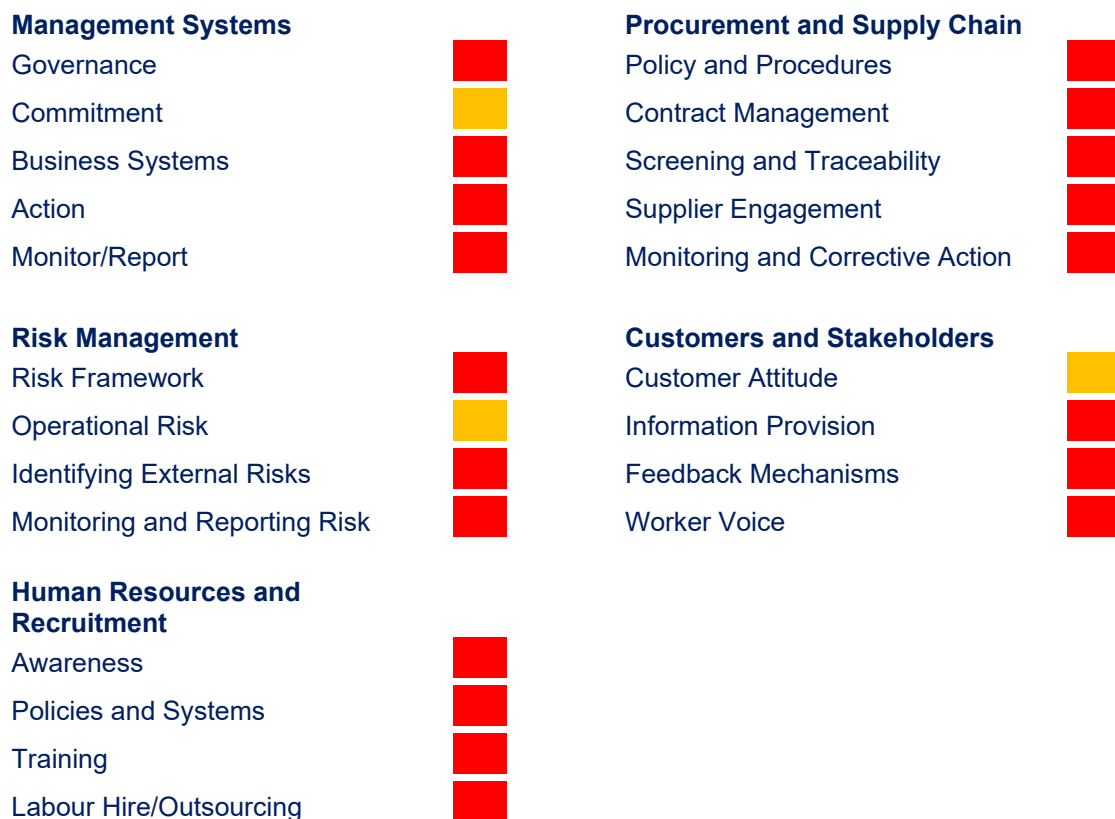
Other than the requirements of canon law for certain ecclesiastical positions to be occupied by specific genders, all other appointments are based on merit and are not gender dependent.

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 'Bridge the Gap' assessment tool provided by ACAN. The results of this analysis serve as benchmarks against which the Diocese can measure itself from time to time to ascertain progress in managing its modern slavery risks.



As can be seen from the heat map, the Diocese has much to improve upon, with almost all categories requiring significant improvement. The heat map highlights, among other things, the Diocese's commitment to managing modern slavery risks.

The Diocese will perform gap analyses regularly to ascertain progress made and where ongoing efforts should be focused.

Supply Chain Risks

The Diocese examined its 2020 supplier expenditure to determine potential modern slavery risks. The following indicators were used:

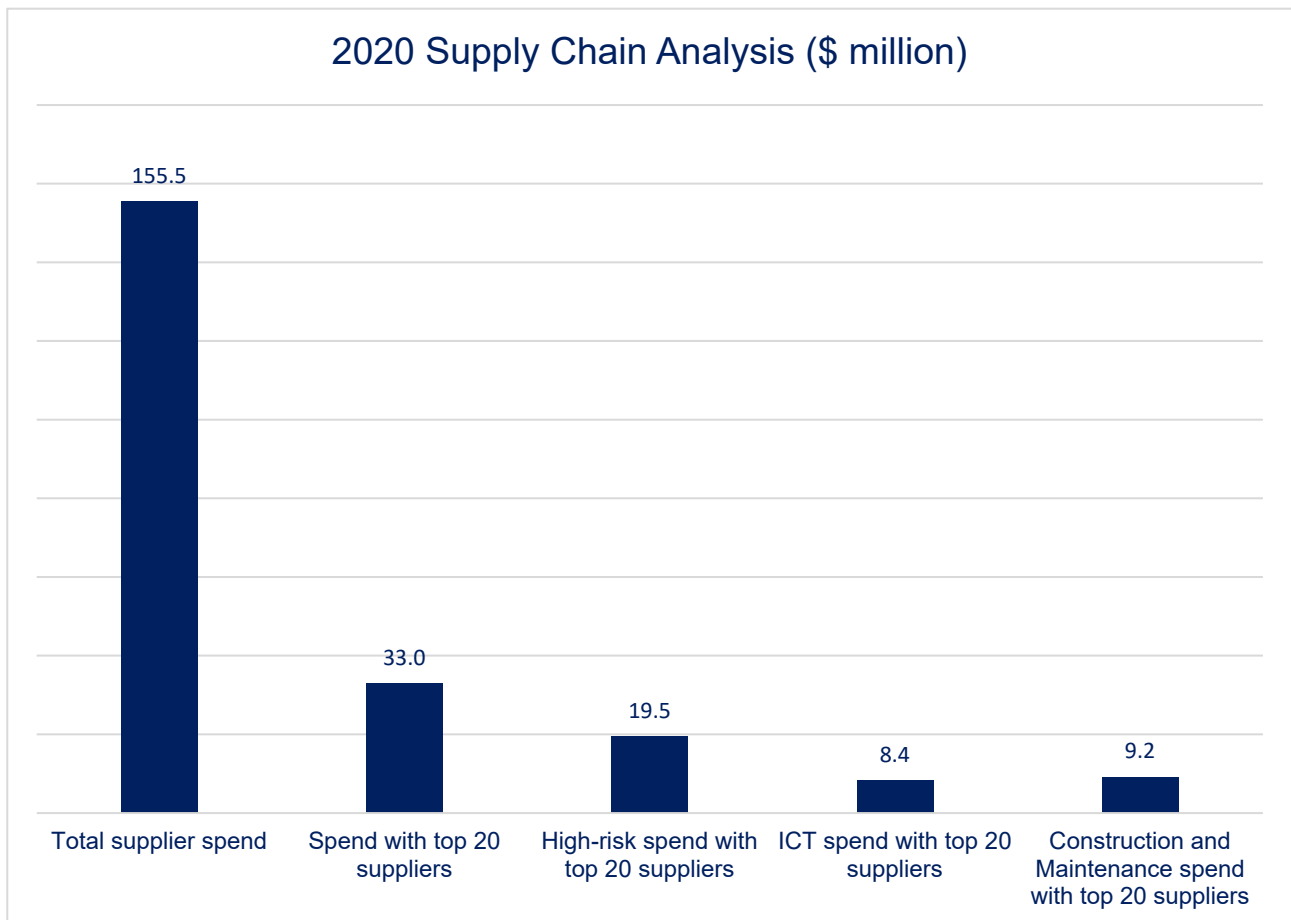
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
- **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor's 2018 List of Goods Produced by Child and Forced Labor, the Global 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 potentially high-risk expenditure categories were identified:

- Apparel
- Cleaning
- Construction and Maintenance
- Facilities Management
- Food and Beverage
- Furniture Manufacture
- Information and Communications Technology (ICT)
- Labour Hire
- Linen
- Medical Consumables
- Office and Educational Supplies
- Security
- Waste Management

In 2020, the Diocese examined its ‘top 20 suppliers by spend’ out of its total supplier expenditure of \$155.5 million within the three operational areas of Catholic Education, CentacareCQ, and Diocese & Parishes. The top 20 suppliers accounted for \$33 million or twenty-one percent (21%) of this expenditure, of which \$19.5 million or fifty-nine percent (59%) was categorised as high-risk expenditure. Of the high-risk spend with the top 20 suppliers, \$8.4 million is in the category of Information and Communications Technology (ICT) and \$9.2 million is on Construction and Maintenance.



Reporting Criteria 4: Actions taken to assess and address risk

The Diocese's focus in 2020 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 & ACAN Modern Slavery Conference

The Diocese became a member of the Australian Catholic Anti-Slavery Network (ACAN) in 2019. ACAN hosted its inaugural *Eradicating Modern Slavery from Catholic Supply Chains Conference* in Sydney in July of that year and two delegates from the Diocese attended. 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

In 2020, the Diocese agreed to take an organisation-wide approach to managing modern slavery risks and formed a small working group, made up of representatives from Diocesan Administration, Catholic Education and CentacareCQ. The group meets regularly to consider how ACAN tools can 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 2021 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 a gap analysis in 2019 to provide a benchmark for modern slavery risk management in the Diocese. The Diocese will revisit this exercise on a regular basis 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 to determine 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 onboarding and management

Supplier onboarding and management will be addressed with help of Sedex, one of the world's leading ethical trade membership organisations, which works with organisations to improve working conditions in their supply chains.

Education and training

With the help of ACAN, the Diocese has participated in various education and training initiatives, including a *Supplier Engagement Strategy Workshop* and a *Modern Slavery Statement Writing Workshop*. In addition,

the Diocese's Modern Slavery Liaison Officer (MSLO) has participated in regular videoconferences with other MSLOs.

Modern Slavery Action Plan

Year 1 (2020) Actions	Year 2 (2021) Actions	Year 3 (2022) Actions
Attended Modern Slavery conference	Embed anti-slavery into organisational governance, including terms of reference and Code of Conduct	Develop Whistleblower Policy
Working group formed	Establish permanent Modern Slavery committee	Establish targets for managing modern slavery risks
Gap analysis completed and actions determined	Complete gap analysis and determine ongoing actions	Complete gap analysis and determine ongoing actions
Supplier risks identified and prioritised	Develop supplier engagement and communications strategy	
Engaged in education and training opportunities	Provide more modern slavery risk management training opportunities for staff	
	Modern slavery to be recognised in risk management activities	
	Incorporate modern slavery contract clauses into new and existing supplier contracts	

The Diocese recognises that eradicating modern slavery will take time and that it is a process of continual improvement. As such this statement is only the first step in that direction.

Reporting Criteria 5: Effectiveness Assessment

The Diocese will initially adopt the following criteria to assess its effectiveness each year in managing modern slavery risk:

Indicator/target	Outcome
Requirements of Modern Slavery Act communicated to all councils	
Inclusion of modern slavery assessments in annual certifications by Directors	
Diocesan Finance Council updated on modern slavery risk management progress	
Staff involved in purchases > \$100,000 per year given modern slavery training	
Standard contract templates updated	
Annual gap analysis performed	✓
Supplier engagement plan reviewed	✓
Action plan reviewed	✓

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 Diocesan Catholic Education, CentacareCQ 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
2020



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ABOUT US

Catholic Healthcare is a ministry of the Catholic Church and is a trusted leading not-for-profit provider of residential aged care, home care, retirement living and healthcare reaching across the east coast of Australia.

We have a proud history of providing care and support to people of all faiths, backgrounds, and ethnicities, for more than 26 years.

Motivated by our Mission to “promote life to the full” we are passionate about enriching the lives of those we serve. Our person-centred holistic approach focuses on the client’s wellbeing within a continuum of care that is tailored, flexible and covers every stage of life’s journey.

Today Catholic Healthcare operates 42 residential aged care homes, 12 retirement living communities, two healthcare services and supports approximately 4,500 people in the community.

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.



BRIEF STATEMENT FROM

David Robinson

Catholic Healthcare supports initiatives aimed at developing a more compassionate and humane society, in which the dignity of each human person is respected.

This includes the Australian Government's Modern Slavery Laws. Catholic Healthcare is committed to using all reasonable means not to engage in activities of modern slavery.

Our particular focus is on the care and support of seniors through our Homes and Community Services. In doing so, Catholic Healthcare engages with a range of suppliers of goods and services and we look forward to working with them to raise awareness of the important issue of modern slavery, and to progressively refine procurement practices which focus on the just and ethical production and supply of goods and services.

I am very pleased to be able to present Catholic Healthcare's first Modern Slavery Statement and commend officers of our organisation who have embraced the cause of eradicating modern slavery with such zeal.

This Modern Slavery Statement was approved by the Board of Catholic Healthcare on 24 February 2021.

A handwritten signature in black ink, appearing to read 'D. Robinson', written in a cursive style.

David Robinson
Chair
Catholic Healthcare Limited

2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

Our Catholic faith and the Church's teachings call us to promote integral human development in building a renewed society based on freedom, justice and peace.

We are therefore committed to the eradication of modern slavery.

Towards this end, Catholic Healthcare has joined with a number of Catholic providers who are united in a desire to address the serious issue of modern slavery in the spirit of Catholic Social Teaching.

Our internal team comprising representatives from Procurement Services, Legal Services and the Mission Team have participated in extensive education on modern slavery and how it impacts supply chains in Australia. They have been actively raising awareness of this issue with other internal teams.

An initial assessment of supply chains has been undertaken and a preliminary assessment of modern slavery risks in this area has taken place. Discussions with internal teams about these issues are ongoing.

We have developed a draft Modern Slavery Policy and included anti-slavery clauses in our organisation's standard contracts. We have also included questions pertaining to slavery awareness and practices in tenders for a broad range of supplies that have been issued this year.

Discussions have been held to consider actions that Catholic Healthcare might take for the next three years in conjunction with developing a preliminary road map to guide those steps into the future.

Our Plans for 2021 and Beyond

In 2021 and beyond, Catholic Healthcare intends to undertake further analysis of our supply chains, strengthen our policies and procedures, and prepare Modern Slavery Action Plans for all business units with a procurement function. Further details are set out in this Statement.



Reporting Criteria 1 & 2:

ABOUT CATHOLIC HEALTHCARE

Our Organisational Structure

Catholic Healthcare is committed to promoting life in all its fullness by providing aged, health and community services, inspired by the Catholic tradition.

A trusted leading not-for-profit provider of residential aged care, home care, retirement living and healthcare reaching across the east coast of Australia, we have a strong and proud history of providing care and support to people of all faiths, backgrounds, and ethnicities, for more than 26 years.

Catholic Healthcare was established 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.

Supported and informed by our Members and Trustees, Catholic Healthcare has one 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"> • Comprising Residential Aged Care Homes • Retirement Living Communities • Social Housing for Seniors and Healthcare Services
<p>2</p>  <p>Home and Community Services</p>	<ul style="list-style-type: none"> • Comprising Home Care Packages • Commonwealth Home Support Services • Homelessness Services • Hoarding and Squalor Services • Assessment Services for Seniors
<p>3</p>  <p>Corporate Services</p>	<ul style="list-style-type: none"> • Comprising Human Resources • Information Services • Finance • Property Services • Marketing and Communications • Residential Aged Care Management • Home and Community Services Management • Mission • Legal and the Managing Director's Office

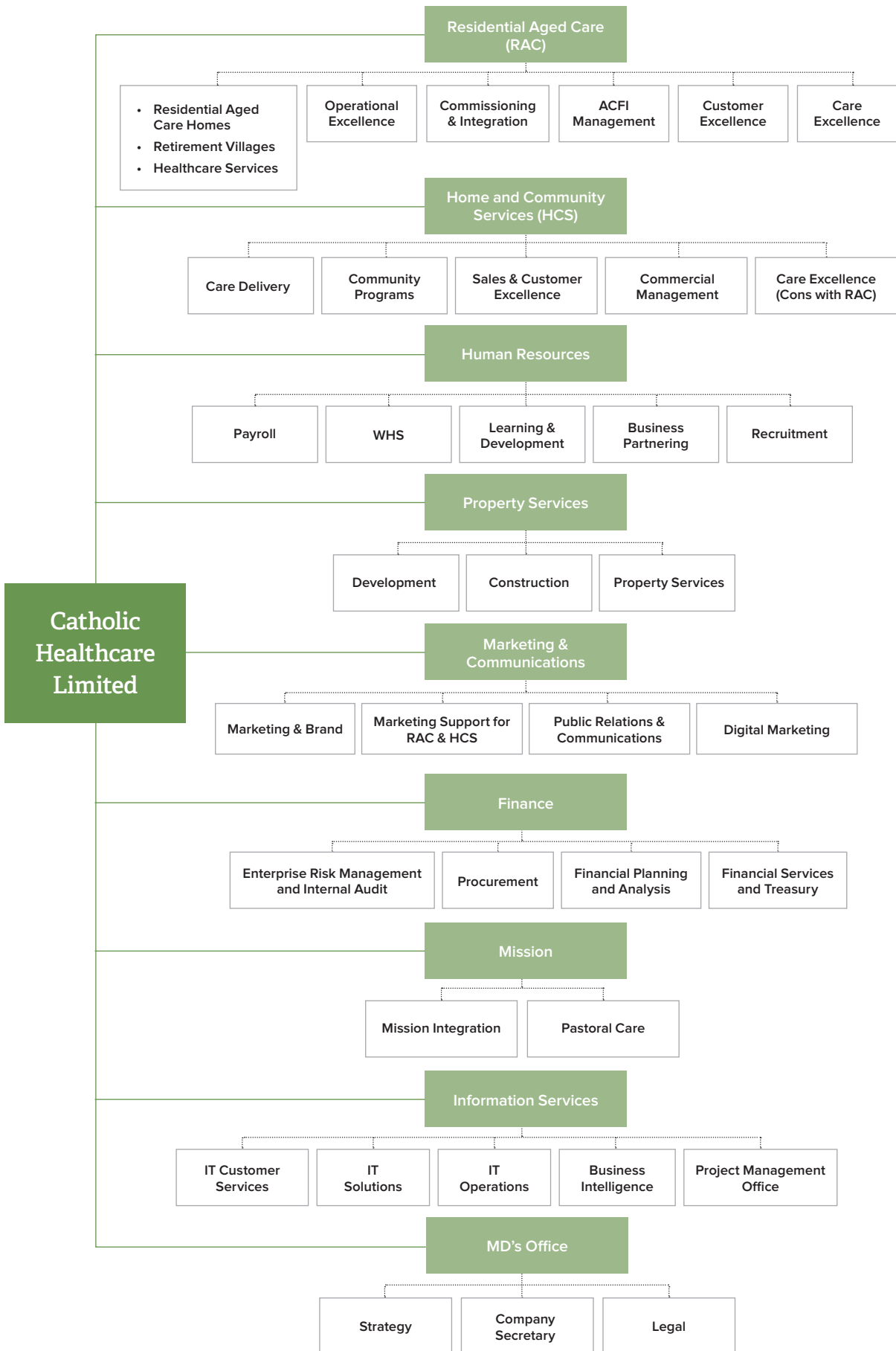
REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

CATHOLIC HEALTHCARE LIMITED (CHL) ORGANISATIONAL CHART



Our Governance Framework

As a Catholic service provider, Catholic Healthcare is concerned for the welfare of all persons, particularly those who are most vulnerable informed by the Parable of the Good Samaritan.

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

At a Glance



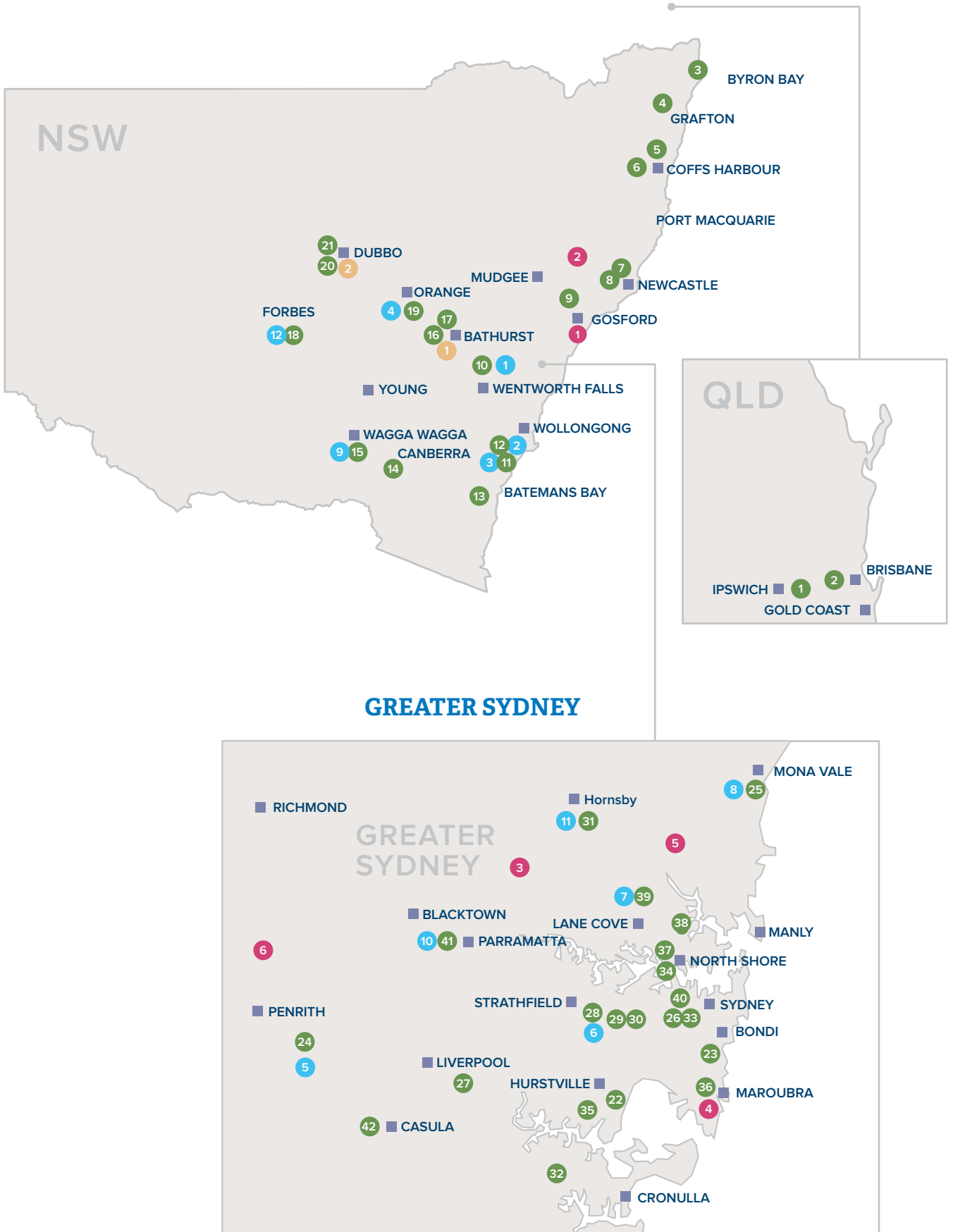
REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Our locations



RESIDENTIAL AGED CARE

- | | |
|---|---|
| 1 VILLA MARIA CENTRE
Eastern Heights | 22 BETHLEHEM HOUSE
Kogarah |
| 2 VILLA MARIA
Fortitude Valley | 23 BRIGIDINE HOUSE
Randwick |
| 3 COOLAMON VILLA
Mullumbimby | 24 EMMAUS VILLAGE
Kemps Creek |
| 4 ST FRANCIS AGED CARE
Grafton | 25 GEORGE MOCKLER HOUSE
Mona Vale |
| 5 ST AUGUSTINE'S AGED CARE
Coffs Harbour | 26 GERTRUDE ABBOTT
AGED CARE
Surry Hills |
| 6 ST JOSEPH'S AGED CARE
Coffs Harbour | 27 HOLY SPIRIT AGED CARE
Revesby |
| 7 CHARLES O'NEILL
Mayfield West | 28 HOLY SPIRIT CROYDON
Croydon |
| 8 ST JOHN'S VILLA
New Lambton | 29 LEWISHAM NURSING HOME
Lewisham |
| 9 OUR LADY OF
LORETO GARDENS
Hamlyn Terrace | 30 LEWISHAM
RETIREMENT HOSTEL
Lewisham |
| 10 BODINGTON
Wentworth Falls | 31 MCQUOIN PARK
Wahroonga |
| 11 ST MARY'S
Berkeley | 32 PERCY MILES VILLA
Kirrawee |
| 12 VILLA MARIA CENTRE
Unanderra | 33 THE SISTER ANNE COURT
Surry Hills |
| 13 MARANATHA LODGE
Batehaven | 34 ST ANNE'S AGED CARE
Hunters Hill |
| 14 BLAKENEY LODGE
Tumut | 35 ST BEDE'S HOME
South Hurstville |
| 15 THE HAVEN
Wagga Wagga | 36 ST JAMES VILLA
Matraville |
| 16 MACQUARIE CARE CENTRE
Bathurst | 37 ST JOSEPH AGED CARE
Hunters Hill |
| 17 ST CATHERINE'S
Bathurst | 38 ST PAUL'S
Northbridge |
| 18 JEMALONG RESIDENTIAL
VILLAGE
Forbes | 39 ST PETER'S
Lane Cove North |
| 19 ST FRANCIS AGED CARE
Orange | 40 VINCENTIAN AGED
CARE SERVICE
East Sydney |
| 20 ST MARY'S VILLA
Dubbo | 41 ST HEDWIG VILLAGE
Blacktown |
| 21 HOLY SPIRIT DUBBO
Dubbo | 42 HOLY SPIRIT
Casula |

HOME CARE

Home Care locations can be found across metro and regional areas of NSW and South East QLD.

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

NEW DEVELOPMENTS

- 1 KINCUMBER
- 2 MORPETH
- 3 NORWEST
- 4 MAROUBRA
- 5 BELROSE
- 6 JORDAN SPRINGS

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

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. These include:

- 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.
- 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 Criteria 3:

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

Catholic Healthcare understands that some goods (or their component parts) acquired by Catholic Healthcare may have been impacted by modern slavery practices.

To better understand these risks, in 2020, we undertook an analysis of the top 50 suppliers by spend in our organisation to determine how many fell within high-risk categories. In 2021 and coming years, we will broaden our analysis across the various high-risk categories and also smaller spend suppliers.

Catholic Healthcare also understands that labour hire is a high-risk category. As the majority of our workforce is employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment, the risk of modern slavery in our directly employed workforce appears to be low; however the use of employment agencies and labour hire contractors potentially represents a risk category.

As our understanding of supplier risk increases and our approach to modern slavery risk management matures, we plan to engage with these our labour hire contractors more rigorously.

Operational Risks

Our COVID-19 Response

COVID-19 has had a devastating impact on the world's population including, and disproportionately, the vulnerable elderly in residential aged care homes.

Given the high mortality rates in this population, Catholic Healthcare's main focus in 2020 has been to ensure appropriate infection control, staffing and supplies for all our Services and in particular, Residential Aged Care Homes.

Catholic Healthcare has actively promoted infection control and care of vulnerable residents, clients and patients, and of all our workers including contractors and agency workers.

Catholic Healthcare has also informed itself about the impact of COVID-19 on more vulnerable workers in the supply chain which has the potential to expose them to modern slavery risks. In response Catholic Healthcare has:

- Trained all relevant workers in appropriate infection control procedures including hand washing and donning and doffing of PPE.
- Supplied PPE to all affected workers as required.
- Adopted appropriate mechanisms to ensure visitor safety and compliance with requirements.
- Developed COVID-19 response plans for all services and integrated them with supports available through the Corporate Division.
- Conducted multiple drills of COVID-19 responsiveness in Homes and corporate services.
- Communicated broadly and openly with residents, clients, workforce, contractors and suppliers.
- Introduced a special category of leave (COVID leave) for workers impacted by COVID-19.
- Avoided varying contract unreasonably or seeking discounts from suppliers.
- Requested information from suppliers, in particular workforce suppliers, about the steps they have taken/take to protect workers from COVID-19 and addressing any shortfalls ourselves.
- Continuing existing supplier due diligence and education in relation to modern slavery risks within our own workforce, starting with our corporate services.



Our People

Catholic Healthcare employs over 4,200 staff including full time, part time and casual workers. One of our key strategic priorities is to ensure that Catholic Healthcare is a great place to work.

87% of our workforce is female which is common among the caring professions.

Catholic Healthcare does not regularly collect data on the country of origin of employees. However, it is known that our employees come from many nationalities including from the Australian, European, Asian, North and South American and African continents.

Catholic Healthcare employs approximately 160 visa holders to support our services, including in regional NSW. Most of our visa holders are in Student and Temporary Graduate Visa categories.

The majority of Catholic Healthcare's employees are employed under Enterprise Agreements approved by the Fair Work Commission and a smaller percentage under individual contracts of employment. Agency workers (mostly RN, EN, AIN and Care Workers) are engaged under agency agreements with other suppliers. Some service providers including allied health professionals and hairdressers are employed under individual contractor arrangement which are open to negotiation.

Catholic Healthcare has robust internal HR processes including those related to recruitment, orientation and induction, workforce management, workforce education, WHS, workforce and leadership development and grievance management. Recruitment processes incorporate stringent governance requirements around compulsory police checks, employment history referencing and the confirmation of essential role qualifications.

In addition to internal grievance processes, Catholic Healthcare has a Whistleblower Policy supported by an external Whistle Blowing service to which any person may bring complaints and concerns.

In addition to offering access to a diverse program of internal learning and development opportunities, the organisation maintains an annual scholarship program to encourage and support ongoing employee educational and professional qualifications.

Catholic Healthcare actively fosters open lines of communications throughout our organisation and achieves this in a variety of engaging and creative ways including through employee forums, internal publications, special events, our Intranet and employee surveys. Members of our Leadership Team, Board and Trustees visit our frontline services on a regular basis and are available to speak with staff, residents and clients.

Modern Slavery Gap Analysis

Heat Mapping

Catholic Healthcare engaged external consultants to analyse our progress in managing modern slavery risks across our organisation.



MANAGEMENT SYSTEMS

Steps have been undertaken to better understand the modern slavery risks in Catholic Healthcare’s operations and supply chains. This work is ongoing.



HUMAN RESOURCES AND RECRUITMENT

The risks of modern slavery issues within Catholic Healthcare’s directly employed workforce is relatively low given our use of Enterprise Agreements which have been reviewed and approved by the Fair Work Commission. Further enquiry can be undertaken in relation to our agency workforce and further consideration of workforce training can be undertaken.



PROCUREMENT AND SUPPLY CHAIN

Catholic Healthcare has a broad procurement policy and general contract clauses outlining modern slavery risks. These contract clauses have been reviewed and included in Requests for Tender Proposals that have been issued this year.

The steps undertaken to date, and which the organisation continues to undertake, to map its supply chain and engage high risk suppliers, will assist with monitoring supplier performance in the future.



RISK MANAGEMENT

Modern slavery risks are regularly being assessed within our business operations.



CUSTOMERS AND STAKEHOLDERS

Catholic Healthcare’s understanding of customer expectations around modern slavery risk management is limited at this stage.

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Supply Chain Risks

In 2020 we undertook a preliminary risk mapping exercise across 50 of our top suppliers by spend to increase our understanding of the key procurement categories that have the highest risks of modern slavery.

Across our business, Catholic Healthcare procure goods and services across 18 broad procurement categories:

Building and Construction	Labour Hire
Professional Services	Cleaning Services
Linen/Laundry	Uniforms and PPE
Events and entertainment	Medical Supplies
Allied Health	Facility management and property management
Waste Management	Travel Services
Food and beverage	ICT hardware
Utilities	Furniture and Office Supplies
ICT Software and network services	Printing/Mail Provider

The following factors formed the basis of this preliminary mapping exercise:

- 1

INDUSTRY SECTOR

Specific industry sectors deemed as high risk in international and national guidance documentation.
- 2

COMMODITY / PRODUCT

Specific products and commodities deemed as high risk based upon 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.
- 3

GEOGRAPHIC LOCATION

Based on estimated prevalence of modern slavery and the government responses as outlined in the 2018 GSI.
- 4

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 a substantial proportion of Catholic Healthcare’s spend in potentially high risk categories is within the 10 spend categories listed below. This accounts for 34 out of the 50 suppliers analysed.

Potential High-Risk Categories

SPEND CATEGORIES

Building and Construction	Cleaning Services
Events and Entertainment	Facility Management
Food and Beverage	Furniture & Office Supplies
Labour Hire	Linen/Laundry
Medical Supplies	Waste Management

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Reporting Criteria 4:

ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

Catholic Healthcare's has aimed, in 2020, to strengthen our understanding of potential modern slavery risks in our operations and supply chains.

To support these endeavours and to ensure a rigorous response, the organisation joined with other Catholic providers through the ACAN initiative (Australian Catholic Anti-Slavery Network) which has provided extensive training in modern slavery risks in Australia and overseas, as well as supporting analysis of our supply chain risks.

We also developed a Modern Slavery Working Group comprising representatives of our Procurement, Mission and Legal Teams which have worked primarily with our corporate services to better understand our supply chains, identify gaps in our processes and begin the work of identifying higher level supplier risks.

Policy and procedure relating to modern slavery risks are also under development. Our standard organisational contracts have been amended to include anti-slavery

clauses which have also been included in our Requests for Tender Proposals. Our Legal Services Team reviews external contacts with an eye for potential modern slavery risks in supply chains.

An Operational Gap analysis was undertaken to determine the level of understanding of modern slavery risk across key business areas in the organisation.

As part of raising organisational awareness about Modern Slavery, the Mission Team circulated an email to the entire organisation about St Josephine Bakhita, the Catholic Patron Saint of Modern Slavery prior to her feast day which is 8th February.*

“Catholic Healthcare’s has aimed, in 2020, to strengthen our understanding of potential modern slavery risks in our operations and supply chains.”

*Annexure 1

Modern slavery action plan and road map

Our plans for 2021 are set out below.

1 Evaluate and Assess

Finalise our Modern Slavery Policy and Procedure and create a plan across the organisation using The Gap Analysis mentioned in this Statement.

Outputs

- Extend our analysis of top spend categories looking initially at high risk suppliers.
- Consider development of an Ethical Practices Questionnaire for staff and suppliers.
- Review the organisational Gap Analysis.

2 Create Collaborative Plans

Finalise our Modern Slavery Policy and Procedure and create a plan across the organisation using The Gap Analysis mentioned in this Statement.

Outputs

- Roll out the Modern Slavery Policy and Procedure.
- Prepare Modern Slavery Action Plans as needed.

As at the date of writing, our plans beyond 2021 are outlined in the table below.

3 Execute and Implement

Implement and Monitor Modern Slavery Action Plans across relevant business units

Expected Outputs

- Promote our Modern Slavery Policy internally and externally
- Consider the desirability of a Modern Slavery Supplier Code of Conduct
- Incorporate Modern Slavery Awareness Training for relevant roles

4 Execute and Implement

Implement and Monitor Modern Slavery Action Plans across relevant business units

Expected Outputs

- Support and collaborate with other Catholic organisations that are in the process of developing remediation pathways for those impacted by modern slavery
- Obtain greater visibility to modern slavery risks in the supply chain, starting with high spend suppliers

REPORTING CRITERIA 1 & 2

REPORTING CRITERIA 3

REPORTING CRITERIA 4

REPORTING CRITERIA 5 & 6

Reporting Criteria 5: EFFECTIVENESS ASSESSMENT

Each relevant business unit has commenced the development of a three-year action plan which will be used to assess the success of initiatives on an ongoing basis.

Key Initiatives planned for 2021 include:



Increasing awareness across the organisation by incorporating a standalone Modern Slavery unit into our eLearning System



Updating procurement policies and procedures



Reporting on progress to our Trustees and Board



Requesting modern slavery statements from suppliers in high risk categories

Reporting Criteria 6:

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.

Annexure 1 – St Bakhita’s Day Email sent to all Catholic Healthcare staff

St Bakhita’s Day
8th of February

St Josephine Bakhita is the patron saint of the Victims of Modern Slavery and Human Trafficking.


As part of our compliance with the Modern Slavery Act 2018, Catholic Healthcare has joined ACAN, a network of catholic organisations across Australia committed to eradicating modern slavery.

There are an estimated 40.3 million people in modern slavery around the world:

- 10 million children
- 24.9 million people in forced labour
- 15.4 million people in forced marriage
- 4.8 million people in forced sexual exploitation

Slavery today is less about people literally owning other people – although that still exists – but more about being exploited and completely controlled by someone else, without being able to leave.

On this day we are encouraged to pray for all those affected by the crimes of modern slavery and human trafficking, along with the people who volunteer and work to eradicate this crime.



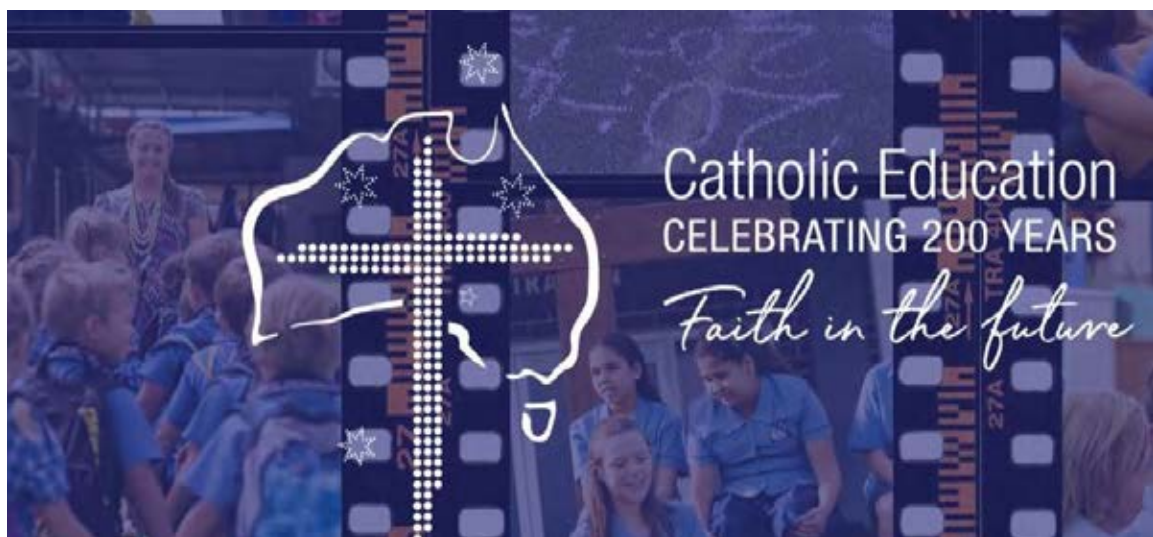




Modern Slavery Statement 2020



DIOCESE OF
LISMORE
CATHOLIC SCHOOLS LIMITED



Disclosure Note

This statement has been made on behalf of Diocese of Lismore Catholic Schools Limited (DLCSL). This Statement covers all entities owned or controlled by DLCSL.
ABN 93 638 070 836

(May 2021)



Mr Adam Spencer

Chair – Diocese of Lismore Catholic Schools Limited (DLCSL)

The DLCSL Board is committed to the task of reducing Modern Slavery in our supply chain and over time as our new governance model evolves 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 5 May 2021.

A handwritten signature in black ink, appearing to read 'a. Spencer', written in a cursive style.



Dr Sally Towns

Director of Catholic Schools, Diocese of Lismore

The DLCSL in consultation with other likeminded Catholic entities have formed a working group, Australian Catholic Anti-Slavery Network (ACAN) who have been 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 inaugural statement will form the early steps of our targeted approach and over time this initial road map will make a positive step forward.

I look forward to bring these important initiatives to life in our vibrant education environment.

A handwritten signature in black ink, reading 'Sally Towns', written in a cursive style.

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Reporting Criteria 1 & 2:

About us

The Diocese of Lismore Catholic Schools Limited (DLCSL) is a company limited by guarantee, and a non-for-profit company.

Established by the Bishops and owned by the Trustees of the Roman Catholic Church, Diocese of Lismore, the Schools Company exists to further the Mission of the Catholic Church of the Diocese, to govern, conduct and administer schools, and support services for schools in the Diocese. The Schools Company continues the essential relationship between communion and Mission involving all members of the people of God. The DLCSL exercises a ministry of service to the educational community, promoting dynamic missionary communion.

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.

2020 Modern Slavery Risk Management Initiatives

Over the course of 2020, the DLCSL has undertaken the following actions since the commencement of being a signatory organisation with ACAN to mitigate modern slavery. These have included:

- Development of a program of implementation flowchart to outline DLCSL steps to address modern slavery.
- Executive team presentation to overview the DLCSL obligation as a signatory organisation.
- A Supplier code of conduct has been prepared ready to send to all tier 1 suppliers.
- Undertaken a Procurement Risk Taxonomy and supplier risk analysis.
- Development of a supplier questionnaire and expectations matrix.
- The development of a Supplier corrective action plan template.
- Drafted supplier model contract clauses.
- Staff awareness, training and presentation to a cross section of staff who by the nature of their role, have a degree of influence to support the ACAN strategy.
- Model stakeholder questionnaire to ascertain and gauge current state.
- Model supplier engagement strategy and communications resources.
- Drafting of a Modern Slavery Statement for submission in 2021.

Our Plans for 2021 and Beyond

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:

- Establish a modern slavery working group from across the organisation to develop and implement the strategy in line with obligations outlined in the Act.
- Ongoing targeted training for staff via the ACAN learning tools.
- Reduce the number of suppliers through strategic procurement and the use of preferred supplier panels.
- Ensure appropriate risk assessment for engagement with suppliers, including developing a supplier risk assessment tool.
- Product/services, size, complexity, depth of their supply chain, geographical location.
- Target those identified with significant expenditure first.
- Target those within high-risk categories for modern slavery – construction, cleaning and uniform supply.
- Ongoing review of existing memoranda of understanding and contracts to ensure compliance when and if renewing.

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. (Refer to Appendix 1)
- 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 DLCSL strategy to address Modern Slavery from 2021 onwards.

Our Organisational Structure

Trustees for the Roman Catholic Church 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 Trustee and commenced operation on 1 July 2020.



The Catholic Schools Office (CSO) is the trading name and executive arm of DLCSL.



45 Schools.

Our Governance Framework

Eliminating modern slavery is an activity that recognises the fundamental importance of upholding the inherent human rights of all people and promotes Catholic social teaching for which the DLCSL's governance framework supports. 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. Failing to meet our social responsibilities in regards to modern slavery would be counter to upholding this mission and vision.

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.

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 sole member of the Schools Company 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.

These development and activities will further enhance the DLCSL's ability to manage and mitigate a number of risks at an enterprise regarding modern slavery.

Our Operations

The Diocese of Lismore stretches along the coastal strip of New South Wales from Tweed Heads in the north to Laurieton in the south and west to the foothills of the Great Dividing Range. The Catholic Schools Office provides a range of services to support approximately 2,500 staff in 45 vibrant and dynamic school communities that serve more than 18,000 students.

The 45 systemic schools (11 secondary and 34 primary) exists 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

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 with in a variety of ways.

Whilst we are not aware of any modern slavery practices in the supply chain, the sheer number of suppliers increases the uncertainty of a 'clean' chain. At this stage, the uncertainty around the supply chain 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 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 introduction of Technology One 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

When the DLCSL commenced actions to address modern slavery, a decision was made to join ACAN. One of the first actions completed was a heat map of the organisation as it existed under a previous governance framework.

The results shown in table 1 outlines an obvious starting point in July 2019 as we commenced the journey to address Modern Slavery.

Table 1

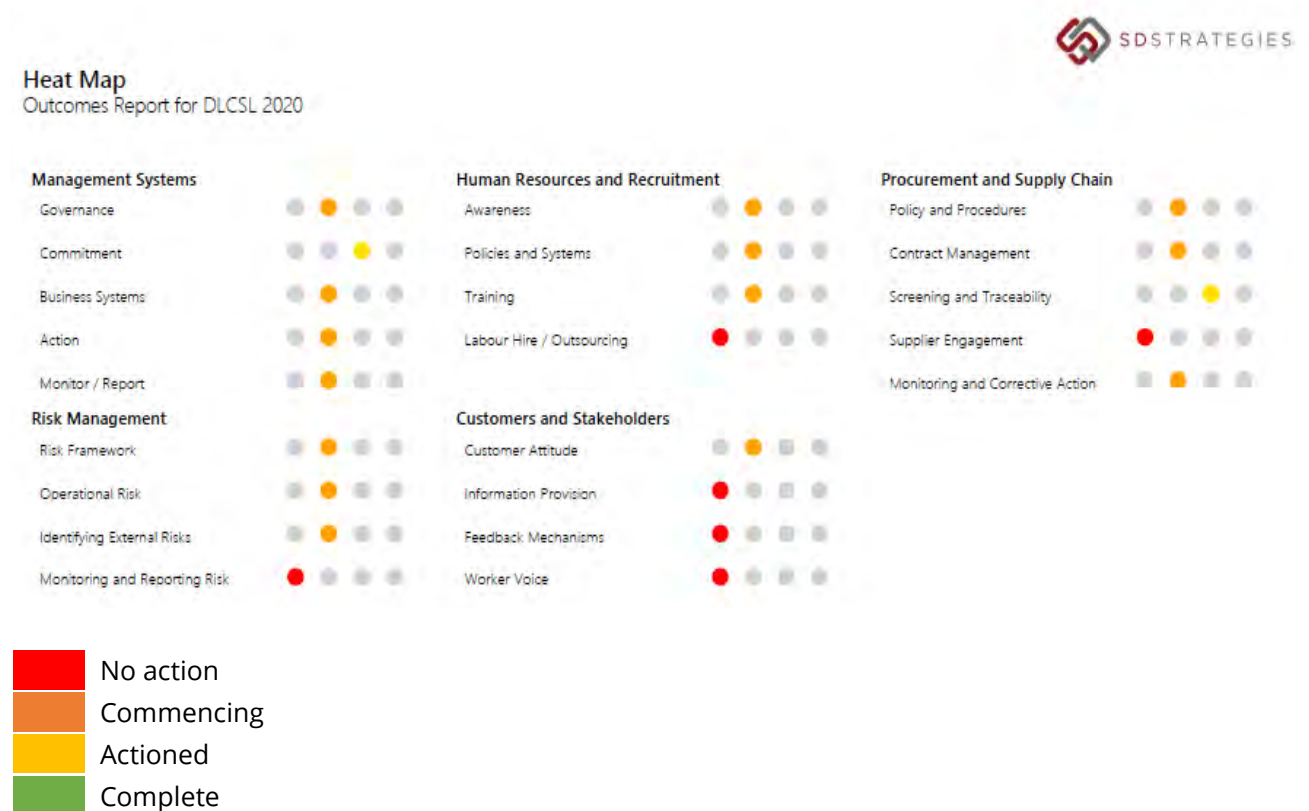


The work completed as a member of ACAN have enabled greater insights into modern slavery risk in our operations and supply chain. This included:

- Monthly peer meetings.
- Support with mapping suppliers.
- Internal staff training.
- Drafting various procedures, policies and guidelines.

The associated work involved has seen movement in most categories as can be seen by the heat map in table 2 completed in 2020 by the DLCSL.

Table 2



Our COVID-19 Response

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 supplier due 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

The DLCSL employs 2500 people across all entities who perform a range of roles with the sole purpose of providing Catholic education across 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 70% female and 30% 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 Committee
- b) Education Committee
- c) Finance Committee
- d) Audit & Risk Committee
- e) Nominations Committee

Moving forward, Modern Slavery will sit within the Audit & Risk Committee as a standing agenda item. Modern Slavery clauses have been cross referenced against several policies and these will be endorsed by the new committees when appropriate. This will then enable operationalising the policies and contracts in 2021.

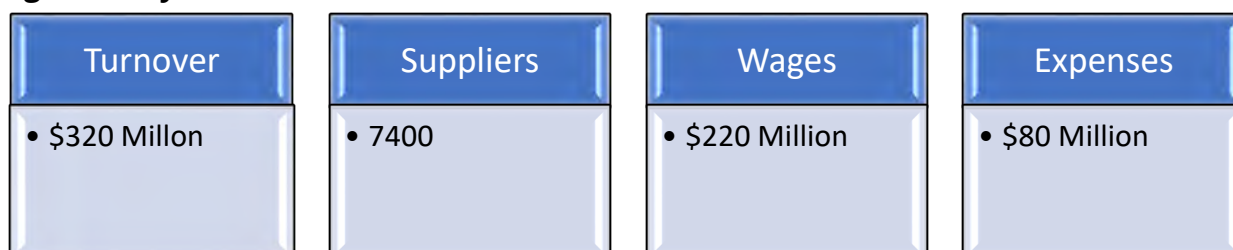
In 2021, recruitment of an internal Risk Manager role to provide a conduit to ensure effective and robust contract development, and more effective corporate governance will occur.

Supply Chain Risks

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.

Figure 3 Key Business Metrics

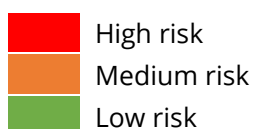
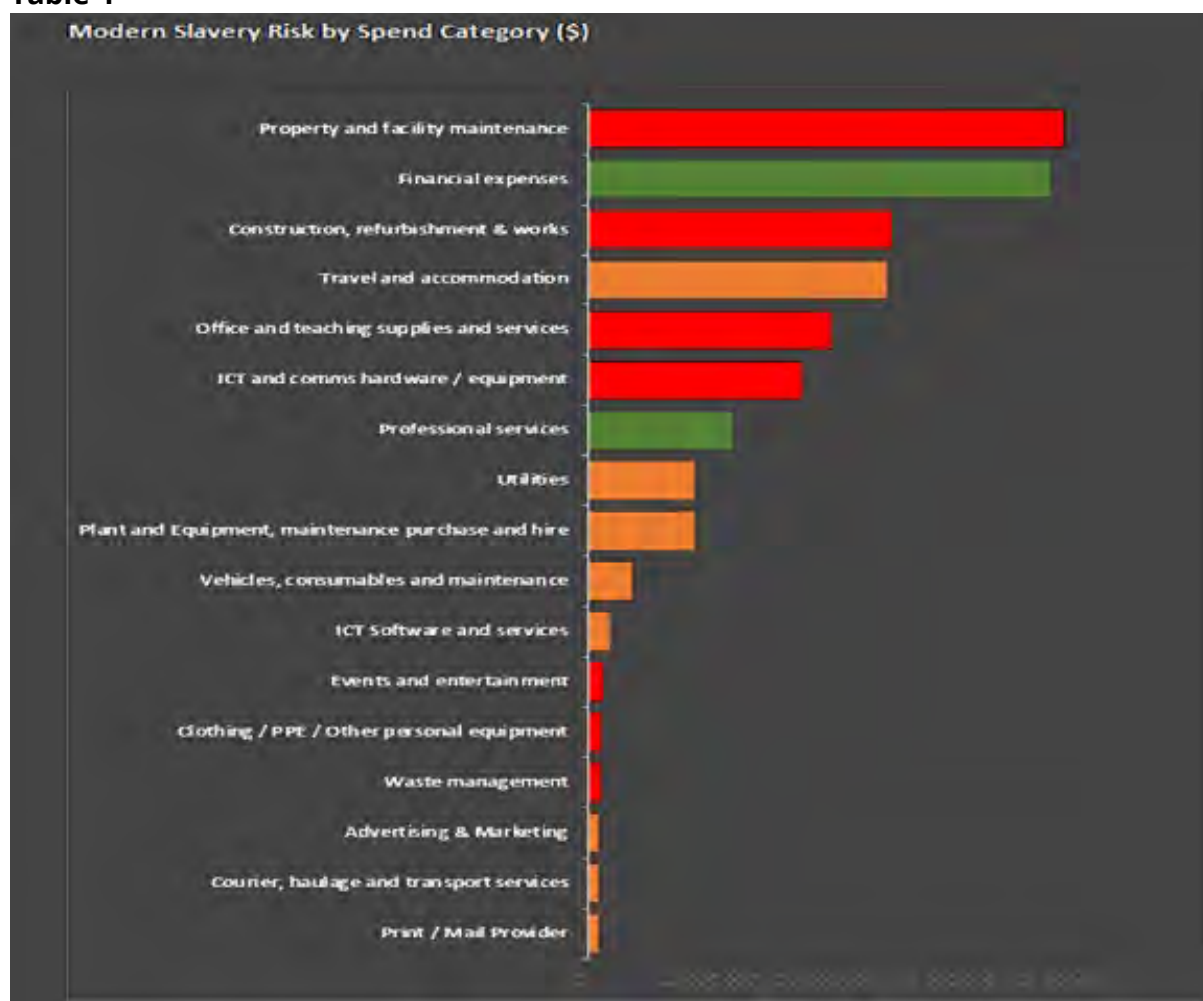


Modern Slavery Gap Analysis

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 spend. 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 (ERP) is being implemented (Technology One Finance and Supply Chain). This will assist over time, by making extraction of procurement data and categorisation of our spend simpler.

Table 4 identifies the supplier's categories at risk based on the value spend. As all of our direct suppliers are based in Australia, our risk assessment was based on sector risk only. Despite the fact that Australia is considered a low risk jurisdiction for modern slavery, we recognise that the risk of modern slavery may permeate via the second and subsequent tiers of our supply chain. Supplier mapping conducted as part of our participation in ACAN has allowed the ability to identify risks in the supply chain.

Table 4



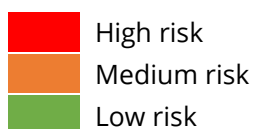
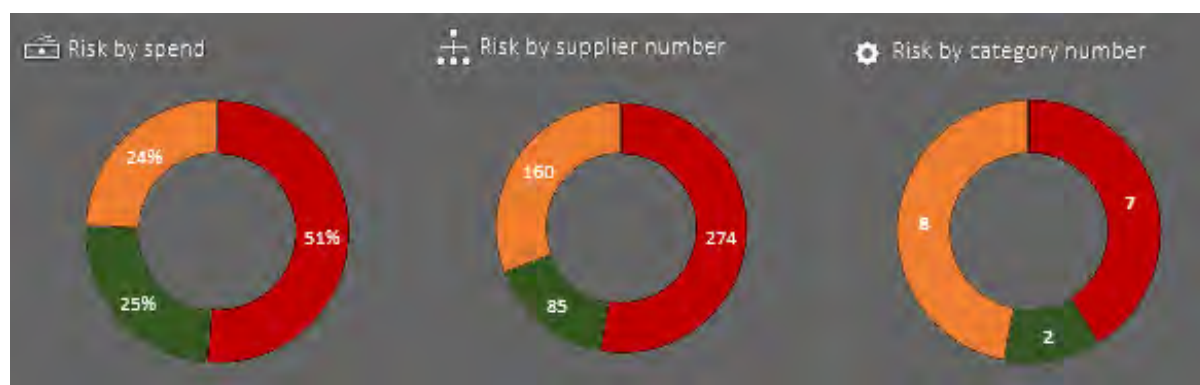
For example, property and facilities maintenance is a substantial component of our operations based on the annualised procurement spend across the organisation as indicated in Table 4. Our Property Team manage all of this spend category and will form an integral part of the DLCSL meeting compliance with Modern Slavery requirements. These will be actioned by interpreting our policies and using the model clause in any future contracts.

Spend data was sorted by supplier, supplier geographic location, sector/industry, type of good, service or works (category) and spend is as indicated in table 5.

It was then overlaid with indicators of modern slavery to determine high, medium and low-level risks that our organisation has the potential to cause, contribute or be directly linked to modern slavery.

Table 5 shows the spend categories with the percentage on a risk matrix and highlights areas of focus.

Table 5



Reporting Criteria 4: Actions taken to assess and address risk

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.

Modern slavery action plan and road map

In 2020 via our ACAN membership, fifteen CSO staff completed Modern Slavery training.

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.

Key aspects of ACAN training included:

- Identifying the types of and potential for modern slavery.
- Risks programs and taxonomy for mitigation.
- Supplier engagement and code of conduct guidelines.

Initially, the training will start a broader conversation and present general awareness information on what modern slavery is, who the victims are, how the issue is relevant to our organisation and the key steps to start managing risk.

Over time this training and skills will allow the CSO 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.

Reporting Criteria 5: Effectiveness Assessment

Effectiveness

While there is extensive work being done to understand and value the respect for human rights, there are currently no units of measurement or international standards to gauge the extent to which actions taken have had an impact on human rights. This is a complex issue that presents a challenge for all organisations in terms of providing credible measurements as to their effectiveness in addressing modern slavery risk.

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.

Our progress regarding modern slavery will be a key task for the newly formed 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 and provides a dialogue on 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

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 of Lismore.
- ACAN.
- Director of Catholic Schools.
- Senior Executive of CSO.
- Principals of each school (separate entities).

The continual development of our strategy will involve a working party of representatives of all areas to attend to the ongoing oversight and development of the DLCSL's modern slavery obligations under the Act.

Reporting Criteria 7: Other

Diocese of Lismore and Fair Farms

An example of the Diocese commitment to eradicate Modern Slavery, ACAN is resourcing Fr Shabas Crasta OCD, Parish Priest at St Augustine's Parish, Coffs Harbour in the Diocese of Lismore who took part in the Fair Farms for Workers Community Forum held in 2020.

Fr Shabas addressed the forum, at which Filipino, Burmese and Pacific Islander parishioners working in the area's horticulture sector who spoke directly to senior executives from Coles Supermarkets.

The horticulture industry is a high risk sector for modern slavery. Supporting engagement through these types of events is an example of how the Australian Catholic Anti-Slavery Network can work with parishes, both to detect and deter labour exploitation in their communities and build on the existing pastoral work of the Church.

Appendix 1

DOMUS 8.7 - A initiative to support victims and businesses

Currently there is no single effective remedy pathway in Australia for either victims of slavery or the organisations who discover it.

Victims are often traumatised and have few resources. They lack information about their rights and our legal system. Individuals and businesses who identify or suspect incidents of modern slavery are provided with no clear guidance on what to do. They are left to navigate a complex maze of immigration, legal, welfare and social security systems.

DOMUS 8.7 is a new initiative by the Catholic Archdiocese of Sydney to provide an effective response to modern slavery for both victims and organisations. It will be Australia's first 'one-stop-shop' service available to victims, workers or businesses to obtain support, advice and guidance on how to respond to potential situations of modern slavery and forced labour.

Services profile

The DOMUS 8.7 operating model is still under development but it is anticipated that the following services will be provided:

- **Toll free hotline** and confidential online reporting platform for victims, workers or businesses to report suspected incidents of modern slavery.
- Practical and immediate **support for victims**.
- **Guidance and advice for businesses** who identify slavery in their operations or supply chains.
- **Coordination** with government agencies, victim support organisations and others.
- Help businesses **develop internal capabilities** to manage modern slavery risk.
- **Advocate** for better support for victims of slavery in Australia.

Why we need a remedy pathway

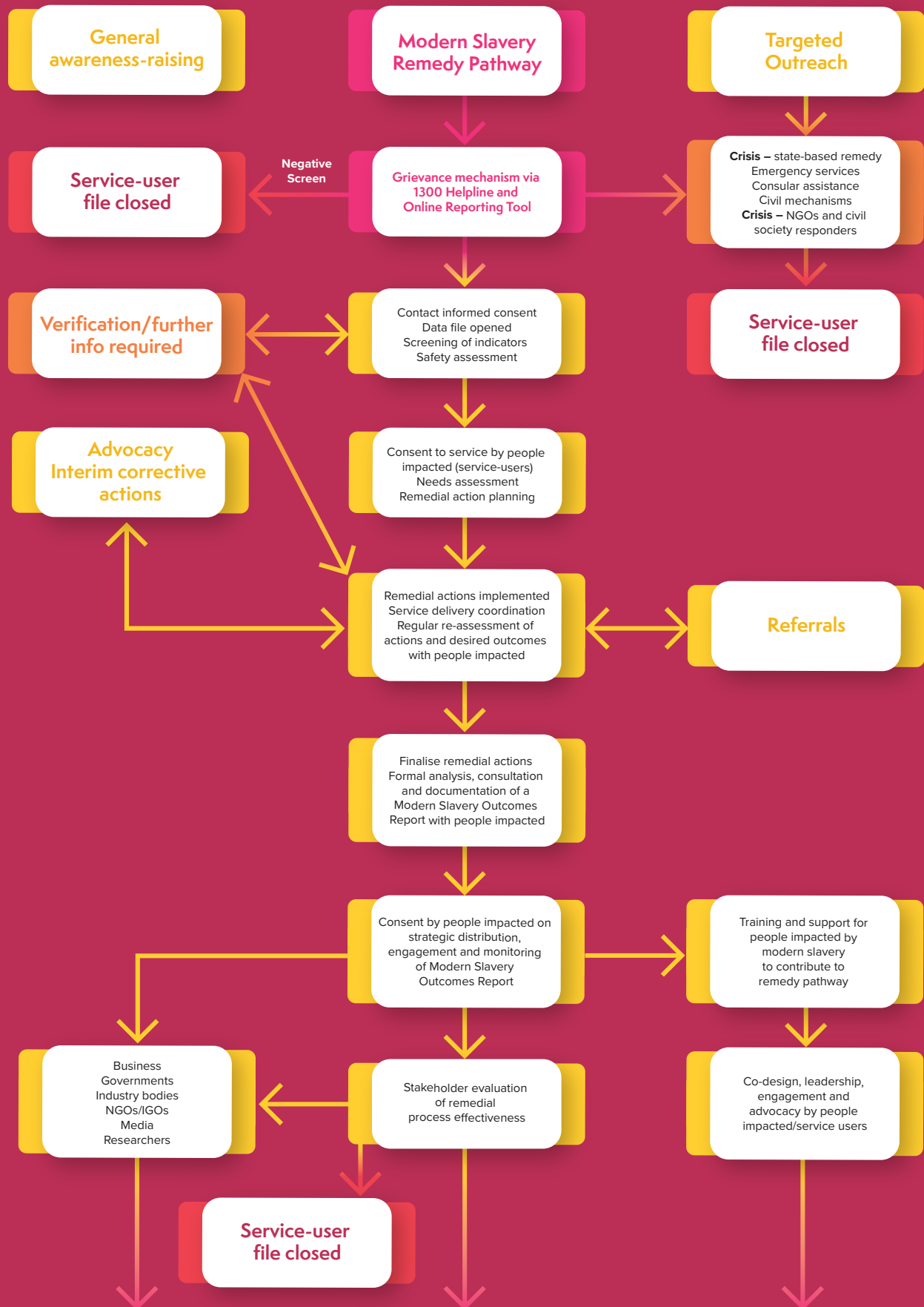
A pathway provides several direct and indirect benefits to businesses:

- Enhances modern slavery risk management programs within your operations and supply chain.
- Provides the support needed for a rapid, coordinated response when victims are identified.
- Develops your internal capability to manage risk and engage staff.
- Establishes a documented pathway to manage (potentially) complex humanitarian issues.
- Addresses a key mandatory reporting requirement of the *Modern Slavery Act 2018*.
- Boosts your credibility and reputation as a responsible business.

- Enhances your standing with regulators, shareholders, customers and community groups.

Integrating remedy into your systems and processes will ensure your businesses ongoing commitment to protecting the human rights of people in your operations and supply chain.

DOMUS 8.7



Outcomes

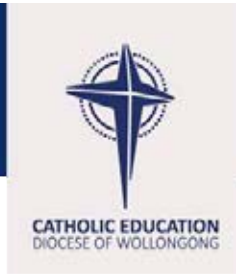
Solutions driven by people impacted by modern slavery
 Documented independent grievance mechanisms and remediation process
 Evidence-based data to inform risk assessment, management and mitigation
 Collaboration and Partnership opportunities

Modern Slavery Statement

2020



CATHOLIC EDUCATION
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Disclosure Note

This Statement has been made on behalf of *Catholic Education Diocese of Wollongong* which is the only agency in the Diocese of Wollongong required to report on its supply chains under the *Modern Slavery Act 2018* (Cth). This Statement covers all entities owned or controlled by *Catholic Education Diocese of Wollongong*.

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

This statement has been reviewed and approved by the Finance, Facilities, ICLT and Planning Head of Service on 11th June 2021.

A handwritten signature in dark blue ink, appearing to read 'Bede Ritchie'.

Bede Ritchie

Head of Finance, Facilities, ICLT and Planning. Catholic Education Diocese of Wollongong



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CATHOLIC EDUCATION
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About us

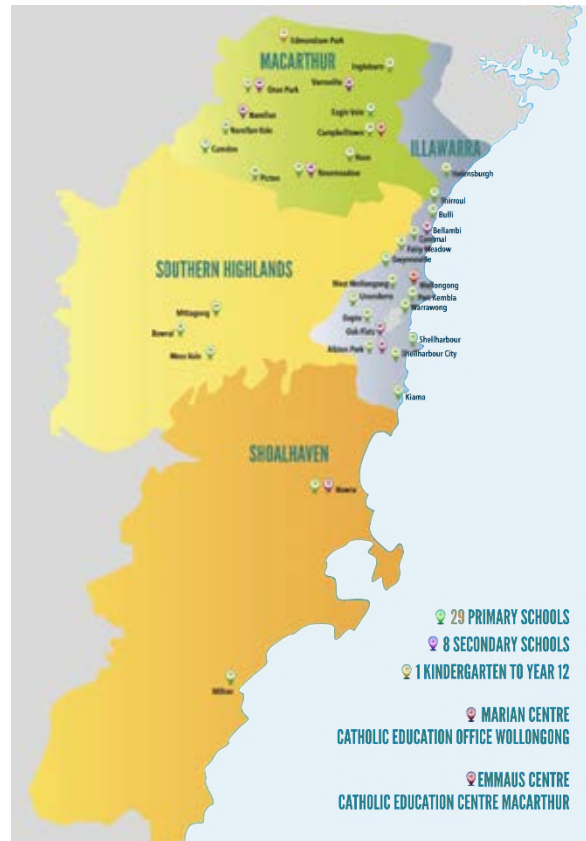
The Diocese of Wollongong is one of eleven Dioceses in the state of New South Wales. The seat of the Diocese is situated in the regional city of Wollongong, approximately 100 km south of Sydney, NSW.

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*, p16)





2020 Modern Slavery Risk Management Initiatives

In 2019, CEDoW became a member of the Australian Catholic Anti-Slavery Network (ACAN), originally formed as the Anti-Slavery Taskforce within the Archdiocese of Sydney, to ensure the School system complies with the requirements of the Modern Slavery Act 2018 (Cth) and contributes to the planned elimination of modern slavery practices by 2030.

ACAN has produced a compliance risk management program and provided resources through their website for members to access, such as document templates, procedures, contract clauses, supplier information, questionnaires and presentations.

During the reporting period, CEDoW has used a number of these resources to identify its high risk areas and has commenced engaging key suppliers on the issue of modern slavery and CEDoW's obligations in this area. In addition, staff awareness training has begun by inviting selected staff members to attend ACAN presentations and undertake their training modules in order to circulate this information within their own service areas.

CEDoW has also reached out to other agencies in the Diocese of Wollongong (DOW), such as the Office of the Bishop, CatholicCare and the Catholic Development Fund, to advise them of the School system's compliance requirements in this area. There are no plans for these other agencies to voluntarily report on modern slavery at this stage.

Our Plans for 2021 and Beyond

CEDoW acknowledges this process will take time and will require continual improvement in order to eliminate the risk of modern slavery practices existing within its supply chains. CEDoW's planned actions in the next reporting period are as follows:

- Ensure CEDoW's *Modern Slavery Policy* is approved by the *Leadership Team* in 2021. This policy outlines the expectations of suppliers' conduct.
- Upload the ACAN *Modern Slavery 101* and *Business Relevance* staff training modules to CEDoW's internal *Learning Management System*. These modules will become a mandatory part of new staff inductions and will be offered to existing staff to increase awareness.
- Embed the ACAN contract clauses in high-risk industry agreements such as Building and Construction, ICT Hardware, Cleaning and Security Services, etc.
- Increase supplier engagement with key high-risk companies either centrally or by the relevant CEDoW service area to assess risk of modern slavery practices.
- Increase centralisation of procurement practices to both obtain better financial outcomes and reduce the number of suppliers being engaged to better manage modern slavery risks.
- Allocate the ACAN risk category to suppliers in the Accounts Payable system to automate future reporting of high risk spending.
- Use the SEDEX (a leading ethical trade membership organisation) platform to identify and assess the risk of engaging various suppliers who may have a record of modern slavery practices in their operations and action where required.
- Continue the partnership with ACAN by participating in their 2021/2022 compliance program.

Statement from the Director of Schools



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 more clear: 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 ensure 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 report for the work it does in attempting to confront and eliminate modern slavery practices.



Peter Hill
Director of Schools
Catholic Education Diocese of Wollongong



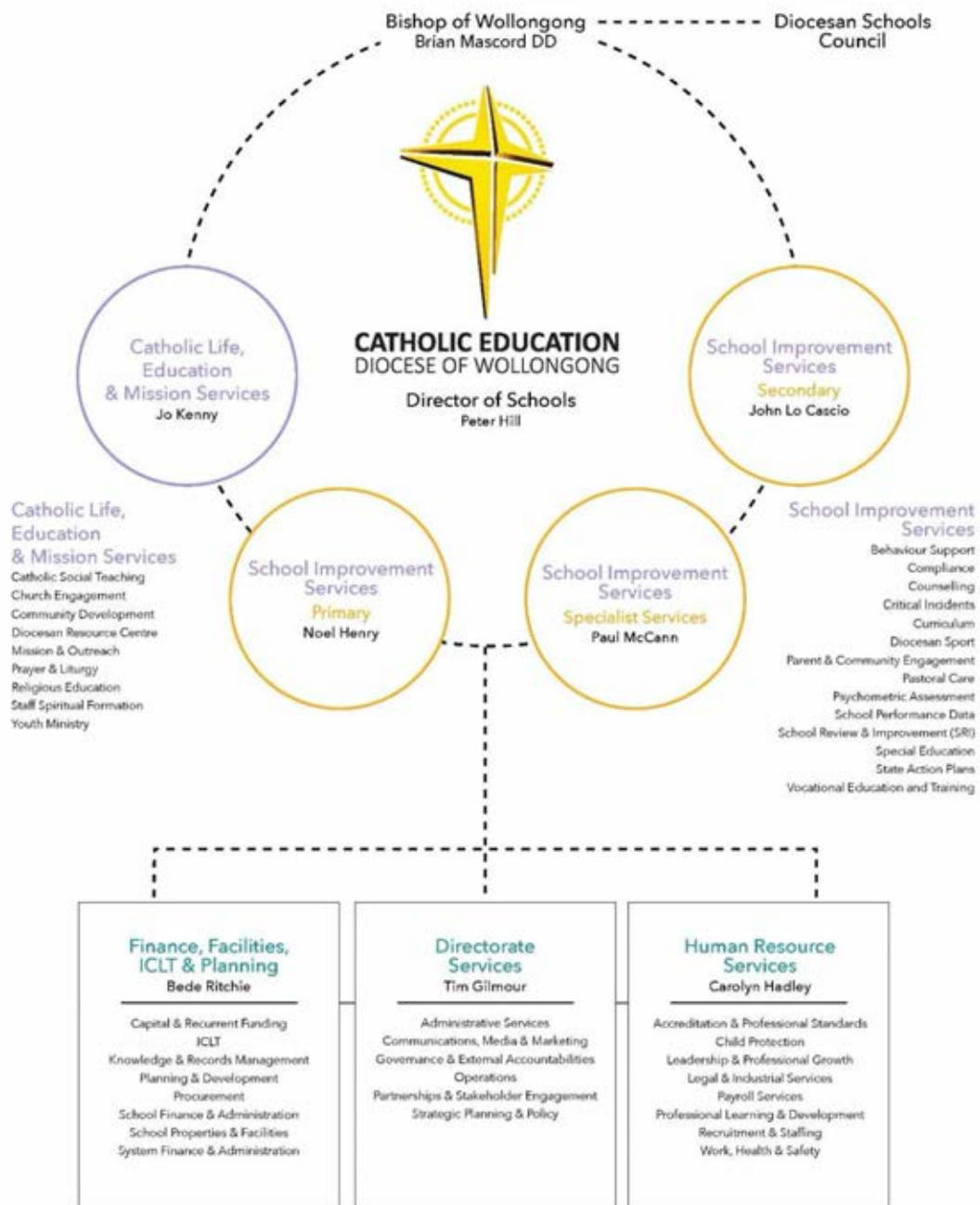
CATHOLIC EDUCATION
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About Catholic Education Diocese of Wollongong

Our Organisational Structure

The overview of CEDoW's organisation structure is below:

Catholic Education Office Organisational Structure 2021



Our Governance Framework

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.

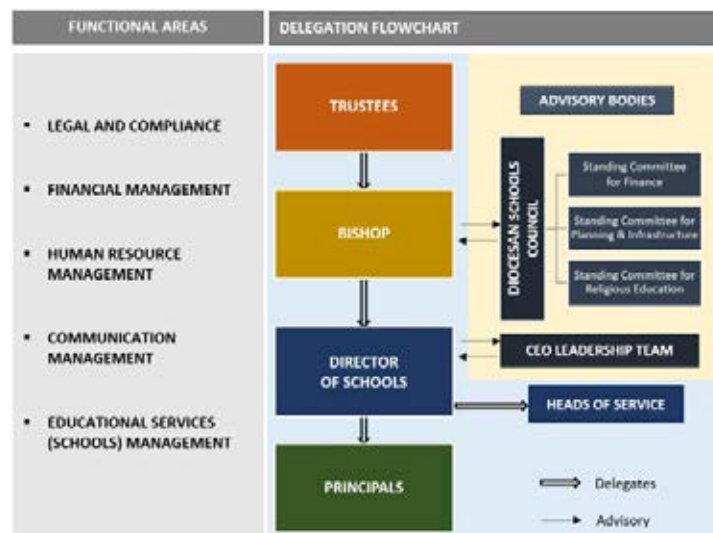
The council is assisted by three advisory boards. They are:

- 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 & Mission
- Directorate
- Finance, Facilities, ICLT & Planning
- Human Resources
- School Improvement – Primary, Secondary and Specialist Support.

The responsibility for compliance with the Modern Slavery Act 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 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 broadly contribute to the ongoing faith and pastoral life of the Diocese.

CEDoW consists of 29 Catholic Parish primary Schools, 8 Catholic co-educational secondary Schools, 1 K-12 Catholic School and 3 Catholic Education Office (CEO) sites. Annual turnover in 2020 was approximately \$310M. These Schools and offices are located in the Illawarra, Macarthur, Southern Highlands and Shoalhaven regions of NSW. As of the August 2020 School Census, the Diocese educates over 19,200 students and employs 2,225 Teaching and Support Staff. The Leadership Team and most of the head office teams are located in the Marian Centre, 86-88 Market Street, Wollongong NSW 2500.

As per CEDoW's *Financial Procedures*, supplier service agreements are undertaken for a maximum 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.

There are also number of key related party Catholic organisations CEDoW uses for specific services such as Counselling, Insurance, Industrial Relations, ICLT Network Support and Banking.

Our Supply Chain

CEDoW engaged the services of some 2,700 third party suppliers during the reporting period. These ranged from multi-million dollar School construction projects to minor consumable purchases. Whilst some contracts are undertaken centrally by the CEO, Schools have the autonomy to purchase directly and engage any suppliers they choose to meet their operational needs.

In general terms, CEDoW's purchasing derives from two sources:

- Centralised CEO contracts and purchasing – These are usually multisite agreements or acquisitions for ICLT or Utility services across the system or high cost Building and Construction projects at specific sites; or
- School contracts and purchasing – These are usually single site agreements or acquisitions for an individual School such as for Cleaning, Maintenance, Waste, Educational Supplies, Photocopying Services, Security, etc.

In order to obtain commercially attractive pricing, Schools and Head Office sites are encouraged to use buying groups such as Procurement Australia and Government Contract suppliers as CEDoW is entitled to request Government 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 Diocese, 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 are deemed at high risk of modern slavery practices.

Modern slavery risks in operations and supply chain

OPERATIONAL RISKS

Our COVID-19 Response

CEDoW acknowledges the impact COVID-19 may have had on vulnerable workers within our supply chains during the reporting period. To address this, CEDoW took a number of steps to ensure those at risk were not disadvantaged in the downturned economy:

- All 38 schools were kept open last year;
- 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 and Cleaning, 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.

The most significant disruptions to purchasing during the reporting period were in attempting to source PPE and hygiene products and the suspension of site visits for various contract renewals such as cleaning and grounds maintenance.

Our People

At the August 2020 Census, CEDoW employed some 2,225 staff of whom 42 identified themselves as Indigenous. Of these staff members, some 80% were female and 20% male employees. Overall, the numbers equated to an FTE of 1,626.

All employees are engaged under an individual contract or Enterprise Agreement that guarantees statutory and employer 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.

Where an employee has issues around their conditions of employment, where relevant, they can approach their Principal, Head of Service or the CEDoW Senior Employment and Industrial Officer. Staff can also utilise the CEDoW Complaints and *Whistleblowing* policies as required and are protected under the requirements of these policies.



Supply Chain Risks

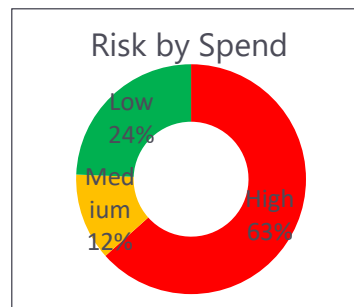
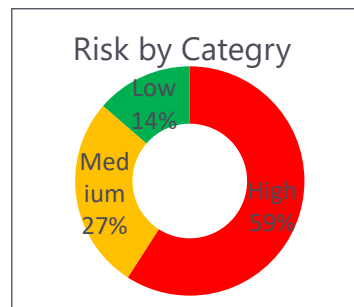
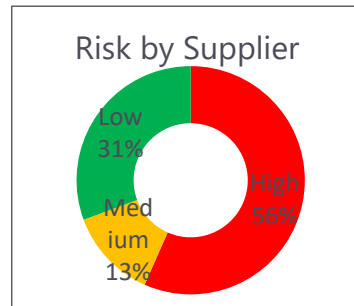
CEDoW has identified its highest Risk Suppliers by spend during the reporting period using the ACAN category risk taxonomy and the risk levels associated with those categories.

The data is based on the 627 suppliers with whom CEDoW spent more than \$10k during the reporting year. These suppliers accounted for some 95% of the \$95M in expenditure on goods and services during 2020.

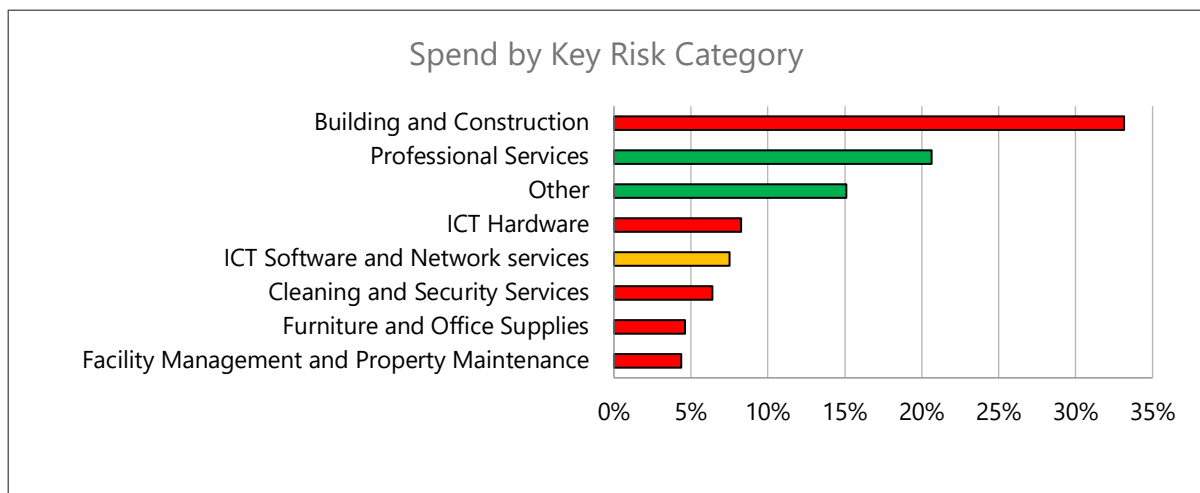
Based on these indicators, we have identified some 56% of these suppliers belonging to industries considered at high risk industries of modern slavery practices. These include Building and Construction, ICT Hardware, Cleaning and Security, Furniture and Office Supplies and Facility Management and Property services.

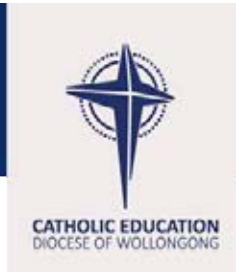
In total, 13 of our 22 supplier spend categories are considered high risk and the dollar spend in those categories is some 63% of the total expenditure for the year.

As a result of this analysis, CEDoW's Supplier Engagement program has focussed on the high value/high risk suppliers as a starting point.



The key spending categories for the reporting period are shown below. This indicates the majority of spending is in potentially high risk areas:





Actions taken to assess and address risk

Actions Taken to Mitigate Risk

In addition to joining ACAN, CEDoW undertook a number of initiatives starting in 2019 and continuing into the reporting period to mitigate the risk of modern slavery practices existing in its supply chains. Examples of the due diligence undertaken are summarised below:

- A modern slavery liaison officer (MSLO) was appointed as the key contact between ACAN and CEDoW. The MSLO was tasked to disseminate ACAN information to CEDoW and attend key events such as ACAN's Ethical Sourcing Seminar in February 2019 and the two-day conference conducted by ACAN in July 2019. In addition, the MSLO attends the monthly ACAN teleconferences and subscribes to the ACAN newsletter.
- The MSLO has broadcast a letter to CEDoW's top 100 suppliers (by spend) in 2019 and 2020 advising of its compliance responsibilities under the *Act* and the need for suppliers to review their supply chains to ensure they are free of modern slavery practices.
- The School Tender and Contract templates were updated in 2019 to have clear references to both the *Fair Work Act 2009* (Cth) and *Modern Slavery Act 2018* (Cth). The extensive ACAN contract clauses were placed in selected high risk industry contracts such as for School uniforms in 2020.
- All Purchase Orders issued to suppliers by the CEO since 2019 have an imbedded *Terms and Conditions* that references to the *Fair Work Act 2009* (Cth) and *Modern Slavery Act 2018* (Cth).
- CEDoW staff participated in ACAN's *Supplier Engagement Training* in July 2020 re how they identify and work with high risk suppliers. The 15 participants included: ICLT; Properties; Finance; Catholic Life, Education and Mission; Communications; Legal; Governance; and a number of Executive Assistants from Service Areas.
- A *Modern Slavery Working Group* (MSWG) was formed in 2020 to oversee CEDoW's compliance with the legislation and implementation of the ACAN policy and procedures. The MSWG consists of the MSLO, the Governance and Accountability officer, the In-house Legal Counsel and an administrative support officer. Part of the MSWG's responsibilities include investigating any claims by staff or suppliers re modern slavery practices and any potential non-compliance with CEDoW's *Modern Slavery Policy*.
- The ACAN *Questionnaire* and supplier education materials were emailed to some 75 high to medium risk suppliers in October 2020 with an annual spend exceeding \$150k over 2019 or 2020. CEDoW received replies from 12 of the companies.
- The top 20 Building and Construction and Facility Maintenance suppliers by spend were invited to the ACAN *Building Links* webinar in December 2020. Some 10 suppliers attended the webinar itself and the video of the training session was then emailed to the 23 providers whose 2020 spend exceeded \$100k to increase their awareness of modern slavery practices in their industry.

- The CEDoW *Modern Slavery Policy* based on the ACAN template was amended and submitted to the *Leadership Team* in December 2020 for approval. The Policy was then uploaded to the CEDoW Policy Directory.
- The ACAN *Modern Slavery 101* and *Business Relevance* staff training modules were passed to CEDoW's Human Resource Services to be included in all future staff induction training programs.

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 in 2021.



Modern slavery action plan and road map

CEDoW is essentially following the 5 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 5 steps have been achieved, much remains to be done going forward.

The key challenge in 2020 was Supplier Engagement. Although CEDoW reached out to many of our key suppliers by spend from 2019 through the ACAN Questionnaire, the response was limited and therefore 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 2021.



Effectiveness Assessment

The MSWG will oversee the process of reviewing CEDoW’s compliance with the Act and progress relating to this. A major review of this progress will occur in July each year so areas that require further attention can be addressed in the second half of the year.

As a way of measuring progress, CEDoW undertook the *SD Strategies* ‘Bridge the Gap’ analysis in 2019 as part of the ACAN Catholic Modern Slavery Conference to assess progress in the key areas listed below. This exercise was revisited during the reporting period, and using ACAN’s resources, progress has been made in a number of areas though there is still significant work to do moving forward.

Key: At the starting line ■ Starting out ■ Making progress ■ Leading practice ■

Modern Slavery Mitigation Implementation Category	2019				2020			
Management Systems								
Governance	■					■		
Commitment		■				■		
Business Systems	■					■		
Action	■					■		
Monitor / Report	■				■			
Risk Management								
Risk Framework	■					■		
Operational Risk		■				■		
Identifying External Risks		■				■		
Monitoring & Reporting Risk	■				■			
Human Resource & Recruitment								
Awareness	■				■			
Policies & Systems	■				■			
Training	■					■		
Labour Hire / Outsourcing	■					■		
Customer & Stakeholders								
Customer Awareness	■					■		
Information Provision	■				■			
Feedback Mechanisms	■				■			
Worker Voice	■				■			
Procurement & Supply Chain								
Policies & Procedures	■					■		
Contract Management		■				■		
Screening & Traceability		■				■		
Supplier Engagement	■					■		
Monitoring & Corrective Action	■				■			

Process of 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 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.

Other

Prior to the ACAN program's operations in 2019, the MSLO attended one-day courses on modern slavery offered by legal firms, Norton Rose Fulbright and Holding Redlich.

CEDoW has nothing further to report on its actions regarding modern slavery during the reporting period.



Catholic Education Canberra Goulburn

Modern Slavery Statement 2020

ABN: 478 2412 7996

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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 21,000 students. We have 3,735 teachers and supporting staff across the system. We invite you to discover our schools and to acquaint yourselves with all that Catholic Education in the Archdiocese of Canberra and Goulburn has to offer.

We provide services in the following areas:

- Spirituality and Pastoral Care
- Education Information and Advice
- Administrative Advice and Information
- Human Resource and Other Services
- Financial Administration
- Planning and Facilities
- ICT Services
- Reporting
- Quality Control
- Advising and reporting to the Catholic Education Commission
- School Services

Our Purpose

“To be faith filled Catholic learning communities of hope, joy and wonder where all are welcome and inspired to grow to their potential.”

Our Vision

“Jesus Christ, our greatest teacher, calls us to share and witness to our Catholic Faith and Tradition, build inclusive communities and deliver contemporary quality learning opportunities for every person.”

*21,179 Students as at Oct 2020, Staff count as at Sept 2020

2020 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.

Modern Slavery staff awareness training has also commenced for its 3000+ 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 undertaking a concerted effort across the organisation to eliminate modern slavery from its supply chains.

Our Plans for 2021 and Beyond

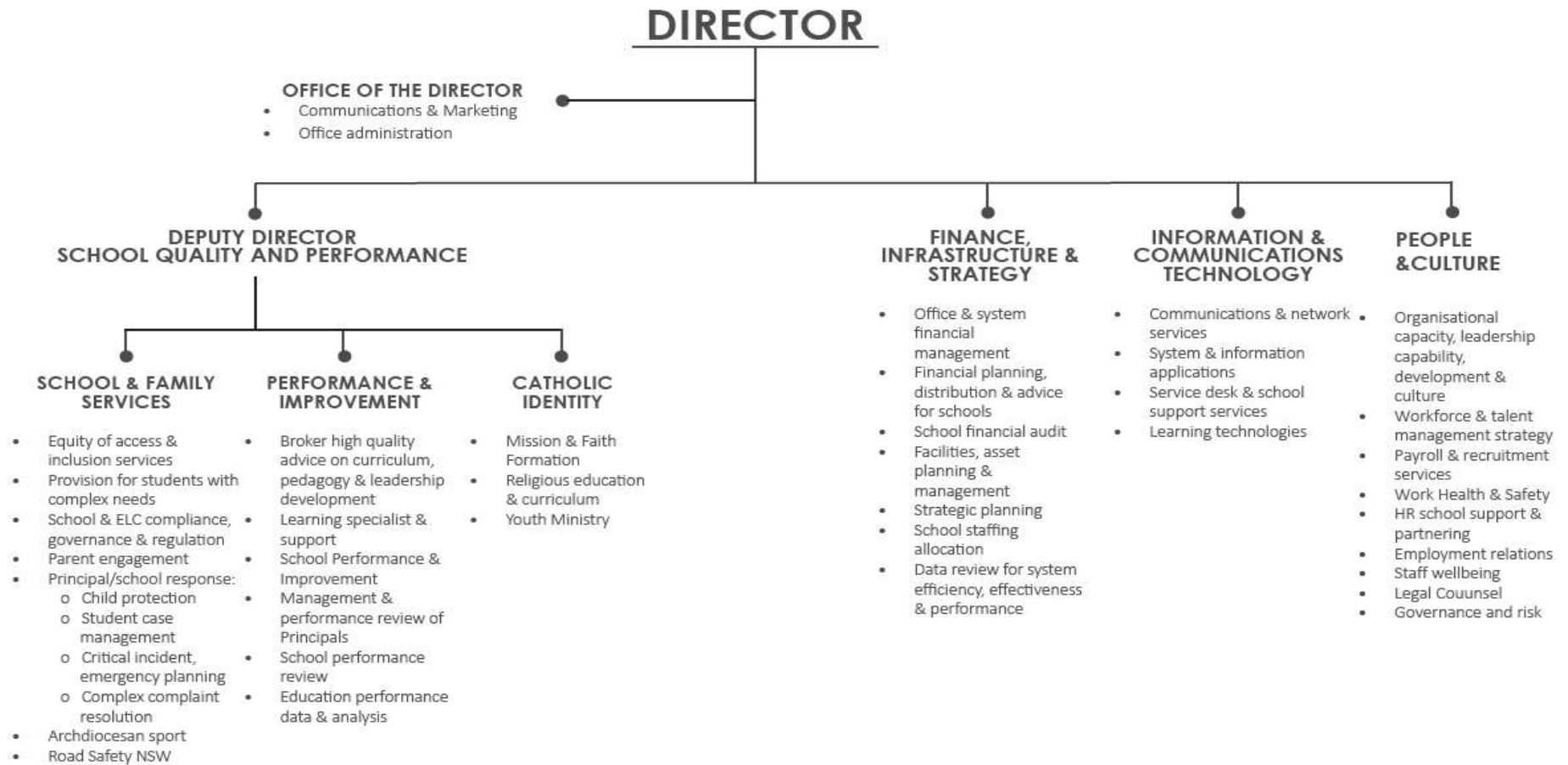
CECG is planning initiatives to expand its efforts to remove the potential risk of modern slavery in its supply chains throughout 2021 and beyond. These include:

- Undertaking awareness training with CECG's highest risk suppliers
- Implement a due diligence program for all Tier 1 and 2 suppliers
- Commence modern slavery communications, advice, and program deliverables to CECG's 56 schools to identify and mitigate modern slavery risk
- Implement reporting and remediation framework when people impacted by modern slavery are identified (Domus 8.7 refer page 20)
- 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

3,735

Total headcount including casual employees.

2,259

FTE excluding casuals

Workforce cohort	FTE	Headcount
CEO		
CEO	148	156
Casual	-	9
ACT SCHOOLS		
Teacher	1024	1142
Learning Support	122	216
Other	154	186
Casual Teacher	-	280
NSW SCHOOLS		
Teacher	564	640
Learning Support	70	133
Other	90	141
Casual Teacher	-	301
EARLY LEARNING CENTRES (ELC)		
ELCs	87	113
ELC Casual	-	131
CECG SYSTEM		
General Casual system wide	-	287
TOTAL	2,259	3,735

*Data as at Sept 2020

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

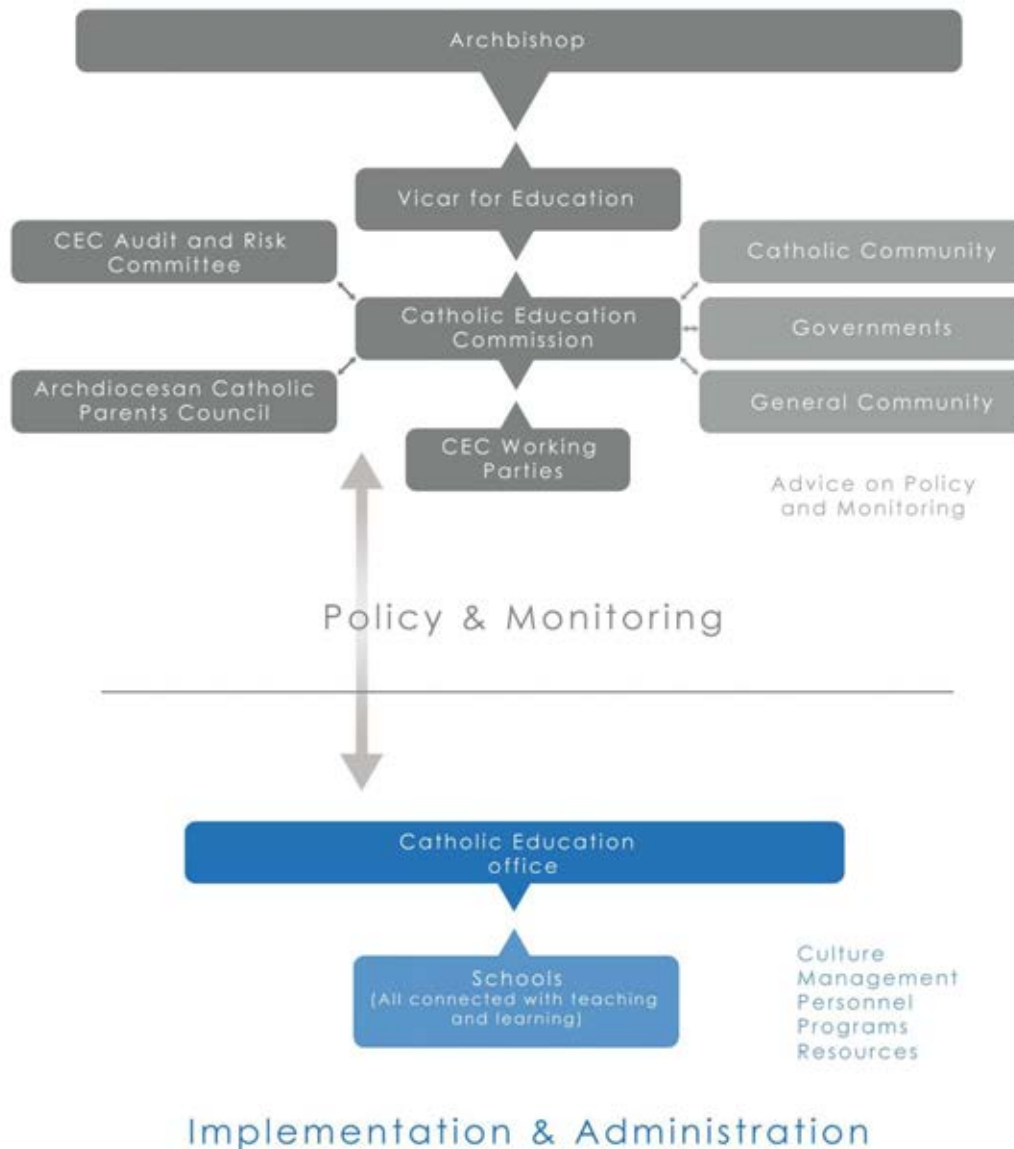
Catholic School Parents Archdiocese of Canberra & Goulburn (CSPACG) was formally launched on the 21 February 2014. CSPACG is the peak body representing the interests of all Catholic school parents in the Archdiocese of Canberra and Goulburn and is the largest non-government school parent body in the 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 21,000 students across 56 schools and 8 Early Learning Centres supported by 3,735 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 2250 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.)

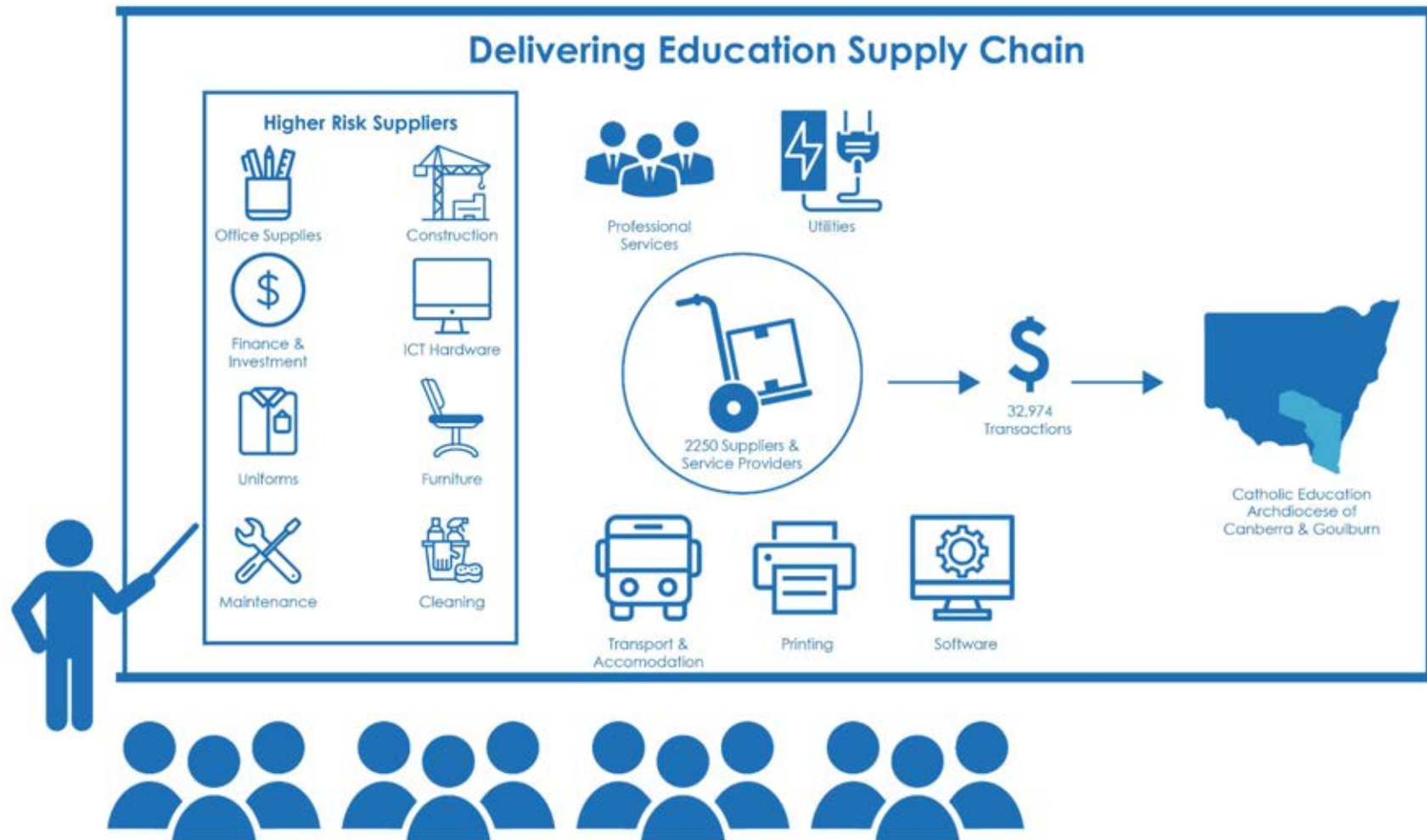
Across the CECG system, schools have a high level of autonomy in deciding which suppliers to work with for short term, low value contracts. This provides schools with the strategic flexibility required to support their communities and service their schools the way they see fit. Additionally, system wide 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.

21,179 Students as at Oct 2020
Staff count as at Sept 2020
Supplier count as at Nov 2020

Modern slavery risks in operations and supply chain



CECG has taken a number of steps to identify its Modern Slavery risks in its operations. 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. 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 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 2250 identified suppliers. This does not include wages expenses and services to CECG.

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	23.33%
Cleaning and security services	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags etc) PPE, uniforms and footwear.	HIGH	5.18%
Events and event management	Promotional products, venues, bar and table wait staff, catering, cleaning and security, vending equipment, tableware, crockery, bar and food service equipment, vending machines, table and room decorations and all associated consumables	HIGH	0.25%

Facility management and property maintenance	Hard and soft services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	HIGH	5.39%
Finance and Investment	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	HIGH	5.87%
Food and catering services	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit and vegetables), wine grapes, beverages, general catering for conferences, lunches, events etc and hospitality services.	HIGH	1.39%
Furniture and office supplies	General office suppliers, stationery, paper products, small office machines, (not computers or peripherals), labels, ink, toner, furniture (chairs, tables, workstations, filing cabinets, shelves, racks etc), workplace suppliers (cleaning, first aid, bathroom etc), packaging, boxes etc	HIGH	3.77%
ICT Hardware	<p>According to the 2018 Global Slavery Index (GSI), electronics are the highest risk product for modern slavery in supply chains. The report also highlights that the most at-risk electronics imported to Australia are from China and Malaysia.</p> <p>Forms of modern slavery identified by the GSI and other reports as being present in the electronics sector include passport retention or doctoring of identity documents, restriction of freedom of movement, poor living conditions, underpayment, fines and illegal salary deductions, excessive working hours and unpaid overtime</p>	HIGH	5.31%
Labour Hire	Wide range of traditional low-skilled / low paid work	HIGH	0.93%
Uniforms and PPE	Uniforms (workwear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks or respirators, glasses / goggles, ear muffs, safety workwear etc)	HIGH	0.69%
Waste management services	Recycling, processing, transport, hazardous waste, special waste streams, PPE, vehicles, bin manufacturing	HIGH	0.78%
Advertising & Marketing	Advertising services, campaigns, branding, media collateral, outsourced business operations	MEDIUM	0.47%
ICT Software and network services	Software and application development, support services, call centres (offshore)	MEDIUM	5.02%

Utilities	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk)	MEDIUM	0.69%
Travel and accommodation	Travel booking services, hotels, accommodation. Orphanage trafficking/voluntourism	MEDIUM	4.48%
Print / Mail Provider	Printing services, printers, ink, paper, other printing consumables	MEDIUM	1.56%
Professional services	Other	LOW	9.48%
Financial expenses	Other	LOW	0.10%
Government and agency fees	Other	LOW	0.11%
Licence / membership fees	Other	LOW	3.58%
Other		VERY LOW	21.62%

*Data as at Jun 2020

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. Commencing with its membership to ACAN and attending the ACAN conference, CECG has assessed its operations and subsequently commenced actions to manage the existing and ongoing risk exposure.

Actions Taken throughout the reporting period:

1. *Designated a Modern Slavery Liaison Officer (MSLO)*

The MSLO holds the responsibility for overarching operational activities in the identification and mitigation of Modern Slavery risks within the organisation. The MSLO assists in promoting closer collaboration across the Catholic sector and meet monthly with the ACAN Anti-Slavery Taskforce Executive to discuss implementation of the risk management program. CECG has identified the importance of the role of the dedicated MSLO to lead the anti-slavery program to remove the risk from its extensive supply chain network.

2. *The formation of a Modern Slavery Working Group (MSWG)*

CECG formed a MSWG 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.

3. *Created a Modern Slavery Policy*

CECG has developed a Modern Slavery Policy with its overarching purpose to prevent - and ultimately eradicate by 2030 - modern slavery by managing and mitigating modern slavery risk within our business operations and supply chains.

This policy enables CECG 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.

4. *Training:*

- All staff in procurement functions have undertaken Modern Slavery Awareness training.
- Supplier Awareness Training has been rolled out to all staff who play a role in supplier and service provider engagements. This includes members from Project

Delivery teams, Finance, Legal, Risk and Governance teams, and Facilities and Maintenance.

- Commenced planning for Modern Slavery e-learning to be rolled out for all 3000+ staff.
- Key members of the MSWG have participated in ACAN Modern Slavery Statement workshops.
- A total of 1.5hrs training conducted to staff

5. *Supplier Risk Assessments*

CECG has undertaken a risk assessment of its 2250 suppliers and service providers and categorised them into risk rated cohorts and spend volume. This risk assessment has identified the areas whereby the risk of Modern Slavery exposure is elevated, and where CECG will focus its preventative and mitigation compliance activities throughout the next reporting period.

6. *Supplier Engagement*

CECG has commenced its supplier engagement strategy via initially writing to its 2250 suppliers and service providers. This communique is the first of many steps of supplier engagement to build supplier awareness, and subsequent action and compliance to remove Modern Slavery risk from CECG's immediate supply chain.

7. *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 CECG supplier contracts.

Responding to COVID-19

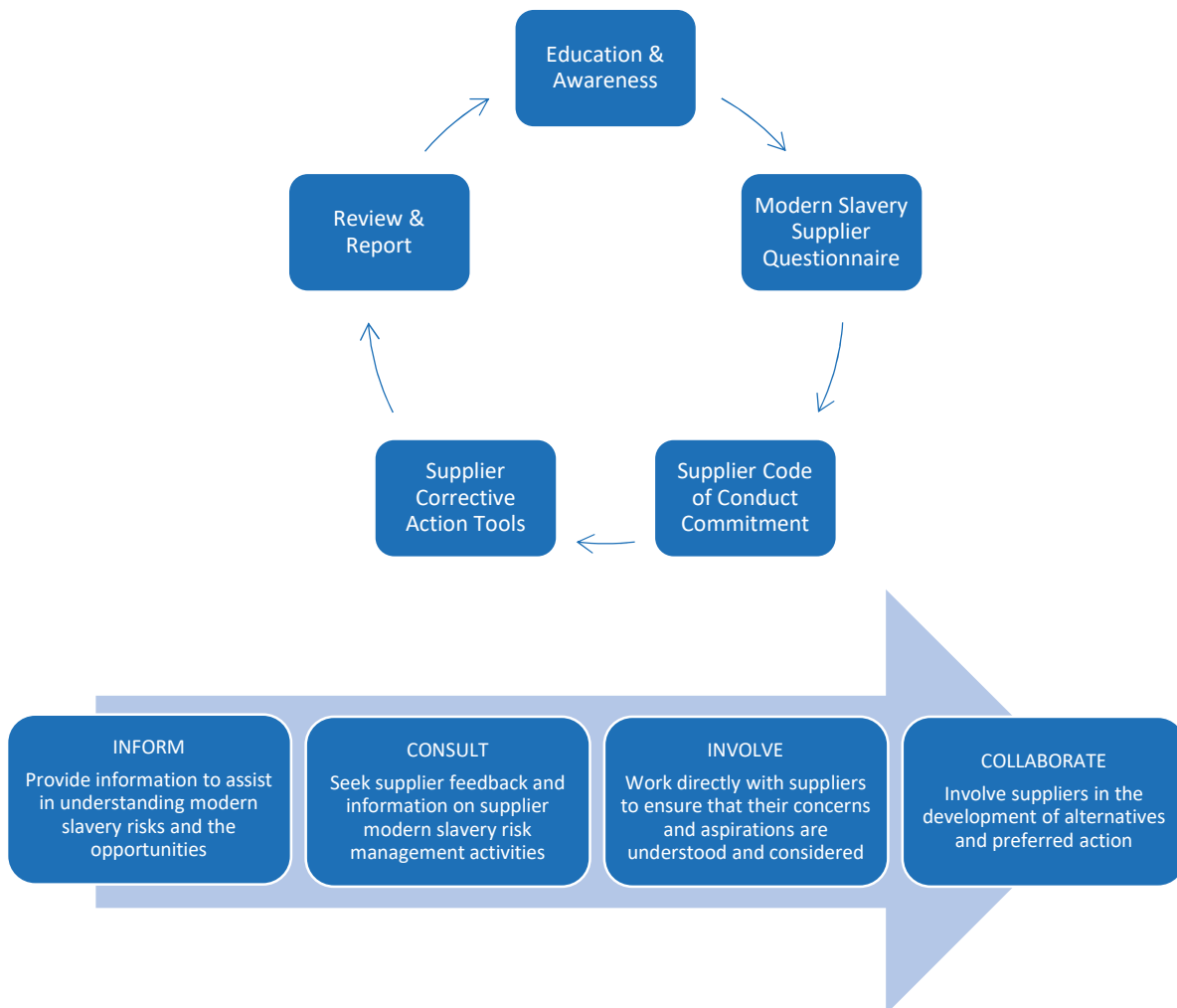
CECG understands that COVID-19 has increased the risk of Modern Slavery across supply chains in both local and global operations. CECG undertook a number of steps to ensure that families at risk were not further disadvantaged throughout the crisis including:

- 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.
- Up to 10% of creditors were given financial concessions to ensure the financial and social impact of the pandemic was reduced.

Modern Slavery Action Plan

CECG's focus for 2021 will be implementing our Supplier Engagement Action Plan with a focus on our suppliers identified in the high-risk cohort. CECG holds the view that a robust supplier engagement plan will be the cornerstone of risk mitigation to eliminate Modern Slavery from our supply chains. This will be supported by our continued efforts to centralise procurement functions and furthering our education and awareness program to our schools who directly engage suppliers for many goods and service to deliver high quality educational services.

SUPPLIER ENGAGEMENT ACTION PLAN 2021



Education & Awareness

CECG wrote to all its suppliers during 2020 to raise awareness of the Modern Slavery Act and the risk Modern Slavery in supply chains. During 2021 CECG will undertake further actions to increase awareness with suppliers and guide them through further educational material to assist them in identifying and mitigating Modern Slavery risk in their supply chains.

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 will further build an understanding and provide 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 will provide insights specifically on:

1. Supplier structure, operations and supply chains;
2. the risks of modern slavery practices in its operations and supply chains;
3. the actions taken to assess and address those risks, including due diligence and remediation processes;
4. how the effectiveness of such actions is addressed;

5. the process of consultation with any entities it owns or controls; and
6. any other relevant information.

Through supplier questionnaires, training and other due diligence measures, CECG will ensure that regulatory obligations are met and help suppliers to also comply. This will also ensure greater understanding of the implications and management of risk of modern slavery across extended supply chains.

Supplier Code of Conduct

CECG will promote 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.

Supplier Corrective Action Tools

The supplier corrective action tool will be provided to all high risk suppliers which will provide insights into the level of action suppliers have taken to mitigate their Modern Slavery risk. Moreover, this will provide CECG assurances that its suppliers have taken proactive steps to assess and mitigate Modern Slavery risk exposure. The Corrective Action Tool reviews a suppliers policy position, risk assessment, purchasing practices, supply chain mapping, high risk goods, services and locations, training, grievance mechanisms and remedy pathways.

Reporting

CECG's goal is to implement an annual report / attestation from its potentially high risk suppliers 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 2021 Modern Slavery Statement.

Measuring Effectiveness:

CECG undertook an initial assessment of its approach to addressing Modern Slavery risks in 2019 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.

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			
Management Systems								
Governance								
Commitment								
Business Systems								
Action								
Monitor / Report								
Risk Management								
Risk Framework								
Operational Risk								
Identifying External Risks								
Monitoring & Reporting Risk								
Human Resource & Recruitment								
Awareness								
Policies & Systems								
Training								
Labour Hire / Outsourcing								
Customer & Stakeholders								
Customer Awareness								
Information Provision								
Feedback Mechanisms								
Worker Voice								
Procurement & Supply Chain								
Policies & Procedures								
Contract Management								
Screening & Traceability								
Supplier Engagement								
Monitoring & Corrective Action								

CECG’s focus in the reporting period was to commence Modern Slavery mitigation broadly across all categories highlighted in the table above. The focus was to strengthen our understanding of risk exposure and implement strategies and processes to mitigate risk. We have exceeded our initial expectation in some areas, and are committed to strengthening our Modern Slavery Framework.

Our Review Process

CECG has planned to undertake regular reviews of our Modern Slavery action plan at regular appropriate intervals to ensure the ongoing actions remain relevant and effective. Our review process consists 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 '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 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 and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

CECG 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

Approval

This Modern Slavery Statement is approved and adopted for Catholic Education Canberra Goulburn.



Ross Fox

Director

Catholic Education Canberra Goulburn



cg.catholic.edu.au



Our statement on modern slavery 2021



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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 Gadium 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

2020 Modern Slavery Risk Management Initiatives

Over the course of the last two 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:

- ◆ Joining the Sydney Archdiocesan Catholic Anti-Slavery Network (ACAN)
- ◆ Mapped out CCI's Operations & Supply Chain
- ◆ Developed criteria for MSA supply chain assessment
- ◆ Assessed risk of 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
- ◆ Ensure Enterprise Risk Management system has MSA incident reporting capability
- ◆ Engage Business units within CCI to confirm risks associated with MSA including Investments and CCI Asset Management

- ◆ Monitor staff use of MSA Contracts and templates
- ◆ Senior Leadership Team (SLT) reviewed and approved the strategy, purpose and wider resources establishment of an Environmental, Social and Corporate Governance Committee (ESG), reporting monthly to the SLT and chaired by the Chief Risk Officer that will oversee MSA activity alongside other ESG initiatives
- ◆ Assessment of MSA training requirements and training solutions both through ACAN and CCI's own staff training Academy

About us (continued)

Our Plans for 2021

CCI has a clear roadmap of initiatives and actions planned for 2021 as follows: -

- ◆ Launch of the ESG Committee at all staff Snapshot in Q1 2021
- ◆ Quarterly meetings of the ESG Committee
- ◆ MS Statement placed on CCI website and intranet
- ◆ Ongoing training of all staff involved in any MS exposures/risk management
- ◆ Quarterly reporting to the SLT on Modern Slavery Requirements
- ◆ Board Risk Committee reporting on ESG as part of the CCI Risk Register on a quarterly basis
- ◆ Introduction of MS awareness into staff induction program for all new starters
- ◆ Engage all High/Medium Risk suppliers and issue with MS information and secure attestation of their MS approach and compliance.
- ◆ 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 2021

Our focus areas beyond 2021 will be:

- ◆ Extend the MS assessment to include sub-suppliers identified within the CCI supply chain
- ◆ Update CCI's risk assessment framework to further incorporate MS risk management
- ◆ Identify and implement 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

Statement from Roberto Scenna



I am pleased to present CCI's 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 our partners because it makes a difference to the people, lives and communities we serve.

CCI recognises our social obligation to eradicate modern slavery as part of running a sustainable business.

We are committed to responsible procurement and to ensuring that social, environmental and ethical business practices are considered with 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 Self-Assessment Questionnaires/Attestation processes for all of the organisation's procurement activities.

Ongoing focus has allowed us to establish an Environmental, Social and Corporate Governance Committee who reports to the CCI Board via the Senior Leadership Team (SLT), on all matters of risk and compliance arising from the Modern Slavery Act.

In FY2020, CCI worked with experts within the Catholic Anti-Slavery Network, and to drive stronger staff training, awareness, and engagement in relation to modern slavery risks and our business.

CCI's enterprise risk reporting systems, both internally and through our Whistleblower policy and practices, helps us to report modern slavery concerns properly.

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 ensures our commitment to manage modern slavery risks remains central to our Catholic values.

Modern Slavery is unacceptable in any form, and I am proud of the work that CCI has committed to in assessing this risk in 21st Century business operations.

Roberto Scenna,
Chief Executive Officer

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 as 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 the following: -



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 chairing the ESG Committee that has operational oversight responsibility for Modern Slavery initiatives. The ESG Committee meets monthly and reports quarterly to the Senior Leadership Team (SLT) as part of their Risk Deep Dive process, and quarterly through to the Board Risk Committee.

CCI's ESG Committee 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 matters

CCI's principles-based approach to Modern Slavery, and ESG Roadmap, are reflected in the below governance framework: -

CCI's ESG Guiding Principles

Transparent

Transparent and comprehensive disclosure of CCI's governance structure and governance processes.

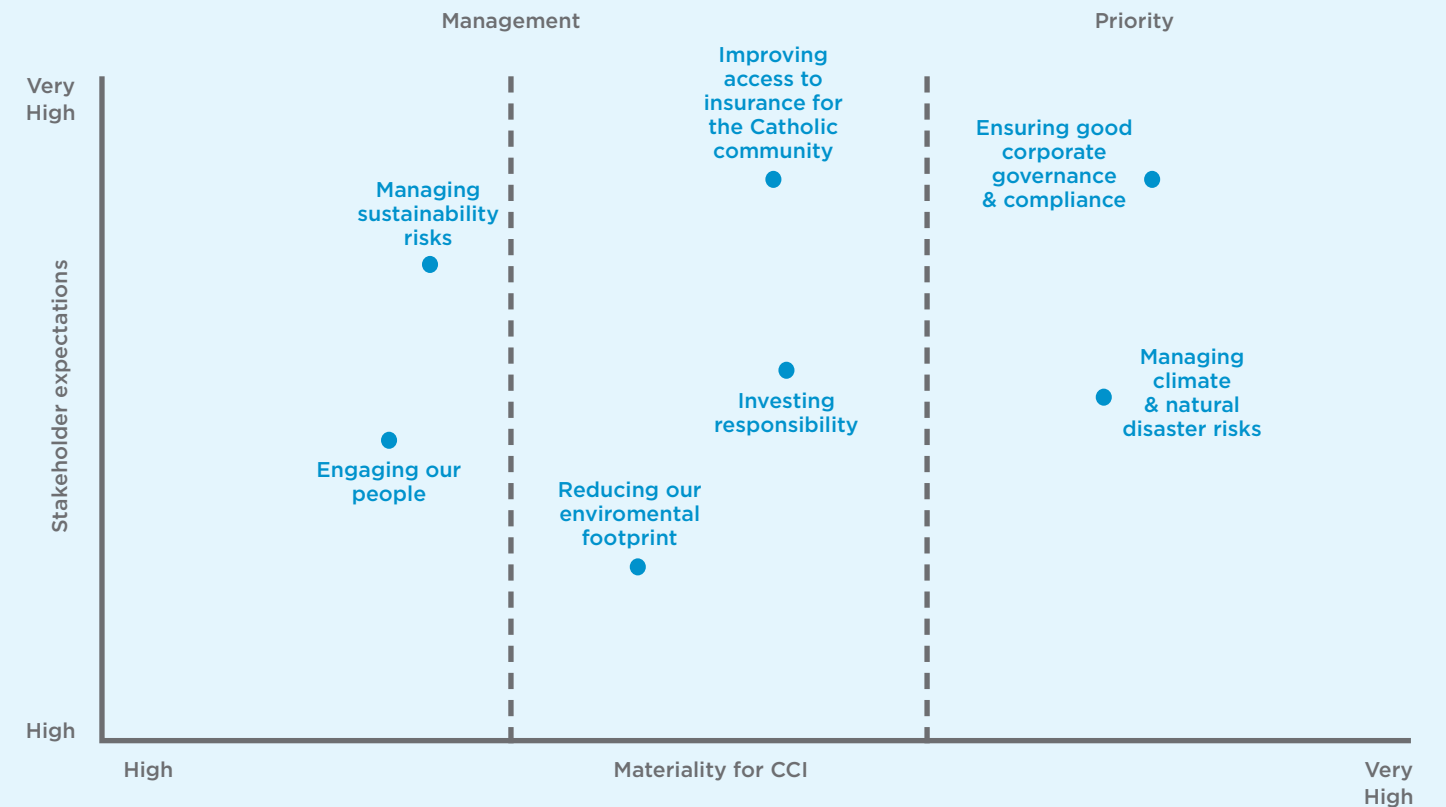
Compliant

Management and Board regularly assess CCI governance against regulatory developments, relevant best practice standards, shareholder and stakeholder requirements.

Active

Management monitors developments in corporate governance and in corporate matters of regulators.

CCI's Corporate Responsibility Roadmap



CCI will develop its Human Rights Policy in 2021 through its ESG Committee. 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. CCI has refused business support to entities that systematically violate human rights, in the past year.

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 2021.

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 Team.

About Catholic Church Insurance (continued)

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 operates in Australia exclusively, with its 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 245 FTE Staff across its various offices.

Typically, CCI 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 c.AUD2bil 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 Board Investment 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.

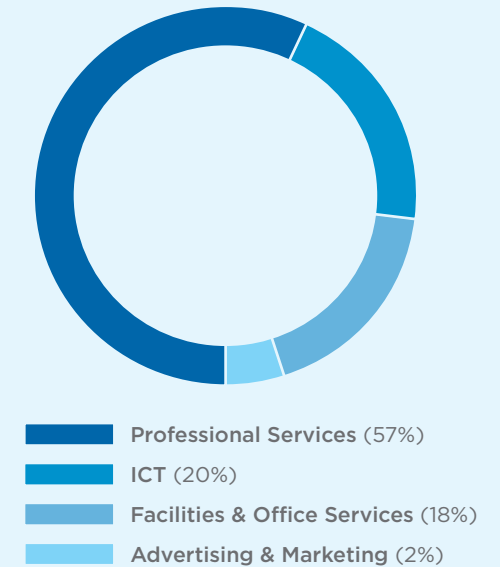
Our Supply Chain

As a provider of insurance and asset management services, we have assessed our modern slavery risk as low. CCI's third party spend consists of professional and IT services predominantly, from Australian firms.

The CCI procurement team has primarily focused 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 will explore how we can improve the visibility of any sub suppliers providing services to CCI to ensure compliance to modern slavery legislation.

Figure [1] CCI Spend by Category



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.

Modern slavery risks in operations & supply chain

CCI recognises its human rights obligations extend beyond its own operations to that of 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 with our standard contract clauses in relation to modern slavery. These include:

- (a) conduct your business in a manner that is consistent with the principles of the Modern Slavery Act 2018, and have never been convicted of any offence related to Modern Slavery;
- (b) have made all reasonable enquiries to ensure, and will continue to take all reasonable steps (including appropriate due diligence procedures) to ensure, that there is no Modern Slavery in your

own or in your sub-contractors' supply chains, or in any other part of your business (and will provide us with evidence of this upon request); and

- (c) will notify us immediately upon becoming aware of any actual or suspected Modern Slavery in any supply chain in connection with this Agreement, and will provide us with all details requested by us relating to the Modern Slavery and take all reasonable steps to mitigate any damage caused by it, at your own cost.

In 2021, 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 EFT 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 2019	Rating 2020	Change
Management Systems	Governance	Orange	Green	↑
	Commitment	Orange	Orange	→
	Business Systems	Red	Orange	→
	Action	Orange	Green	↑
	Monitor / Report	Red	Orange	↑
Risk Management	Risk Framework	Orange	Green	↑
	Operational Risk	Orange	Green	↑
	Identifying External Risks	Orange	Green	↑
	Monitoring and Reporting Risks	Orange	Orange	→
Procurement & Supply Chain	Policy and Procedures	Orange	Green	↑
	Contract Management	Red	Green	↑
	Screening and Traceability	Orange	Orange	→
	Supplier Engagement	Orange	Green	↑
	Monitoring and Correction Action	Orange	Green	↑
HR & Recruitment	Awareness	Orange	Green	↑
	Policies and Systems	Orange	Green	↑
	Training	Red	Orange	↑
	Labour Hire / Outsourcing	Orange	Green	↑
Customers & Stakeholders	Customer Attitude	Orange	Green	↑
	Information Provision	Red	Orange	→
	Feedback Mechanisms	Orange	Orange	↑
	Worker Voice	Red	Orange	↑

Actions to assess risk

The focus for CCI in 2020 was strengthening our understanding of potential modern slavery risks in operations and the supply chain, joining ACAN, forming a Working Group, identifying gaps and assessing high level supplier risks (Tier 1 or Direct Suppliers).

In 2020, CCI completed the following actions in relation to managing risks of Modern Slavery:

- ◆ Formation 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 2020 and 2021
- ◆ Supplier Gap Analysis
- ◆ General awareness training for staff (All Managers, Team Leaders, and the Senior Leadership Team)
- ◆ Identifying gaps and assessing high level supplier risks (Tier 1 or Direct Suppliers)

- ◆ Progressed Modern Slavery compliance attestations confirmation/review for key professional service providers including loss adjusters, brokers, lawyers, builders working on approved panels, reinsurers with further work to be undertaken to complete and maturity the processes/ reporting in the next year
- ◆ 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 contacts to include requirements for suppliers to comply to Modern Slavery Act

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 that details our status at December 2020.

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 [Entity name] 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 can 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 2021.

Additional information about Domus 8.7 and the process applied can be found on www.domus87.org.au

Actions to assess risk (continued)

Modern Slavery Risk Project Plan

JAN 2019		JUN 2019		JUL 2019		JUN 2020		DEC 2020		JUN 2021	
Review Modern Slavery Act Obligations		Raise Awareness with CCI		Analysis Impact to CCI & Develop MSA Policy		Implement		Lodge Modern Slavery Statement			
Review Modern Slavery Act (MSA)		Covert MSA Guidance note into a presentation pack to raise awareness		Map out CCI's Operations & Supply Chain informatino		Engage business units to confirm risk of modern dlavery including investments & CCIAM		Prepare Modern Slavery Statement (MSS)			
Review Modern Slavery Guidance Note		Develop a Staff Chance & Communication Plan		Develop Criteria to Assess Risk of Modern Slavery		Engage Medium/ High MS Risk Suppliers and issue MS information		Board to Approve MSS			
Liaise with Externals on information about impacts to CCI		Provide Training information to the Board Audit Committee to raise awareness of the MSA obligations		Assess risk of modern slavery, including in our investment portfolio		Sign-up & work with Australian Catholic Anti-Slavery Network (ACAN) <i>Note: ACAN lodge date 30 June 2021</i>		Lodge MSS with Department of Home Affairs			
Attend External Training on Modern Slavery		Deliver Staff Training on key aspects of the legislation from an operation perspective		Updated Procurement Policy to include Modern Slavery requirements		Continue staff awareness/training, including staff inductions & use of intranet		Place MSS on CCI intranet			
		Escalated Modern Slavery Risk onto the Corporate Risk Register		Updated contracts template to include modern slavery requirements		Mointor staff use of pre-qualification form and MS contract wordings		Consider any remediation actions; any ongoing monitoring required and opportunities for continual improvement in process			
		Issue staff communication to launch change via Yammer		Updated supplier pre-qualification form to include modern slavery requirements		Review learnings from supply chain operations, any incidents lodged and audit findings		Consider if a company-wide ESG statement should be developed incorporations MS			
				Ensure incident register captures those relating to MSA							

Completed
 In progress
 Not started

Effectiveness Assessment

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 Action Plan Implementation tracking will form part of the standing agenda and reporting obligations of the ESG Committee, with quarterly reports through the Senior Leadership Team Risk Deep Dive process, as well as through the quarterly 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 undertake a second line, informal internal audit of progress in FY22. 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 June 2021.



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Mercy Education

Modern Slavery Statement 2020

MERCY EDUCATION LIMITED

DISCLOSURE NOTE

This Modern Slavery Statement as 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 that operates or controls no other legal entities.

The National Office of Mercy Education Ltd is located at 720 Heidelberg Rd, Alphington, Victoria.

This Modern Slavery Statement has been endorsed by, and is published under the authority of, the Mercy Education Ltd Board, per special resolution of the Board dated 28 MAY 2021.

This Statement covers the twelve colleges that Mercy Education directly governed in 2020:

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

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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About Us

Statement from our Chief Executive



Preparing our first *Modern Slavery Statement* has been a challenging and thought-provoking exercise. Historically, most of our consideration of these issues has occurred at the local school level – with interested teachers and students undertaking a range of awareness-raising activities.

The implementation of the reporting obligations of the *Modern Slavery Act* has required us to move into a more robust and active framework for understanding, documenting and managing these risks at the corporate level.

Mercy Education accepts this challenge gratefully, acknowledging that it is equally a demand of our own Christian, Catholic and Mercy values.

For how can we talk with our 12,500 students about Compassion, Justice and Respect without ensuring that their education is not displacing the education of their sister or brother elsewhere across the globe?

How can we preach “life to the full”, whilst other members of our enterprise spend their days moving between arduous labour and meagre confinement?

We have only discovered ACAN late in our journey – but their support and guidance has been greatly appreciated as we developed our Year One Statement and documented our pathway forward.

We will continue to educate ourselves and our staff on these issues, and we commit to developing a much deeper understanding of our supplier risks, and to using our size and capacity to implement meaningful changes in our supply networks.

A handwritten signature in black ink, appearing to read 'Chris Houlihan'. The signature is fluid and cursive, written in a professional style.

Christopher Houlihan ■ CHIEF EXECUTIVE

Who is Mercy Education

Mercy Education Limited is a single legal entity (company limited by guarantee) that operates 12 Catholic secondary schools across three states. Our canonical (Church Law) governor is the Institute of Sisters of Mercy of Australia & Papua New Guinea (ISMAPNG).

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 enkindles within us a desire to assist others, so they too *“may have life, and have it to the full”*. (John 10:10)

The six core values of Mercy Education are Compassion, Justice, Respect, Hospitality, Service and Courage.



Students from St Brigid's College, Lesmurdie (WA), learn about the Religious Leaders' Joint Declaration Against Modern Slavery.



2020 Modern Slavery Initiatives

In respect of the 2020 reporting year Mercy Education:

- Appointed a Modern Slavery Liaison Officer.
- Joined the Australian Catholic Anti-Slavery Network (ACAN).
- Briefed our school Principals and Business Managers on the obligations of the Modern Slavery Act 2018.
- Undertook a review of supplier risk based upon our preliminary understanding of key supply chain risks to schools (computer hardware, school uniforms and sporting equipment).
- Prepared our first *Modern Slavery Statement*.
- Updated our procurement delegations of authority to include modern slavery clauses requiring prospective suppliers in high-risk sectors to provide additional information as to how they manage such risks in their supply chain.

Our Plans for 2021

In 2021, Mercy Education's goals include:

- To establish a Modern Slavery Working Group which includes school representatives and which considers both the procurement systems and general education aspects of our work on modern slavery.
- To provide detailed training (via both online courses and face-to-face discussions) to all staff involved in school procurement.
- To develop and implement specific strategies for managing modern slavery risks in our three highest risk sectors: construction, computer hardware and textiles (uniforms).
- To review cleaning arrangements at all school sites to ensure that contractor employment arrangements are transparent and compliant with Australian employment legislation.
- To 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 than for organisations with centralised accounting and procurement.

Our Plans Beyond 2021

In 2022, Mercy Education aims to:

- Implement supplier codes of conduct and detailed procurement contract clauses.
- Continue to work with suppliers to understand their supply chain risks in greater detail. This will include the use of research and audit tools such as SEDEX. This may also involve a program of supplier rationalisation.
- Implement specific construction project protocols.
- Implement and publicise a remedy framework for those impacted by modern slavery via the *Domus 8.7* service.
- Move Mercy Education's focus from procurement education of leadership staff to all staff and students.

Reporting Criteria 1 & 2: About Mercy Education Ltd

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.

In 2020, Mercy Education operated 12 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 comprise our Board have full responsibility for all civil governance matters. To assist with this oversight the Board maintains standing committees in respect of Finance, Risk, Education, Governance and Mission.

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 issues relating to mission, quality, finance, governance and risk.

Operational decision-making at each of the twelve schools is the responsibility and purview of the College Principal, who reports directly to the Chief Executive.



Our Governance Framework

The supervision of Mercy Education's responsibilities under the *Modern Slavery Act 2018* has been allocated to the Risk Committee of the Mercy Education Board. This is consistent with the treatment of other compliance requirements obligated by legislation.

Whilst the Risk Committee has primary carriage of this responsibility, it is acknowledged that other Board Committees have a significant interest in the topic as well, including the Board's Finance Committee (in respect of procurement) and Mission 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 modern slavery.



Our Operations

The following datapoints provide a snapshot of Mercy Education Ltd operations in 2020:

- Operated Catholic schools in South Australia (1), Victoria (8) and Western Australia (3).
- Seven of these schools provide a single gender education for girls and the remaining five operate on a co-educational basis.
- All of our 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 four in major regional centres.
- Two of our regional schools operate across dual campuses – all other schools are based at a single campus.
- Approximately 12,580 students were educated in Mercy Education schools in 2020.
- Our youngest school is 83 years old and our oldest school is 174 years old – the average age of our schools is 131 years.

Our Workforce

The following staffing guide relates to Mercy Education's 2020 operations:

- Approximately 1,650 staff worked in full-time or part-time employment across Mercy Education schools.
- A further 500 staff were directly employed on a casual basis as emergency teachers, sporting coaches, music tutors and other roles.
- In many of the schools, maintenance, groundskeeping and cleaning services are outsourced – these are the only staff who work at our schools who are not directly employed by Mercy Education. This category includes an estimated 60 workers.

Our Supply Chain

In 2020 Mercy Education had a total operational turnover of \$260m. As an educational institution, the key element of our expenditure is the teaching and support staff whose salaries and employment related costs represented 64% of our turnover.

In terms of non-staffing expenditure, in 2020, Mercy Education spent \$50m on recurrent procurement costs and an additional \$21m on capital procurement (largely on buildings \$14m and computer hardware \$6m).

Due to the limitations of disparate accounting systems, Mercy Education currently has limited data in respect of expenditure levels with individual suppliers. However, Mercy Education works with over 2,000 individual suppliers annually.

A detailed discussion of the group's supply chain investigations is contained within the Statement. At this stage Mercy Education has limited data regarding specific suppliers but preliminary investigations suggest potential supplier risk issues in respect of China and South East Asia.

This risk will be reflected in the following areas:

- Construction (Materials and Imported Labour)
- Computer Hardware
- Clothing & Textiles
- Educational Resources

In 2021, Mercy Education will undertake two supply chain focussed projects:

- 1) Detailed review of all 2021 expenditure by supplier
- 2) Individual discussions with high risk, high spend suppliers

Both of these projects will provide significantly deeper insights into what portion of the schools' expenditures is actually high-risk, and where and why this is.

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chain

Based on our initial assessment of modern slavery risks an initial survey was taken of 2020 expenditure to identify the volume of business and number of suppliers in three high-risk areas – computer hardware, school uniforms and sporting equipment.

Uniform suppliers were contacted for the schools to provide preliminary advice that Mercy Education was a reporting entity under the *Modern Slavery Act* and that Mercy Education would be looking to discuss the details of its supply chain arrangements further as it moved through this process.

Our People

In terms of employment, Mercy Education employs approximately 1,650 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, sports coaches and the like.

Each school subscribes to the relevant state-wide industrial agreements that apply to staff in all other Catholic schools and these agreements cover almost all staff members at each school. All staff have access to unions and the unions are involved in the negotiation of these agreements.

Work that requires daily attendance at the schools is generally carried out by direct employees of Mercy Education. The main exceptions to this rule are cleaning and maintenance operations – in some of the schools, these tasks are carried out by employees and at others by third-party contractors. Approximately 60 staff who work on school sites are engaged under such arrangements.

Mercy Education has published policies available online (www.mercy.edu.au) that include Complaints Management, Gender Equity, Code of Conduct, Workplace Health & Safety and Whistleblower Policy. Such policies are subject to cyclical review by the Board.



Students at St Aloysius College, Adelaide (SA), participate in a modern slavery reflection called “children don’t belong on a shopping list”.

COVID19 Impacts

COVID19 has definitely affected Mercy Education’s capacity to engage with suppliers – apart from increased internal demands to maintain school operations, there has been a sense that all suppliers are similarly stretched.

COVID19 has not significantly increased or decreased Mercy Education’s modern slavery risk. In terms of procurement, Mercy Education has reduced purchasing of some items (such as sporting equipment) but has purchased increased quantities of cleaning products. Purchases of personal protective equipment (mainly disposable face masks) were new items but consumption of these items was still very low.

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.

Modern Slavery Gap Analysis

At the start of 2020, Mercy Education had limited knowledge about the issues and risks pertaining to modern slavery and considered that it was an issue that had only peripheral connection to the work of schools. There were no systemic structures in place to adequately assess modern slavery risk or to ensure appropriate training and responses were in place.

The ‘Bridge the Gap’ analysis that follows has been assessed at the end of the 2020 year with some small advances now being documented. Most importantly, the awareness of modern slavery risk is now significantly more sophisticated among the key leaders of Mercy Education and the organisation now has a detailed action plan of the steps that are required to be implemented over the next two years.

There is clearly much more work to be done but understanding the topic and the work ahead has been the significant, foundational outcome of work in 2020.



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 twelve Mercy Education schools and the National Office each use a variety of different software systems with no central interchange of data.

Mercy Education does have a common chart of accounts for quarterly reporting purposes and so this first supply chain analysis has been based on a review of aggregate group expenditure. Whilst this approach has still provided some significant insights, it includes the following limitations:

- a) It does not contain individual supplier details – including spend amounts. This has restricted the ability to identify the full complexity of the supply chain, particularly the number of suppliers and those ‘major’ suppliers with whom Mercy Education might target its efforts.
- b) Some of Mercy Education’s codes are not sufficiently granular to reporting specific categories; for example, waste management is a significant but not major operational expense that is contained in financial records within a broader cleaning expense category.

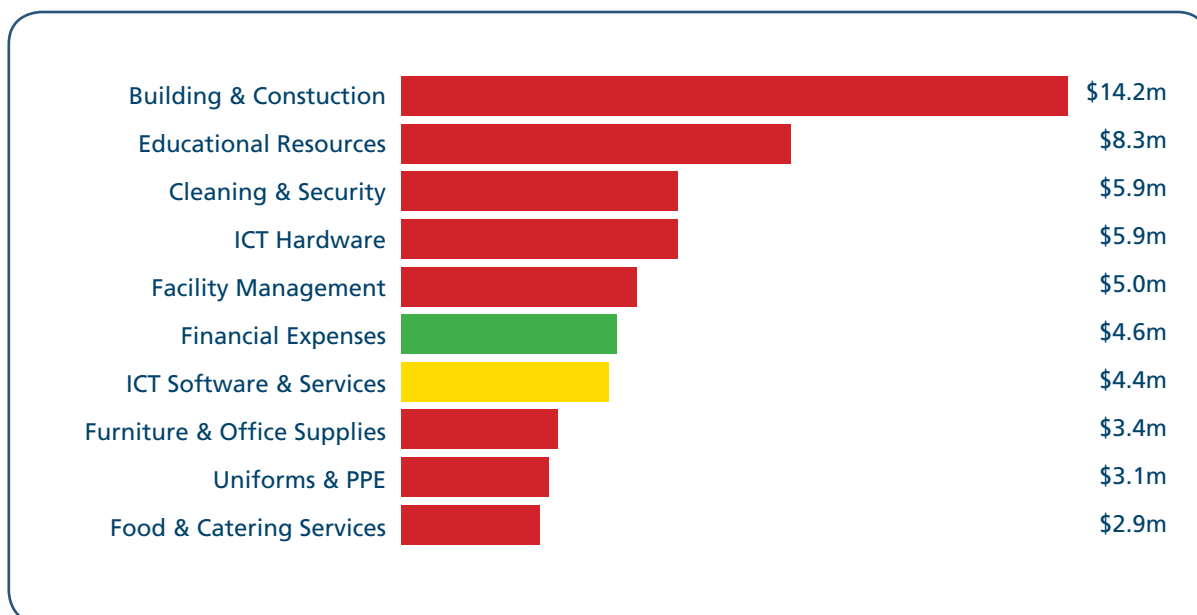
For this 2020 analysis, some of these deficiencies have been resolved by a separate survey of school business managers to identify key suppliers in what Mercy Education had previously (prior to joining ACAN) considered to be the three highest risk sectors: computer hardware, school uniforms and sporting equipment. A discussion on these items is included below.

In preparing this 2020 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) and other international guidance materials.

By gaining a better understanding of Mercy Education’s supplier profiles, the organisation and 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 would result in a significant re-classification of expenditure currently considered as high risk.

For the 2021 analysis Mercy Education will undertake a full supplier analysis for inclusion in its *Modern Slavery Statement* next year. Preparing accounting systems for this will be a significant focus of the 2021 work.

TOP TEN PROCUREMENT CATEGORIES BASED UPON 2020 SPEND



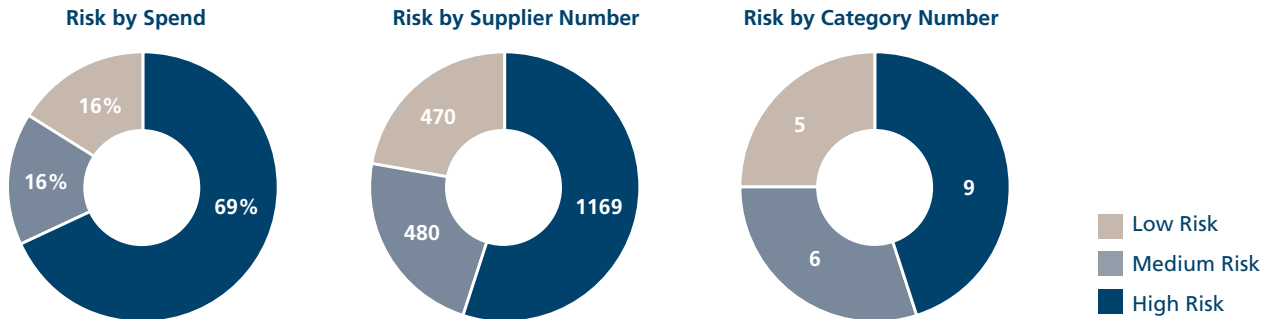
Analysis of All Recurrent and Capital Procurement in 2020

Procurement Category	ACAN MS Risk Assessment ¹	Total Spend in 2020 (\$)	As % of total procurement	No. of suppliers ²
Building & Construction	High	14,213,868	20%	20
Educational Resources ³	High	8,298,128	12%	840
Cleaning & Security Services	High	5,870,927	8%	15
ICT Hardware	High	5,866,987	8%	10
Facility Management	High	5,004,815	7%	100
Furniture & Office Supplies	High	3,350,463	5%	100
Uniforms & PPE ⁴	High	3,140,000	4%	22
Food & Catering Services	High	2,881,135	4%	60
Finance & Investment	High	222,578	0%	2
ICT Software & Network Services	Medium	4,415,691	6%	180
Utilities	Medium	2,581,833	4%	50
Travel & Accommodation	Medium	1,452,371	2%	120
Advertising & Marketing	Medium	1,263,543	2%	40
Fleet Management	Medium	673,527	1%	60
Plant & Machinery ⁵	Medium	625,625	1%	30
Financial Expenses	Low	4,579,920	6%	10
Licence & Membership Fees	Low	2,557,189	4%	100
Educational Excursions ⁶	Low	1,878,638	3%	180
Government & Agency Fees	Low	1,565,400	2%	120
Professional Services	Low	509,018	1%	60
TOTAL 2020 RECURRENT & CAPITAL PROCUREMENT		70,951,655	100%	2,119

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. Due to technical limitations of Mercy Education's current accounting system estimates of individual supplier quantities have been used. These estimates have been focused on the top 80% of spend in each category i.e. the actual supplier numbers may be higher.
3. This category was added by Mercy Education. Ranked as "High" due to the number of imported physical resources (stationery, books, sporting equipment, art equipment) but Mercy Education believes these items are a small percentage of this category spend overall.
4. Actual direct expenditure in this category was \$1.3m. This higher figure includes an estimate of the downstream uniform procurement spend by the seven "contracted out" uniform shop operations.
5. This category was added by Mercy Education. Ranked as "Medium" due to the high technical capacity required for production of such items.
6. This category was added by Mercy Education. Ranked as "Low" due to this expenditure occurring in Australia with professional education organisations (camps, outdoor education) and institutions (museums, galleries).

In 2020, Mercy Education procured \$71m of goods and services, of which 69% (\$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 middle pie chart above shows that Mercy Education has a significant number of suppliers (1,169) in the high-risk category. Mercy Education has provided a further analysis of this below in the consideration of high-risk procurement. Fortunately, although there are hundreds of suppliers in some categories (educational resources), there are also some categories where high-spend co-exists with a low number of suppliers (construction, cleaning, uniforms). This will provide the opportunity to focus first efforts on these areas where Mercy Education can make the biggest difference.

Assessment of High-Risk Procurement

In considering the nine high risk categories, Mercy Education has developed an average spend per supplier indicator to assist in prioritising where to focus initial efforts.

\$ '000s	Average Supplier Spend	Category	Total Spend (\$m)	(\$m)	%
711		Building & Constuction		14.2	29%
587		Computer Hardware		5.9	12%
391		Cleaning and Security		5.9	12%
143		Uniforms		3.1	6%
111		Finance & Investment		0.2	0%
50		Facility Management		5.0	10%
48		Food & Catering		2.9	6%
34		Furniture & Office Supplies		3.4	7%
10		Educational Resources		8.3	17%
			Total High Risk Procurement	48.9	100%

As the left-hand panel of the chart above shows, Mercy Education will have a significantly greater impact by focusing initial efforts on those procurement categories where it has high average supplier spend. For this reason, in 2021 Mercy Education will focus on the top four categories listed above:

- Building and Construction
- Computer Hardware
- Cleaning Services
- Uniforms

A detailed analysis and response for each high-risk procurement category follows.

ANALYSIS OF HIGH-RISK PROCUREMENT BY CATEGORY

High Risk Procurement Category	Average Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Building & Construction	710,693	29%	<p>Mercy Education has not historically understood construction (within Australia) to be high risk and believes that the large proportion of the \$14.2m expended in 2020 was spent with Australian construction business and their sub-contractors following 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 procedures relating to such contracts make it highly amenable to customer-driven controls to reduce this risk.</p> <p>Improving understanding of this risk, and Mercy Education's response, has been flagged as a priority project for 2021.</p>
Computer Hardware	586,699	12%	<p>Mercy Education spends over \$5m each year just on laptop devices. Currently these laptops are supplied by five main suppliers: Apple, Dell, Hewlett-Packard, Lenovo and Microsoft.</p> <p>Due to the size of these providers, they 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 chain issues, reducing but not removing modern slavery risks.</p> <p>Mercy Education involvement with these suppliers will be restricted to evaluating their credentials via third-party certification agencies and participating in sector-wide projects with these suppliers. This may include increasing pressure on those suppliers whose responses lack significant insight or detail.</p>
Cleaning & Security Services	389,272	12%	<p>During 2020, 11 of 12 Mercy Education schools used only contract cleaning services for 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 in place about expectations in this space.</p> <p>Developing such protocols will be one of the 2021 priority projects.</p>
Uniforms & Textiles	142,727	6%	<p>During 2020, 5 of 12 Mercy Education schools operated their own uniform shop operations. 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 including those companies as well.</p> <p>More than half of those schools that contract out their uniform operations use a single supplier. Initial discussions with this supplier suggest that they have robust policy and procedures in place to reduce modern slavery risks.</p> <p>Mercy Education's focus in 2021 will be to extend these discussions with this supplier and confirm this via external agencies. Mercy Education will also commence discussions with other uniform suppliers as well.</p>
Finance & Investment	111,289	0%	<p>The total spend here is quite low and our investments are managed by Catholic Church Insurance Asset Management which has an ethical screen for all of our investments. No further action is currently proposed.</p>
Facility Management & Property Maintenance	50,048	10%	<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 in further detail once Mercy Education's full supplier analysis is undertaken in 2021.</p>

High Risk Procurement Category	Average Supplier Spend	% of High Risk Spend	Mercy Education Reflections
Food & Catering Services	72,028	6%	Supplier engagement in this area will be considered for 2022 once the results of Mercy Education's 2021 supplier analysis are complete.
Furniture & Office Supplies	18,614	7%	Supplier engagement in this area will be considered for 2022 once the results of Mercy Education's 2021 supplier analysis are complete.
Educational Resources	9,879	17%	<p>Whilst this category represents a significant portion of Mercy Education's high-risk spend, there are a number of issues that preclude significant attention at this point:</p> <ol style="list-style-type: none"> 1) Mercy Education does not have sufficient detail about expenditure in this category due to the limitations of its accounting systems. 2) Due to the nature of these expenses, it is probable that most expenditure in this category is actually low-risk and involves sole proprietors, small businesses, professional associations and publishers operating in Australia. 3) The sheer volume of suppliers in this category and the low average spend makes supplier engagement ineffectual. <p>Mercy Education acknowledges that this expenditure area may contain actual high risk purchasing such as sporting goods, stationery and overseas printing. Expenditure in this area will be reviewed in greater detail following the detailed supplier review being completed in 2021.</p>



Reporting Criteria 4: Actions Taken to Assess and Address Risk

Mercy Education's Focus and Approach in 2020

Prior to 2020, modern slavery was a topic that was generally addressed by Mercy Education at the local school level. 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.

In consideration of the Modern Slavery Statement and the work of the Australian Catholic Anti Slavery Network, it became clear that Mercy Education's current response needed to be formalised and elevated to the corporate governance level. This would ensure a greater consistency of response across the organisation and a resulting greater impact in reducing the impacts of modern slavery.

2020, then, has been a year for Mercy Education to understand the full scope of the issue and to consider, document and prioritise its responses. In 2021, Mercy Education will work to deploy this greater understanding into training, policies and procedures, governance oversights and supplier relationships.

Steps Taken in 2020

1) APPOINTMENT OF MODERN SLAVERY LIAISON OFFICER (MSLO)

In mid-2020, Mercy Education's outgoing Chief Financial Officer was appointed as our initial Modern Slavery Liaison Officer (MSLO). Mr Joseph Konynenburg has significant insights into school operations and supply chains from his time in that role and he is also well-known to the local school leadership teams. As a registered teacher himself, Joe has a strong capacity to connect this work to the local staff and student level as well. Joe will continue in this MSLO role managing Mercy Education's Modern Slavery response through 2021.

2) JOINED THE AUSTRALIAN CATHOLIC ANTI-SLAVERY NETWORK (ACAN)

Whilst Mercy Education discovered ACAN late into our Year One journey, it remains very excited to be part of this collaborative approach working with colleagues across the Catholic Church in Australia. Apart from the excellent resources and support this membership provides, it is also a significant opportunity to magnify the scope of our impact in our conversations with individual suppliers and to develop creative and pastoral solutions for remediation such as the *Domus 8.7* project.

3) PREPARED MERCY EDUCATION'S FIRST MODERN SLAVERY STATEMENT

The preparation of this first Modern Slavery Statement has required considerable resources but has also provided an excellent framework for Mercy Education to develop a significantly more coherent response (and action plan) to this issue.

4) UNDERTOOK FIRST PROCUREMENT RISK ANALYSIS

The first project was an analysis of expenditure with the top three suppliers in each school for these areas that initially identified as areas of highest risk (computer hardware, school uniforms and sporting equipment). This helped to confirm that computer hardware and school uniform purchasing were high risk expenditures, each with a limited number of suppliers. This makes both suitable targets for immediate action and they are included in Mercy Education's four procurement categories for further action in 2021.

The second project was a full classification of all corporate procurement expenditure by sector category (with associated risk assessment). This was a high-level analysis which evaluated all procurement (both recurrent and capital) for the organisation in 2020, along with an estimate of the number of suppliers involved across the group in each category.

This assessment demonstrated that construction risk was an area that Mercy Education had not previously considered in our discussions of modern slavery. It also highlighted the level of expenditure on contract cleaning services and the associated risks of sub-contracted supplier operations. On this basis, both construction and cleaning services have been added to Mercy Education's four procurement areas for further action in 2021.

5) UPDATED MERCY EDUCATION'S PROCUREMENT DELEGATIONS OF AUTHORITY

Whilst a comparatively small step, the major corporate delegations of authority document has been updated to require procurement officers to require suppliers in high-risk procurement areas to provide written confirmation as to how the supplier manages modern slavery risks in their supply chain prior to being selected for contract.

Mercy Education anticipates significant further work in 2021 in refining and extending policy settings and supplier contracts around modern slavery and providing effective training to all procurement staff.

Modern Slavery Action Plan and Road Map

Mercy Education will continue to work within the ACAN framework to maximise its impact on modern slavery. This includes ongoing professional development as well as participation in the educational sector-wide action plans.

The following road map documents Mercy Education's key achievements for 2020 as well as its specific objectives for 2021 and 2022.

Focus	2020	2021	2022
Our Governance	<ul style="list-style-type: none"> Update procurement policies to require modern slavery assessment in high-risk procurement. 	<ul style="list-style-type: none"> Establish cyclical reporting framework and procedures Lodge first modern slavery statement (for 2020) 	<ul style="list-style-type: none"> Review progress to date and establish forward action plan
Our Risks	<ul style="list-style-type: none"> Appointment of Modern Slavery Liaison Officer 	<ul style="list-style-type: none"> Join ACAN to increase our leverage and access to quality resources Establish Modern Slavery Working Group across our schools Add modern slavery as specific risk to corporate risk register 	<ul style="list-style-type: none"> Implement and publicise remedy framework for victims of modern slavery via the collaborative Australian Catholic project <i>Domus 8.7</i>
Our Suppliers	<ul style="list-style-type: none"> Identify key suppliers in computer hardware and school uniform supplies and review their Modern Slavery documentation 	<ul style="list-style-type: none"> Develop full supplier analysis based on all procurement during calendar year across all schools Undertake employment conditions review of all staff on school sites not directly employed by the school (i.e. cleaning, maintenance) Commence supplier discussions with construction, uniform and ICT providers 	<ul style="list-style-type: none"> Develop Supplier Code of Conduct Implement supplier legal clauses in procurement documentation Undertake SEDEX supplier credentials evaluation for suppliers receiving top 50% of procurement spend
Our Staff	<ul style="list-style-type: none"> Notify school leaders about Modern Slavery risks and reporting requirements 	<ul style="list-style-type: none"> Ensure all school leaders and procurement staff have completed training modules on modern slavery risks. 	<ul style="list-style-type: none"> Local procurement staff and school leaders to provide professional development to all staff members on modern slavery risks
Our Students & Families		<ul style="list-style-type: none"> Audit and document existing student programs on modern slavery 	<ul style="list-style-type: none"> Establish documented curriculum coverage of modern slavery issues in each school. Produce and distribute modern slavery information document to all families across all schools

Remediation Pathways

Mercy Education 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 co-operating in, actions to address harms to people and root causes to mitigate future risks 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 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*, Mercy Education can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where Mercy Education is directly linked to modern slavery by a business relationship, Mercy Education is committed to working with the entity that caused the harm to ensure remediation and mitigation of its recurrence.

Reporting Criteria 5: Effectiveness Assessment

Mercy Education notes that slavery of any form is a scourge on humanity, repugnant and entirely antithetical to our value system. As Christian people, Catholics are called 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 and is implementing for 2021 a governance oversight model for modern slavery as follows:

Tier	Group	Accountabilities
1	Mercy Education Board	<ol style="list-style-type: none"> 1) The Mercy Education Ltd Board reviews and endorses the Modern Slavery Statement before it is approved for publication. 2) Modern Slavery will be added as a recurring agenda item to the standard Board agenda. 3) The Mercy Education Board will receive the regular minutes of the Modern Slavery Working Party. 4) The separate Risk, Finance and Mission Committees of the Board will each receive feedback from and have input into the Modern Slavery Working Party.
2	Mercy Education Executive Staff	<ol style="list-style-type: none"> 5) At least one member of National Executive Staff will be on the Modern Slavery Working Party. 6) The National Executive Staff will receive the regular minutes of the Modern Slavery Working Party. 7) Each member of the National Executive Staff will have exposure to and input into our Modern Slavery response via their Board Committee accountabilities.
3	Modern Slavery Working Party	<ol style="list-style-type: none"> 8) The Modern Slavery Working Party will be convened in 2021 and will take primary carriage of the Modern Slavery issue, and the Mercy Education response. 9) Membership will include representatives of Principals, Teachers, Business Managers, Procurement Officers and Students. 10) Each school will also have a delegated modern slavery liaison officer (MSLO) who will represent their school on the Working Party and lead the discussion of these issues locally. 11) The Modern Slavery Working Party will supervise the implementation, and ongoing updating, of the Mercy Education Modern Slavery Road Map.

Reporting Criteria 6: Process of Consultation with Entities Owned or Controlled

Mercy Education Ltd does not own or control any other entities.

Reporting Criteria 7: Other

Mercy Education believes the scope of our modern slavery response in 2020 has been comprehensively documented across the first five criteria.



Senior drama students at the Academy of Mary Immaculate, Fitzroy (VIC), perform an ensemble performance based on the theme of Slavery in Australia.



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ABN: 69 154 531 870



St Vincent de Paul Society
NSW
good works



MODERN SLAVERY STATEMENT 2020

This 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, March 2021.

Disclosure Note This statement has been made on behalf of St Vincent de Paul Society NSW (ABN 91 161 127340) and the Trustees of the Society of St Vincent de Paul (NSW) (46 472 591 335) including in respect of St Vincent de Paul Housing (41 158 167 483).

This Statement does not apply the St Vincent de Paul Society entities outside of NSW.

Registered Office 2C West Street, Lewisham NSW 2049.



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.

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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 forms of child labour. It includes situations where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

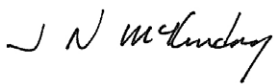
Modern Slavery is a great challenge to justice in the world and is antithetical to who we are. We are committed to identifying any risk of Modern Slavery in our operations or supply chains and working to eliminate it.

In 2020, we initiated our first supplier engagement with a select group of suppliers to learn more of their supply chains and their anti-Modern Slavery practices. We have strengthened our policies and administrative practices to build greater due diligence in our management of procurement and better understanding of Modern Slavery. We will build on these initiatives in the coming years.

In addition, we aim to raise awareness across our organisation, new and potential suppliers, that we are committed to the elimination of Modern Slavery wherever it occurs.



Peter McNamara
President of Trustees
Society of St Vincent de Paul (NSW)



John McKendry
Chair of the Board
St Vincent de Paul Society NSW



Denis Walsh
Chair of the Board
St Vincent de Paul Housing

March 2021





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 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.

The St Vincent de Paul Society NSW is committed to sustainability and recycling. Our network of Vinnies stores sells a range of pre-loved goods, the revenue from which we use to support people in need. We also directly assist people experiencing poverty and disadvantage through the donation of furniture, housing and household goods.

St Vincent de Paul Housing is 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 by Amélie Housing who are contracted to provide day-to-day management of St Vincent de Paul 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 asylum seekers.

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 2019/20 FINANCIAL YEAR WE:



Assisted 55,000 people with \$15.9 million in food, clothing, household relief and financial aid



Distributed \$5.6 million in emergency payments to 4,285 households in NSW



Launched the Build Homes, Build Hope petition calling on the NSW Government to invest in more social housing. The petition with more than 10,000 signatures was tabled in State Parliament on 21 October 2020



In response to COVID-19, partnered with other organisations and the NSW Government to house rough sleepers in city hotels, leading to the near elimination of street homelessness in the Sydney CBD



Supported 33,350 people through our health, housing and homelessness, disability and community inclusion programs



Together with our Society counterparts in other states and territories, raised \$25.2 million through the Vinnies Bushfire Appeal



In partnership with the NSW Government's Social and Affordable Housing Fund, completed 10 social and affordable housing developments with 382 modern and comfortable units, housing 450 people

2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

In the 2020 calendar year, in support of our Modern Slavery Risk Management, we:

- approved a Modern Slavery Policy to mitigate the risk of Modern Slavery within our business operations and extended supply chains
- developed a new Procurement Policy which takes a centre-led approach to procurement, increasing visibility of our supply chains and enhancing due-diligence when appointing suppliers
- created a preferred supplier list enabling greater due-diligence in relation to suppliers on this list
- implemented Supplier Engagement Principles which include specific requirements that suppliers uphold human rights, not engage in forced or child labour in their operations, and comply with national legal standards and minimum wage requirement (provided as attachment)
- revised our Whistle-blower Policy allowing our people confidential and third-party avenues for making reports
- joined the Australian Catholic Anti-Slavery Network (ACAN) in July 2020
- formed a cross-functional working group to drive Modern Slavery risk management Society-wide
- trained our people - targeted staff completed ACAN's eLearning modules MS101 Introduction of Modern Slavery and Business Relevance and attended a Supplier Engagement Workshop
- conducted a supplier data analysis to identify high-risk suppliers by category and spend
- conducted a fact-finding survey among a select target group of suppliers in high-risk sectors of cleaning, waste management, property and fundraising
- conducted a gap-analysis to understand our strengths and areas for improvement regarding managing Modern Slavery risk.

OUR PLANS FOR 2021

We propose to expand our supplier engagement and implement a structured and more tailored approach to identifying and addressing instances of Modern Slavery in our supply chain. We will:

- ensure relevant policies are compliant with Modern Slavery legislation
- increase Modern Slavery awareness amongst our people
- conduct training on our Modern Slavery obligations for staff with procurement and contracting responsibilities
- ensure any new contracts, where appropriate, include anti-Modern Slavery requirements
- commence implementation of a risk assessment process across our suppliers
- commence the identification and mapping of high-risk supply chains across the state
- commence the implementation of mitigation strategies where the potential for Modern Slavery is identified
- participation in the ACAN year-two Modern Slavery risk management program.

OUR PLANS BEYOND 2021

Our long-term plan is to:

- adopt and implement a remedy framework for people who have experienced Modern Slavery
- work with exporters of products procured from St Vincent de Paul Society NSW to develop a better understanding of their supply chain once the products have left St Vincent de Paul Society NSW
- work with importers of products to understand their supply chains
- establish an ongoing risk assessment process across our suppliers
- finalise the identification and mapping of high-risk supply chains across the state
- implement mitigation strategies as required
- implement risk audits and other tools to examine supplier procurement and other related practices.



REPORTING CRITERIA 1&2

About St Vincent de Paul Society in 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**, is a public company limited by guarantee
- **St Vincent de Paul Housing** is also a public company limited by guarantee.

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 Housing does not have employees and contracts Amélie Housing to run all day-to-day operations.

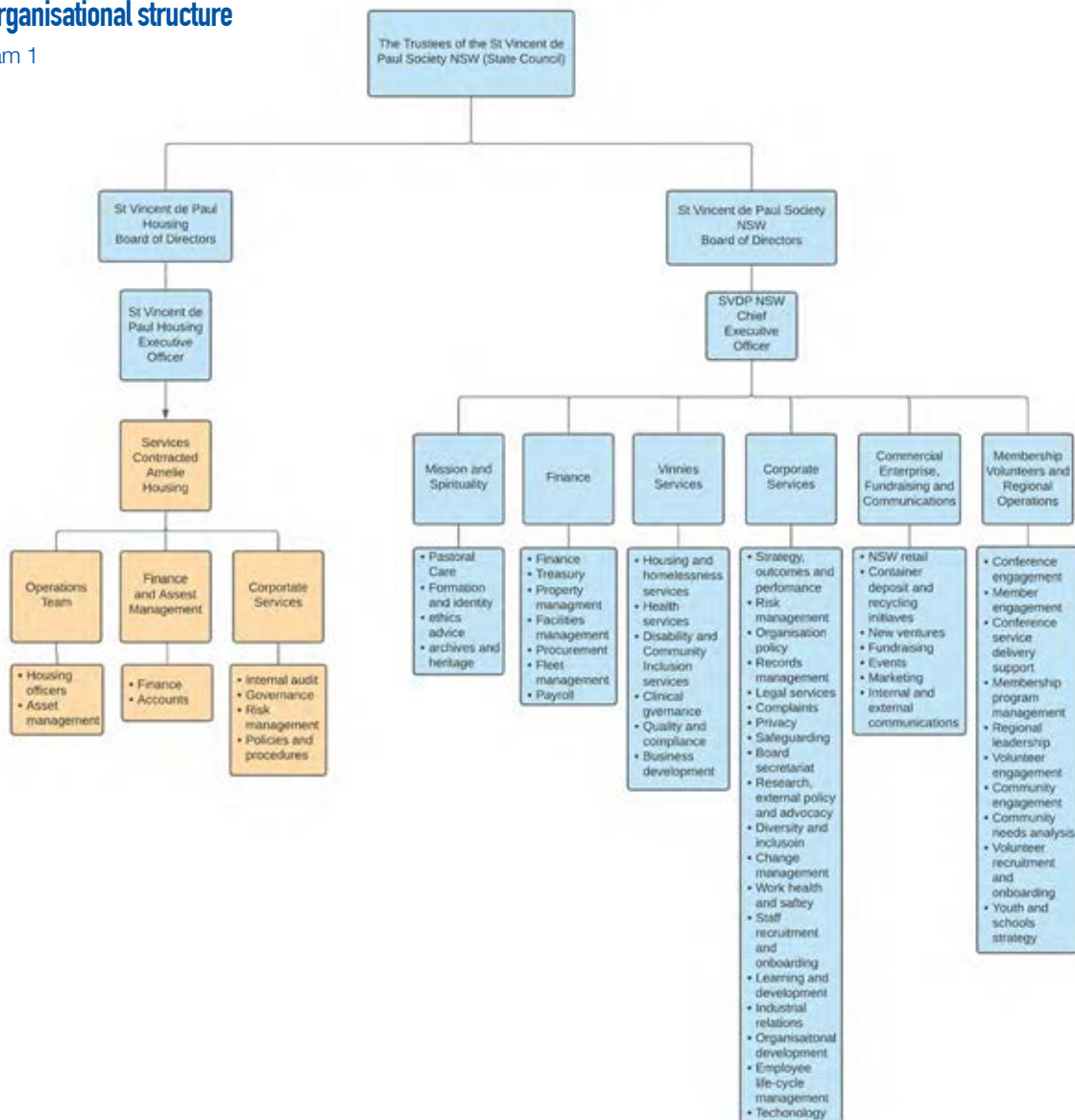
This Modern Slavery Statement does not apply to:

- 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 consolidated revenue for FY2019/2020 was \$226,000,000.

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. 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 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 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 Executive Director, Corporate Services is responsible for organisational governance and ensuring that governance policies and procedures are current, and also chairs the cross-functional Modern Slavery working group which drives the Modern Slavery work in the Society in NSW
- All Executive Directors are responsible for ensuring their staff comply with our policies and practices.

Policies relevant to Modern Slavery include:

- Modern Slavery Policy
- Procurement Policy including Supplier Engagement Principles
- Whistle-blower policy
- Feedback and Complaints Policy
- Risk Management Framework

Trustees of the Society of St Vincent de Paul (NSW)

St Vincent de Paul Society NSW also supports the Trustees of the Society of St Vincent de Paul (NSW) including in respect of its obligations under the Modern Slavery Act.

St Vincent de Paul Housing Board

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.

Amélie Housing's Chief Financial Officer and Operations Director have contractual responsibility for procurement in respect of St Vincent de Paul Housing.

The National Corporate Services Director is responsible for organisational governance and ensuring that governance policies and procedures are current.

Policies relevant to Modern Slavery include:

- 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.

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 employees and volunteers are organised into five regions: West, North West, North East, Metropolitan and South.

Conference Work

Our members are the face of the Society in communities across NSW and work in Conferences, which are mostly connected to Catholic parishes. Conference members visit people in their homes, nursing homes and hospitals. Members connect with people where they live, providing practical assistance such as food and shopping vouchers, furniture and clothing, and 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 drought and bushfires, and deliver emergency assistance.

Vinnies Services

These include 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 Stores

Our Vinnies retail network includes 227 stores across NSW. Our stores primarily sell donated second-hand items including clothing, furniture, and bric-a-brac. Our stores are staffed with a combination of employees and volunteers. The proceeds of our retail network contribute to the funding of our other services. The stores also provide an avenue for goods to be reused rather than discarded and enable people on low incomes to purchase items that they need.

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 stores.

The St Vincent de Paul Society NSW participates in 'Moving the Needle' on textiles in landfill alongside Salvos Stores and the Australian Red Cross. Moving the Needle is a campaign encouraging shoppers to use every new purchase as a reminder to donate their past purchases to charity rather than add to the 311,040 tonnes of clothing waste generated in Australia each year. Moving the Needle is targeting a 20% reduction in textile waste by 2022.

Social and Affordable Housing

As a provider of the NSW Government's Social and Affordable Housing Fund (SAHF), St Vincent de Paul Housing was contracted to build 502 units for people on low to moderate incomes. The units were completed in November 2020. Of these, 357 are for social housing and 145 for affordable housing tenants.

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.

OUR SUPPLY CHAIN

We are in the process of transitioning to a centre-led procurement operating model, working in partnership with regional and divisional functions. The St Vincent de Paul Society NSW and St Vincent de Paul Housing procure the following types of goods and services:

- building and construction
- cleaning and security services
- professional services
- ICT hardware/ICT software and network services
- facility management and property maintenance
- waste management services
- events and event management (fundraising agency, digital and creative services)

During 2020 our supplier engagement program focussed on some of our higher-risk procurement categories including cleaning and security, waste management services, building and construction and fundraising. All suppliers contacted were suppliers to St Vincent de Paul Society NSW. Through our engagement with suppliers, we are also increasing awareness of the Modern Slavery Act 2018 (Cth) and risks of Modern Slavery for business.

Suppliers indicated that they had predominantly Australian-based supply chains, although in the building and construction sector there was limited visibility beyond Tier 1 suppliers. Among larger suppliers, 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.

Our early supply analysis and engagement has highlighted that we have a broad mix of suppliers with a low annual spend. With these suppliers, in particular, we acknowledge that a more supportive and educational approach will be required.

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 hand out. We comply with labour, employment, work health and safety and whistle-blower laws.

Our policies and procedures are designed to provide protection to our people and other stakeholders. Based on our initial investigations during 2020, we consider that for the most part, our operations do not cause or contribute to Modern Slavery.

However, having regard to the nature and location of our suppliers we do have some areas of vulnerability, such as: cleaning and security services, waste management services, building and construction, facility management and property maintenance. The export of textiles potentially represents an additional area of vulnerability.

Our COVID-19 Response

The initial response to COVID-19 focused on the safety of the people we assist and our members, volunteers and staff.

There was a need to change operations that had been reliant on face-to-face engagement and innovate to continue to meet the needs in the community by using COVID-Safe methods of service delivery while office-based staff commenced working-from-home. Our retail operations were also significantly impacted.

The COVID-19 pandemic has impacted on our progress in implementing initiatives that raise awareness of Modern Slavery amongst our people more broadly; engaging with a larger number of our suppliers; and implementing a broader range of anti-Modern Slavery initiatives.

In response to COVID-19 The St Vincent de Paul Society NSW centralised its sourcing, purchasing and distribution process for Personal Protective Equipment (PPE) in order to ensure that PPE met Australian Standards and was obtained from reputable suppliers.



Our People

The St Vincent de Paul Society NSW is comprised of members, volunteers and employees. We have more than 13,000 members and volunteers and 1,300 employees.

Member Gender



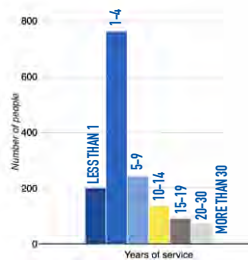
Volunteer Gender



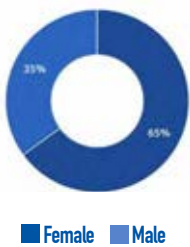
Where Volunteers Work



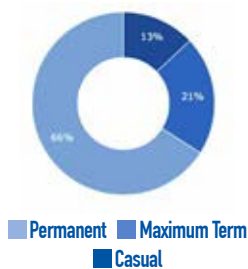
Staff Years of Service



Staff Gender



Staff type of Employment



Our members and volunteers speak positively of their engagement with the Society.

“My years working at the Society have been very important in my life, giving me the chance to help people and contribute to my community.” Glenda, who recently farewelled the Society after 45 years’ service in the Riverina region.

We safeguard our people from the risk of Modern Slavery by complying with relevant legislation. The majority of our staff work under the conditions of modern awards and have access to union membership. Employment of people with disabilities through Ozanam Industries is aligned to the NDIS Outcomes Framework.

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
- Recruitment 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.

Modern Slavery Gap Analysis

The St Vincent de Paul Society NSW conducted a gap analysis in 2020 using the ‘Bridge the Gap’ tool developed by SD Strategies. The gap analysis reflects that we were at the beginning of our work to identify and minimise risks of Modern Slavery in our operations and supply chains. Since completion of this analysis we have made progress across several aspects including training and supplier awareness. We have also published our Modern Slavery Policy.

Results – Gap Analysis for the 2020 Bridge the Gap Heat Map

Management Systems



Risk Management



Human Resources and Recruitment



Customers and Stakeholders



Procurement and Supply Chain



SUPPLY CHAIN RISKS

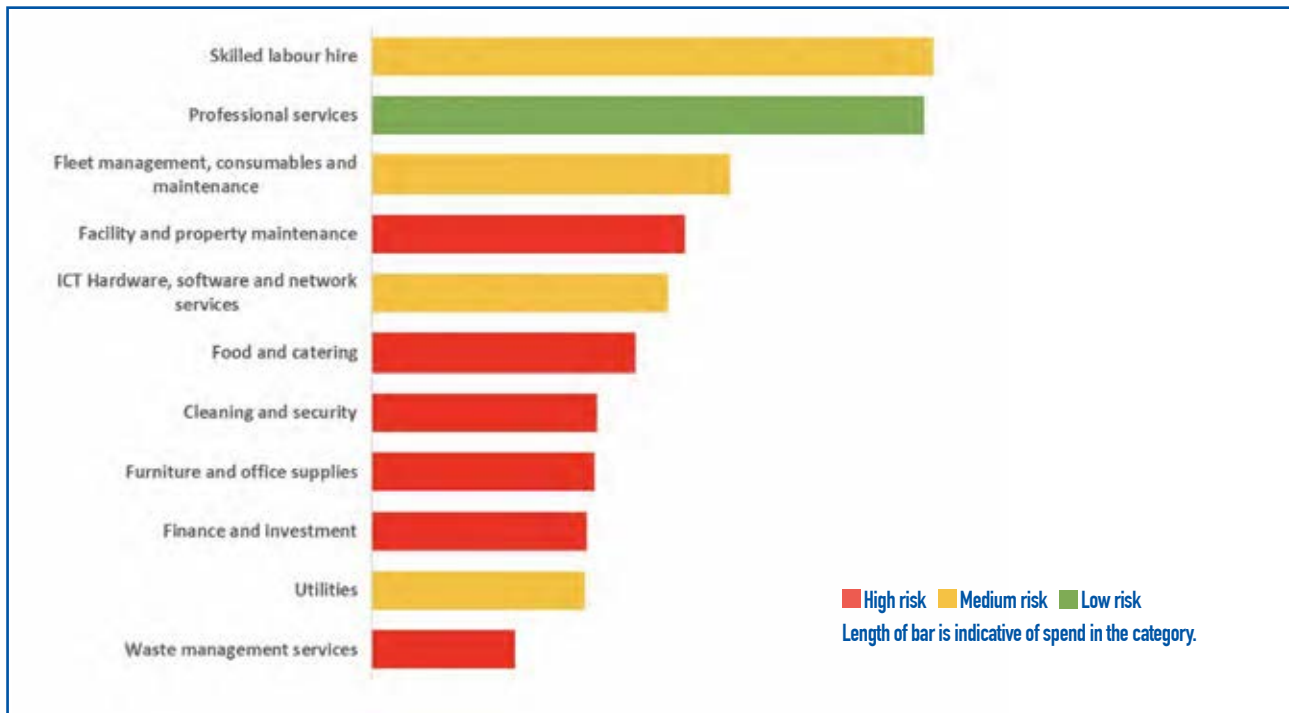
St Vincent de Paul Society NSW mapped our suppliers within the Greater Sydney Region, and analysed our supply chain for Modern Slavery risks.

In 2021, together with St Vincent de Paul Housing, we will broaden our focus to include the operations and supply chains of all regions within NSW. We will prioritise by:

- industry sectors deemed as high risk

- commodity/products deemed as high risk
- geographic locations based on the estimated prevalence of Modern Slavery
- workforce profile – an analysis of the type of labour involved in the supply chain of the product or service

The graph below illustrates the Modern Slavery Risk ratings by our highest spend categories within the Greater Sydney Region.



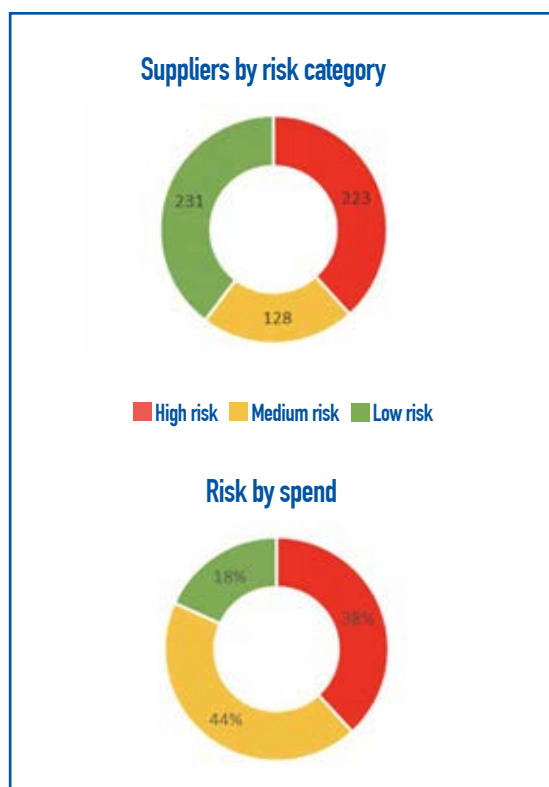
Of the 10 supplier categories that are our greatest spend within the Greater Sydney Region facility and property maintenance, food and catering, cleaning and security, furniture and office supplies, finance and investment categories are considered high risk.

38% of the Greater Sydney Region total spend analysed is considered high risk, and comprises more than 223 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 44% of our total spend is with 128 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.





REPORTING CRITERIA 4

Actions taken to assess and address risk

In 2020, we focused on:

- developing a better understanding of our obligations under the Modern Slavery Act
- joining ACAN and receiving professional support, advice and training to establish processes we need to fulfil our obligations and undertake the necessary risk assessments of our supply chain
- establishing a cross-functional working group to drive awareness and new practices across the Society
- mapping our supply chain
- participating in a supplier engagement workshop organised by ACAN
- training key staff on Modern Slavery
- participating in monthly teleconferences facilitated by ACAN
- working towards a supplier engagement strategy in relation to Modern Slavery
- conducting a risk analysis of a select group of suppliers and identifying those considered to be high-risk for initial engagement
- engaging with the select group of suppliers to gain information about their practices and their supply chain
- conducting a gap-analysis to understand areas of activity which required greater attention
- ensuring that our organisational policies aligned with our obligations under the Modern Slavery Act.

Working towards a supplier engagement strategy

In the initial reporting period we (The St Vincent de Paul Society NSW), limited our supplier engagement to suppliers in the Greater Sydney Region and specifically to those in high-risk categories - waste management services, facility management and property maintenance and cleaning and security services.

This initial engagement was carried out solely with a selection of direct suppliers. We designed a supplier engagement questionnaire to understand how suppliers managed the risk of Modern Slavery in their supply chain and whether any of the Society's operations cause, contribute to or are directly linked to the risk of Modern Slavery.

Learnings from this initial engagement process include:

- the importance of having and maintaining a deeper relationship with our suppliers – suppliers who had this relationship with the organisation were more likely to respond to our request.
- COVID-19 restricted engagement to phone calls and email. The opportunity for face-to-face supplier engagement, including a forum style approach allowing for relationship building, may have increased the level of supplier engagement.

Findings from the engagement questionnaire were as follows:

- a positive commitment to managing Modern Slavery risks in their supply chain
- 60% of responding suppliers had a Modern Slavery Statement or equivalent commitment document in their operation
- 60% of suppliers responding have various means of Modern Slavery risk assessment and had taken steps to map their supply chain against Modern Slavery risk indicators
- a smaller number of respondents stated that they have formally assessed risks in their purchasing practices that could cause or contribute to Modern Slavery
- where respondents stated that they supply goods that contain raw materials or commodities from countries where there is a risk of either child labour or forced labour, they have acknowledged that they are taking actions to mitigate the risk

- a number of respondents stated that they had trained key internal stakeholders on Modern Slavery and have grievance or complaints mechanisms in place to enable people, including workers in their supply chain, to confidentially report Modern Slavery concerns.

Procurement

We developed the Procurement Policy to provide greater transparency and efficiencies in how the Society purchases goods and services and requires employees to conduct themselves ethically.

Procurement of goods and services must be conducted in accordance with all applicable laws and government regulations in Australia and any standards relating to the quality of products sourced or supplied by the Society.

Recycling

Some donations received by Vinnies Shops are not saleable in store and are sold on to other markets for reuse and recycling. These include, the making of rags for use in industrial settings.



REMEDICATION

We are committed to providing appropriate and timely remedy to people impacted by Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws. This includes providing for, or cooperating in, actions to address harms to people and root causes to mitigate future risks if 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. Our 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 we 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.

We are 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 or regulatory agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

We have funded a “Remedy Pathways” module in its Modern Slavery E-Learning course that will be available to staff and other stakeholders in 2021.

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.

Risk Management Frameworks will be updated to specifically address the risk of Modern Slavery.

As this is our first Statement, and because of the limitations brought about by COVID-19, our 2020 targets are limited. We propose to develop more comprehensive performance indicators in the 2021 Statement.

INDICATORS/TARGET 2020	OUTCOME	
	Progressing	Achieved
Board apprised of Modern Slavery obligations	✓	
Key staff trained on Modern Slavery	✓	
Formed a Modern Slavery Working Group		✓
Procurement Policy implemented		✓
Supplier Engagement Principles Implemented		✓
Modern Slavery Policy implemented		✓
Supply chain mapped	✓	
Initial supplier engagement process implemented		✓

REPORTING CRITERIA 6

Process of consultation with entities owned or controlled

The cross-functional working group, responsible for the development of our Modern Slavery Program, includes members from St Vincent de Paul NSW and St Vincent de Paul Housing.

The Modern Slavery Statement was reviewed and approved by the Trustees, Board of St Vincent de Paul Society NSW and the Board of St Vincent de Paul Housing.

All entities will continue to work collaboratively to identify and reduce the risk of Modern Slavery within our organisation and supply chains.

REPORTING CRITERIA 7

Other

St Vincent de Paul Society NSW is engaged in combatting Modern Slavery outside the scope of the Commonwealth legislation:

- 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; and the Assist a Student program which helps disadvantaged students in the Asia-Pacific region complete their education, reducing the possibility that they will experience Modern Slavery.
- Our Social Justice Team advocates on Modern Slavery in NSW, for example, support for Australian Catholic Religious Against Trafficking in Humans (ACARTH) petition to have the NSW Modern Slavery Act proclaimed.

APPENDIX

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

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.





The University of Notre Dame Australia

Modern Slavery Statement 2020

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Introduction

This statement has been prepared by the University of Notre Dame Australia to comply with the Modern Slavery Act 2018 (Cth). It sets out the steps taken by Notre Dame to identify and address modern slavery risks in our business and supply chains.





About Notre Dame

Notre Dame is a 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. The University's seven clinical Schools are located throughout New South Wales and Victoria.

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.

We have an enrolment of over 13,000 students and offer a comprehensive range of undergraduate and postgraduate programs. The University was ranked number one in Australia for Overall Satisfaction in the 2020 Graduate Outcomes Survey (undergraduate category – qilt.edu.au).

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 Australia 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.

Notre Dame strives through appropriate engagement with supply partners, contractual arrangements and procurement principles, to ensure that its suppliers comply with all legislation dealing with the prevention of modern slavery or human trafficking.

To ensure effectiveness, our Finance Office has established and leads a Modern Slavery Project Group which includes representatives from within the University who are responsible for identifying and addressing key risks within our supply chains. In addition to the work we have done in our own operations and supply chains, we have been active in our collaboration with other organisations through the Australian Catholic Anti-Slavery Network, sharing knowledge and engagement initiatives, discussing approaches, and building on learnings to address this growing global issue.

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

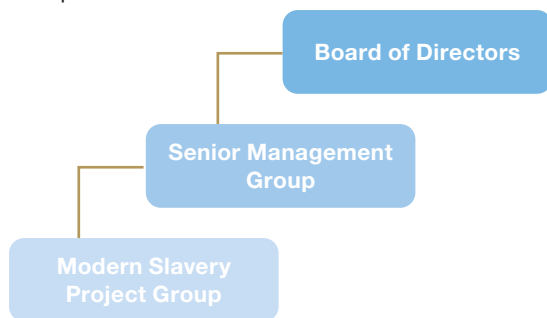
A handwritten signature in blue ink that reads "Chris Ellison".

Chancellor

Our Actions Taken in 2020

Modern Slavery Project Group

A cross-divisional and multidisciplinary Modern Slavery Project Group was established to design and implement foundational activities to identify, manage and address modern slavery risks within the University's operations. The Project Group consists of staff from Legal, Finance and Procurement. The Group reports to the Board through the University's Senior Management Group.



Collaboration

Notre Dame is part of the Australian Catholic Anti-Slavery Network (ACAN) which allows us to collaborate, share resources and training within the network.

Gap Analysis

As part of ACAN, we undertook a “bridge the 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. Our auditors KPMG also offered a benchmarking survey in which we participated in mid-2020 highlighting opportunities for improvement. The results of both analyses will be instrumental to the development of the three-year roadmap.

Risk Assessment

We have analysed our suppliers and operations to identify the first tier suppliers with potential modern slavery risks.

We also reviewed our top 200 supplier agreements to assess the appropriateness of the clauses relating to modern slavery risks. This represented approximately 80% of total spend.

Modern Slavery Statement

We have published a Modern Slavery Statement to set the culture and expectations across the University and all our stakeholders.

Education and Awareness

Key staff members from the Project Group and targeted stakeholders within the university have participated in workshops and training facilitated by ACAN.

ACAN hosted a webinar providing education on the modern slavery risks specific to the building and construction industry and we extended that invitation to targeted suppliers.

Policies and Processes

Our Procurement Policy and Procedures were amended to align to the Modern Slavery Act 2018 (Cth) and drive commitment to eradicating modern slavery.

All new agreements entered into were reviewed and/or amended to include specific clauses dealing with modern slavery risks. In addition to this, our Agreement templates were updated and a Modern Slavery Side-Agreement template was developed by the Legal team to assist with the implementation of this new process.

We have commenced developing a Modern Slavery Policy and Whistleblower Protection Policy.

Supplier Engagement

More than 4,000 letters were sent out to suppliers explaining Notre Dame's opposition to modern slavery practices and our commitment to taking steps to eradicate it from our operations and supply chains.

These letters outlined:

- Notre Dame's requirement that both the suppliers and their contractors comply with the Act;
- a commitment to take reasonable steps to ensure that there is no modern slavery or human trafficking in their supply chain or in any part of their business; and
- a requirement to notify the University should they become aware of a breach.

Our Supplier on-boarding process has been updated to include modern slavery risks. This will be continuously reviewed as part of the three-year roadmap.

Our Plans for 2021 and Beyond

Three Year Roadmap

We plan to formalise our Modern Slavery Risk Management Initiatives roadmap for the next three years to provide guidance around reporting and corrective actions to be taken, as well as an internal assessment of the effectiveness of our initiatives.

Developing Future Ethical Leaders

While we currently offer courses in Social Justice, we have also developed a specialised program in Modern Slavery and Human Trafficking to promote the study of social issues within our community, educating future professionals and developing ethical 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.

Collaboration

The Modern Slavery and Human Trafficking programs will establish close collaboration and engagement with international foundations, human rights groups, and university partners, 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.

Notre Dame will continue to be a member of ACAN, contributing and collaborating with the network. In January 2021, a representative from ACAN presented to 140 first year medical students on their second day. The session covered how modern slavery interacts with health care - from the board room to the emergency room.

The Procurement team is also looking for further opportunities to collaborate with other networks including the Australian University Procurement Network.

Modern Slavery Project Group

We intend to expand the Project Group across more divisions to incorporate representatives from the Academic, People & Culture, Infrastructure and Technology teams to support with the implementation of future initiatives.

Supplier Management

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; and
- auditing high-risk suppliers.

To support this, the Procurement team will also undergo a restructure to realign key responsibilities, improve supplier relationships and contract management and develop processes that support the eradication of modern slavery.

The initiatives implemented in 2020 will continue to be applied including the changes to the on-boarding process and review of agreements, terms and conditions.

Implementation of Policies and Procedures

We have commenced developing a Modern Slavery Policy, outlining principles, responsibilities for all stakeholders and reporting. We will implement this in 2021 alongside the Whistleblower Protection Policy. Both policies seek to set the culture and expectations across the University but also provide a channel and support for raising concerns or grievances around policy violations.

We will also develop a Supplier Code of Conduct which will outline our minimum ethical standards, reporting and corrective action processes.

We will continuously review and improve existing policies and processes including the Procurement Policy, supplier on-boarding and staff on-boarding processes.

Education and Awareness

We anticipate to roll out introductory modern slavery training across the organisation to raise awareness of modern slavery risks across the University. We expect the training to be mandatory for procurement and areas purchasing products and/or services that carry a higher level of modern slavery risk such as electronics, cleaning and security contracts. This training will be made available to all staff through our online learning management system and staff will be encouraged to undertake this training as part of their on-boarding.

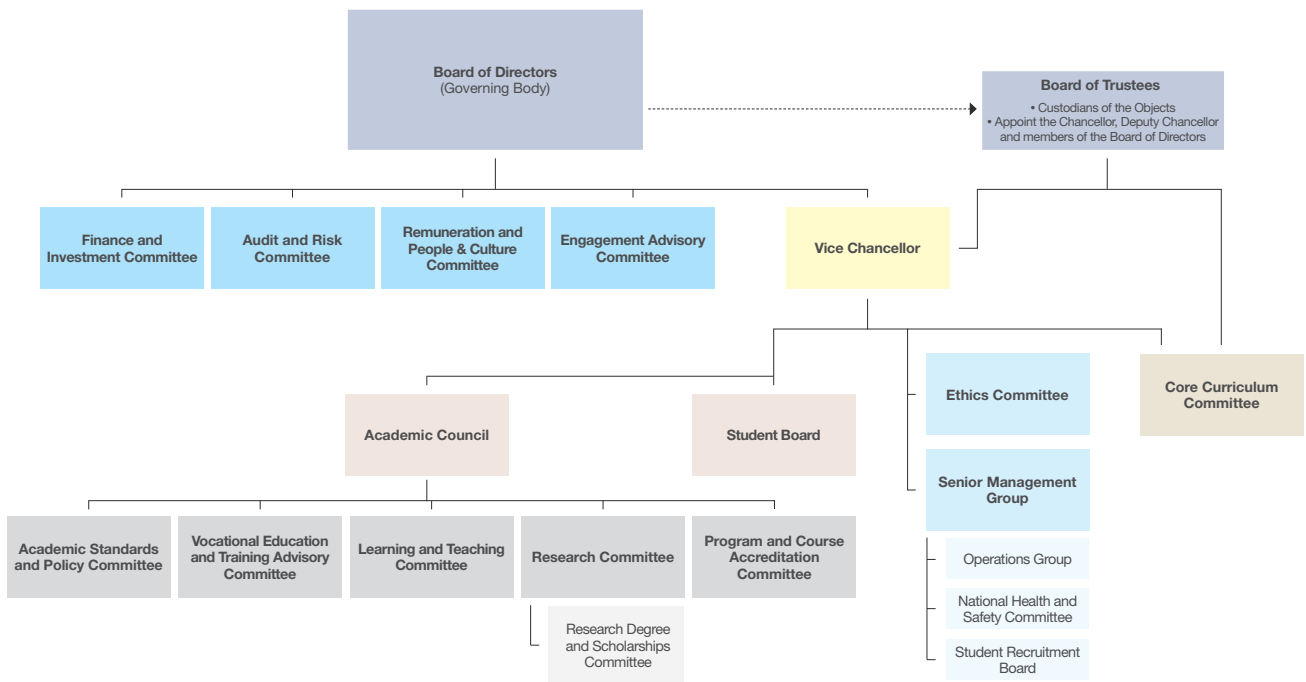
We will also continue to provide training opportunities for suppliers.

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

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 excellent, 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 agreements spanning multiple years.

The University has strong relationships with industry, in particular the business, health, education, law, medical and architecture industries. The majority of our students undertake placements in the industry relevant to their course of study while studying for their degree.

As a private, Catholic university, Notre Dame has a strong relationship with the Catholic Archdiocese of Sydney, Perth and Broome.

There are partnerships with Universities from around the globe, enabling students from both Notre Dame and its partners the opportunity to enjoy the experience of studying abroad. These policies enable staff engagement in cross-institutional collaborative research.



Our revenue
\$197.3 million

13,284
domestic & international students

7 clinical schools

26 international partner institutions



We have
2,051
employees

453 451 1147
Full time Part time Casual

70% Female | **30%** Male

Average length of employment

6.7 years



We have over
600
volunteers

Longest Serving **32 years**
Oldest **92 years** | Youngest **17 years**

The information presented above is at 31 December 2021.

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 organisational-wide approach to risk management. Our approach supports consistent identification, management and reporting of risks and is aligned to the risk appetite prescribed by the Board.

Our dedicated risk and assurance team has the accountability for developing and embedding the organisation's approach to risk management as well as establishing the internal audit function at Notre Dame. Internal audit plans are established and agreed upon each year. On completion of each internal audit engagement, the results are conveyed to management and management will provide 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.

Our People

Since its foundation, we have 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 initiatives such as public lectures, debates and presentations which are hosted by the University.

The University's Enterprise Agreement (EA) is negotiated between its employees and their representatives (National Tertiary Education Union) and the University. 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.

Notre Dame has 2,051 employees and over 600 volunteers nationally.

Notre Dame recruited employees both directly and with the assistance of recruitment agencies. The University has spent approximately \$0.3 million on contract and agency workers in 2020.

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.

Impact of COVID-19

2020 was a challenging year for Notre Dame, as for the rest of the higher education sector.

In response, the University's immediate focus was to respond rapidly to the risks associated with inability to teach and deliver a high standard of education. Relying on the innovation, professionalism and dedication of the academic and professional services staff, Notre Dame was able to quickly transition to full online learning in March. This enabled students to continue their studies without delay. Our students were also impacted by the pandemic in other ways. To provide emergency assistance to those students impacted financially by the health crisis, a \$1 million Financial Hardship Fund was launched thanks to the generosity of our benefactors.

We also recognise that COVID-19 may impact the ability of suppliers to manage supply chains and maintain good practices. This can increase the risk of slavery to vulnerable individuals in our operations and supply chain. Our supplier on-boarding process is continuously being reviewed and improved to reduce this risk.

Our Suppliers

Notre Dame has over 4,000 suppliers of which, approximately 200 represent the top 80% spent. In 2020, 97.79% of the University's total spend with suppliers was within Australia, with the USA (1.41%), the United Kingdom (0.23%), Singapore (0.21%) and Germany (0.17%) being the main countries of origin of supplier spend outside the country.

The top five industry sectors used to supply the University in 2020 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, stationary supplies, waste disposal, professional and education services.

Supplier Risks

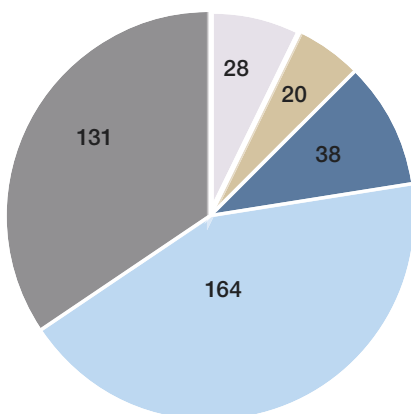
The initial focus of the risk mitigation strategy has been to identify the high risk suppliers based on the key indicators below:

- **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 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).

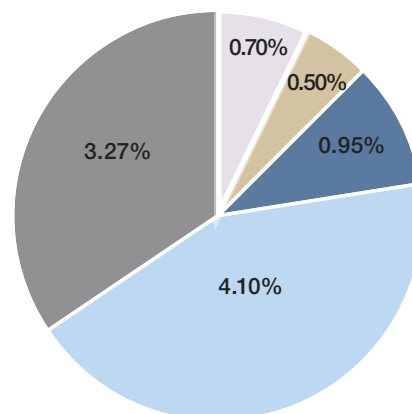
From a total of 4,000 suppliers, 9.52% have been identified in the high risk category and broken down by number and percentage in the charts below:

CATEGORY	NO OF SUPPLIERS	%
Total Number of suppliers	4,000	100.00
Building and Construction	28	0.70
Cleaning Services	20	0.50
Security Services	38	0.95
Facility Management	164	4.10
Information & Communications Technology	131	3.27
	381	9.52

Number of Suppliers in the High Risk Category



Percentage of Suppliers in the High Risk Category

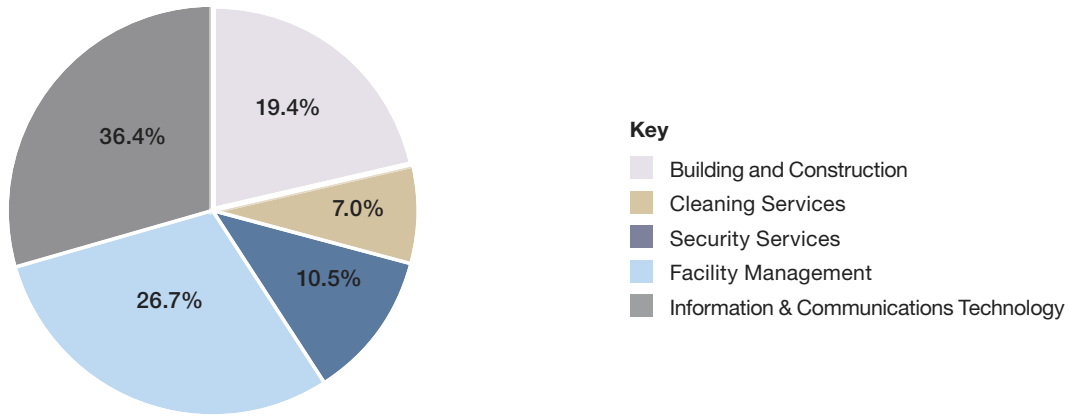


Key

- Building and Construction
- Security Services
- Information & Communications Technology
- Cleaning Services
- Facility Management

Of total expenditure, 25% was spent in these high risk categories, split as percentage as shown below:

25% of the Total Spend



The analysis has determined that the risk on total spend is relatively low, all high risk expenditure will continue to be investigated in line with the guidelines of the Modern Slavery Act 2018 (Cth) and the University's three year roadmap.

Effectiveness Assessment

The Modern Slavery Project Group has regularly reviewed and monitored the progress made by the University to address modern slavery. A summary table is outlined below:

Target	Not Commenced	In Progress	Completed
MANAGEMENT SYSTEMS			
Establish Governance and Board oversight			✓
Establish the Modern Slavery Project Group			✓
RISK MANAGEMENT			
Update risk management framework			✓
PROCUREMENT & SUPPLY CHAIN			
Identify high risk suppliers			✓
Review Top 200 suppliers by spend for evidence of modern slavery clauses			✓
Amend agreements or terms/conditions for modern slavery clauses for those contracts identified in the Top 200 supplier review		✓	
Develop Modern Slavery Side-Agreement template			✓
Amend supplier agreement template to include modern slavery clauses			✓
Update Procurement Policy and Procedures including supplier on-boarding process			✓
Establish awareness of modern slavery risks for all suppliers			✓
HUMAN RESOURCES & RECRUITMENT			
Develop Whistleblower Protection Policy and Systems		✓	
Introduce relevant training programs for staff			✓
CUSTOMERS & STAKEHOLDERS			
Publish Modern Slavery Statement externally			✓

In 2020, the University focussed its resources on identifying areas of modern slavery risks. Some of our planned activities for 2020 were disrupted due to the impact of COVID-19 on our operations. We will progress these activities in 2021.

In 2021, we plan to formalise our Modern Slavery Risk Management Initiatives roadmap for the next three years to provide guidance around reporting and corrective actions to be taken, as well as an internal assessment of the effectiveness of our initiatives. Following this, the next step will be to identify key stakeholders to engage with Notre Dame to track, measure and report on the progress against the plan.

We are currently in the process of developing 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 and aim to offer these to students in 2021. The University also plans to engage proactively with ACAN on the implementation of:

- 1) Additional training modules for University students and employees;
- 2) Targeted audits of suppliers deemed as high risk (through engagement of an external third party); and
- 3) Revised agreements with Tier 1 suppliers to address modern slavery in their supply chains, if anomalies are identified.

We will monitor and review our initiatives, policies and procedures to further enhance effectiveness.



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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: 23 March 2021

1. 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 2020.

SCC strongly opposes all forms of modern slavery and the harm it inflicts upon children, women and men. We strive to carry out our activities in a manner that respects and supports the protection of human rights and ensure that those we do business with do the same.

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

2. Our company

SCC is a not for profit provider of aged care services with a strong presence in regional NSW.

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.

Today we care for more than 3,500 customers and operate in 39 locations across NSW and the ACT.

Our values help us create supportive environments for 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... Our work places high value on people's wishes, their dignity and their privacy.
- Teamwork... We don't keep things to ourselves. We communicate well. We offer to help.

3. 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 2121. Our ABN is 76 131 082 374.

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

Our supply chain is comprised of a broad range of suppliers primarily 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.

4. 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 100 suppliers, who account for 73% of our annual spend on 2,420 suppliers. Supplier products and services were assessed against a category risk taxonomy specifically developed for the entities in the Australian Catholic Anti-Slavery Network (ACAN), which SCC is a member of. ACAN exists to assist Catholic faith-based entities to assess and address operational and supply chain modern slavery risks, and to reduce slavery across the world.

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

- Staff Agency
- Construction
- Facilities Management
- IT
- Food & Beverage
- Medical Equipment
- Medical Consumables
- Cleaning Chemicals

We found that the key types of modern slavery driving the risk in our supply 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. Our priority is always ensuring the safety and wellbeing of our residents and staff. Throughout 2020, we were required to source extra PPE as a matter of urgency at times, which involved close collaboration with our existing preferred supplier for PPE. We continued to engage with our existing preferred supplier, who complies with SCC's modern slavery requirements.

5. 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.

ACAN representatives met and presented to the SCC Senior Executive Management Team on February 27, 2020. During this meeting, ACAN described its commitment to reducing slavery, and explained how they would assist SCC to manage modern slavery risks within its supply chain and operations. ACAN also described how they support organisations to report against criteria of the Act.

Our procurement staff, who play a critical role in working with our supply chain, participate in monthly modern slavery conference calls hosted by ACAN.

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.

Modern Slavery Working Group

We established a Modern Slavery Working Group with representatives at management level from across our organisation, including: Marketing and Communications, Property and Development, Procurement, Learning and Development, and People & Culture.

The Modern Slavery Working Group utilised ACAN's significant resources and applied the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities to build knowledge and develop modern slavery actions for 2020.

Supply chain engagement and due diligence

To increase awareness of modern slavery, SCC provided all of our top 100 suppliers with a Modern Slavery Supplier Awareness Presentation. This not only provided education on the definition of modern slavery and who is at risk in their supply chains, but also communicated SCC's expectations for supplier performance.

Suppliers considered at risk of modern slavery were requested to provide documentation of their anti-slavery initiatives in order to establish a baseline of current practice and risk.

Those suppliers who were identified as having a high risk of modern slavery were requested to complete a Modern Slavery Supplier Questionnaire. The outcomes of this process will be shared with each supplier in 2021, and actions recommended where improvements are deemed necessary.

Policies

The SCC Supplier Code of Conduct, publicly accessible on the SCC website, sets out principles for supplier behavior. 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.

We have updated our standard Request for Proposal template to ensure consistency and to support the implementation of our Supplier Code of Conduct. Our suppliers are obligated to ensure that any risks to people and workers in suppliers' supply chains or any parts of the suppliers' business are identified, assessed, remedied, eliminated and monitored.

Training and education program

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

An introductory modern slavery e-learning module has been completed by 85% of our Executive staff and their direct reports, as well as our Board members. Further training was also focused on key support services employees who are responsible for supplier relationships, and these employees have completed an anti-slavery supplier engagement and forum workshop, providing a framework for collaboration and engagement with suppliers about modern slavery risks and how to address them.

Modern slavery is now part of the induction process for new management staff. The following resources have been published on our Intranet to support staff 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, 2018.
- Specific reference to our Sustainability Action Plan and our commitment to the United Nations Sustainable Development Goal 8 – Decent Work & Economic Growth.
- Information articles via internal publication 'Take 5' raising continued awareness on the relevance of modern slavery to SCC.

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 includes cases of modern slavery. Alternatively, anonymous reports can be made to an independent external disclosure management service.

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 ACAN. If there is any 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 first priority.

SCC 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 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 to provide 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 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, SCC is 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.

6. Assessing the effectiveness

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

Procurement team

The SCC procurement team are responsible for tracking and progressing engagement and due diligence initiatives with our suppliers. The procurement team also reviews all supplier feedback and responses to questions or requests in relation to modern slavery matters.

Senior Executive team and board of directors

The SCC procurement team reports progress of Working Group actions to the SCC senior executive team, who ultimately oversee and direct SCC modern slavery efforts. The Board are regularly updated by our Chief Executive Officer on modern slavery initiatives.

If no cases of modern slavery have been found, we acknowledge that this does not mean that we don't have modern slavery in our operations or supply chains, but that we need to review the effectiveness of our Whistleblower Policy, Whistleblower hotline and due diligence practices.

7. Plan for addressing modern slavery in 2021

SCC will continue working to mitigate modern slavery and progress and mature our approach in 2021 by focusing on the following:

- Establish a Modern Slavery Policy for SCC;
- Continue our supplier engagement process and roll out our modern slavery questionnaire and training material to suppliers identified as medium risk;
- Assess progress of our high-risk suppliers to mitigate modern slavery;
- Our Modern Slavery Working Group will develop our modern slavery action plan for 2021;
- Continue to educate and train our staff to understand and recognise the signs of modern slavery;
- Promote our Whistleblower Policy and Supplier Code of Conduct to our staff and supply chains to encourage anonymous reporting of concerns regarding modern slavery;
- Update our standard supplier contract templates to include reference to Modern Slavery;
- Provide a greater proportion of our suppliers with our Modern Slavery Supplier Awareness Presentation, and Supplier Code of Conduct;

- Ask that our top 100 suppliers provide information regarding their anti-slavery initiatives;
- Remind staff about our anti-slavery priorities and mitigation measures via our internal 'Take 5' publications;
- Build on and expand on modern slavery information on the SCC intranet; and
- Participate in sector-wide anti-slavery initiatives with ACAN and ACAN member organisations.

8. Additional information

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

Modern Slavery Act reporting requirement	Addressed in Section	Page No.
Identify the reporting entity	2	1
Describe the reporting entity's structure, operations and supply chains	3	1 & 2
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. Parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	4	2
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	5	2, 3, 4
Describe how the reporting entity assesses the effectiveness of such actions.	6	4
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	5	3
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	1 to 6	1 to 5

Villa Maria Catholic Homes Ltd

2020 Modern Slavery Statement



VMCH

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We 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) is set out in this document. It is developed in accordance with the Modern Slavery Act 2018 (the Act).

While this Statement is our first public regulatory disclosure specifically addressing modern slavery in line with the requirements of the new 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.

A commitment to supporting the disadvantaged and marginalised is an essential part of our operations and this is appropriately reflected in our policies and procedures.

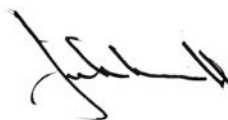
We do not tolerate behaviour that is in breach of the law or which is non-compliant with our policies or which does not align with our ethical values. We expect our employees, contractors, volunteers and suppliers to operate in a manner which is consistent with our values and standards.

This Statement sets out the steps we have taken throughout 2020 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 & Risk Committee and approved by VMCH's Board on 25 February 2021.

We are pleased to be part of the Australian Catholic Anti-Slavery Network (ACAN) and acknowledge the support ACAN has provided in developing VMCH's modern slavery mitigation plans. This Statement is submitted as part of the ACAN compendium, consequently this report is for activities to the year ending 31 December 2020. VMCH's usual reporting period is 1 July to 30 June.

Our membership of ACAN is an important part of the joint approach Catholic organisations are taking 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."



Julien O'Connell A.O.
VMCH Board Chairman



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 486 Albert Street, East Melbourne, Victoria.

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 support, including Early Learning and Therapy, Specialist Education, Disability Services, Affordable Homes, Residential Aged Care, Retirement Living and At-Home Aged Care services.

Our values underpin the work we do. As a Catholic not-for-profit organisation, compassion, respect 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.

2.1 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 really listen. 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 who we are by supporting people and families to live their best lives, providing a place to call home and spaces to learn and grow.

2.2 2020 Modern Slavery Risk Management Initiatives

Our approach to modern slavery will span several years. 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 put in place the governance structures consistent with VMCH's risk appetite statement and Enterprise Risk Management Framework.

2.3 Our Plans for 2021

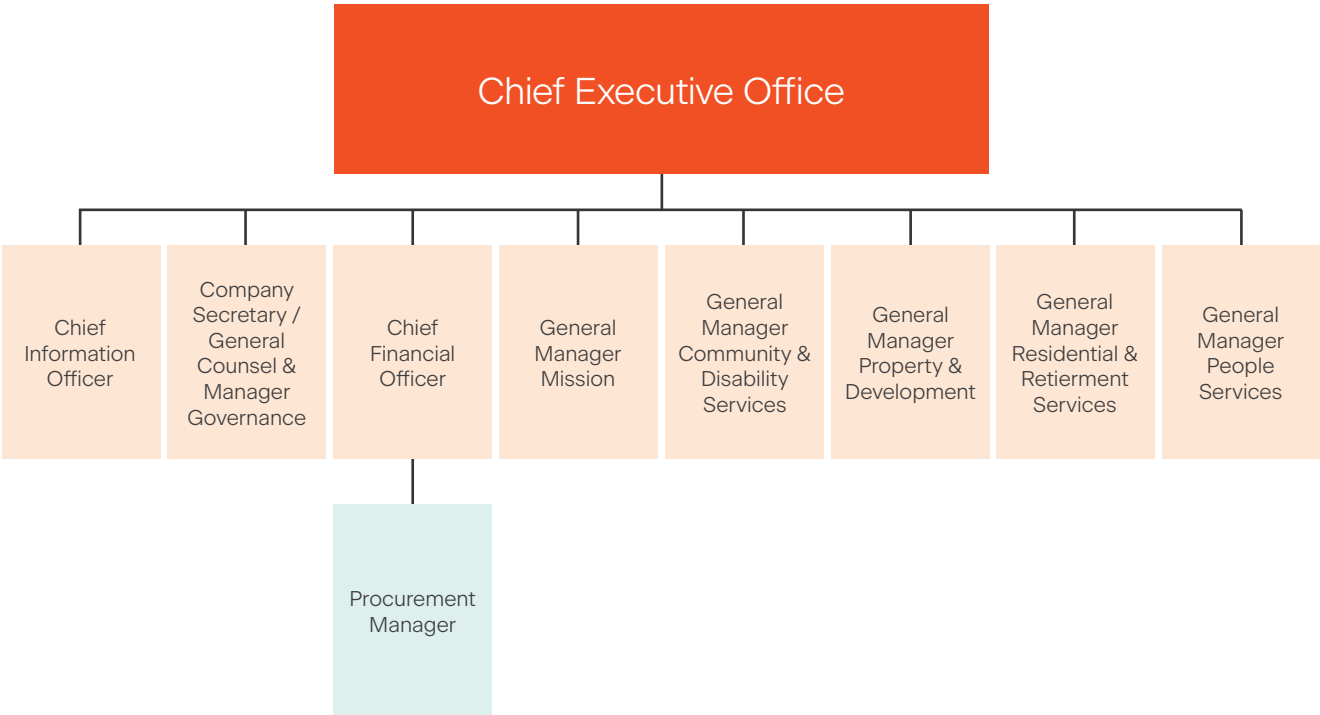
VMCH takes a continuous improvement perspective to its approach to modern slavery risks. Our plans for 2021 will build on the work undertaken in 2020. This will be a consolidation year to solidify and embed the work we have already undertaken.

3. Organisational structure and operations

Our operations cover:

- At-home aged care which supports 4115 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 983 people in twelve locations across Victoria.
- Support for 1526 individuals with disabilities including 233 children at specialist school St Paul's College and in our Early Learning and Therapy programs.
- 14 Specialist Disability Accommodation (SDA) houses across Melbourne that provide specialised support for adults with disability.
- Three respite homes that provide care and support for children overnight, on weeknights and weekends.
- 564 retirement living apartment/units across 18 locations in Victoria.
- Accommodation to 459 people living in our affordable homes across 21 locations across Victoria.
- Employment of approximately 2,500 people on full time, part time or casual basis. Of these approximately 340 are full time employees, 1380 are part time employees and 736 are casual.
- Over 600 volunteers who donate their time to VMCH.

Our organisational structure includes a procurement function which provides procurement advice and support to the operational areas.



4. Governance Structure

VMCH's Board has responsibility for ensuring a reporting culture and an Enterprise Risk Management Framework exists within VMCH. The Quality Compliance & Risk Committee (QCR) assists the Board in its responsibilities relating to:

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

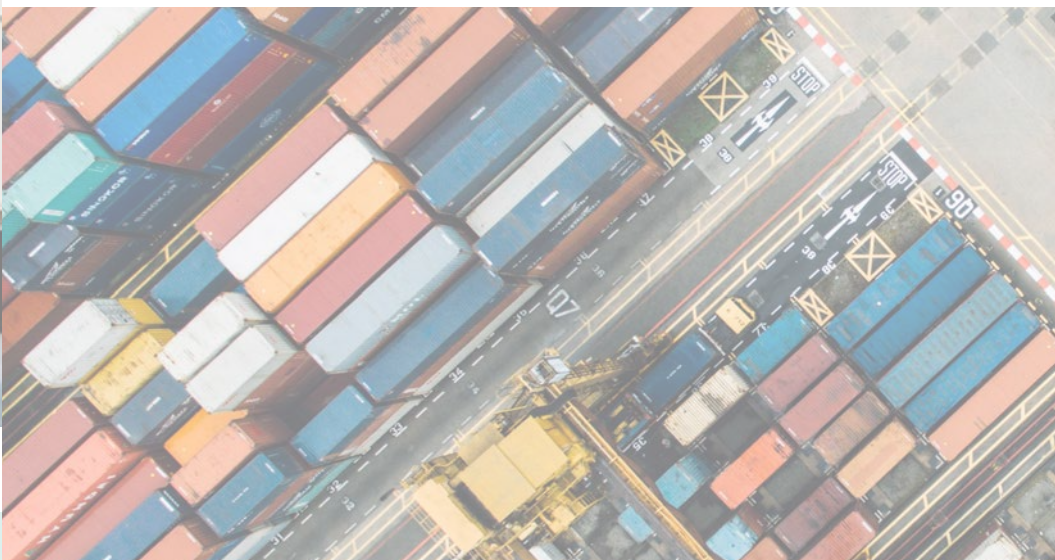
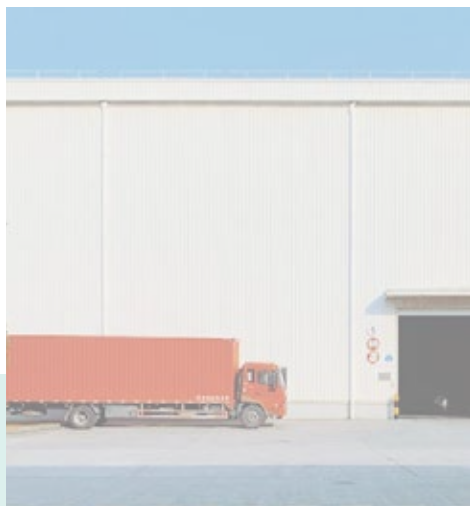
The QCR reviews a wide range of matters relating to Clinical Governance, Quality and Compliance frameworks. This includes all matters related to client care, safety and support and non-financial risks within which the organisation operates in accordance with VMCH's risk appetite and risk management framework.

We established a Modern Slavery Working Group (Working Group). 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 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
- 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.

The Working Group is chaired by the General Manager Governance/Company Secretary & General Counsel (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.



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 that have an Australian presence and many have their head office in Australia. Other suppliers' head offices are based around the world with key countries including China, United Kingdom and the United States.

Examples of goods	Examples of services
<ul style="list-style-type: none">• Medical equipment• Medical consumables• Furnishing• Food supply• Textiles• Building materials	<ul style="list-style-type: none">• Allied health• Nursing agency• Cleaning• Trade services for refurbishments and maintenance• Lifestyle and entertainment• Specialist IT systems



6. Modern slavery risks in operations and supply chain

This year VMCH started to develop its corporate understanding of modern slavery risk. We developed key processes to assess areas of elevated modern slavery risk within our business supply chain.

VMCH joined with other Catholic providers and is 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.

6.1 Our COVID-19 Response

The COVID-19 restriction created challenges for many organisations including VMCH. For most of 2020, our focus was on protecting the people we provide care for, our staff and volunteers. This was particularly the case as our operations are Victorian based where the most severe COVID restrictions were applied.

An organisational Critical Incident Team (CIT) was formed to continually monitor the COVID 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. Precautions which were required for all staff in relation to PPE requirements were also extended to contractors.

The pressures created by dealing with mitigating the risk to the people we care for from COVID-19 meant that some of the work we would have undertaken in assessing and mitigating the risk or modern slavery, has been delayed. This was particularly the case with face-to-face engagement with suppliers.

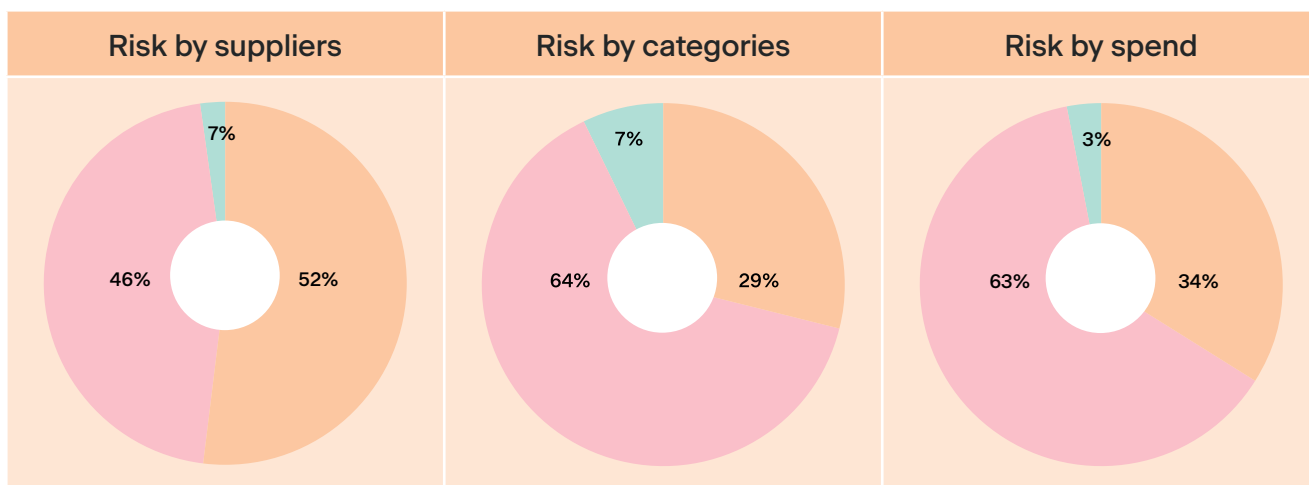
6.2 Operational and Supply Chain Risks

VMCH recognises that modern slavery risk may occur in our organisation and extended supply chain. In conjunction with ACAN, VMCH undertook a supplier risk analysis of our top 48 suppliers (by spend).

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

There were 9 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 we consider may have a high risk of modern slavery is labour hire risk through the use of agency staff through third party suppliers.

Action taken to address the supply chain risks are discussed below.

The focus for the initial phase of modern slavery risk mitigation has been on establishing the foundations for further work.

Actions taken include:

Governance framework

VMCH became a member of the ACAN with a modern slavery liaison office (MSLO) representative. ACAN is a network of over 30 Catholic entities. VMCH's MSLO attended ACAN conferences and monthly meetings. The purpose of the meetings was to understand the potential modern slavery risks and to provide member organisations, including VMCH, with resources to assist in the modern slavery mitigation plans.

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

The VMCH Board approved the Modern Slavery Policy which, together with the Protected Disclosure (Whistleblower) Policy, Procurement Policy, Fraud and Corruption Policy, Employee Grievance Procedure, and Bullying and Discrimination Prevention Policy, provide a framework to ensure direct risks of modern slavery are effectively managed within our operations. Each of these has a continual review process into which finding and further treatments for modern slavery can be incorporated to ensure best practice.

The VMCH Board was briefed about modern slavery and their obligations under the Modern Slavery Act.

Supplier code of conduct was developed.

The ACAN Supplier Engagement Strategy Guide was adopted following the supplier engagement workshop which was undertaken with key VMCH stakeholders and ACAN.

Bridge the gap analysis

When VMCH joined ACAN, VMCH undertook a 'bridge the gap' analysis to identify our current position with its modern slavery risk. A comparison survey was undertaken again in December 2020.

The results showed that there had been improvement in some significant areas including in management systems (governance), risk management (operational risk), procurement and supply chain (supplier engagement) and human resources (awareness, training and labour hire/outsourcing).

The areas where there was improvement are listed in the table below.

Category	Topic	Result 2019	Result 2020*	Change
Management Systems	Governance	3	4	↑
Risk Management	Operational Risk	2	3	↑
Procurement & Supply Chain	Supplier Engagement	2	3	↑
Human Resources & Recruitment	Awareness	1	3	↑
	Training	1	3	↑
	Labour Hire/ Outsourcing	2	3	↑

* The result is scaled from a rating of 1 to 5 where 5 is the best result.

Contracts and tenders

Standard clauses regarding modern slavery are incorporated into all relevant agreements and are part of the standard tender materials VMCH now uses for its procurement activities.

Our tender process includes the modern slavery policy and any tenderer must accept and comply with VMCH's Modern Slavery policy to be considered as part of the tender.

Training

Online training was developed with the assistance of ACAN and introduced into VMCH's online training portal for employees and volunteers.

Modern Slavery online training was included in the suite of modules directors are required to complete.

Webinar was made available for suppliers.

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

Communication

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

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.

From a supplier perspective, we have developed questionnaires for completion by our top 50 suppliers (by spend).

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.

7. Future Commitment

VMCH has several actions planned for 2021 that directly relate to the identification, management and mitigation of our risks of modern slavery:

- Continued membership of ACAN to leverage off 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 comply with VMCH's Modern Slavery Policy as part of the final agreement.
- Further development of VMCH's Modern Slavery action plan and road map to build on the work undertaken to December 2021.

8. 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.

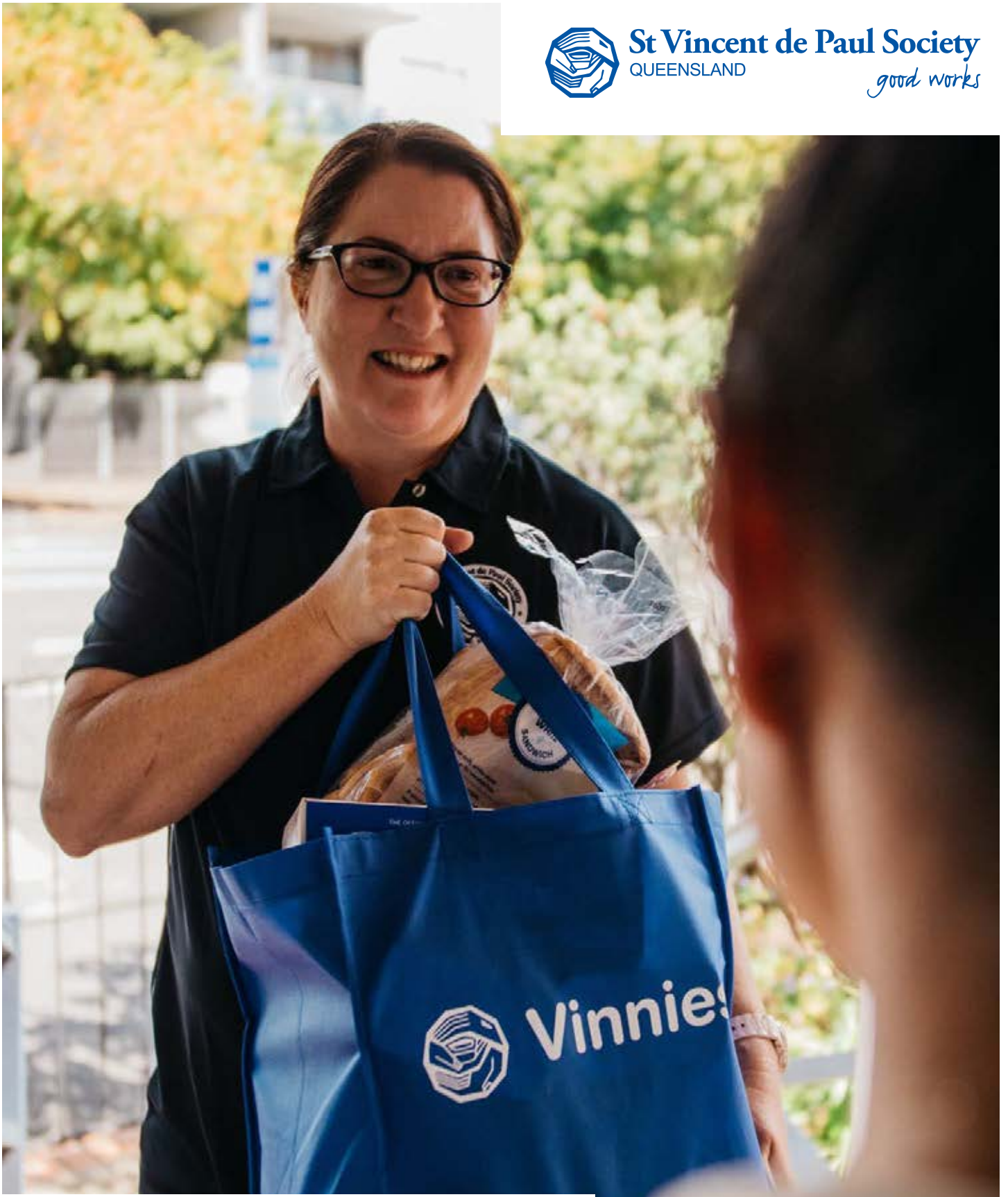
About VMCH

Here at VMCH, compassion, respect and inclusion aren't just words to us. As a Catholic not for profit organisation, these values underpin everything we do.

Our professional and compassionate teams are with you on your life journey; helping you with a wide range of support from early learning and therapy, specialist education, disability services, affordable homes, residential aged care, retirement living and at-home aged care.



St Vincent de Paul Society
QUEENSLAND
good works



St Vincent de Paul Society Queensland

Modern Slavery Statement

1 January 2020 to 31 December 2020

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 Raelene Robinson, Procurement Manager, St Vincent de Paul Society Queensland, February 2021.

Responsibility for this document rests with St Vincent de Paul Society Queensland.

Privacy statement: St Vincent de Paul Society Queensland 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

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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). 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 2020.

We are 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. Ozcare has issued its own Modern Slavery Statement which can be accessed on their website <https://www.ozcare.org.au/>

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 to Queenslanders in need would not be available.

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.

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.

2020 Modern Slavery Risk Management Initiatives

In the reporting year, we began developing our modern slavery framework, which includes the appointment of a Modern Slavery Liaison Officer (MSLO) and the joining of the Australian Catholic Anti-Slavery Network (ACAN) to develop our 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 2021 and beyond. The cornerstone of the reporting year was conducting the analysis on our supplier portfolio.

We have also developed a high level supplier engagement strategy and implemented key stakeholder training. Most importantly, we have started the conversation and bringing awareness of modern slavery to key staff members and suppliers.

In essence, 2020 has been used to:

- develop a modern slavery management framework;
- appoint the MSLO;
- review our supplier portfolio;
- develop high level supplier engagement strategy;
- develop supplier questionnaires;
- implement key stakeholder training on modern slavery risks;
- established a modern slavery working group consisting of key stakeholders throughout the organisation;
- briefed our Boards on modern slavery compliance obligations.

Plans for 2021 and Beyond

We will continue to review our policies, procedures and codes of conduct taking into account modern slavery considerations.

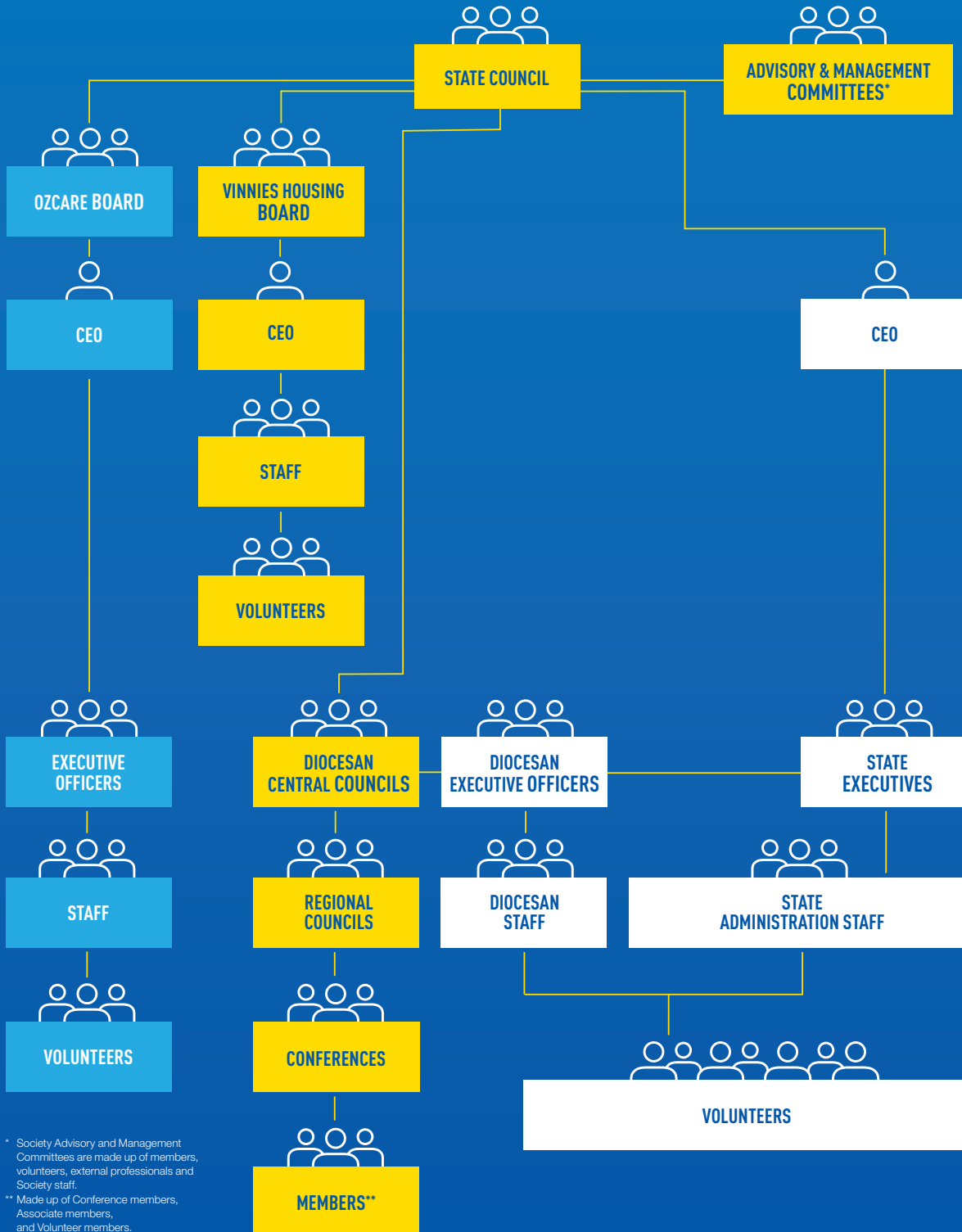
We will also look to implement:

- 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
- 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



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). Vinnies Housing will at all times:

- act within the philosophy, mission and values of the Society
- appoint board members, the majority of which will be Vincentians;
- influence 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. 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. Any person registered as a Conference member has voting rights in relation to the affairs of SVDPQ.

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.

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.

Modern Slavery Statement

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 heads 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

Our Operations

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.

In SVDPQ, we provide a range of:

- housing solutions including homeless intervention and prevention services and crisis accommodation;
- mental health services supporting people over 16 years of age living with a mental health condition;
- drug and alcohol recovery;
- family support centres to help build capacity for families dealing with financial, child-raising and emotional pressures;
- 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, focussing on intervention to families to improve the safety and wellbeing of children in their home;
- migrant and refugee services;
- youth services assisting disadvantaged young people; and
- education and employment, by providing people who have experienced homelessness or hardship the chance to complete vocational and tertiary certificates.

In addition, Vinnies Housing works to relieve poverty distress or disadvantage by:

- providing subsidised housing options to those in need including people requiring accommodation, people with complex and specific needs, people in disadvantaged target groups and those on very low household incomes;
- providing affordable housing and support services to people experiencing housing stress, homelessness or at risk of homelessness.

We have in excess of 1,980 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 fairly 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.

Our Supply Chain

We purchase 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:

- Vehicles, consumables and maintenance
- ICT Software, networking and support services
- Property and facility maintenance
- Utilities
- Building, construction and fabrication services
- Office and building 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 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

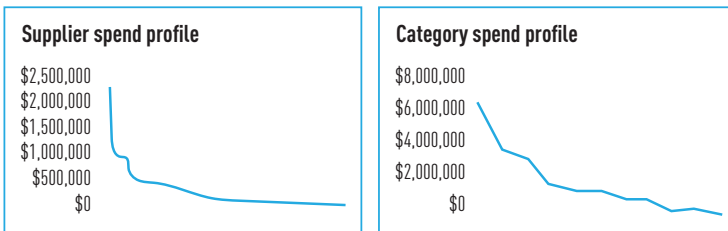
During the reporting year, we have mapped out our Top 50 suppliers by spend and applied purchasing categories, allowing us to conduct category risk taxonomy assessments.

Our Top 50 suppliers represent 48% of our spend, with 38% being assessed as high risk, 57% as medium risk and 5% low risk.

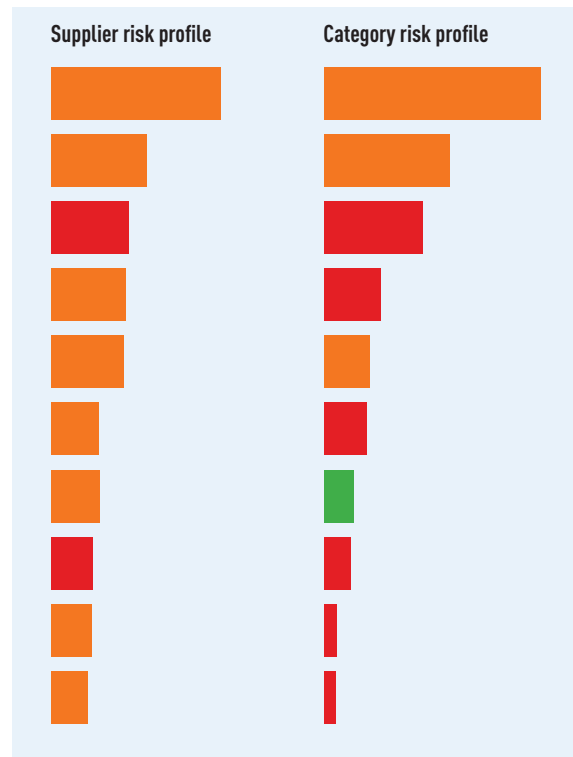
The high-risk suppliers fall into the below categories:

- Property and facility maintenance
- Building, construction and fabrication services
- Office and building supplies and services
- Travel and accommodation
- Furniture and bedding
- Waste Management
- Food and hospitality; and
- Labour hire.

Modern Supply Chain Risk



SPEND RISK (\$AUD)	\$6,986,484	\$10,477,566	\$815,998	\$18,280,048
SUPPLIER RISK (No.)	27	19	4	50
CATEGORY RISK (No.)	7	3	1	11



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 bench marked by external providers. We also regularly review employee remuneration practices.

Our people are engaged in regular surveys and feedback process. Feedback process is outlined in the organisation Complaint and Compliment framework policy.

Our people are required to adhere to the organisation Code of Conduct and policies and procedures that cover Bullying & Harassment, Privacy legislation, Whistleblower, Complaints and Compliments, 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.

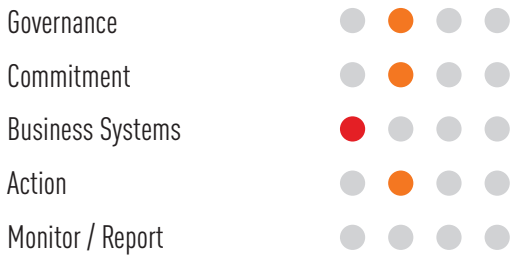


Modern Slavery Gap Analysis

We have completed a modern slavery gap analysis focussed mainly on Management Systems, Risk Management, Human Resources and Recruitment, Customers and Stakeholders and Procurement and Supply Chain.

Results – Gap Analysis for 2020 Bridge the Gap Heat Map

Management Systems



Management Systems



Human Resources and Recruitment



Customers and Stakeholders



Procurement and Supply Chain



SUPPLY CHAIN RISKS

Industry Sector

Our two highest spend categories are in Vehicles and Information and Communications Technology (ICT) and are classified medium risk. Following on from these two are Property and Facility Maintenance, Office and building supplies and services (including furniture).

Geographic location

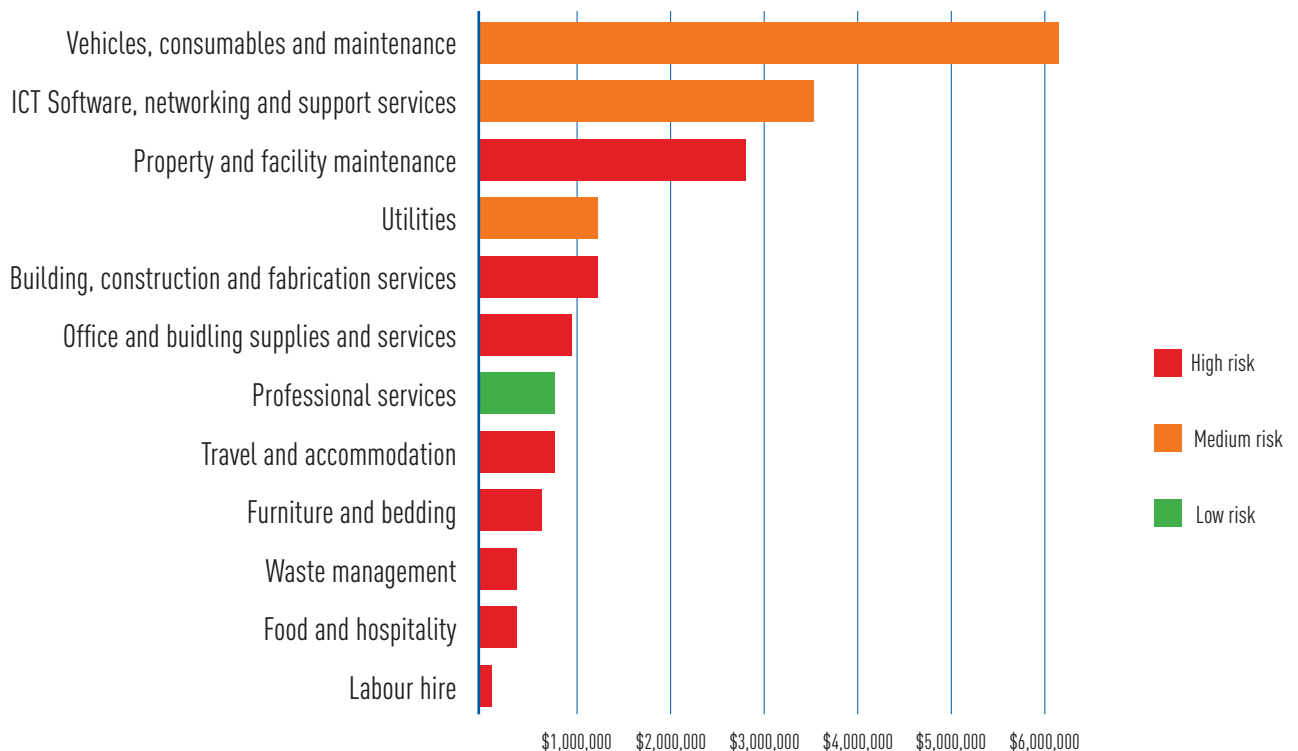
While we predominantly use Australian suppliers, we recognise that some of our goods and services may come from other countries.

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 8 spend categories:

- Property and facility maintenance;
- Building, construction and fabrication services;
- Office and building supplies and services;
- Travel and accommodation;
- Furniture and bedding;
- Waste management;
- Food and hospitality; and
- Labour hire.





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 2021 and beyond. The cornerstone of the reporting year was conducting the analysis on our supplier portfolio.

In the reporting year, we joined the Australian Catholic Anti-Slavery Network (ACAN) with a view to gain resources with other like-minded entities and develop its processes in line with industry best practice. A Modern Slavery Liaison Officer (MSLO) was appointed to lead the discussion and strengthen the approach by establishing an internal modern slavery working group.

Like many other organisations around the world, we have suffered disruptions and delays caused by COVID-19 during the reporting year and we are navigating a way towards the new normal.

In essence, 2020 has been used to:

- develop a modern slavery management framework;
- appoint the MSLO;
- review our supplier portfolio;
- develop high level supplier engagement strategy;
- develop supplier questionnaires;
- implement key stakeholder training on modern slavery risks;
- establish a modern slavery working group;
- brief our Boards on modern slavery compliance obligations.

Resources used include the spend category risk taxonomy, program implementation flow chart, supply chain risk dashboard, bridge the gap analysis, and guidance for supplier questionnaire.

In 2021, we plan to:

- review and update our policies, procedures and codes of conduct to include 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 20 suppliers to include modern slavery provisions in new supplier contracts.
- deliver targeted briefings to 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.

Modern slavery action plan and road map

The following three key actions would be prioritised and implemented as part of our modern slavery risk management approach:

1. Developing Board engagement resource materials to increase awareness around management of modern slavery risk and practices, establish clear actions and ensure accountability and leadership;
2. Adapting modern slavery general awareness training resources which are accessible to all members of the Modern Slavery Working Group to ensure consistent and accurate information is provided to all applicable staff, members, volunteers and suppliers
3. Developing model supplier code of conduct and modern slavery provisions to ensure a consistent approach to supplier engagement and management and inform the market that we are serious about eradicating modern slavery in our supply chains.

Reporting Criteria 5: Actions taken to assess and address risk

SVDPQ will assess its implemented actions on a regular basis. The following process key performance indicators will assist 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 SVDPQ and Vinnies Housing. The Statement was approved by the SVDPQ 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/>

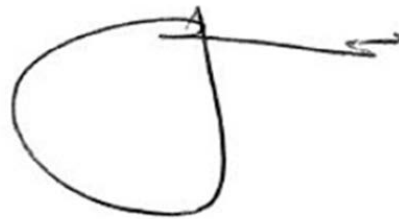
Reporting Criteria 7:

Other

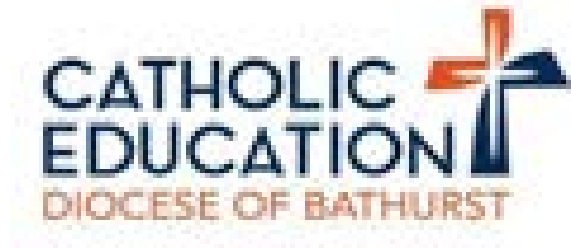
Not applicable.



Dennis Innes - State President
- St Vincent de Paul Society Queensland



Greg Coghlan - Chair
- St Vincent de Paul Society Queensland Housing



Catholic Education Diocese of Bathurst Modern Slavery Statement 2020

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Disclosure Note

This statement has been made on behalf of *Catholic Education Diocese of Bathurst*. This Statement covers all entities owned or controlled by *Catholic Education Diocese of Bathurst*.

ABN 73 470 086 952

About Our Diocese

The Catholic Diocese of Bathurst 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.

2020 Modern Slavery Risk Management Initiatives

Initiatives implemented in 2020 were:

- joining Australian Catholic Anti-Slavery Network
- forming a Modern Slavery Working Group
- attendance of Modern Slavery Working Group at professional development opportunities
- undertake a Modern Slavery Gap Analysis
- undertaking Bridge the Gap Analysis
- the development of Modern Slavery Statement CEDB 2020
- the writing of a Modern Slavery Policy for implementation in 2021

Our Plans for 2021

Implementation strategies for 2021 are:

- ratification of Modern Slavery Policy and procedures
- communication of this policy and procedures to staff
- communication of this policy and procedures to some business partners and supply chains
- assessment of modern slavery risks within our operations and supply chains especially through analysis of the Modern Slavery Gap analysis
- the development of a Risk Framework with effective, efficient and transparent controls to manage and mitigate risks
- integration of modern slavery requirements into relevant tenders and contract terms and conditions
- the development of Modern Slavery Statement CEDB 2021

Our Plans Beyond 2021

Beyond 2021 Catholic Education Diocese of Bathurst (CEDB) plans are to implement:

- due diligence for review of suppliers and business partners
- increased awareness of suppliers and business partners to manage their own modern slavery risk
- increased awareness, engagement and education of staff and community
- an analysis of country of origin sourcing for goods and services
- practical steps to prevent and manage ongoing and changing risk
- protocols and mitigation processes to ensure human rights impacts caused by our activities, are effectively addressed
- annual review and writing of Modern Slavery Statement CEDB

Statement from the Executive Director of Schools, Mrs Christina Trimble

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
2nd December 2020



Statement from the Bishop of Bathurst, Bishop Michael McKenna

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

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.

+ Michael McKenna
Bishop of Bathurst
16th December 2020

About Catholic Education Diocese of Bathurst

OUR VISION STATEMENT

“We have gifts that differ, according to the grace given to each of us.” Romans 12:6

With Jesus Christ as our inspiration and guide, we are called to provide high quality Catholic education in the Diocese of Bathurst.

OUR MISSION STATEMENT

In partnership with the family, parish and community, our schools nurture a relationship with Jesus, celebrate and share the Catholic faith, and educate to enable all to make a positive contribution to the world.

OUR STRATEGIC GOALS

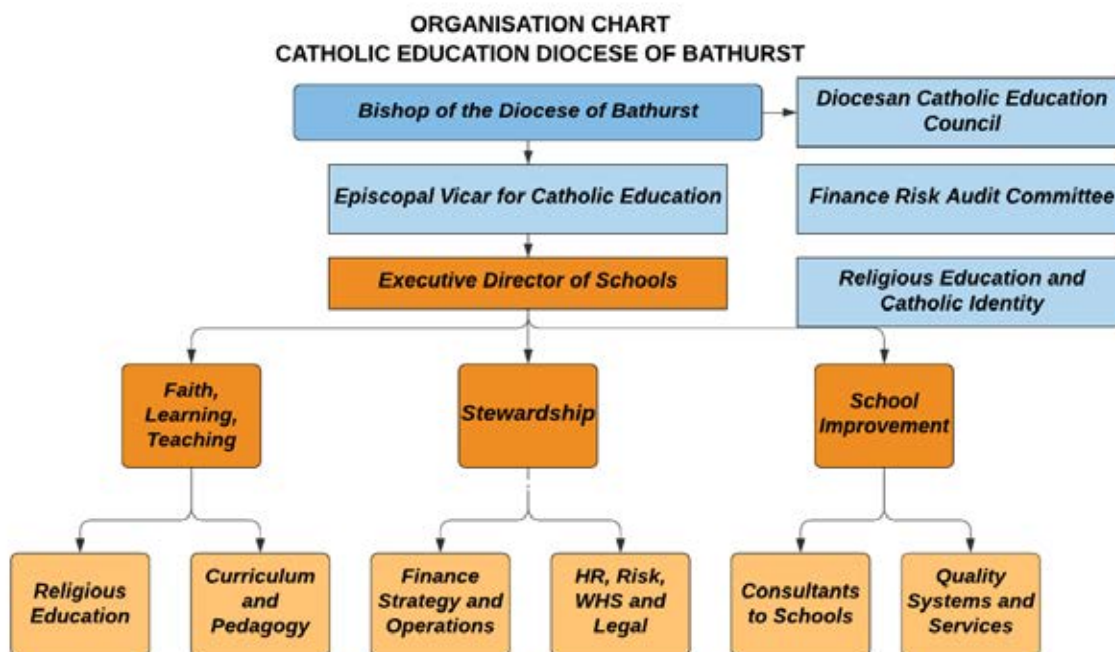
- FAITH:** The formation of school communities of faith, inclusion and missionary discipleship
- LEARNING:** A Professional Learning Communities culture committed to high levels of learning for all
- STEWARDSHIP:** A high performing system with a focus on strong leadership, equity and sustainability

OUR FRAMEWORKS

- FAITH:** Faith Formation
- LEARNING:** Model of Christ Centered Learning, Pastoral Care and Wellbeing
- STEWARDSHIP:** Formation for Christ Centered Leadership, Leading the Way



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 Stewardship, 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
- reports and makes recommendations to the DCEC and FRAC and RECI as required

Our Operations

Catholic Education Diocese of Bathurst is engaged in providing high quality education to students from Kindergarten to Year 12 in the Bathurst Diocese.

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.

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 over 1200 staff and educates some 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 transactions and employment in their 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 Supply Chain

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 mostly located in Australia. It is not common practice to source goods and services directly from overseas suppliers. However, CEDB Australian suppliers may source goods and materials from overseas suppliers. An in depth analysis of country of origin sourcing has not been undertaken.

No disclosures have been made to CEDB regarding the source or identity of suppliers or their sourcing of goods and services.



Modern slavery risks in operations and supply chain

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 supply chains and throughout the CEDB communities.

It is important as a business to assess all activities, but specifically higher-risk activities, business partners and/or geographical areas especially in supply chains and contractor engagement.

Operational Risks

Our COVID-19 Response

Catholic Education Diocese of Bathurst recognises that the impacts of COVID-19 may have profound impacts upon the vulnerability of workers in global supply chains, including in Australia.

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

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 workers and vulnerable individuals in the supply chain

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 in age from those newly graduated to those preparing for retirement after a lifetime of service to Catholic Education.

The staff headcount is 1126 with these being composed of 572 full time employees and 554 part time employees. The Diocese also employs casual staff who are not included in these figures.

The staff gender balance is heavily female with approximately 80% female and 20% male. Staff are also employed who are immigrants, disabled, and/or indigenous, but these are in the minority.

All staff are employed under the current applicable award conditions.

Award conditions are updated and reviewed annually or as regulations change, by the Human Resources department and other responsible departments at CEDB. These changes are implemented within the required timeframes and communicated to all staff through the regular communication channels.

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 the Complaints Management Policy, Whistleblower Policy, Procedural Fairness Policy,



Discrimination, Harassment and Bullying Policy, Workplace Grievance Policy, and Workplace Gender Equality Policy. Staff are encouraged to have union support and work towards resolving issues and improving workplace practices for all employees.

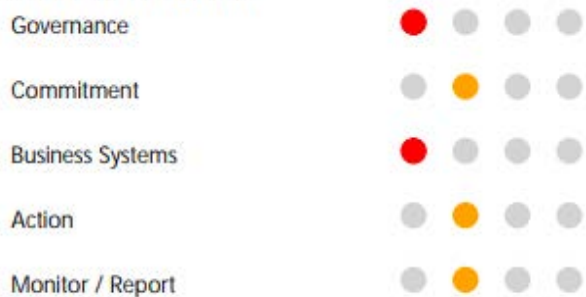
Policies and procedures are reviewed regularly by the responsible department and in response to changes to legal and regulatory requirements. All changes are communicated to staff and, if appropriate, training instigated in relation to the changes.

Modern Slavery Gap Analysis

A Bridge the Gap analysis was completed on 11th December 2020 shortly after CEDB joined ACAN and began developing Modern Slavery processes, risk assessments and plans for ongoing development.

The results of Bridge the Gap indicate that CEDB is at the earliest stages of the process and has plenty of scope for development and addressing the issues.

Management Systems



CEDB has taken some steps to understand the modern slavery risks in the operations and supply chain. While the Board and senior management 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.

Human Resources and Recruitment



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.

Procurement and Supply Chain



Modern slavery risks are not considered in current procurement policies or supplier management processes. Supply contracts do not refer to modern slavery risks and the supply chain has not been mapped to assist to understand priority suppliers or risk categories. CEDB does not yet monitor suppliers for modern slavery risks or engage them on risks or opportunities.

Risk Management



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.

Customers and Stakeholders



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.

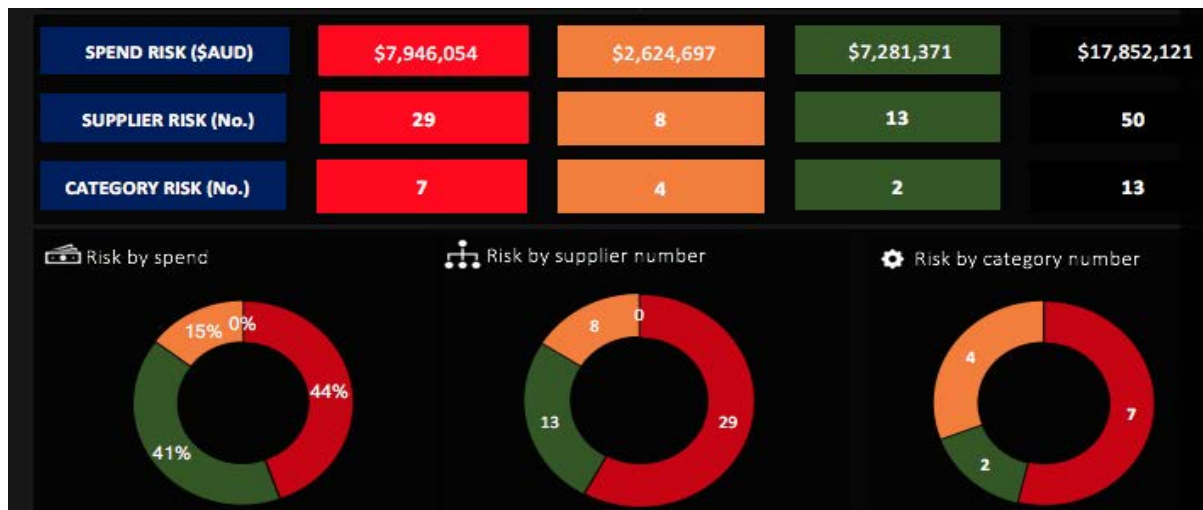
Supply Chain Risks

In 2020 a Modern Slavery Gap Analysis was undertaken which highlighted the CEDB highest risk suppliers. These form the basis for the supplier dashboard for ACAN entities. These high risk suppliers fall into the following categories:

- **Industry sector** – specific industry sectors deemed as high risk
- **Commodity/product** – 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

Key metrics of data analysis

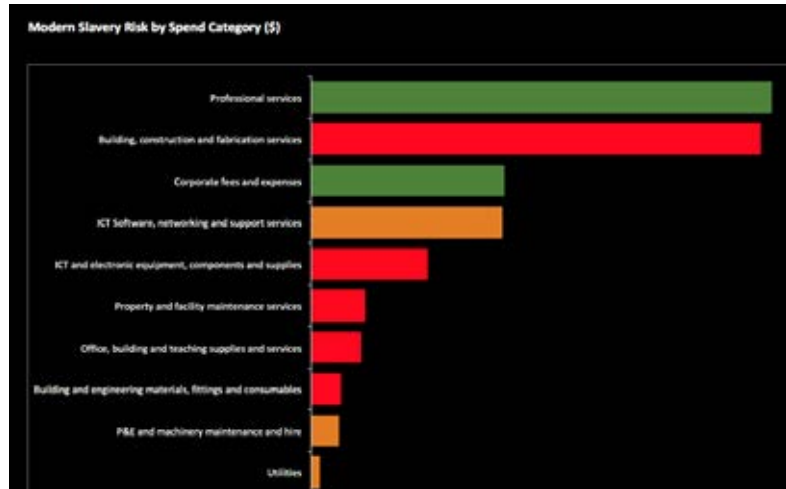
This graphic indicates that 29 of the top 50 suppliers to CEDB in 2020 are in the highly at risk category of Modern Slavery practices, and thus these suppliers and services will form part of the 2021 plan of action.



Top 10 Categories of CEDB expenditure

It is identified that in the top 10 Categories of CEDB expenditure in 2020, 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

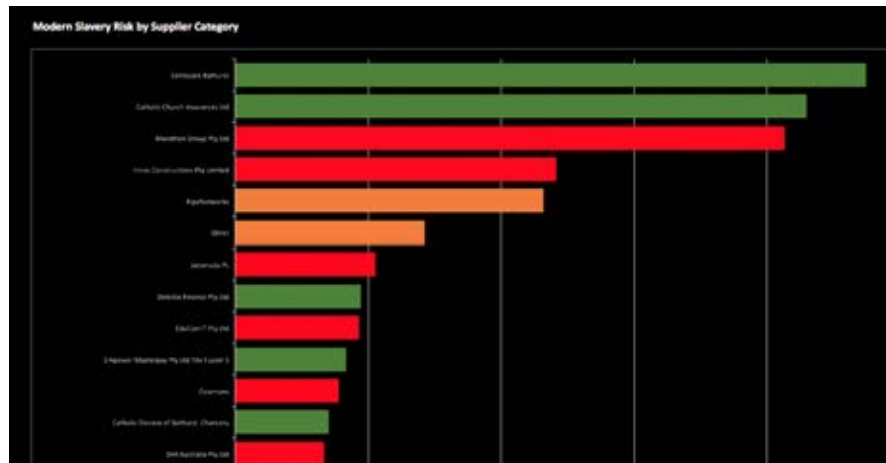


These 5 Spend Categories will form the basis of CEDB focus in 2021 to ensure processes are developed to address Modern Slavery in the companies the CEDB deals with.

Top 13 Companies for CEDB expenditure in 2020

It is identified that in the top 13 Companies which CEDB expenditure was greatest with in 2020, 6 are companies of high risk:

- Marathon Group Pty Ltd
- Hines Construction Pty Ltd
- Jatomedo Pty Ltd
- EducomIT Pty Ltd
- Colemans
- Dell Australia Pty Ltd



These 6 Companies will form the basis of CEDB focus in 2021 to ensure processes are developed to address Modern Slavery in these companies.

Actions taken to assess and address risk

CEDB focus areas for 2020 were:

- joining Australian Catholic Anti-Slavery Network
- forming a Modern Slavery Working Group
- attendance of Modern Slavery Working Group at professional development opportunities
- undertaking a Modern Slavery Gap Analysis
- undertaking Bridge the Gap Analysis
- the development of Modern Slavery Statement CEDB 2020
- the writing of a Modern Slavery Policy for implementation in 2021

As a result of these initiatives, 2021 is planned as the year to begin implementation of the Modern Slavery Policy and procedures, and begin addressing risk as determined by the Gap analysis.

Modern slavery action plan and road map

Based upon the Bridge 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 strategies to undertake
- a timeframe for strategies to be undertaken
- who will oversee the work undertaken
- priority of the work - **highest priority** or **medium priorities**

Management Systems	Year 1, Year 2 By the end of:		
Review governance and delegations at CEDB to ensure Modern Slavery requirements are addressed	Term 1/Y1	SB	
Develop commitment process consistent with governance and delegations schedules	Term 2/Y1	SB	
Review all business systems for Modern Slavery practices and ways to improve and address Modern Slavery	Term 4/Y2	SB	
Develop a process to Monitor and Report annually regarding progress with Modern Slavery requirements	Term 4/Y1	TD	

Human Resources and Recruitment			
Develop customer, staff and stakeholder awareness of Modern slavery requirements	Term 1/Y1	TD	
Review and develop policies and practices related to recruitment	Term 2/Y1	GM	
Develop training modules to upskill all staff, contractors and suppliers	Term 2/Y1	GM/SB/CG	
Develop process to ascertain that Labour Hire/Outsourcing adheres to Modern Slavery requirements	Term 4/Y1	GM/SB	

Procurement and Supply Chain			
Review all Policies and procedures related to procurement and	Term 4/Y1	SB	

supply chains			
Review and update all Contract Management and contractor documentation to reflect Modern Slavery focus and practices	Term 2/Y2	GM	
Review and develop screening and traceability processes for procurement and supply chains	Term 4/Y2	SB	
Develop and implement monitoring and corrective action processes	Term 3/Y2	SB	

Risk Management			
Review Risk Management Framework to incorporate Modern Slavery Review	Term 2/Y1	GM	
Undertake analysis of Operational Risk	Term 2/Y1	GM	
Undertake analysis to Identify External Risks	Term 2/Y1	GM	
Develop Monitoring and Reporting Risk processes	Term 1/Y2	GM	

Customers and Stakeholders			
Develop a process for customer attitude to be an active process in the system	Term 2/Y1	TD	
Develop information flyers to distribute to all customers	Term 1/Y2	SB/TD	
Develop feedback mechanisms for the customers and stakeholders in the system	Term 4/Y2	GM	
Develop a process for worker voice to be an active process in the system	Term 4/Y2	GM	

SB = S Boss, GM = G McKay, TD = T Dobosz, CG = C Gaudry

Addressing Remediation

CEDB 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 CEDB is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CEDB, is a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. CEDB'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 CEDB can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

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 included 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 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.

Effectiveness Assessment

As CEDB joined ACAN and began addressing Modern Slavery in November 2020 there are no results or effective processes to report upon.

Process of consultation with entities owned or controlled

CEDB does not control or own other entities and thus does not report on this.

Other

No other items to report at this initial stage of the process.



**CATHOLIC
EDUCATION
MELBOURNE**

Modern Slavery Statement 2020

ABN – 85 176 448 204

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About Us

Catholic Education Melbourne (CEM) serves and leads Catholic schools in the Archdiocese of Melbourne. We provide a range of services to support about 20,000 teaching and non-teaching staff in 335 Catholic schools serving more than 153,000 students.

Our system has a rich history of dialogue and collaboration with state and federal government departments and authorities. We play an important role in shaping and supporting national Catholic education priorities and policies.

Our vision is for an outstanding Catholic education that equips our young people with the knowledge, skills, hope and optimism to live meaningful lives and shape and enrich the world around them.

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



2020 Modern Slavery Risk Management Initiatives

Catholic Education Melbourne has taken a series of steps towards achieving practical outcomes from our ethical procurement initiatives, such as:

- 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 to make the procurement as ethical as possible.

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. Catholic Education Melbourne 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)
- thought leadership and advocacy: driving collaboration and best practice.



Statement from Most Rev Peter A. Comensoli, Archbishop of Melbourne

This message would be published in the Catholic Archdiocese of Melbourne's Modern Slavery Statement.



Statement from Jim Miles, Executive Director



We are pleased to share the first Catholic Education Melbourne Modern Slavery Statement.

We have taken initial 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 to eradicating any modern slavery risks as they arise 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 2020 has been to develop a risk framework and tools to identify and manage 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 develop a pilot program to assist with prioritising and assessing supplier risks.

While we are encouraged by the progress that has been made in our first 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 great outcomes. We are also cognisant that dealing with modern slavery will require ongoing focus in collaboration with 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 Melbourne
James Goold House
228 Victoria Parade East Melbourne Victoria 3002
22 June 2021



Our Annual Report

The Catholic Education Melbourne 2019 financial report is included in the [Annual Report](#) and can be found on the Catholic Education Melbourne website <https://www.cem.edu.au>. The 2020 financial report will be published during July 2020 on the Australian Charities and Not-for-profits Commission (ACNC) website.

Our Operations

Catholic Education Melbourne (CEM) (Melbourne Archdiocese Catholic Schools [MACS] from 1 January 2021) has been supporting to provide a quality Catholic education to more than 153,000 students – almost one in four school students – at over 330 schools across Melbourne.

This makes Catholic education by far the second largest provider of schooling in Victoria and the largest Catholic education provider within a diocese in Australia.

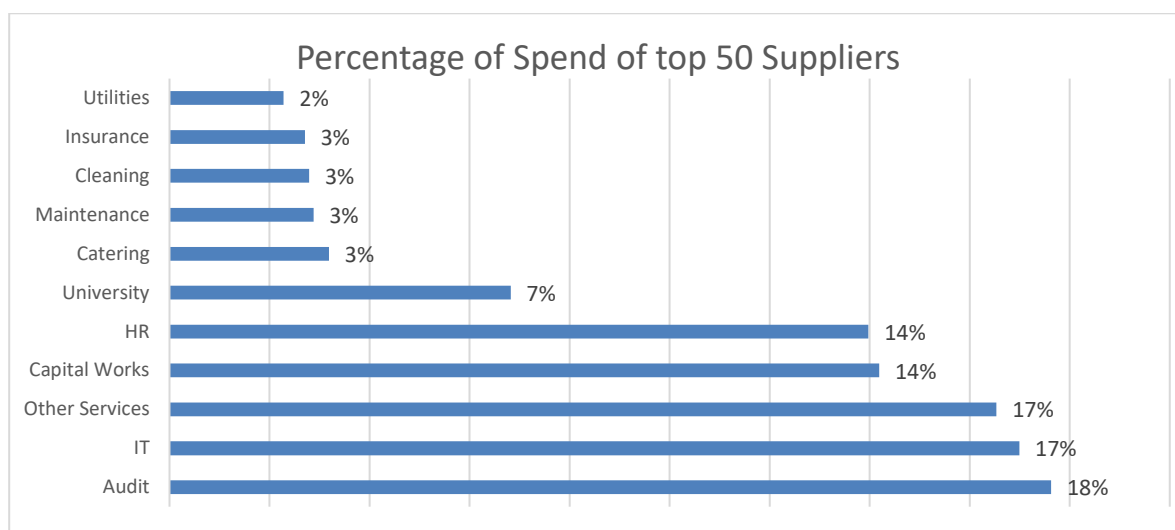
Catholic Education Melbourne’s head office is located in East Melbourne. It is supported by four regional offices in north, south, east and west of Melbourne, along with a Catholic Leadership Centre. Catholic Education Melbourne employs close to 500 staff in Melbourne.

Melbourne Archdiocese Catholic Schools Ltd (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 transferred to MACS. The schools do not currently form part of this Modern Slavery Statement but will feature in the MACS Modern Slavery Statement for the year ended 31 December 2021.

Our Supply Chain

The majority of Catholic Education Melbourne’s major suppliers are based in Australia. The top 50 suppliers were considered for this analysis and the percentage breakup of those is shown in the pie chart below.

The total expenses for the financial year ending 31 December 2020 was \$114,158,843. The details are available in the financial report and can be found at [The Australian Charities and Not-for-profits Commission \(ACNC\)](#) website



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 the Australian Catholic Anti-Slavery Network (ACAN). ACAN will help us gain insight into 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.

The highest risk areas identified are as follows:

1. Cleaning services – a new tender is in progress, which includes reference to modern slavery.
2. Catering/food and beverage – there are no current contracts with Catholic Education Melbourne although purchase orders have a modern slavery clause as part of the terms and conditions.
3. Facility management – this includes maintenance services such as plumbing, handyman services, minor repairing etc. There are no current contracts with Catholic Education Melbourne although purchase orders have a modern slavery clause as part of the terms and condition
4. 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) and/or forced labour by entities in earlier stages of their supply chains. Our understanding of supply chains will improve working with ACAN over time.

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 around the world are not currently known, 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 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 Catholic Education Melbourne 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, 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, dirty, dull or dangerous). Based on Catholic Education Melbourne’s profile, 77% of the spending was



considered as no risk, 9% as medium risk and 14% as high risk, as shown in the graph below. Only the following categories were considered to be high risk: cleaning services, catering/food and beverage, facility management and ICT hardware.



Actions Taken to Assess and Address Risk

For the 2020 reporting period, Catholic Education Melbourne undertook initial actions to address the modern slavery risks in its operations. Commencing with its membership to the ACAN and attendance at the ACAN conference, Catholic Education Melbourne, 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:

- a) **designated a modern slavery liaison officer (MSLO)** – the MSLO holds the responsibility for overarching operational activities to identify and mitigate modern slavery risks within the organisation. The MSLO assists in promoting closer collaboration across the Catholic sector and meets monthly with the ACAN anti-slavery taskforce executive to discuss the implementation of the risk management program. Catholic Education Melbourne has identified the importance of the role of a dedicated MSLO to lead the anti-slavery program to remove the risk from its extensive supply chain network.
- b) **created a Modern Slavery Policy** – Catholic Education Melbourne 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 enables Catholic Education Melbourne 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*. This policy has been adopted by MACS of 2021.
- c) **provided slavery-free tea, coffee and drinking chocolate** – Catholic Education Melbourne'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.



- d) **communicated regularly with schools** – all Catholic schools in the Archdiocese of Melbourne were given regular updates on modern slavery, especially on the high-risk categories such as sporting goods, uniforms, cleaning services etc.
- e) **undertook modern slavery awareness training** – at least one staff member in all business groups have undertaken modern slavery awareness training and supplier engagement training. Supplier awareness training will be rolled out by HR to all staff across the organisation.
- f) **undertook supplier risk assessments** – Catholic Education Melbourne 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. Therefore MACS will focus its preventative and mitigation compliance activities throughout the next reporting periods.
- g) **commenced supplier engagement** – Catholic Education Melbourne 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, subsequent action and compliance will be taken to reduce modern slavery risk from Catholic Education Melbourne’s 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 Catholic Education Melbourne supplier contracts.

Effectiveness Assessment

Modern slavery gap analysis

The ‘Bridge the Gap’ analysis tool reviewed the following five categories related to Catholic Education Melbourne operations:

- a) Management Systems
- b) Human Resources and Recruitment
- c) Procurement and Supply Chain
- d) Risk Management
- e) Customers and Stakeholders.

This initial analysis was conducted in July 2019 which showed the following results:



Overview

Here's broadly what you told us:

Category	Summary
Management Systems	You have taken some steps to understanding the modern slavery risks in your operations and supply chain. While your Board and senior management team acknowledge that modern slavery occurs in your business sector, your 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.
Human Resources and Recruitment	You have not incorporated modern slavery issues into your employee or contractor training or awareness programs. Your hiring and onboarding processes do not reference modern slavery risk management. Current labour - hire and outsourcing practices do not identify modern slavery risk areas.
Procurement and Supply Chain	Modern slavery risks are not considered in your procurement policies or supplier management processes. Supply contracts do not refer to modern slavery risks and you have not mapped your supply chain to understand priority suppliers or risk categories. You do not monitor suppliers for modern slavery risks or engage them on risks or opportunities.
Risk Management	Modern slavery is not considered in your business risk framework. You have no systems or processes in place to assess or manage potential modern slavery risks in your operations, supply chain, business partnerships or industry sector.
Customers and Stakeholders	You have limited understanding of your customer or stakeholder expectations around modern slavery risk management and do not elicit feedback from them on this issue. You do not have feedback or communications mechanisms in place for workers in your supply chain and do not make information on modern slavery risks publicly available.

Bridge the Gap: Helping you better manage modern slavery risks in your business.
Developed by SD Strategies Pty Ltd 2019[®]

Another Bridge the Gap analysis was completed in December 2020, which showed the following results:

Overview

Here's broadly what you told us:

Category	Summary
Management Systems	With a highly engaged Board and senior management team and a well - established modern slavery program, you are making great progress in identifying, managing and mitigating your modern slavery risks. Continue to review your goals, targets and KPIs and explore opportunities for innovation and leadership in your industry sector.
Human Resources and Recruitment	You have not incorporated modern slavery issues into your employee or contractor training or awareness programs. Your hiring and onboarding processes do not reference modern slavery risk management. Current labour - hire and outsourcing practices do not identify modern slavery risk areas.
Procurement and Supply Chain	You are leading the way in assessing and addressing modern slavery risks and impacts in your supply chain. Detailed procurement policies, guidelines and processes are in place and actively implemented and evaluated. You work closely with your suppliers to address non - conformances and identify improvement opportunities.
Risk Management	Modern slavery is not considered in your business risk framework. You have no systems or processes in place to assess or manage potential modern slavery risks in your operations, supply chain, business partnerships or industry sector.
Customers and Stakeholders	You have a basic understanding of your customer and stakeholder expectations around modern slavery and have established specific communications mechanisms for internal and external stakeholders to report modern slavery issues. You include limited information about your modern slavery risks on your website.

Thank you for taking the initiative to assess and address your modern slavery risks.

Bridge the Gap: Helping you better manage modern slavery risks in your business.
2/12/2020. Developed by SD Strategies Pty Ltd 2019[®]

3. **Regular check of the risk review process** – this stage will be utilised to undertake a further assessment of 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.
4. **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.
5. **Annual supplier reports/attestation** – supplier reports will assist in understanding our suppliers’ risk framework and risk exposure. Utilising this tool will assist in directing resources where needed most – for example, further communication or education advice in relation to modern slavery.
6. **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 to 2021

From 1 January 2021, Catholic Education Melbourne will become Melbourne Archdiocese Catholic Schools (MACS), and changes to governance responsibilities will mean that addressing, measuring, and eradicating modern slavery will be the responsibility of MACS.

We are 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 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, we have through ACAN become a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. CEM’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 CEM can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CEM 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 CEM to ensure victim centred remediation processes are implemented to the satisfaction of CEM.

CEM (MACS as from 2021, 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 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.

MACS 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

Looking ahead, we plan to progress through MACS the following actions in 2021 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 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 adapt 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 through the development and roll-out of ethical procurement guidelines for employees.

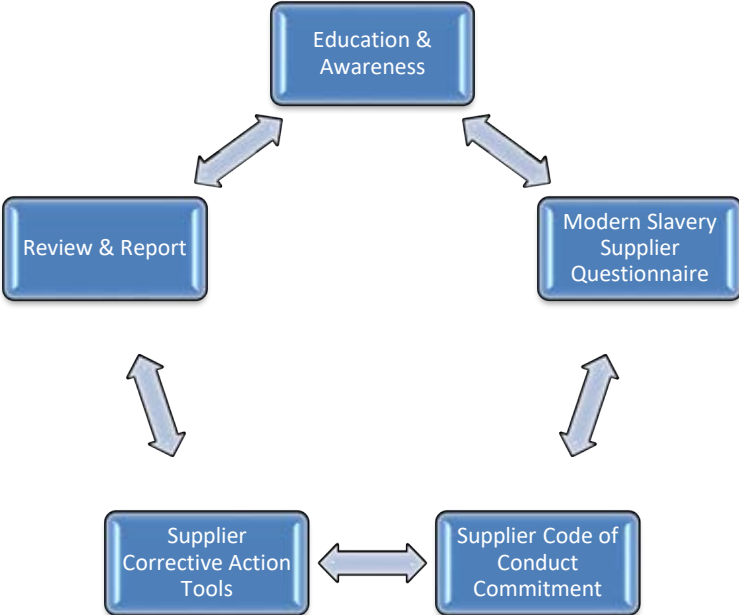
Enhance engagement with suppliers

- 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.
- 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 are encouraged by the initial work we have done, and continue to do, 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 on their own.

SUPPLIER ENGAGEMENT ACTION PLAN 2021



Internal Consultation

We understand it is important for our entity owned to appropriately identify modern slavery risks and understand what actions they need to take to address modern slavery risks.

All procurement and sourcing for CEM is conducted by an internal staff and the vendors are all based in Australia. We have consulted with different departments of CEM 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, 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 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 the organisation to conduct their own risk assessment, due diligence and remediation activities.

CEM is confident that the steps taken this year have built a strong foundation for a robust modern slavery framework. However, we recognise there is more to do and now through MACS as from 2021 is committed to continually improving our approach, partnering with our stakeholders and working to eradicate modern slavery.



Modern Slavery Statement 2020

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 government on Catholic schools' use of these public funds in accordance with legislation.

The CECV has responsibility for the education of over 211,000 students within Victoria (2020 census) and is supported by the Catholic Education Offices of the four dioceses: Melbourne, Ballarat, Sandhurst and Sale.



Structure

The Archbishop of Melbourne and the Bishops of Ballarat, Sandhurst and Sale established the Catholic Education Commission of Victoria (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 the 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 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 & 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

2020 Modern Slavery Risk Management Initiatives

The CECV has taken a series of steps towards achieving practical outcomes from our Ethical Procurement Initiative. The aim of this implementation is to gain greater visibility of procurement, and to integrate ethical sourcing practices more broadly into these areas going forward.

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 of 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 first 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 2020 financial year. It has been prepared to meet the mandatory reporting criteria set out 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 to support those affected.

This Statement was approved by the Board of the Catholic Education Commission of Victoria.

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
10 June 2021

Statement from Jim Miles, Executive Director, CECV



We have completed our first Modern Slavery Statement for the Catholic Education Commission of Victoria Limited (CECV).

We are satisfied with the progress we have made 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 to addressing any modern slavery risks as they arise 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 the year 2020 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 prioritisation and assessment of supplier risks.

While we have made progress during our first 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.

This Statement was approved by the Board of the Catholic Education Commission of Victoria.

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
10 June 2021

Our Annual Report

The Catholic Education Commission of Victoria (CECV) 2019 financial report is included in the [Annual Report](#) and can be found on the CECV website www.cecv.catholic.edu.au/.

The CECV 2020 annual report is expected to be completed during July 2021.

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 government on Catholic schools' use of these public funds in accordance with legislation.

The CECV has responsibility for the education of over 211,000 students within and is supported by the Catholic Education Offices of the four Dioceses: Melbourne, Ballarat, Sandhurst and Sale. Victorian Catholic schools are established under the authority of the bishop 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 in and operates under a Service Level Agreement with Catholic Education Melbourne (CEM). CEM has transitioned to Melbourne Archdiocese Catholic Schools (MACS)) as from 1 January 2021.

The CECV looks forward to continuing its work to promote and support the continuing delivery of a high-quality, uniquely Catholic education in 2020 and beyond.

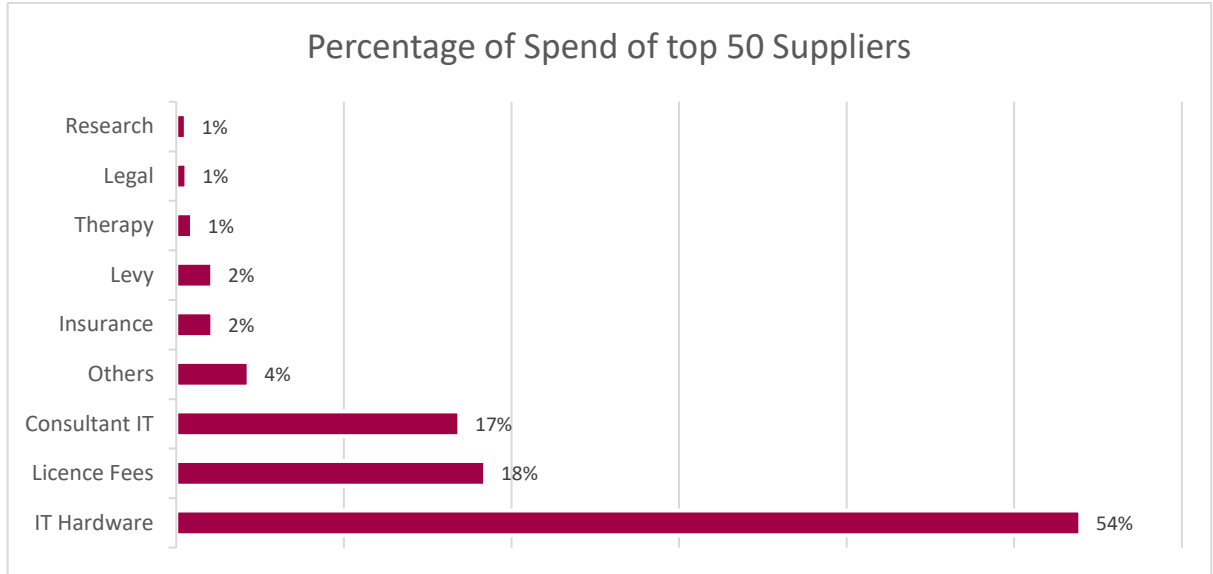
It needs to be noted that as part of its 2020 expenses of \$2.9 billion, 98.9% related to direct distributions of Government grants to systemic schools. Therefore actual expenditure excluding capital expenditure incurred of \$393,000 that was with external parties was only \$57.3 million. This only represents 0.02% of total CECV expenses.

Our Supply Chain

The majority of the CECV's major suppliers are based in Australia. The top 50 suppliers were considered for this analysis which is shown in the chart below.

The turnover for financial year ending 31 December 2020 was \$2.9 billion with almost 99% being distributed as government grants to systemic schools. The details are available in the financial report and can be found at [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 the Australian Catholic Anti-Slavery Network (ACAN). ACAN will help us gain insight into the entities with which we partner for our operational activities and those who are 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 around the world are massive, we still do not know how it has impacted the CECV suppliers and 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** – based on estimated prevalence of modern slavery and the government responses as 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 the production of 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 0.02% of total CECV expenditure with external entities, and based on the CECV’s profile, 20% of CECV spend was considered as no risk, 69% as medium risk and 11% as high risk, as 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 a further three 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) **designated a modern slavery liaison officer (MSLO)** – the MSLO holds the responsibility for overarching operational activities in the identification and mitigation of modern slavery risks within the organisation. The MSLO assists in promoting closer collaboration across the Catholic sector and meets monthly with the ACAN anti-slavery taskforce executive to discuss implementation of the risk management program. The CECV has identified the importance of the role of a dedicated MSLO to lead the anti-slavery program to remove the risk from its extensive supply chain network.

- b) **drafted an Anti-Slavery Policy** – the CECV 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 to be enacted during 2021 enables 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*.
- c) **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 whereby the risk of modern slavery exposure is elevated, and where the CECV will focus its preventative and mitigation compliance activities throughout the next reporting period.
- d) **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, and subsequent action and compliance will be taken to remove modern slavery risk from the CECV’s immediate supply chain.
- e) **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

The ‘Bridge the Gap’ analysis 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 during 2019 showed the following results:



Overview
Here’s broadly what you told us:

Category	Summary
Management Systems	You have taken some steps to understanding the modern slavery risks in your operations and supply chain. While your Board and senior management team acknowledge that modern slavery occurs in your business sector, your 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.
Human Resources and Recruitment	You have not incorporated modern slavery issues into your employee or contractor training or awareness programs. Your hiring and onboarding processes do not reference modern slavery risk management. Current labour - hire and outsourcing practices do not identify modern slavery risk areas.
Procurement and Supply Chain	Modern slavery risks are not considered in your procurement policies or supplier management processes. Supply contracts do not refer to modern slavery risks and you have not mapped your supply chain to understand priority suppliers or risk categories. You do not monitor suppliers for modern slavery risks or engage them on risks or opportunities.
Risk Management	Modern slavery is not considered in your business risk framework. You have no systems or processes in place to assess or manage potential modern slavery risks in your operations, supply chain, business partnerships or industry sector.
Customers and Stakeholders	You have limited understanding of your customer or stakeholder expectations around modern slavery risk management and do not elicit feedback from them on this issue. You do not have feedback or communications mechanisms in place for workers in your supply chain and do not make information on modern slavery risks publicly available.

A subsequent analysis was undertaken with improved results in 2020:



Overview
Here's broadly what you told us:

Category	Summary
Management Systems	With a highly engaged Board and senior management team and a well - established modern slavery program, you are making great progress in identifying, managing and mitigating your modern slavery risks. Continue to review your goals, targets and KPIs and explore opportunities for innovation and leadership in your industry sector.
Human Resources and Recruitment	You have not incorporated modern slavery issues into your employee or contractor training or awareness programs. Your hiring and onboarding processes do not reference modern slavery risk management. Current labour - hire and outsourcing practices do not identify modern slavery risk areas.
Procurement and Supply Chain	You have a broad procurement policy and general contract clauses outlining modern slavery risks, however these are not enforced. Some steps have been taken to map your supply chain and engage high - risk supplier, but more needs to be done to monitor supplier performance. Engagement and communication is limited to high risk suppliers.
Risk Management	Modern slavery is not considered in your business risk framework. You have no systems or processes in place to assess or manage potential modern slavery risks in your operations, supply chain, business partnerships or industry sector.
Customers and Stakeholders	You have a basic understanding of your customer and stakeholder expectations around modern slavery and have established specific communications mechanisms for internal and external stakeholders to report modern slavery issues. You include limited information about your modern slavery risks on your website.

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 of 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 to undertake a further assessment of 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 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 to 2021

CECV 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 CECV 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, CECV, is a founding partner of Domus 8.7 - an independent program to provide 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. By 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 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.

CECV has funded a “Remedy Pathways” module in it’s 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

Looking ahead, we plan to progress the following actions in FY2021 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 to be defined and implemented to ensure independent oversight occurs of the modern slavery framework.

Improve our processes

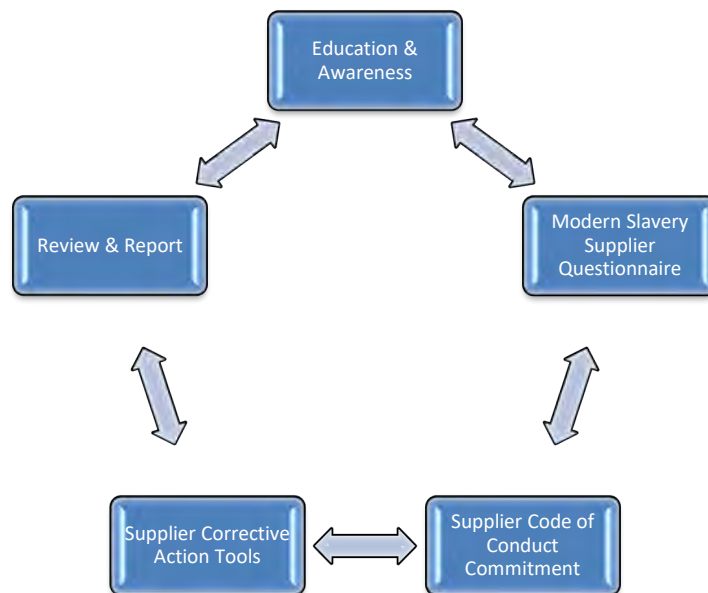
- Further embed due diligence processes within the first line of defence and adapt learnings for this first reporting period.
- Expand incident management processes to include the ability to capture human rights and modern slavery breaches.
- Uplift our compliance obligations framework.
- Develop guidance 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 through the development and roll-out of 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 continue to work on preventing modern slavery and any inadvertent involvement we may have across our operations and supply chains. There is more to do, as we are always looking for new and better ways to eliminate modern slavery, always in partnership with others such as ACAN and other Catholic Church entities, knowing that no one can do so on their own.

SUPPLIER ENGAGEMENT ACTION PLAN 2021



Internal Consultation

We understand it is important for our entity owned to appropriately identify modern slavery risks and understand what actions they need to take to address modern slavery risks.

All procurement and sourcing for CECV is conducted by an internal staff 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 to conduct their own risk assessment, due diligence and remediation activities.

CECV is confident that the steps taken this year 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 eradicate modern slavery.



Catholic Education Northern Territory

Modern Slavery Statement 2020



Faith in their future

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*.

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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, Daly River and Wadeye. CENT schools also support and manage 9 Early Learning Centres, 9 After School Care facilities and 4 remote pre-schools. These schools service early learning, Primary, Middle and Secondary students. CENT also supports a Flexi-Learning Centre in Alice Springs, a 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 4800 students and has 459 Teachers supported by 534 non-teaching and Indigenous Education Workers and 84 Early Learning staff.

CENT education office has 68 staff members providing support to schools in areas of Pastoral Care & Wellbeing, Teaching and Learning, Leadership, 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".

Our Mission:

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.*

2020 Modern Slavery Risk Management-Focus Areas

CENT focus areas in 2020 were:

- joining Australian Catholic Anti-Slavery Network
- attendance at professional development opportunities
- carry out a Modern Slavery analysis of suppliers
- Updated contractual terms and conditions for suppliers
- Designated a Modern Slavery Liaison Officer (MSLO)
- Initiated supplier engagement in MS

CENT focus areas for 2021:-

- Develop our Modern Slavery Statement.
- Engage with and educate our staff and communities.
- Work with our suppliers to increase their awareness about modern slavery.
- Assess the risks of modern slavery in our current system operations and supply chains.
- Develop and Implementing our Supplier Engagement Action Plan

Commencement of a Supplier Engagement Action Plan comprising of the following:

- Education & Awareness
- Modern Slavery Supplier Questionnaire
- Consultation with suppliers, contactors
- Inclusion of suppliers and contractors
- Review & Report on new suppliers

CENT Plans Beyond 2021

Beyond 2021 Catholic Education Diocese of Darwin (CENT) plans are to implement:

- due diligence review of suppliers and business partners
 - increase awareness of suppliers to manage risks associate with modern slavery
 - supported the education of staff and community in modern slavery
 - annual review and writing of Modern Slavery Statement
 - Draft development of Modern Slavery Policy
-

Statement from the Director

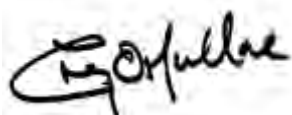
Catholic Education Northern Territory acknowledges our role as a Catholic entity in making everyone aware of modern slavery and the role they can play in working towards the eradication of modern slavery practices.

Although thought to be something in our 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”. Working within our Diocese we have a clear role to ensure our actions are working to eliminate modern slavery in our procurement processes, our operation and our 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 chains.

Catholic Education will continue to work with ACAN and other catholic entities in the diocese, stakeholders, contractors and suppliers to eliminate modern slavery from our operations and supply chains.

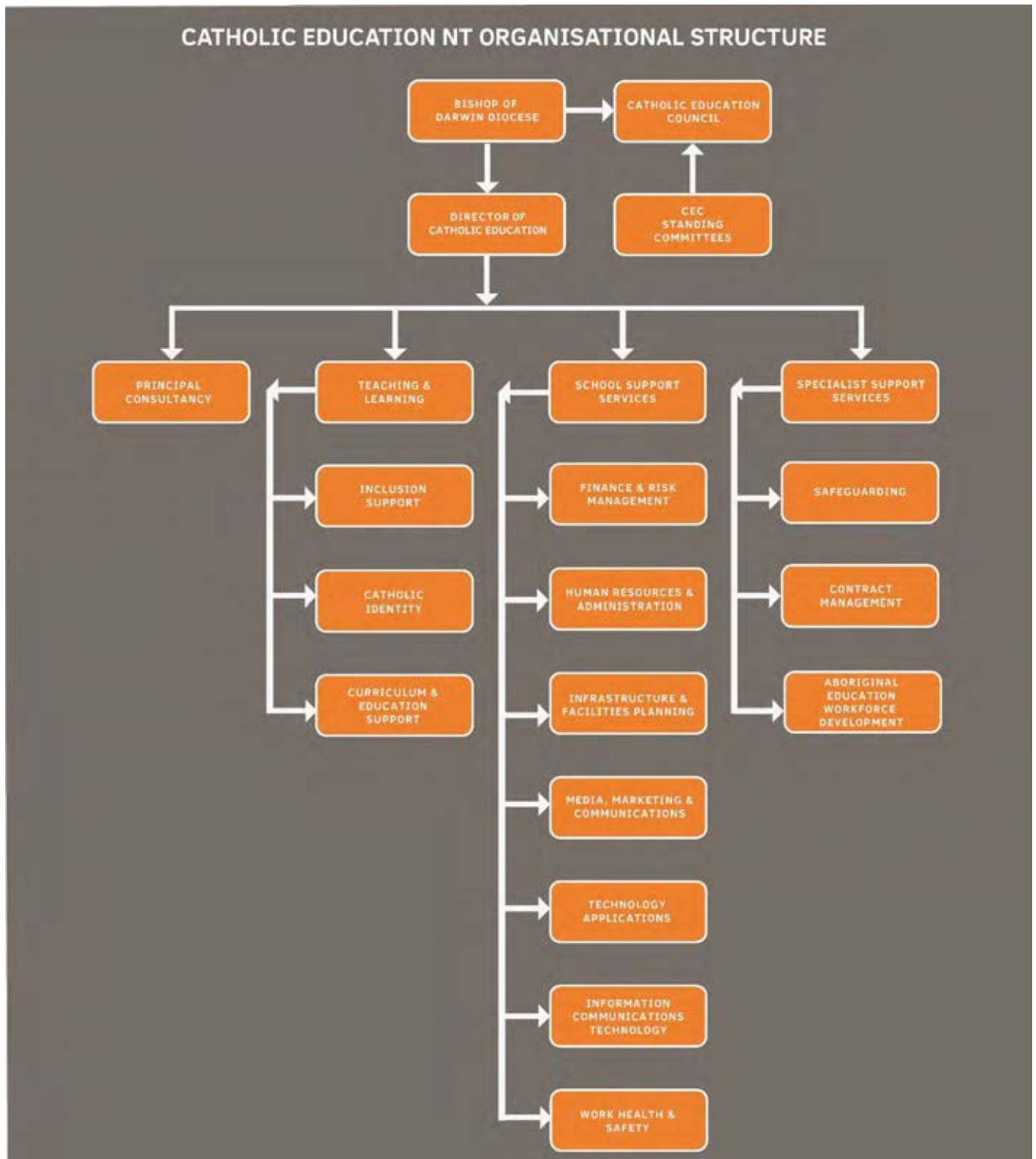


Mr Greg O'Mullane
Director of Catholic Education



About Catholic Education Northern Territory

Our Organisational Structure



Our Governance Framework

The Trustees of the Roman Catholic Church for the Catholic Darwin Diocese is the registered proprietor for schools within CENT. The Bishop of the Diocese of Darwin has canonical authority for the operation of schools within the System, and ultimate responsibility for the delivery of Catholic education within the Diocese.

The Bishop of Darwin Diocese has delegated authority to the Director, Catholic Education Northern Territory (CENT), to assist the Bishop to discharge his canonical duties with respect to Catholic education. The Director of Catholic Education ensures all civil law responsibilities associated with systemic financial accountability, legislative compliance including safety, contract management and people management are adhered to.

In undertaking the Director's duties and fulfilling his responsibilities, the Director consults with the Bishop, and works with the Catholic Education Council in relation to matters of policy and fiscal accountability and educational compliance. The Director provides regular updates to the Bishop on matters of operational significance including Modern Slavery.

The Catholic Education Council (CEC) is established to support and advise the Bishop on his responsibilities for Catholic schools in the Diocese. The Council advises and makes recommendations to the Bishop but does not make decisions. The Council is not an incorporated body. CEC members are drawn from key stakeholder groups in the Diocese-

Our Operations

CENT's vision and mission is to provide a Catholic Education across the NT for 4800 students across 18 schools comprising 4 secondary Colleges, 5 comprehensive colleges, 8 primary schools and a 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 support of school infrastructure including housing facilities in remote locations. CENT also operates a boarding facility in Darwin and has a number of international students supported through home-stay arrangements.

Travelling to some 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 can be delayed and often require travel by light aircraft and when the roads are accessible four-wheel drive vehicles are required.

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 Chain

CENT procures goods and services for the education of students 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 abroad. CENT however, acknowledge that suppliers may source goods or materials from abroad and enquiries with suppliers is ongoing to establish procurement and manufacturing practices where practicable to do so. CENT is aware of a number of their suppliers identifying as compliant with Modern Slavery requirements. CENT does not have the resources to undertake an in-depth analysis of supplier compliance and looks to ACAN to support the establishment of national standards.



Modern slavery risks in operations and supply chain

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 made suppliers aware of the impact the pandemic would have on the most vulnerable workers in the supply chain and were attentive to supplier procurement ensuring that newly appointed suppliers were compliant with Modern Slavery requirements and that low paid workers were not disadvantaged or exploited.

CENT ensured staff and students were aware of the risks associated with COVID 19 and followed Government Health recommendations. This highlighted the need to be aware that persons employed in lower wage industries should not be disadvantaged by having to take on work that may subject them to exploitation. To this CENT sought to support those families that were disadvantaged in wage during the pandemic.

Our People

The employee demographic in Darwin and NT in general is culturally diverse and representative of many nationalities across the globe including Africa, Europe, Asia and Oceania. CENT also has a strong Aboriginal workforce representative in all schools. CENT employees are engaged full-time / part-time and casually or on fixed term contracts. Staff turnover can vary from year to year when staff elect to return interstate at the end of the contract period.

CENT gender balance favours female staff with approximately 73.1% and 26.9% 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 CatholicCare Counselling Services.



Modern Slavery Gap Analysis

CENT has taken a number of steps to identify its Modern Slavery risks in its operations. In the delivery of educational services across their 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.
- Finance & Investment.
- Cleaning & Security Services.
- ICT Hardware.
- ICT Software and Network Services.
- Uniforms.
- Food & Catering Services.
- Furniture & Office Supplies.
- Professional Services.
- Facility Management & Maintenance.
- Marketing & Advertising Services.
- Utilities.
- Printing / Mail Services.
- Government & Agency Fees.
- Travel & Accommodation.
- Labour Hire.
- Financial Expenses.
- Waste Management.

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 18 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.

CENT RISK TAXONOMY:			
Category	Spend Description	Risk	% of Expenditure
Building and Construction:	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.	HIGH	19.66%
Cleaning and security services:	Sub-contracting and labour hire services, chemicals and cleaning products, security equipment (radios, torches, pouches, bags Etc.) PPE, uniforms and footwear.	MEDIUM	6.60%
Facility management and property maintenance:	Services including minor repairs, plumbing and septic, utilities management, building operations, HVAC, landscaping and yard work, removalists, cleaning and janitorial, security and patrols	HIGH	12.18%
Finance:	Investment funds, private equity and hedge funds, banks, financial services providers, insurers, credit and bond rating agencies	LOW	0.66%
Food and catering services:	Food and groceries (meat, seafood, fresh, dried, processed, pre-packaged, bakery products and general groceries, dairy, fruit and vegetables), wine grapes, beverages, general catering for conferences, launches, events Etc. and hospitality services. Sea food supplies.	MEDIUM	6.01%
Furniture and office supplies:	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.	HIGH	13.53%

ICT Hardware:	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). 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.	LOW	0.91%
Uniforms and PPE:	Uniforms (work wear, school wear, sportswear), footwear and PPE (e.g. gloves, face masks, respirators, glasses / goggles, ear muffs, safety work wear Etc.)	LOW	2.85%
Advertising & Marketing:	Advertising services, campaigns, branding, media collateral, outsourced business operations.	LOW	1.61%
ICT Software and network services:	Software and application development, support services, call centres (offshore).	MEDIUM	5.78%
Utilities:	Electricity (including solar farms), gas, water and wastewater, telecommunications (linked to resources sector risk). Plant (electrical tools and equipment).	HIGH	11.57%
Travel and accommodation:	Travel booking services, hotels, accommodation. Orphanage trafficking.	MEDIUM	6.11%
Print / Mail Provider:	Printing services, printers, ink, paper, other printing consumables	LOW	1.24%
Professional services:	Legal. Catholic Insurance. Consultation.	HIGH	11.30%



SUPPLY CHAIN RISKS

In 2020 a Modern Slavery Gap Analysis was undertaken which highlighted the CENT highest risk suppliers. These form the basis for the supplier dashboard for ACAN. These high risk suppliers fall into the following categories:

- **Industry sector** – specific industry sectors deemed as high risk
- **Commodity/product** – specific products and commodities deemed as high risk

Key metrics of data analysis

This graphic indicates that 68.24% of the top 14 suppliers to CENT in 2020 are in the highly at risk category of Modern Slavery practices, and thus these suppliers and services will form part of the 2021 plan of action.



Top 10 Categories of CENT expenditure

A focus on the top 5 categories will form the basis of CENT's priorities in 2021 so as to ensure processes are developed to address Modern Slavery in the companies CENT deals with.

Actions taken to assess and address risk

Actions taken to assess and address risk

CENT focus areas for 2020 were:

- joining Australian Catholic Anti-Slavery Network
- attendance at professional development opportunities
- carry out a Modern Slavery analysis of suppliers
- Updated contractual terms and conditions for suppliers
- Designated a Modern Slavery Liaison Officer (MSLO)
- Initiated supplier engagement in MS

CENT focus areas for 2021 are;

- develop our Modern Slavery Statement
- engage with and educate our staff and communities
- work with our supplies to increase their awareness about modern slavery
- assess the risks of modern slavery in our current system operations and supply chains.
- develop and implement our Supplier Engagement Action Plan
- begin to address risk as determined by the Gap analysis
- CENT is committed to ongoing participation in ACAN and engaging high-risk suppliers via the [Sedex](#) platform.

The initiatives to expand CENT's remediating risk of modern slavery in its supply chains throughout 2021 and beyond include:

- Undertaking *awareness* training with CENT staff, Principals, Finance, Infrastructure and contractors to provide advice to schools to identify and mitigate modern slavery risk
- Provide *education* (training) to suppliers and contractors on Modern Slavery identification.
- Implement meetings on Modern Slavery to *communicate* initiatives and incentives in the progression of CENT and Modern Slavery.
- Implement the *reporting* framework for the identified Modern Slavery (*Domus 8.7*)

CENT 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, CENT, is a founding partner of Domus 8.7. 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 help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Remediation obligations and expectations will be included in contracts with high-risk suppliers who must notify and consult with CENT to ensure victim centred remediation processes are implemented to the satisfaction of CENT.

When suspicions of modern slavery practises 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

Modern slavery action plan and road map

CENT is currently in the process of developing an action plan and roadmap for 2021/2022. The risks identified will support this work and enlisting key stakeholders in CENT to address risks will form a key component of the road map.

CENT entities and departments have included a focus on Modern Slavery activities in the Annual Improvement Plans to varying degrees.

Effectiveness Assessment

CENT's engagement in Modern Slavery and membership with ACAN is a new area of focus. 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.

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.

Other

This is the completed documentation for CENT Modern Slavery statement and there is no other relevant information to provide



**Catholic
Schools
NSW**



Catholic Schools NSW

**MODERN
SLAVERY
STATEMENT**



DISCLOSURE NOTE

This statement has been made on behalf of Catholic Schools NSW Limited. This Statement covers all entities owned or controlled by Catholic Schools NSW Limited as at 31 December 2020.

ABN 46 619 593 369

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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:

- **Service:** 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.
- **Accountability:** We demonstrate our fidelity to our mission through professionalism in our work, effective stewardship, transparency and holding ourselves accountable for outcomes.
- **Integrity:** We act ethically, justly and honestly. We demonstrate that we value the dignity and worth of each individual by listening, speaking and acting respectfully towards everyone.
- **Collegiality:** We value the principle of subsidiarity and work in close collaboration with others for the common good.

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.





2020 MODERN SLAVERY RISK MANAGEMENT INITIATIVES

The following provides a summary of the actions we undertook in 2020 as part of our modern slavery work programme.

SUPPLIER RISK IDENTIFICATION

We conducted a deep dive risk assessment of all of our suppliers with spend data over \$10,000 against modern slavery risk indicators (such as location and industry of the supplier). From this, we then identified 10 procurement categories that have a potential high risk of modern slavery.

SUPPLIER ENGAGEMENT AND AUDIT

We implemented an engagement strategy for all of our suppliers with spend data over \$10,000. This involved:

- Educating our suppliers about modern slavery risks; and
- Writing to each of our suppliers formally, starting with our identified 'high risk' and 'medium risk' suppliers, asking them a number of targeted questions.

We then worked with our suppliers to address the modern slavery risks we identified from their responses. 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.

MODERN SLAVERY ACTION PLAN

We developed an action plan to map our timeframes for the work we will continue to undertake, including actions to administer modern slavery governance, risk management, and ongoing supply chain management. Our action plan is a 'living' plan, with new items added as a process of continuous improvement.

EMPLOYEE AWARENESS

We delivered modern slavery awareness training to all our employees via a face to face session and also through our online learning platform.

BOARD COMMITMENT

In 2018, our Board resolved to become a party to the Catholic Church's response in support of its measures to eradicate modern slavery in its various forms. The Board has received reports on the progress of our action plan.

The Board also participated in a modern slavery board awareness presentation in 2020 during our annual Board risk management workshop.

OUR RISK MANAGEMENT FRAMEWORK

Modern slavery risks will form part of CSNSW's overall risk management framework which is subject to Audit & Risk Committee and Board oversight. CSNSW's risk management framework is internally and externally audited.

We are in the process of further enhancing our risk management framework to ensure that it identifies, assesses, manages and monitors any modern slavery risks.

The following is a list of proposed changes to our risk management framework, some of which have already been implemented:

- Introducing a dedicated Modern Slavery Policy which describes our expectations of our employees and stakeholders, and the actions we are taking to prevent and manage modern slavery risk, including:
- Model contract clauses;
- Due diligence checklist as part of our new supplier on-boarding process; and
- Ongoing engagement and monitoring of our suppliers.
- Updating our existing policies and processes to also incorporate modern slavery risks and controls (for example, outlining our expectations in our Code of Conduct and new employee induction package).

SHARING WITH OUR SCHOOLS

We know it is also important to share our learnings and provide support to our schools, so they too can take active steps to minimise the risk of modern slavery in their supply chains through their own 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

Modern slavery compliance will become a 'business as usual' activity for us. This will include ongoing actions such as:

- Due diligence of new suppliers, which will mean that we only select suppliers that meet our criteria and can commit to our zero tolerance stance towards any form of modern slavery;
- Ongoing engagement and monitoring of our existing suppliers as part of our regular monitoring processes (including contract reviews where required);
- Committing to continuous improvement by continued collaboration with other Catholic entities and continued membership of the Australian Catholic Anti-Slavery Network (**ACAN**), which is facilitated by the Archdiocesan Anti-Slavery Taskforce (**Taskforce**). This will also comprise the introduction of new or improved processes and procedures as they arise; and
- Continuing to act as a 'leader' for our member schools by providing them with information and support to minimise their own modern slavery risks.

STATEMENT FROM CHAIRMAN



CSNSW is vehemently opposed to modern slavery in all its forms, from slavery and servitude to forced or compulsory labour and human trafficking.

Although not subject to the legislative framework recently introduced in Australia that requires large organisations to identify and publicly report on modern slavery risks in their supply chains, we are pleased to join our efforts with others committed to a world without slavery by voluntarily opting in to the statutory reporting requirements of the Modern Slavery Act 2018 (Cth).

The slavery risks CSNSW must manage are different to those faced by many other organisations. However, we trust that this Modern Slavery Statement will demonstrate our commitment to contribute to the collective movement to rid the world of slavery.

This Statement was approved by the Board of CSNSW on 19 May 2021.

A handwritten signature in black ink, appearing to read 'Sedgwick', written in a cursive style.

Stephen Sedgwick AO
Chairman

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.

We are based in an office in Sydney, NSW and have 71 employees (FTE 64.9) 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.

OUR GOVERNANCE FRAMEWORK

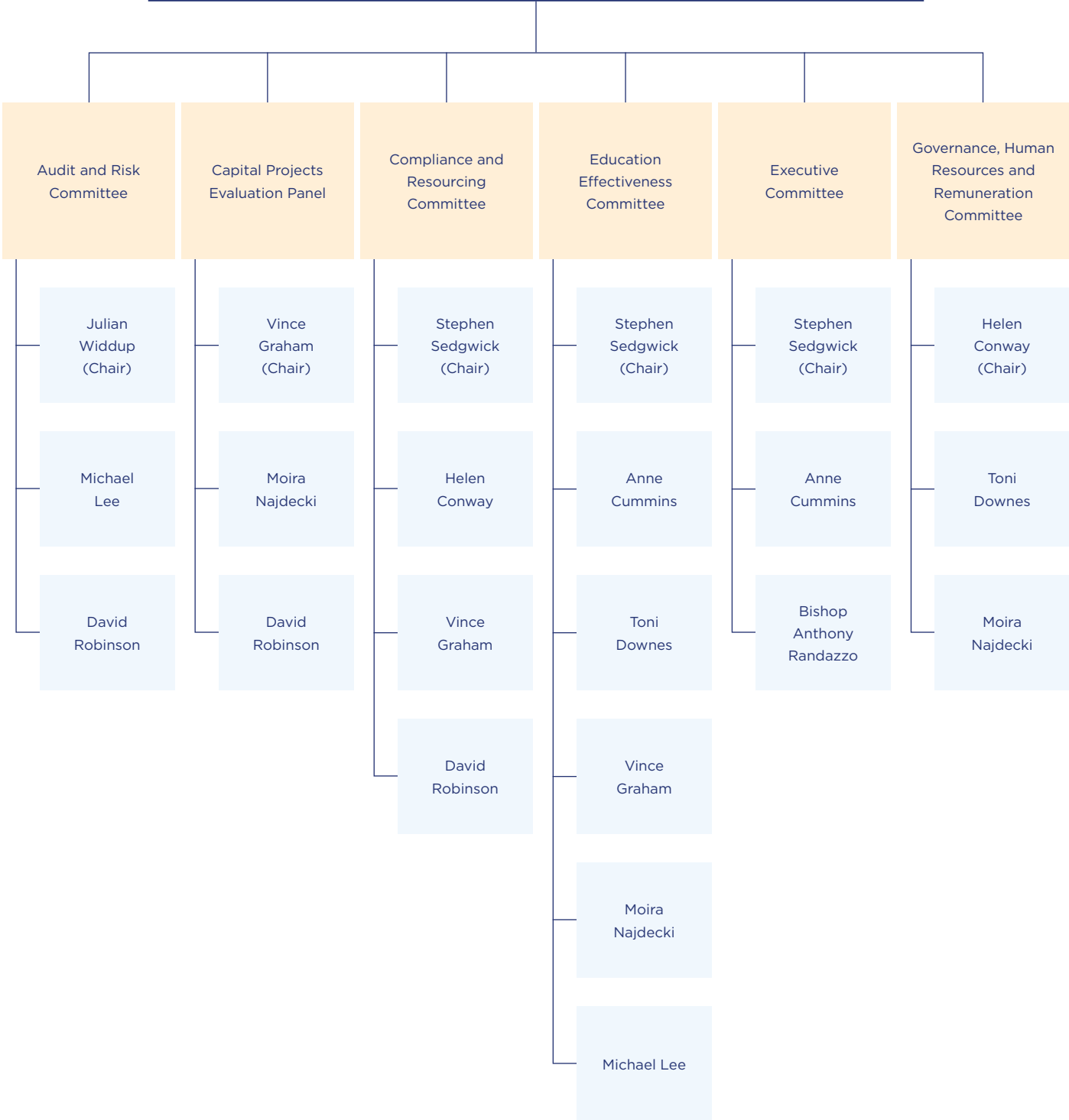
CSNSW is governed by a Board of independent directors and its work is undertaken by an experienced and professional secretariat.

We have established processes within our governance framework to provide our Board with oversight and accountability of 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 and Risk Committee, our Board is kept apprised of our day to day activities in implementing our modern slavery action plan and considering recommendations made by the business about modern slavery risk management and proposed activities.



CSNSW BOARD



OUR OPERATIONS

CSNSW is responsible for:

- Receiving and distributing government funding to diocesan Catholic schools for their day-to-day operations and for 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; and
- Promoting and advocating for Catholic education in NSW.

OUR SUPPLY CHAIN

Our suppliers provide us with goods and services to support our effective operations.

We have established long-term relationships with most of our suppliers. Where appropriate, these relationships are underpinned by formal contractual arrangements which set out our compliance expectations.

WHAT WE BUY

Our main category of procurement, by both number of suppliers and spend data, is professional services providers and consultants (such as organisational consultants, research firms, audit firms, and educational consultants). We have provided a more specific breakdown of our procurement categories in this Statement under *Reporting Criteria 3: Modern slavery risks in operations and supply chain*.

GEOGRAPHICAL LOCATIONS OF OUR SUPPLIERS

Our direct suppliers are predominantly located in Australia and encompass small businesses through to other Catholic entities through to 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.



REPORTING CRITERIA 3: MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

In 2019, the Board of CSNSW resolved to voluntarily opt-in to comply with the *Modern Slavery Act 2018 (Cth)* consistent with the Catholic Church’s overall commitment to prioritise and take a leading role in the eradication of modern slavery.

We then became a participant in the Modern Slavery Risk Management Program (Program) supplied by the Taskforce. We also appointed a Modern Slavery Liaison Officer to attend monthly meetings with other Program participants and liaise closely with the Taskforce on preparing for the regime.

The work which we have undertaken since joining the Program, using the resources and tools provided by the Taskforce and based on the guidance provided by the Australian Government Department of Home Affairs, is described further in this document.

At the conclusion of this work we were pleased to find that the potential for us 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 the actions taken to address this and further minimise modern slavery risks.*

OPERATIONAL RISKS

Our People

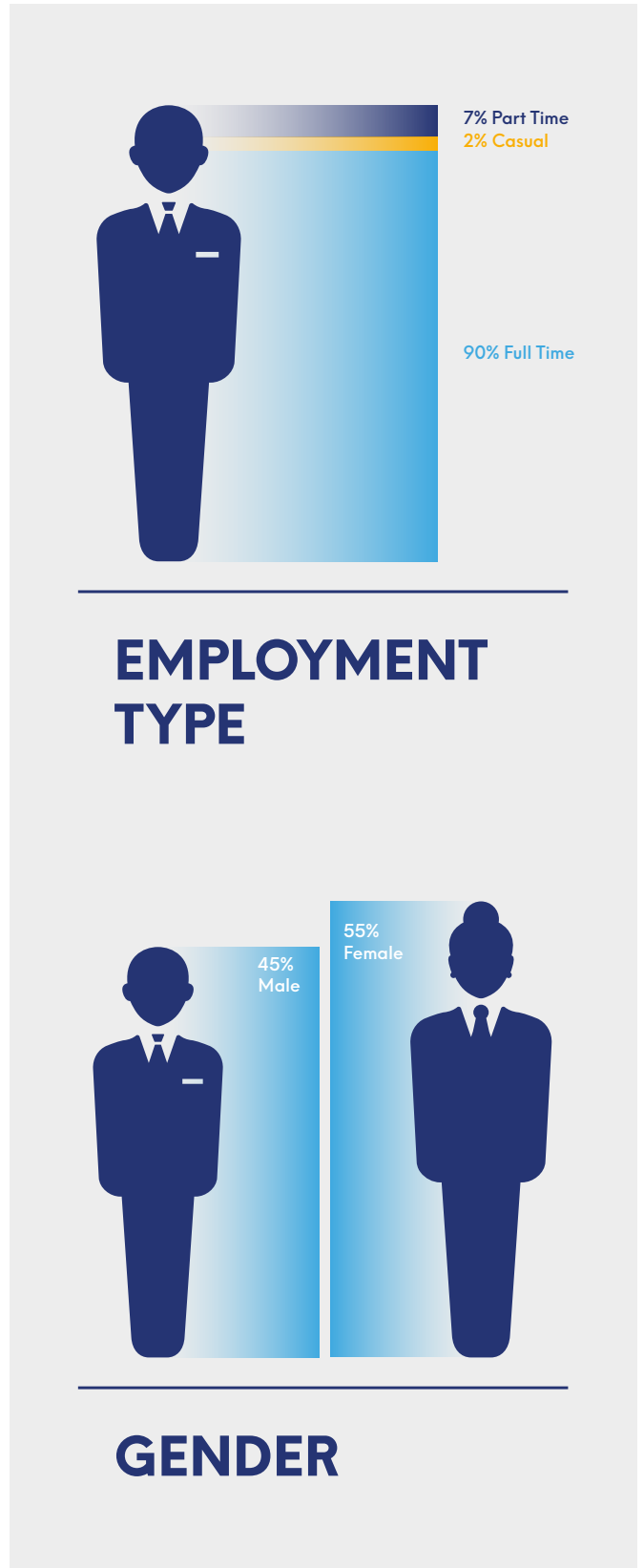
We currently employ 63.9 employees. The majority of our employees are employed directly by us on permanent contracts.

A breakdown of employees by gender and by employment type is described in the adjacent graphs.

We comply with all labour, employment, immigration and whistleblower laws of Australia including the *Fair Work Act 2009 (Cth)*. We also have an internal audit programme to periodically assess our compliance and identify any gaps or areas for improvement.

Whilst our modern slavery risks within our direct team are minimal, we have identified some areas in our operations which may be vulnerable. These include outsourced activities such as cleaning, catering and car parking providers.

We have described in *Reporting Criteria 4: Actions taken to assess and address risk the actions which we have taken to further minimise these risks.*





OUR COVID-19 RESPONSE

We have recognised that exceptional circumstances, such as the COVID-19 pandemic, 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). This can make some workers more vulnerable to modern slavery.

We have implemented the specific Guidance produced by the Australian Border Force by taking a number of extra steps and actions to address these increased risks including:

- Maintaining existing supplier relationships (eg honouring current contracts where possible) and fostering open communication with suppliers about risks (eg working with suppliers where required to ease pressures, such as changed payment or deliverable timeframes); and
- Collaborating with the Taskforce to identify best practice approaches in the exceptional circumstances.

SUPPLY CHAIN RISKS

We completed a desktop audit of all of our suppliers with whom we spent \$AU10,000 or more during the year 2020, from which we identified 138 suppliers. We then conducted a deep dive risk assessment of these suppliers against key modern slavery indicators, as follows:

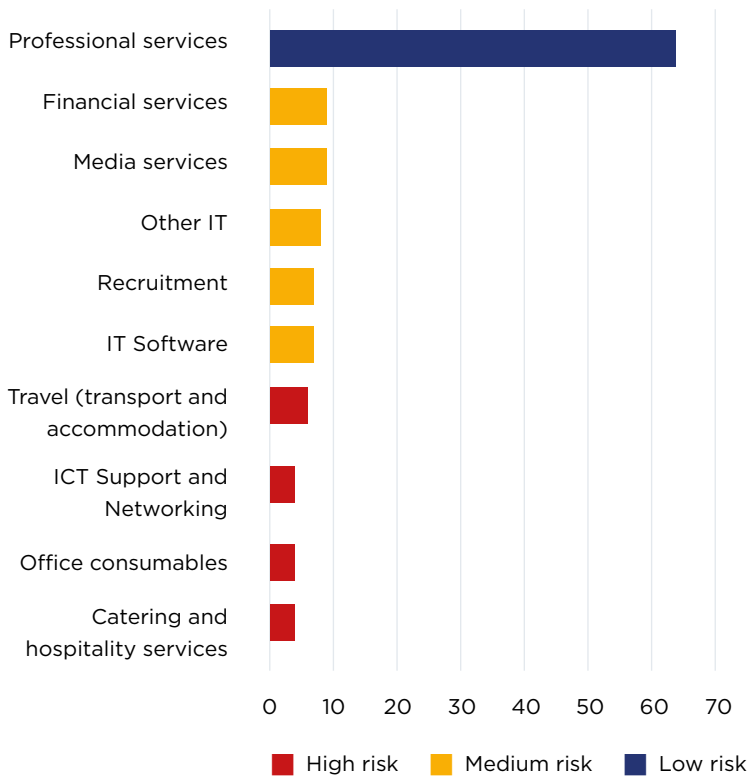
- **Industry sector** – Specific industry sectors deemed as high risk in international and national guidance documentation.
 - **Commodity/product** – Specific products and commodities deemed as high risk by the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor, the Global 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.
 - **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).
- Additionally, we assessed them against other more generic risk indicators such as:
- Whether the supplier is a recognised legal entity;
 - Whether we have a formal contract in place with the supplier, and also whether the contract permits any outsourcing by the supplier;
 - Whether there have been any reported modern slavery violations or negative media reports; and
 - Whether the supplier operates in other jurisdictions where modern slavery obligations are already in place, and if so, review of their publicly available Modern Slavery Statement (if any).

Based on these indicators, we identified that approximately 20% of the 138 suppliers we assessed have a potential high risk of modern slavery.

Further analysis of these suppliers was then undertaken with the input of our relevant relationship managers for each supplier to ascertain the true nature of the supply. For example, whilst an architectural firm may on its face be a ‘building and construction’ supplier, the firms we engage may be better categorised as a supplier of professional services.

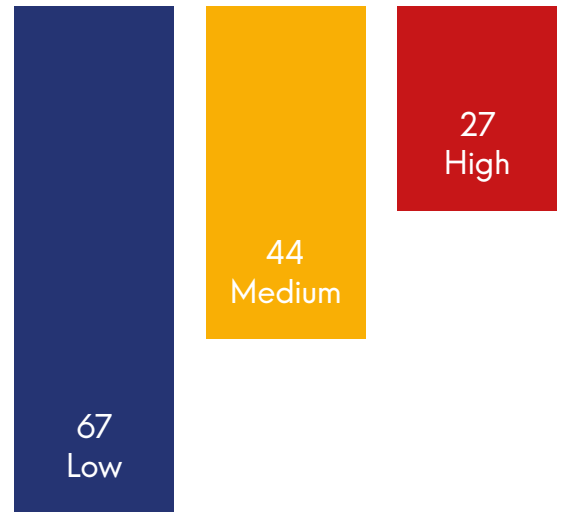
We identified that our 'Top 10' suppliers fall within the following categories:

CATEGORY RISK PROFILE (TOP 10)



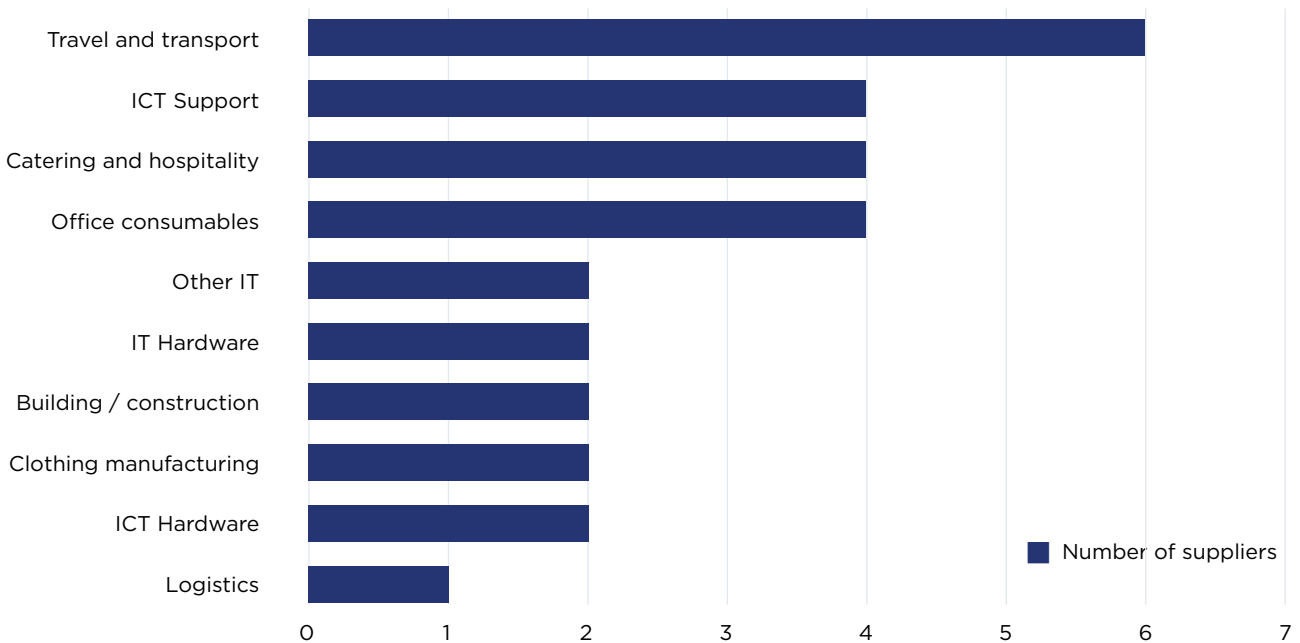
We also identified the total number of our suppliers per each risk category (low, medium and high risk):

RISK BY NUMBER OF SUPPLIERS



The breakdown of the procurement categories where we identified a potential high risk of modern slavery was as follows:

'HIGH RISK' PROCUREMENT CATEGORIES



WHISTLEBLOWING

We also have a Whistleblower Policy and procedures in place, which would enable us to identify any specific supply chain risks via reports made to our Whistleblowing hotline, which can also be made anonymously.

Instances of actual or suspected modern slavery would amount to a "disclosable matter" under our Whistleblower Policy, and a broad range of people are eligible to make reports including employees or former employees of suppliers, or their spouses, children or other relatives. In making a report, they would obtain the support and protections detailed in our Whistleblower Policy.

REPORTING CRITERIA 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

MODERN SLAVERY ACTION PLAN

With guidance from the Taskforce, we developed a detailed action plan describing the work to be undertaken in each of our operational areas and the timing of each piece of work. A short extract from our action plan is set out below as an example.

Procurement and supply chain

1. Incorporate modern slavery requirements into existing policies and procedures.
2. Include general clauses on modern slavery in supplier contracts.
3. Incorporate performance standards and contract evaluation criteria for high risk contracts.
4. Conduct desktop review of high-risk suppliers.
5. Identify and document direct (Tier 1) suppliers.
6. Undertake mapping of Tier 1 suppliers (initially) and Tier 2 where resources allow.
7. Undertake gap analysis of procurement policies and procedures.
8. Engage all Tier 1 suppliers in modern slavery awareness Programs.
9. Develop targeted communications & engagement programs for high risk suppliers.
10. Establish a supplier monitoring program.
11. Develop a monitoring system to assess ongoing performance.
12. Develop corrective action plans to address modern slavery risks among high risk suppliers.
13. Work with suppliers to identify gaps and address barriers to implementation.

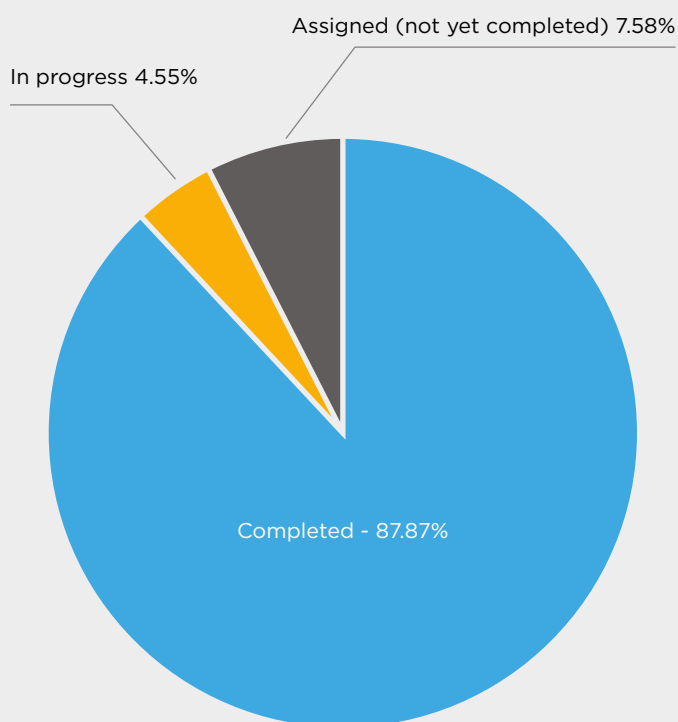
Our action plan comprises 82 distinct 'actions' (for example, the steps taken for procurement and supply chain as outlined above).

Actions have been prioritised according to the legislative timeframes for the preparation and lodgement of this Statement and with the guidance of the Taskforce.

Each action has also been logged as a task on Complispace Assurance, our governance and risk management system, to ensure that their status is monitored and due dates are met.

We also have an online learning management system which enables us to deliver training to employees online (in conjunction with face to face modules) and also monitor completion of training via the generation of reports. For modern slavery training we have delivered so far, the employee completion rate across CSNSW has been high.

MODERN SLAVERY TRAINING MODULES – COMPLETION BY EMPLOYEES OF CATHOLIC SCHOOLS NSW



Note that all new employees must complete modern slavery training within one month of commencing employment with CSNSW. Training which is currently in progress or assigned but not yet completed is due for completion by 31 May 2021.

SUPPLIER AUDITS

As a result of the actions which we took with our suppliers (and as described in this Statement under *Reporting Criteria 3: Modern slavery risks in operations and supply chain*) and the responses received from our supplier audits, we classified the outcomes as follows:

- No further action required for 2020, due to minimal risk being identified from supplier responses and other available information;
- Follow up of the supplier to find out more about the potential risks (particularly their outsourced activities); or
- Recommended actions to address the identified risks, for example:
 - Including contract clauses in our contract with a supplier to formalise our expectations and set out consequences when they do not meet these standards;
 - Considering whether the 'high risk' suppliers will also need to agree to a Supplier Code of Conduct as a term of their contract;
 - Reviewing a Supplier's own Modern Slavery Statement (where they are also required to lodge one); and/or
 - Providing further information to a supplier to increase their modern slavery awareness.

We will be contacting our 'low risk' suppliers in early 2021 which will complete this initial audit work.

OTHER ACTIONS

The work which we undertook in 2020 is described in detail under *Reporting Criteria 3: Modern slavery risks in operations and supply chain*.

In 2021, we propose to undertake further actions including:

- Finalisation of the updates to policies and procedures, including the rollout of our Modern Slavery Policy;
- Rollout of human resources and recruitment actions, such as incorporation of modern slavery information into induction programmes;
- Continued monitoring and review of our supply chain, as per the actions described in this Statement under *Reporting Criteria 5: Effectiveness Assessment*; and
- Continued communication, training and awareness with all our stakeholders including our Board, employees, and schools.

We remain a member of ACAN (facilitated by the Taskforce) which will provide ongoing support to us in responding to modern slavery risks. We consider that our membership of ACAN also demonstrates our ongoing commitment to comply with the requirements of the *Modern Slavery Act 2018 (Cth)* by voluntarily opting in.



REMEDATION

Whilst our work to date has not identified any instances of modern slavery in our supply chains, we are committed to ensuring that we provide appropriate and timely remedy to people impacted by modern slavery should this ever be identified. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with us to ensure victim centred remediation processes are implemented to our satisfaction.

Through our membership with ACAN, we have also become a founding partner of Domus 8.7 - an independent program to provide remedy to people impacted by modern slavery. By partnering with Domus 8.7, we can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and also means that we can continuously improve risk management and our response.

We have also funded a "Remedy Pathways" module in our Modern Slavery E-Learning course that will be available to employees and other stakeholders in 2021.



REPORTING CRITERIA 5: EFFECTIVENESS ASSESSMENT

We will regularly review our modern slavery risks as part of our overall risk management framework.

This is governed by processes including:

- Reporting to our Board annually, or more frequently on an exceptions basis;
- Quarterly reporting to the Audit and Risk Committee as part of the regular risk reporting cycle;
- Ongoing monitoring of specific pieces of work via Complispace Assurance, our governance and risk management system, by the creation of 'Tasks' allocated to relevant employees for completion by specified dates;
- Regular training for all employees through an online module which includes a test, all employees must pass the test to satisfactorily complete the training;
- Monitoring via our annual internal audit process;
- Oversight by the Legal team of all new contracts and contract changes, with a mandatory Document Execution Request form for requested executions; and
- Ongoing engagement and monitoring of suppliers.

We expect that these processes will enable us to check that the actions we are taking to assess and address any risks are effective, and also enable us to identify any 'gaps' and areas in which we can improve.

For example, some of the 'Tasks' we have created in Complispace for the purposes of effectiveness assessment include:

- Annually conducting a 'gap analysis' assessment with the assistance of the Taskforce to identify any gaps in processes or procedures and opportunities for improvement; and
- Undertaking six-monthly desk-top audits of select suppliers with findings reported to the Audit and Risk Committee.

Our internal audit process will also assess whether the systems and processes we have implemented have been working as designed and intended (for example, confirming that due diligence of new suppliers has been completed and resulted in actions such as contract clauses or selection of alternative suppliers where required).



REPORTING CRITERIA 6: PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

We note that for the 2020 reporting period for this Modern Slavery Statement, CSNSW did not own or control any other entities.

REPORTING CRITERIA 7: ANY OTHER RELEVANT INFORMATION

We do not have any further information to include in this Modern Slavery Statement.



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Modern Slavery Statement 2020



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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*.

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 a registered charity with the Australian Charities and Not-for-Profit Commission. We have existed for over 150 years, commencing operations in 1867 at Rookwood. 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

Up to 2020	2021	BEYOND
<ul style="list-style-type: none"> • Board commitment to eradicate Modern Slavery (MS) • MS requirements incorporated in Procurement Strategy Plan • Increase awareness of MS with senior mgt. and key staff • Completed baseline assessment • Completed a spend analysis to determine our risk profile to MS • Sent communications to all suppliers on our MS commitment 	<ul style="list-style-type: none"> • Understand the awareness and actions of all our potential high risk suppliers • Implement Procurement Strategy Plan • Implement MS policies and procedures • MS is briefly covered in staff and contractor education and induction programs • Adopt anti-slavery contract clauses. 	<ul style="list-style-type: none"> • All potential high-risk suppliers are effectively engaged and educated in MS • Establish remedy response when MS practices and identified in operations • All medium priority suppliers are effectively engaged and educated in MS



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.

Brief Statement from the CEO



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 wording in contracts.
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.

This statement represents the 2020 calendar year and has been approved by the Board of CMCT on 24 February 2021.

A handwritten signature in black ink, appearing to read 'Peter O'Meara'. The signature is written in a cursive, flowing style.

Peter O'Meara
CEO

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 9-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, Corporate Governance & Procurement
- People Capability & Change

The Strategic Plan 2019-2021 outlines five key priorities:

- 1. Grow and maintain relationships
- 2. Business sustainability
- 3. Staff and culture
- 4. Service excellence
- 5. Enhanced governance and accountability

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, Risk Management & Procurement (FRMP)

The Board approved the Procurement Strategy Plan in February 2020 which incorporated ACAN's Modern Slavery initiative. The FRMP leads a Procurement Project team and reports regularly to the CEO and periodically to 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 a cemetery at Varroville and seeking DA approval for cemetery development at Wallacia. The location of the Executive / Administration function and the Board's registered office is Level 2, 11 Murray Rose Ave, Sydney Olympic Park NSW 2127.

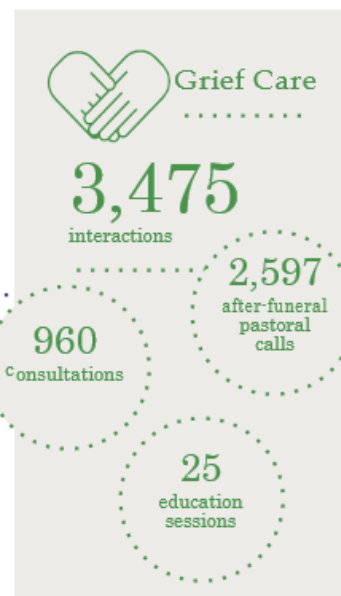
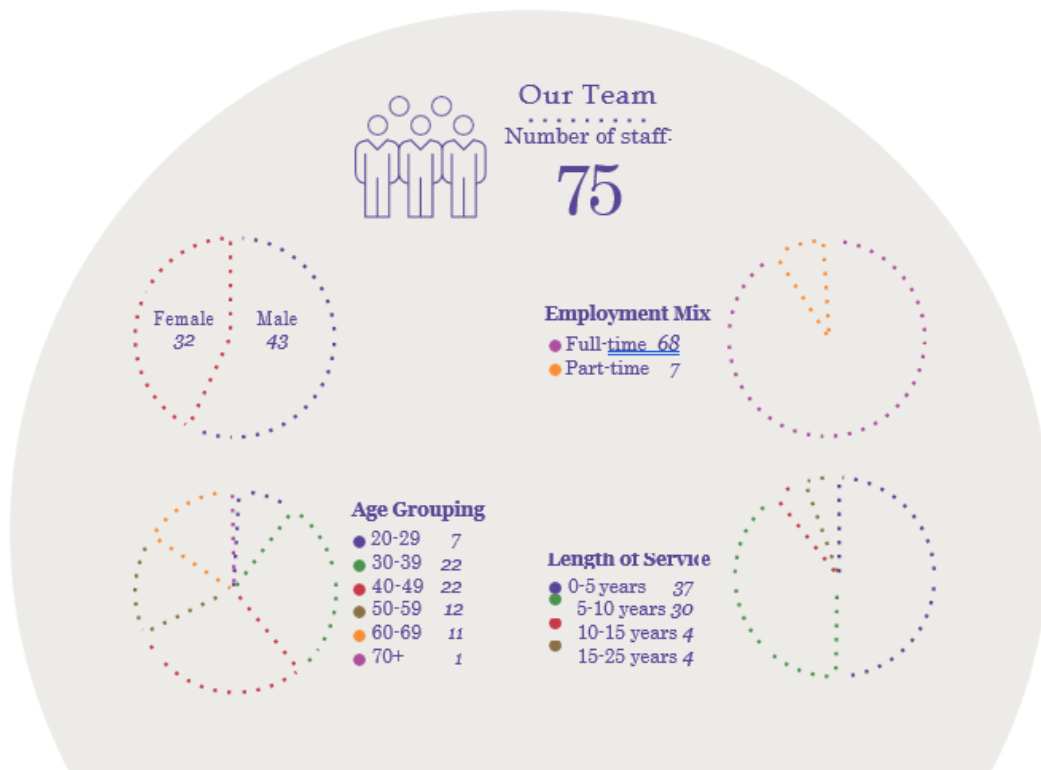
CMCT has obligations under legislation and guidelines including, but not limited to:

- *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.

An important outcome of the Procurement Strategy plan is to establish a 'centre led' Procurement function that organises and manages "common use" contracts covering a substantial proportion of OPEX AND CAPEX. 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.

Sourced from CMCT's 2020 Annual Report, highlights a profile of our employees and services.



Our Supply Chain

Over 12 months ending October 2019, CMCT purchased over \$16m of goods and services mainly from 69 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 50% was spent on CAPEX and 50% on OPEX.

The key area of potentially high-risk suppliers is in Building, Construction and fabrication services totalling \$7.9m. A significant component was the construction of Crypts at Rookwood cemetery. The next major outlay of potentially high-risk suppliers is with Property and facility maintenance totalling \$382k. A significant component was the ground maintenance of the cemeteries at Rookwood and Liverpool.

Modern Slavery risks in Operations and Supply Chain

CMCT's Board made a commitment to voluntarily join the Australian Catholic Anti-slavery Network (ACAN) initiative and participated in the ACAN conference in July 2019 to develop a greater understanding of our supply base and the potential risk to modern slavery practices.

It was clear from this analysis that we were 'at the beginning of our journey.'

Subsequently the Procurement Project team was established and undertook the following key steps:

- Obtain Senior Management and key staff commitment to the Modern Slavery initiative,
- Increase the awareness of Modern Slavery within the organisation,
- Develop a 'baseline' of the organisation's capability to implement the change,
- Completed a detailed analysis of our supply base of the potential risks to Modern Slavery, and
- Communicate to our suppliers our intent to eradicate Modern Slavery,

OPERATIONAL RISKS

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. 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.

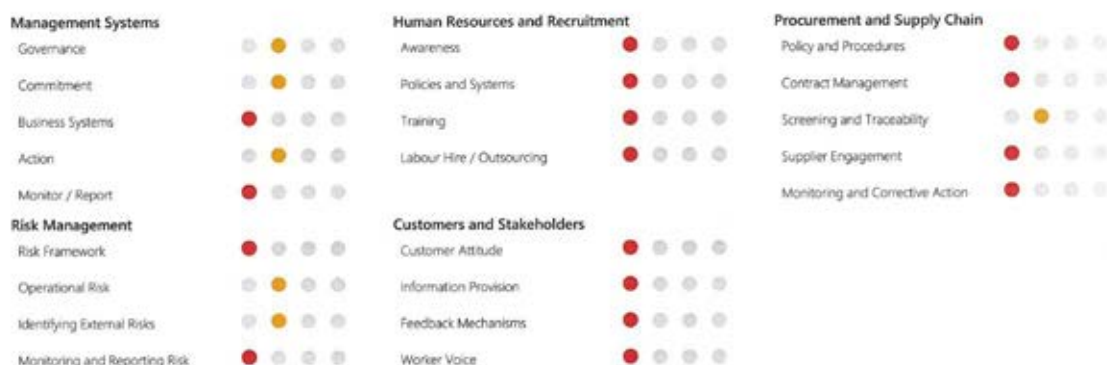
Modern Slavery Gap Analysis

In September 2020, key senior managers and staff involved in the purchasing of goods and services completed a 'Bridge the Gap' exercise to establish a baseline.



Heat Map

The heat map provides a snapshot of how you are currently tracking in your approach to managing modern slavery risks.



Category Summary

Management Systems

CMCT have taken steps to understanding the modern slavery risks in our operations and supply chain. 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 will be integrated into the Procurement function.

Human Resources and Recruitment

CMCT has commenced incorporating modern slavery issues into our employee or contractor training or awareness programs. In 2021 our aim is hiring and onboarding processes that reference modern slavery risk management.

Procurement and Supply Chain

We have mapped our supply chain to understand priority suppliers and risk categories. Our existing supply contracts do not refer to modern slavery risks and we do not monitor suppliers for modern slavery risks. We have recently notified our suppliers our intent to implement ACAN’s initiative. In 2021 our aim is Modern slavery risks are considered in our procurement policies or supplier management processes.

Risk Management

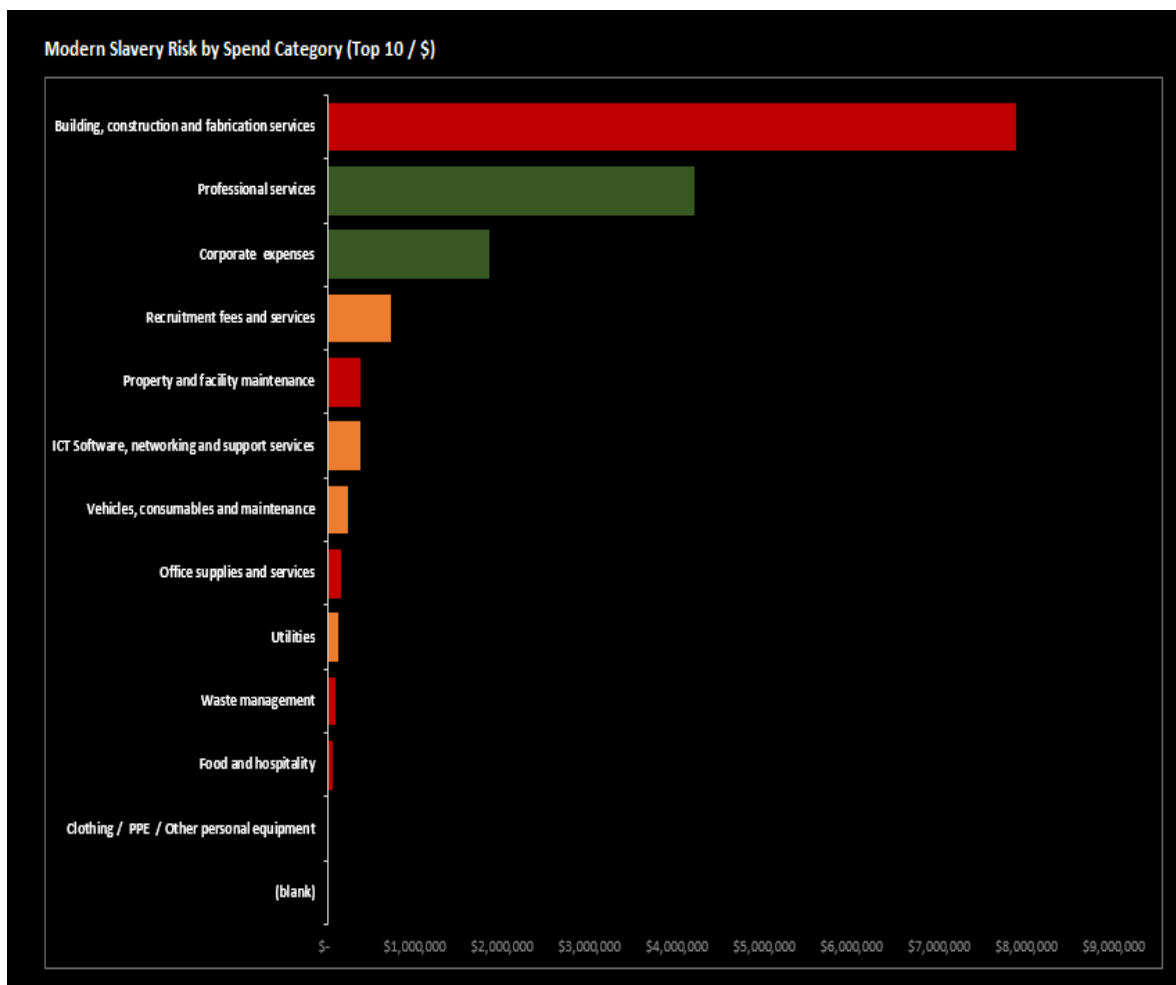
Modern slavery is not considered in our business risk framework. We have no systems or processes in place to manage potential modern slavery risks in our operations, supply chain, business partnerships or industry sector. This will be addressed in the implementation of the Procurement Strategy plan in 2021.

Customers and Stakeholders

CMCT have limited understanding of our customer or stakeholder expectations around modern slavery risk management and do not elicit feedback from them on this issue. We do not have feedback or communications mechanisms in place for workers in our supply chain and do not make information on modern slavery risks publicly available.

SUPPLY CHAIN RISKS

In 2020 we identified the potential highest risk suppliers according to key indicators used by ACAN. 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 2019 financial year and the indicators of potential risk are based on the best available information as disclosed in the ACAN conference in July 2019. 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.



It highlights CMCT has 6 potential high-risk categories involving 41 suppliers that constitutes 53% of the overall spend.

Our COVID-19 Response

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.

In April 2020 the CEO reassured the employment for existing staff during the business downturn who may have been under financial pressure. In addition, CMCT significantly changed how it operated by:

- Allowing staff to work from home,
- Implementing a split team roster, and
- Ensuring PPE was available as required.

Actions taken to assess and address risk

The focus in 2020 was securing Senior Management and key relevant staff commitment to the ACAN initiative and building our understanding of Modern Slavery risk in CMCT's Supply chain. Subsequently the Modern Slavery requirements was incorporated into the Procurement Strategy plan and implementation appropriately resourced.

Modern slavery action plan and road map

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 develop our own action plan by:

- (a) the FRMP regularly attending the Modern Slavery 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 Modern Slavery E-learning module, and
- (c) Establishing a Project team consisting of 3 Senior Managers, a procurement specialist and an accountant. In addition, a consultative group was formed of staff who are either major buyers of goods / services or have significant budget responsibility.

The key actions delivered for 2020 were:

- Joined ACAN
- Engage the Board and the leadership team of the enormity and importance of the task
- Incorporated Modern Slavery requirements in the scope of implementing the Procurement Strategy plan
- Completed the sector specific action plan
- Completed the Bridge the Gap analysis
- Completed the Modern Slavery e-learning module – 14 attendees.
- Completed the Model supplier engagement strategy workshop - 14 attendees.
- Reviewed the spend analysis to assign a rating to each material supplier (a) Strategic impact and value to business, and (b) potential risk of Modern Slavery
- Document the current engagement strategy with all potential high-risk suppliers
- Completed the Business Relevance module – 2 attendees
- Sent a letter to all suppliers notifying our commitment to ACAN's Modern Slavery initiative

Effectiveness Assessment

Effective assessments include, but not limited to:

- The Modern Slavery initiative has been incorporated into the Procurement project implementation. Its progress is monthly reviewed by senior management and reported to the Board every 6 months.
- The 'Bridge the Gap' exercise is completed annually.
- No. of employee hours dedicated to training and awareness on Modern Slavery risks.
- No. of suppliers engaged to raise awareness on Modern Slavery risks.
- No. of contracts which include anti-slavery clauses.

Other

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.



Catholic Archdiocese of Perth Modern Slavery Statement 2020

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



Statement from The Most Reverend Timothy Costelloe SDB Archbishop of Perth



We welcome the *Modern Slavery Act 2018* (Cth) and the increased awareness, requirement for due diligence and responsibility that this legislation brings to Australian organisations, including the Catholic Archdiocese of Perth.

We hope that this shared commitment between government, business and community, will bring real and lasting improvement and change to labour supply and working conditions at both national and global levels as well as within local jurisdictions, such as Western Australia.

It is important to recognise that modern slavery is a significant and complex human rights issue which challenges us as a Catholic community to respond with the kind of love of neighbour illustrated by the parable of the Good Samaritan (Luke 10: 25 – 37). This means that we take the opportunity and the responsibility to create a future of hope for the victim trapped in slavery by doing all we can to eradicate the risk of modern slavery from our organisational structures.

This call to action is also reflected in our professed faith which we live out in community through decisions and actions informed by Catholic social teaching and its principle of the innate dignity of the human person (Catholic Social Doctrine Compendium, n 145), meaning we take seriously the moral obligation to:

- identify structural abuses and weak or failed governance systems so as to reduce or eradicate systemic problems that allow modern slavery to perpetuate;
- become vigilant with regards to purchasing choices and risk management; and
- willingly collaborate with others to eradicate the crime of modern slavery.

This is our first public disclosure that specifically addresses the very real risk that modern slavery is present 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



Statement from Our Executive



Executive Director
Office of the Archbishop

We are pleased to present our first Modern Slavery Statement as we commit further to sustainable business practices informed by Catholic ethical thought and the Gospel imperative of neighbourly love.

The term ‘modern slavery’ is used to describe a range of exploitative practices including human trafficking, forced labour, the worst forms of child labour and where threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Tackling modern slavery is a difficult issue which requires continuous commitment and ongoing focus.



Executive Director
Finance and Administration

We recognise our responsibility and the opportunity to help eradicate modern slavery.

We also recognise that collaboration between our people, suppliers and participants in our supply chain is an effective and sustainable way to combat modern slavery.

We acknowledge that our risk management program will be based upon continual improvement, which ultimately will ensure our personnel and suppliers uphold our values and commitment to prevent modern slavery.

Any form of modern slavery is unacceptable and so we will continue to assess and address the risk of modern slavery within our operations and supply chain into the future.

Supported by ACAN, we will develop risk action plans to mitigate risk exposures from our procurement processes incorporating due diligence procedures and the adoption of supplier agreement clauses.

This statement has been approved by The Roman Catholic Archbishop of Perth.

Mr Daniel Lynch
Executive Director
Office of the Archbishop

Mr Gregory Russo
Executive Director
Finance and Administration



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.

Modern Slavery Risk Management Initiatives 2019 - 2020

The CAP initiated, and was a participant in, the Archdiocesan modern slavery working party to assess our modern slavery risks, and recommend how these risks could be addressed. The CAP understandings around modern slavery and the risks it presents to our operations and supply chains has been enhanced throughout 2020 by consultation with experts and through participation in the Australian Catholic Antislavery Network (ACAN), a collaboration of more than 30 Catholic entities throughout all states and territories of Australia.

Awareness raising and learning opportunities have been presented to CAP personnel, and personnel of independent faith and social outreach agencies that operate in the Archdiocese, through place of work workshops or Faith in Action sessions provided through the Centre for Faith Enrichment.

With this support, we have begun the journey that will ensure our decision making reflects a commitment to mitigate modern slavery risks, thus making a difference to some of the most resource-poor and disadvantaged people working in the supply chains of goods that we purchase.



Our Plans for 2021 and Beyond

The CAP has renewed its participation in the ACAN Modern Slavery Risk Management Program 2021 to 30 June 2023. The Program provides access to various tools and resources which will facilitate the development of a CAP Modern Slavery Prevention Implementation Plan to outline the CAP's ongoing commitment to continuous improvement in policy and procedures to effectively mitigate the risk of modern slavery from our operations and supply chains.

The Implementation Plan will include:

- the development of a CAP Modern Slavery Prevention Policy which will articulate the roles and responsibilities in respect of risk identification and management of modern slavery risks in relation to CAP personnel and operations;
- engagement with 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;
- the development of a 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;
- consideration to, and inclusion 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; and
- continued 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.

By virtue of the CAP's participation in the ACAN program, the CAP will:

- support Domus 8.7, which serves as ACAN's remedy pathway for victims of modern slavery abuse and independent advisory service; and
- access the Sedex platform which provides inherent risk information in respect of country, sector and commodity risk globally affecting CAP supply chains.





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:

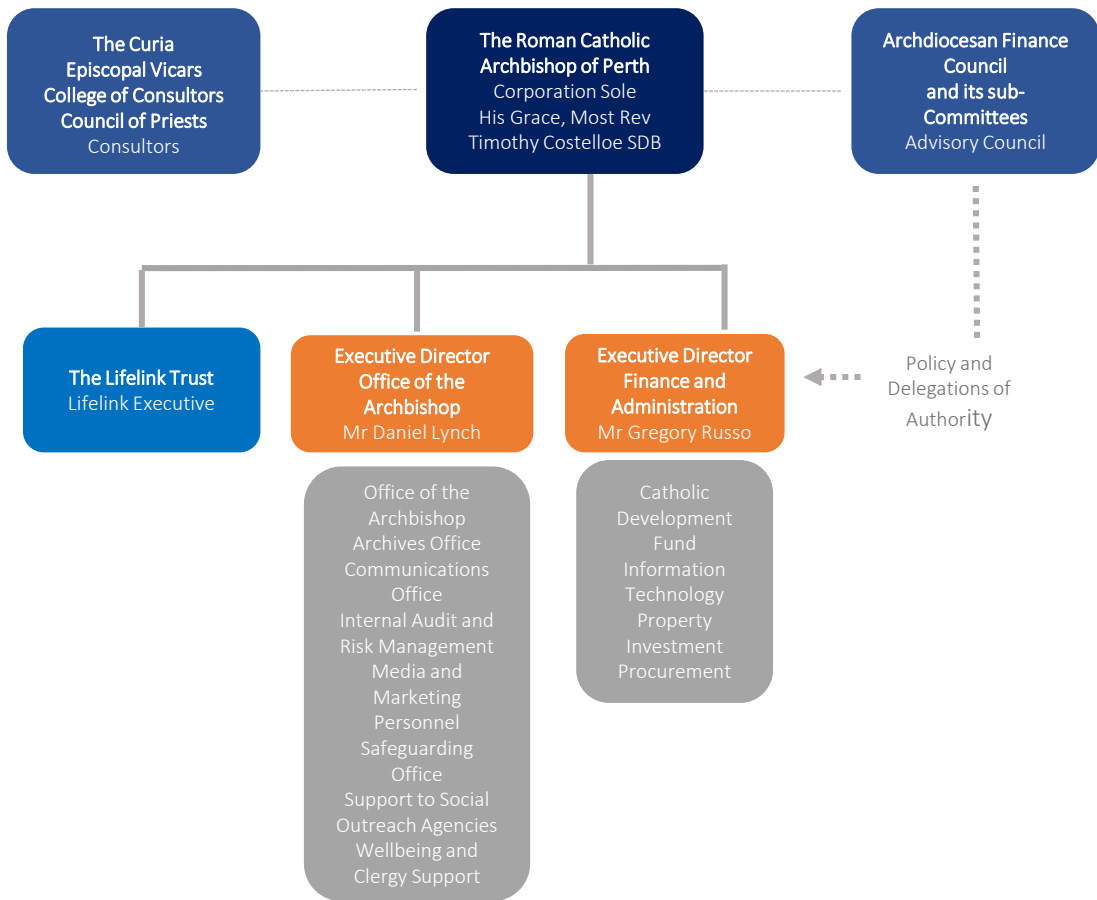
- Catholic Development Fund Committee;
- Property and Investment Committee;
- Finance and Audit Committee; and
- Governance and Risk Committee.

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 Lifeline 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.





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 practise honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

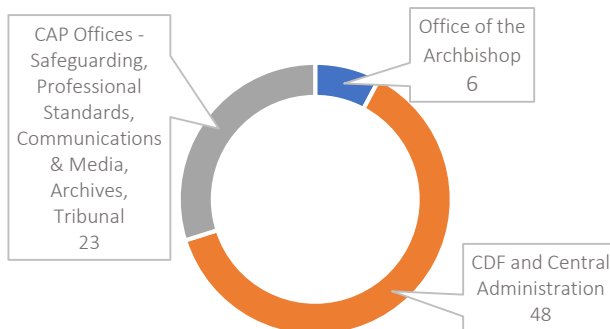
The CAP Code of Ethical Conduct sets out the expectations for all employees and articulates the Gospel’s requirement for all to respect the dignity of each person, and to be fully supportive of the ethos of the Catholic Church.

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. Workshops were conducted in 2020 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 77 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



Our Supply Chains

In 2020 the CAP procured approximately \$11M in goods and services from 299 Tier 1 (direct) suppliers. We have established long-term relationships with many of our suppliers who are predominantly located in Australia.

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.

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.

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 2019 the CAP participated 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.

Impacts of COVID-19

The COVID-19 pandemic has had a devastating impact globally. There has been significant impact on supply chains translating to increased risks of modern slavery on vulnerable workers. The CAP is aware of the increased health risks attributable to overcrowded working conditions and lack of personal protective equipment to those vulnerable workers.

In responding to the impacts of COVID-19 on operations and our workforce, the CAP focused on implementing controls to protect employees and provide a COVID-safe working environment. This response required supply of essential safety items, such as hand sanitiser, with sourcing preference based on availability and speed of delivery.

In keeping with the Australian Government's advice that 'sudden changes to supply chain structures can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation', the CAP supply chain priorities are to:

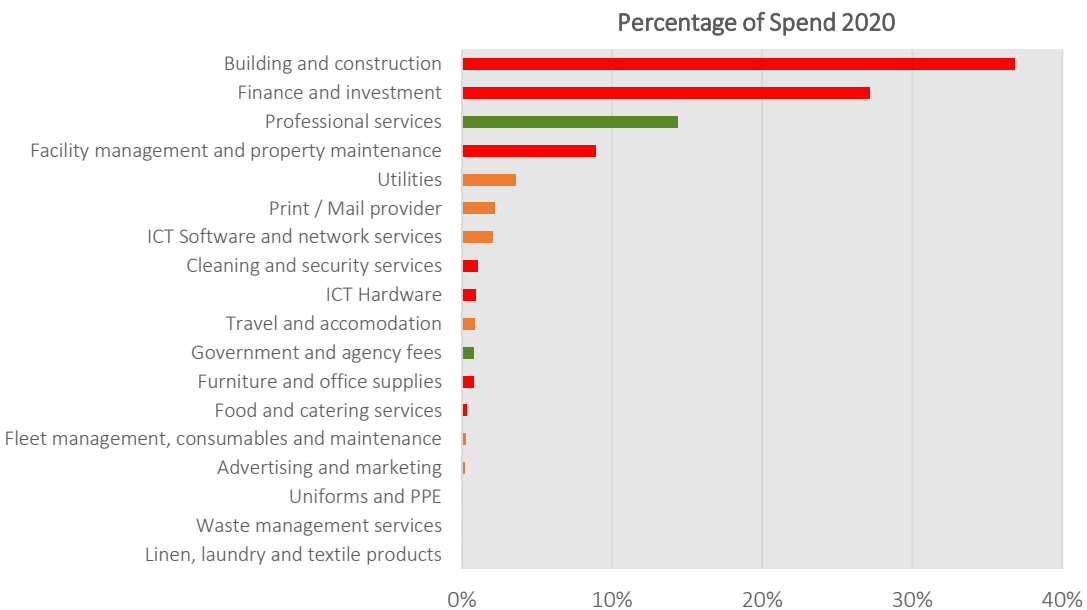
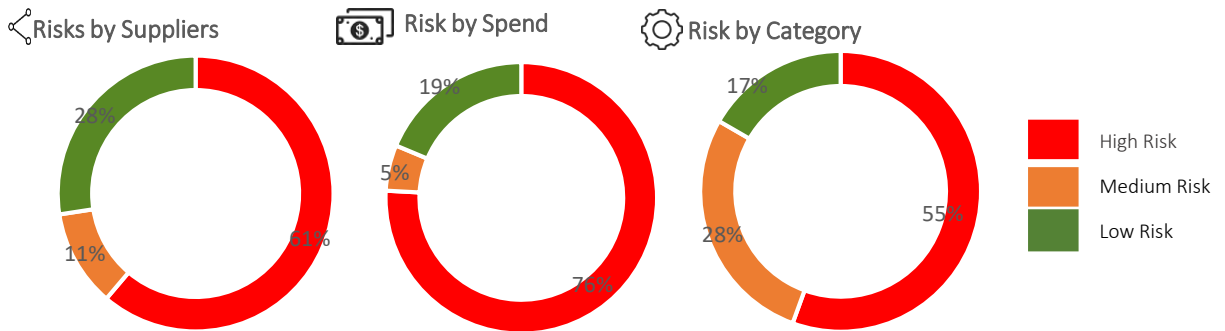
- maintain supply continuity which means deferring orders in preference to cancellation as we continue to support local procurement; and
- continue to work with existing suppliers.



Supplier Risk Identification

The CAP assessed the 2020 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.





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 serves to provide an understanding of areas that require improvement and a the basis for a practical plan to better manage modern slavery risks.

Category	Topic	Result 2019	Result 2020	Change
Management Systems	Governance	Starting out	Making progress	+
	Commitment	At the starting line	Making progress	++
	Business systems	At the starting line	Starting out	+
	Actions	At the starting line	Starting out	+
	Monitor/report	At the starting line	Starting out	+
Risk Management	Risk Framework	Starting out	Starting out	-
	Operational risk	Starting out	Starting out	-
	Identifying external risks	At the starting line	Starting out	+
	Monitoring & reporting risk	At the starting line	Starting out	+
Procurement & Supply Chain	Policy & procedures	At the starting line	Starting out	+
	Contract management	At the starting line	Starting out	+
	Screening & traceability	At the starting line	At the starting line	-
	Supplier engagement	At the starting line	Starting out	+
	Monitoring & corrective action	At the starting line	At the starting line	-
Personnel & Recruitment	Awareness	At the starting line	Making progress	++
	Policies & systems	At the starting line	Starting out	+
	Training	At the starting line	Making progress	++
	Labour hire/outsourcing	At the starting line	At the starting line	-
Customers & Stakeholders	Customer attitude	Starting out	Starting out	-
	Information provision	At the starting line	Starting out	+
	Feedback mechanisms	At the starting line	At the starting line	-
	Worker voice	At the starting line	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 2020 is the first voluntary reporting period for the CAP with respect to the Modern Slavery Act. The actions undertaken during 2019 and 2020 were focussed on establishing a strong foundation for future action to identify and address modern slavery risks in our operations and supply chains.

Actions undertaken

<p>Raising CAP awareness of modern slavery risks</p>	<ul style="list-style-type: none"> • Attendance at the ‘Eradicating Modern Slavery from Catholic Supply Chains’ conference held in Sydney, July 2019 • Active participant in ACAN Modern Slavery Risk Management Program • Production of a video to communicate the shared commitment of all four Western Australian Bishops to Anti-Modern Slavery, produced as a collaborative effort with Catholic Education WA (CEWA) and several groups within the Archdiocese • Establishment of a Modern Slavery Working Party comprising representatives of CAP, CEWA and Australian Catholic Religious Against Trafficking in Humans (ACRATH) • Completion of ACAN developed e-learning MS101 training course by 3 CAP employees (it is the intention this introductory training module will be promoted to all CAP employees in 2021) • Social media engagement and article produced in The Record to raise awareness about modern slavery in line with the United Nations’ 2020 World Day Against Trafficking in Persons
<p>Incorporating modern slavery prevention into CAP governance</p>	<ul style="list-style-type: none"> • Designated Modern Slavery Liaison Officer (MSLO) • Commenced development of CAP Modern Slavery Prevention Policy • Consideration of modern slavery risk from supply chains in the CAP Risk Register • Development of CAP Modern Slavery Implementation Plan
<p>Engaging with CAP supply chain</p>	<ul style="list-style-type: none"> • 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



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* (Cth) – 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.

Domus 8.7 is an initiative of the Catholic Archdiocese of Sydney designed to provide an effective response to modern slavery for both victims and organisations. 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, CAP is a founding partner of Domus 8.7. Whilst the Domus 8.7 operating model is still under development, the program will offer a toll free hotline and confidential online reporting platform for victims, workers or businesses to report suspected incidents of modern slavery, along with practical and immediate support for victims, and advocate for better support for victims of slavery in Australia.

CAP has funded a “Remedy Pathways” module in its Modern Slavery e-Learning course that will be available to staff and other stakeholders in 2021.

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.

Effectiveness Assessment

Actions taken to date have focussed on establishing the appropriate foundations to educate CAP Executive and employees on the risks of modern slavery in our operations and supply chains, and identify the appropriate implementation plan for policies and underlying procedures.

Through this initial engagement process, key findings have been identified:

- Modern slavery is a complex issue that is often hidden. As such, collaboration, communication and engagement are key to reducing the risk and ultimately effecting change;
- CAP can either cause, contribute to or be directly linked with modern slavery practices;
- As a basic religious entity the CAP recognises that raising awareness of this important issue and providing appropriate opportunities to increase knowledge on modern slavery is critical;
- 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;
- Although there is increasing media and publicly available information on the existence of modern slavery, many people do not recognise the gravity of the situation, or that CAP may play a part in it. The CAP aims to provide leadership by educating and raising awareness to CAP employees, suppliers and other stakeholders.



The CAP Governance Framework articulates the roles of the Executive and Archdiocesan Finance Committee with respect to risk management, internal controls and codes of conduct. The CAP Executive will liaise with the designated MSLO to assess the effectiveness of the Modern Slavery Implementation Plan. 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.

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).

Other Relevant Information

During 2020, CAP has supported several organisations that work to address the root causes of slavery (poverty, lack of education etc.), including Caritas and Catholic Mission. CAP 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;
- ACRATH; and
- The Humanitarian Group, Perth.



Deacon Greg Lowe
CAP Modern Slavery Liaison Officer

In addition, letters were sent to the General Secretariat of the Australian Catholic Bishops Conference and to the Executive Director, Caritas requesting statements be issued on modern slavery to further raise awareness and highlight the issue across the Catholic community in Australia.

Locally there is growing recognition that parish staff and parish priests would benefit from education around modern slavery.

The CAP is committed to a collaborative approach to our response to modern slavery, working with ACAN participating entities, as well as industry experts, civil society and advocacy groups. The CAP intends to continue to collaborate and partner with organisations that advocate for human rights throughout 2021.

Modern Slavery Statement 2020



CATHOLIC ARCHDIOCESE
OF MELBOURNE

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Disclosure Note

This statement has been made on behalf of The Catholic Archdiocese of Melbourne. This Statement covers all 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 Archdiocese of Melbourne Catholic Development Fund (ABN 15 274 943 760), the CDF Community Fund (ABN 94 380 397 118), Catholic Social Services Victoria (ABN 23 709 016 343), Corpus Christi College (ABN 16 794 595 193) and the Melbourne Catholic Archbishop's Charitable Fund (ABN 47 260 552 202).

In the statement below, we will refer to the "Catholic Archdiocese of Melbourne", as a single name reference. This statement does not cover our agencies, Villa Maria Catholic Homes, Melbourne Archdiocese Catholic Schools which are submitting their own modern slavery statements for 2020. It also does not cover any of our parishes.

This statement is approved by the Most Rev Peter A Comensoli, Archbishop of Melbourne.



About us

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.

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.

It is important to recognise that modern slavery is a complex and significant human rights issue which affects millions of people.



Statement from Most Rev Peter A Comensoli, Archbishop of Melbourne

In a year when COVID-19 impacted communities across the world, we commenced a more deliberative approach to eradicate modern slavery.

Pope Francis described modern-day slavery as “a scourge that wounds the dignity of our weakest brothers and sisters.” We need genuine “commitment to the total eradication of this scourge.”

We acknowledge that there is much more work to be done, and we commit to the program of actions outlined in this, our first, Modern Slavery Statement.

On behalf of the Catholic Archdiocese of Melbourne, I commend this statement to you.

Most Rev Peter A Comensoli
ARCHBISHOP OF MELBOURNE



Introduction

Prior to the Commonwealth Modern Slavery Act (2018) coming into force on 1 January 2019, the Catholic Archdiocese of Melbourne established a joint Modern Slavery working group with the Archdiocese of Hobart. In 2019, the Catholic Archdiocese of Melbourne joined the Australian Catholic Anti-Slavery Network (ACAN), and obtained access to guidance materials, processes, and expert advisory.

Given the breadth and size of Archdiocesan organisations, it made sense for some of the larger ones – the Catholic Education Commission of Victoria, Villa Maria Catholic Homes and Melbourne Archdiocesan Catholic Schools – to prepare their own modern slavery statements.

During this reporting period (FY2020), piloted awareness raising and training on various issues related to Modern Slavery was conducted, including Model Supplier Code of Conduct, Model Roles and Responsibilities, Supplier Engagement Strategy, Spend Category Risk Taxonomy and Program Implementation. Workshops were attended in person prior to COVID-19.

The Catholic Archdiocese of Melbourne also piloted the “Modern Slavery 101” and the “Slavery and Business” online e-Learning modules, in preparation for a wider roll out. We conducted GAP analysis and a preliminary spend risk review to understand our shortcomings and where to focus our priorities.

Understanding supply chain risks

The Catholic Archdiocese of Melbourne assessed its supplier expenditure to identify modern slavery risks. The assessment was carried out based on the following parameters:

- Geographic location;
- Industry;
- Product Category; and
- Workforce Profile.

Some geographic manufacturing locations are known to have a higher risk, as is the industry producing certain types of commodities, goods and services. The type of workforce involved in manufacturing also have an influence on the risk associated with a supplier of a particular good or service, in particular where there is a prevalent use of low skilled, vulnerable or migrant labour or where the work is deemed as ‘3D’ work (dirty, dull or dangerous).

Using relevant benchmarks (e.g. the Global Slavery Index) and available guidance materials (e.g. the US Department of Labor’s 2018 List of Goods Produced by Child and Forced Labor) and the above parameters the following product categories are deemed to be high-risk:

- Cleaning;
- Grounds maintenance; and
- Security.

This data allowed CAM to form a preliminary of how risk is distributed across our supply chain:

Spend/Supplier Risk

	Total	High Risk	Medium Risk	Low Risk
\$ Spend	\$14,360,442	\$3,661,663	\$5,974,310	\$4,724,469
% of Total spend	100%	25%	42%	33%
Number of Suppliers	931	164	551	216
Supplier Distribution	100%	18%	59%	23%

The Suppliers in each risk category are:

High Risk

Cleaning, Security, and Ground’s maintenance.

Medium Risk

Electricity, Gas, Waste, Office Consumables, Fire Services, Airconditioning & Ventilation, Pest Control, Locks & Access control, General Electrical, Plumbing, Small Values Equipment.

Low Risk

Municipal Rates, Intra-church rent (residential and retail), Safety Equipment and Training, Staff Training, Memberships & Subscriptions, Admin Fees

The majority of our spend and risk lies with 40 suppliers (76% of the High risk spend). Accordingly, we developed a Top20 supplier modern slavery risk list, where our efforts are initially focussed.

It should also be noted, particularly in relation to those product categories deemed to be high-risk (cleaning, grounds maintenance and security), that in October 2020 the Catholic Archdiocese of Melbourne has outsourced operation of a substantial part of our procurement to BGIS.

Categories we procure through BGIS includes Cleaning, Security, Ground’s maintenance, Electricity, Gas, Waste, Office Consumables, Fire Services, Airconditioning & Ventilation, Pest Control, Locks & Access control, General Electrical, Plumbing, Small Values Equipment and training.

BGIS has a modern slavery management framework in place and perform pre-screening and onboarding of suppliers. This means the first tier of our supply chain is located entirely in Australia, the majority within Victoria.

Modern Slavery Gap Analysis

Following the review of our supply chain we initiated a “modern slavery” gap assessment. The gap assessment is evaluated through a scale of four steps of maturity:



The gap assessment identified 16 Basic (Red) results, and 6 Medium (Orange), reflecting significant opportunity for improvement.



Focusing our efforts

Addressing criteria four and five of the reporting criteria, CAM developed an action plan based on the outcome of the “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.

ACTION	TIMEFRAME
Management Systems	
We will continue to develop our policies, principles, and processes, and integrate these into our management tools.	2021
We will work to integrate anti-slavery into our governance structure and define metrics, by which we can measure, manage, and report.	2022
Risk Management	
We will continue working with our partners to update our risk management framework and define how to measure and understand risk in our supply chain and in our operations.	2021
To maintain relevance of the risk assessment we will develop a process to periodically review and update the risk management framework, as and when our understanding of Modern Slavery Risk matures.	2022-2023
Procurement & Supply Chain	
In the area of procurement and Supply chain, we will work to get the basic elements rolled out to our suppliers, in the form of updated contract clauses, supplier code of conduct and tender requirements.	2021
Beyond that, we will develop protocols for reviewing suppliers and for following up on adverse findings. We are also working on a supplier engagement initiative, actively liaising with our high risk suppliers, to collaborate on implementing initiatives which will have real impact on the risk of modern slavery.	2023
Human Resources & Recruitment	
In the area of Human resources and recruitment we will roll out the ACAN e-Learning modules “Modern Slavery 101” and “Business Relevance”, and the next 3 e-Learning training modules, currently in the pipeline, to Staff and Archdiocesan boards.	2021
We will also update our hiring policies and systems to ensure key requirements relating to our Anti-Modern Slavery initiatives are embedded.	2021

For 2021, we aim to move 7 Red gaps to at least an Orange status. The Catholic Archdiocese of Melbourne will continue to engage through ACAN and Domus 8.7 and draw on the various resources available.

Appendix 1: About Catholic Archdiocese of Melbourne

Modern slavery Remediation

The Catholic Archdiocese of Melbourne recognises our moral and legal obligations to do our part in identifying, mitigating and remediating cases of modern slavery, where they become apparent to us.

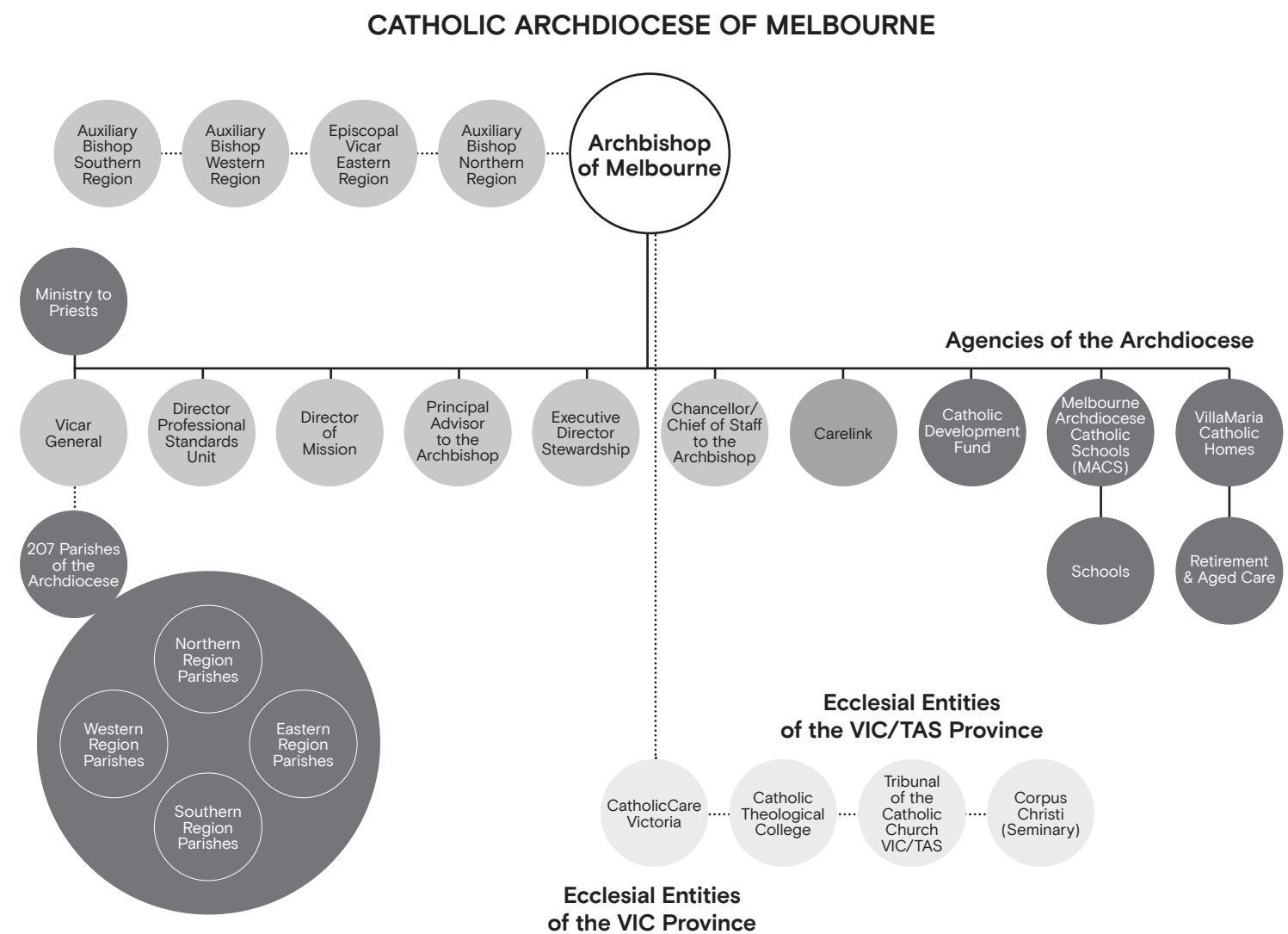
In this regard, we will be guided by the UN Guiding Principles of Business and Human Rights, the Commonwealth Modern Slavery Act 2018 and relevant Australian laws.

We are also a founding partner of Domus 8.7, an independent initiative to assist people impacted by modern slavery.

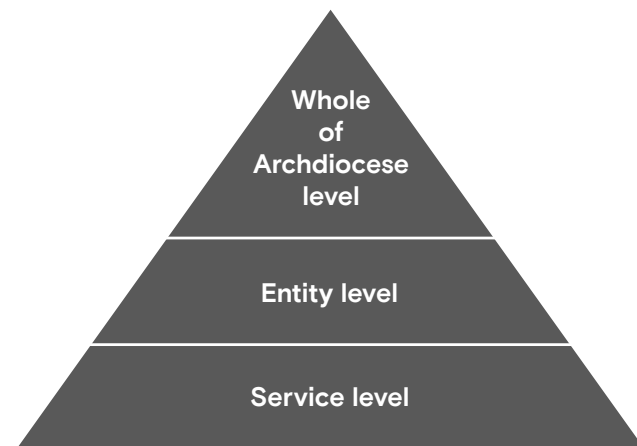
It is our moral and legal obligation to do our part in identifying, mitigating, and remediating cases of modern slavery, when they become apparent to us.

Our 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. The agencies Villa Maria Catholic Homes and the Melbourne Archdiocesan Catholic Schools report in their own right, and as such not covered by this statement.



Our Governance Framework



The general 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 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 respectively to their executive and board structures.

When instances of Modern Slavery is 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.



Our Operations

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. 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.

See map on bottom of Page 13.

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.

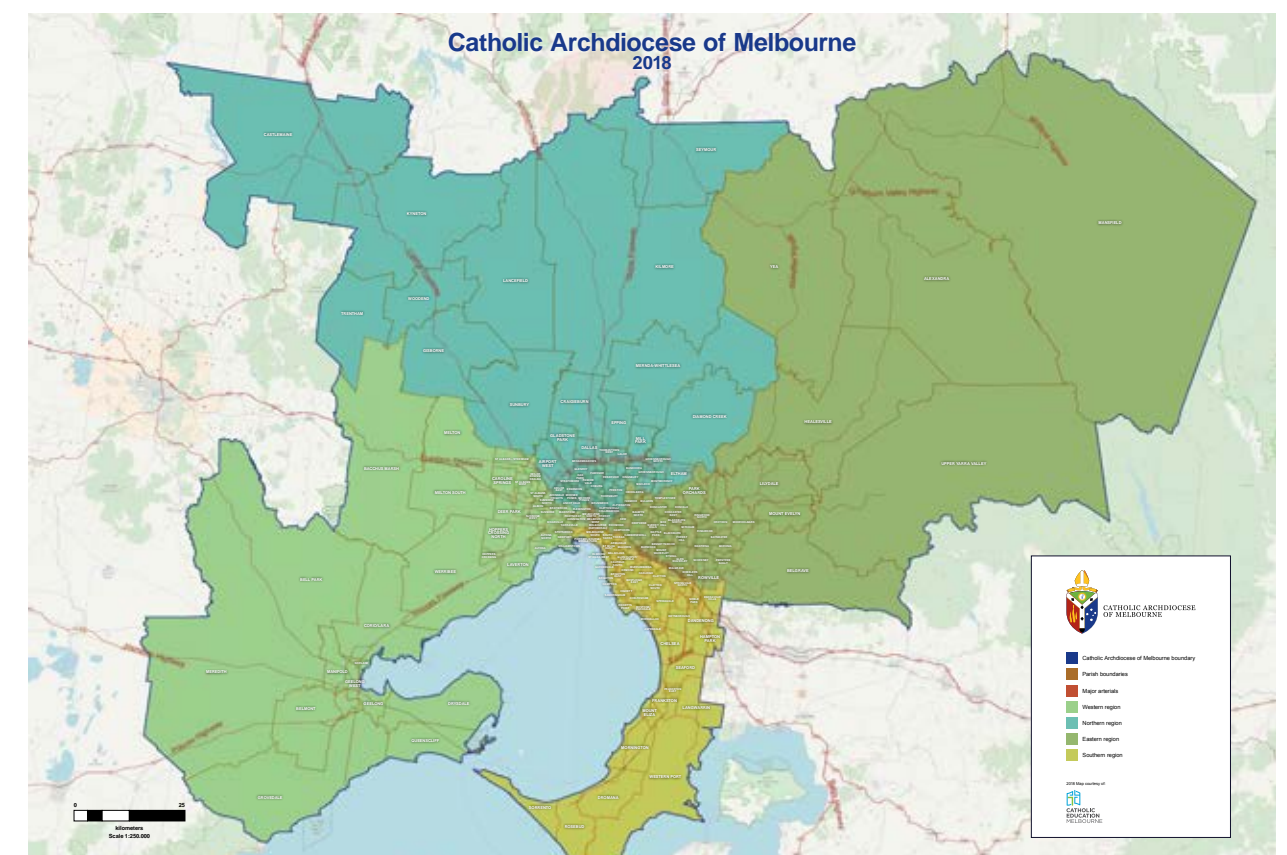
We have 206 staff with a majority female staff ratio.

	Number	Casual	Part Time	Full Time
Female	108	10	25	73
Male	98	12	9	77
Total	206	22	34	150

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.





CATHOLIC ARCHDIOCESE
OF MELBOURNE



Catholic Archdiocese
of Sydney

MODERN SLAVERY STATEMENT 2020



AUSTRALIAN CATHOLIC
**ANTI-SLAVERY
NETWORK**



Foreword by
Most Rev
Archbishop
Anthony
Fisher OP

ARCHBISHOP OF SYDNEY



I am pleased to submit the inaugural Modern Slavery Statement for the Catholic Archdiocese of Sydney (CAS). In 2017, I committed the Church in Sydney to work towards eradicating modern slavery from the operations and supply chains of the Archdiocese and charged the Anti-Slavery Taskforce under the leadership of John McCarthy QC to take this work forward.

The work of the Taskforce has been greatly encouraged by the strong leadership of Pope Francis who has been a tireless champion of this cause calling it 'an open wound on modern society' and a 'crime against humanity'. The Holy Father never misses an opportunity to talk about the scourge of modern slavery in our world today, and his commitment to this cause is unceasing.

This Modern Slavery Statement relates to the archdiocesan and agency initiatives in operations and the supply chains of the Archdiocese. Although this is a voluntary statement, it sets an important benchmark to measure the progress we are making in our aim to eradicate modern slavery. Our statement will be included as part of the Australian Catholic Anti-slavery Network (ACAN) Compendium of Catholic Modern

Slavery Statements. The Compendium is an important record and great testament to the collaboration that has taken place across the Church in Australia to not only shine a light on the issue of modern slavery but to provide practical ways that we can work together on this issue. The Compendium is the collective record of the work done so far but most importantly, it shows us how much work there is still to do.

The Archdiocese of Sydney will continue to work with governments, the corporate sector and civil society to eradicate modern slavery in our generation.

I thank and congratulate everyone involved in the production of this statement, especially the staff of the Anti-Slavery Taskforce and once again renew our resolve to work for the day where modern slavery is remembered in the history books.

Yours sincerely in Christ,

Most Rev. Anthony Fisher OP



Worldwide Rosary Relay live-streaming from St Mary's Cathedral led by Archbishop Fisher OP with specific Intention for all victims of violence and human trafficking on 16th May 2021. . Photos by Giovanni Portelli, Catholic Archdiocese of Sydney



About Us

This is a voluntary Modern Slavery Statement of the Catholic Archdiocese of Sydney (CAS) including the CAS social services agency, CatholicCare Sydney and the Catholic Development Fund Sydney.

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.

More than 593,000 Catholics live and worship within the Archdiocese's boundaries, spiritually supported by 516 Priests and 1200 Catholic religious.

CAS has 137 parishes in nine Deaneries – Western, Sutherland, Northern, South West, Central, City, Eastern, St George and Concord.

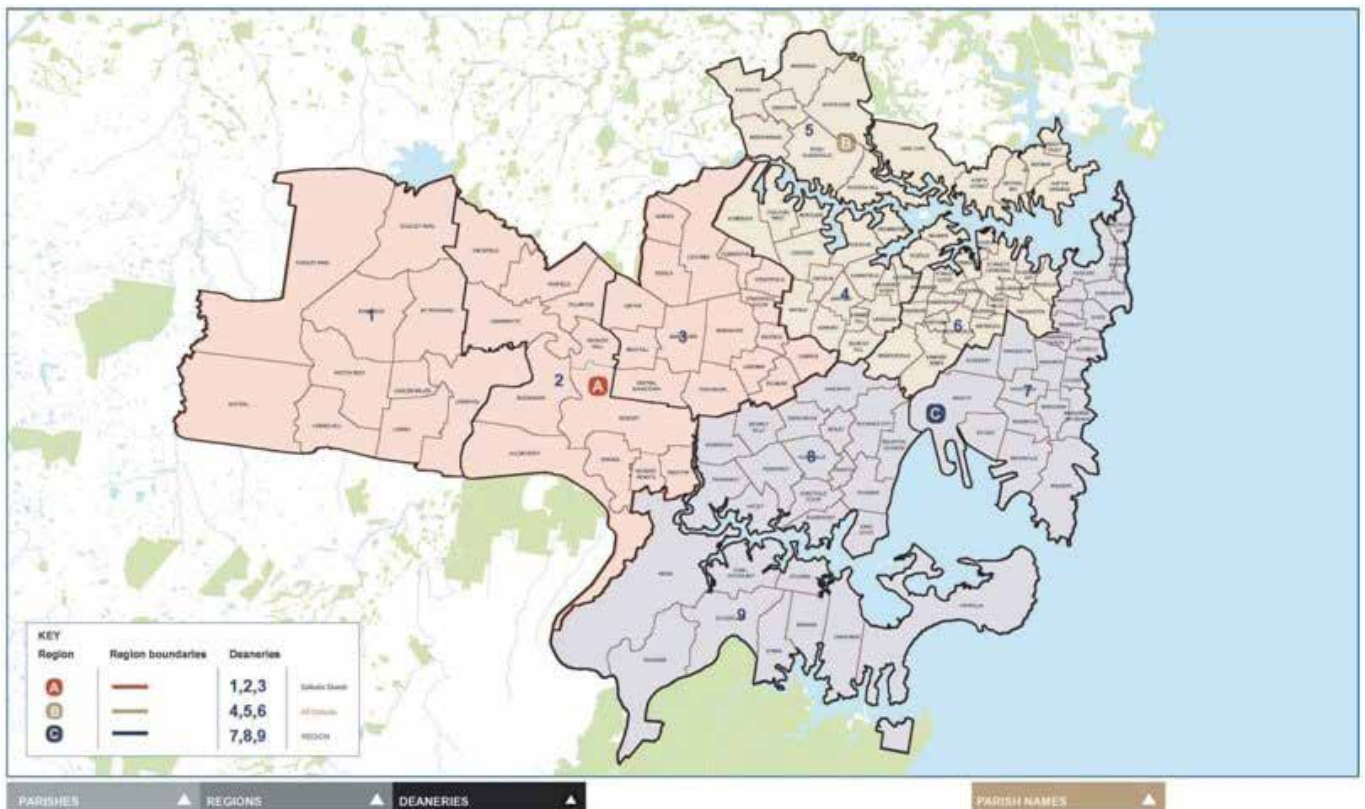
The Archdiocesan Head Office (Chancery) is located at the Polding Centre, 133 Liverpool Street, Sydney, NSW 2000.

CAS traces its beginnings back to the earliest days of

colonial settlement. Around 30% of the 756 convicts to arrive on the First Fleet in 1788 were baptised Catholics. On 12 May 1834, the Vicariate Apostolic of New Holland and Van Diemen's Land was created and Father John Bede Polding, an English Benedictine, was appointed Vicar Apostolic with jurisdiction over what is now the Commonwealth of Australia.

The Diocese of Sydney was created on 28 February 1842 with Bishop Polding as its diocesan bishop. Later that year the Diocese was elevated to an Archdiocese, whose area covered the entire eastern portion of the Australian continent, comprising what are now known as the states of New South Wales, Victoria and Queensland.

Today there are 33 Catholic dioceses in Australia, including seven archdioceses.





CRITERIA 1&2

About the Catholic Archdiocese of Sydney (CAS)

CAS is a particular Church of the universal Church under the successor of St Peter, through our common baptism, is a Eucharistic and sacramental community of Faith, Hope and Love seeking to live and proclaim the Gospel of Jesus Christ. CAS works within the framework of Catholic teaching to strengthen Catholic life, foster co-operation and service, and promote evangelisation. A Catholic Archdiocese of Sydney Organisation Chart is included as *Appendix A*.

CAS Governance Framework

CAS is an unincorporated association and registered charity, under the supervision of Archbishop Anthony Fisher OP. In addition to being comprised of 137 parishes, it is also comprised of a number of different offices or divisions

(known internally at CAS as “agencies”) which provide services, care and support to people in:

- aged care;
- education;
- prayer, worship and liturgy;
- solidarity and justice;
- vocations and seminary; and
- 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.



Launch of the Catholic Action in Australia to Eradicate Modern Slavery from Supply Chains Progress Report at the Sydney Catholic Business Network luncheon: L-R Michael Digges, Alison Rahill, The Most Rev Anthony Fisher OP, Jenny Stanger, John McCarthy QC



CAS Anti-Slavery Taskforce and related activities

Archbishop Fisher established the Sydney Archdiocesan Anti-Slavery 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 Anti-Slavery Taskforce of 3.5 staff resources compliance and best practice in relation to the *Modern Slavery Act 2018 (Cth)*, provides education and outreach to parishes and staff of agencies who may come across potential victims of slavery-like practices, and gives guidance on identification, response, welfare support and referral pathways.

The Taskforce is chaired by John McCarthy QC, the former Australian Ambassador to the Vatican from 2012-2016. Archbishop Fisher has also appointed an Advisory Committee for the Taskforce, whose membership is drawn from senior members of the CAS executive and major Catholic entities.

They are the Executive Director, CAS Administration and Finance; the Archbishop's Private Secretary; the Finance Director of Sydney Catholic Schools, the Dean of Law at University of Notre Dame Australia; the General Manager of the Catholic Development Fund Sydney; the Chief Finance Officer at Australian Catholic University; a representative from the CAS Council of Priests; and the CAS Director of Communications.

The Chair of the Anti-Slavery Taskforce and Taskforce Executive Officers convene Advisory Committee meetings, which are held three times a year.

The Archbishop has also appointed a Committee for Domus 8.7 (see *Criteria 4*). The Committee meets three times a year and its membership comprises the CAS Chancellor, the Chair of St Vincent's Health Australia; the Pro Bono Partner Mills Oakley; Pro Bono Partner at Jones Day and the Chair of the Anti-Slavery Taskforce.



Agencies

CatholicCare Sydney

CatholicCare is the social services agency of the Archdiocese of Sydney, with 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, moving in and out of target areas as the need has arisen or waned.

Agency Profile:

- 567 staff, of which 309 are full-time and 258 are part-time or casual.
- 150 registered volunteers
- annual operating budget exceeding \$40M, the vast majority of which is expended on employees, property & facilities, and ICT support.
- majority of funding comes from Government

(both Federal & State)

- operating from 12 Sydney locations, some owned and some leased (including two leased from other Catholic organisations)
 - CatholicCare Board comprises seven independent directors with a range of clerical or professional backgrounds.
 - CatholicCare has approximately 600 suppliers, of which around 180 are currently engaged.
- Core Service Areas (with % of total employees)
- Families & children, including counselling and clinical care, relationships, parenting (40%)
 - Aged home care support (22%)
 - Disability, including Centacare Industries and NDIS (17%)
 - Pastoral care (7%)
 - Administration & support services (14%)

CatholicCare operates both CCareline (131819) and Carer's Gateway platforms. CatholicCare also holds a non-participating 100% share in Access Programs Australia Ltd, an independent employee counselling service, and a 50% share in Family Spirit Ltd, an adoption and foster care agency in which the other 50% is held by Marist 360.



Catholic Development Fund

The 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 their financial resources and activities. The Fund 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.

The Fund has an annual expenditure of approximately \$2 million excluding the salaries of its 13 staff across 111 FTE positions. 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 our Parishes, Schools, Religious Orders, Aged/Healthcare Entities and agencies of the Archdiocese;
- Managing the funds invested in the 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 our clients;
- Providing efficient and cost-effective transactional services to our clients;
- Providing a surplus so that the charitable and pastoral works of the Archdiocese may continue; and

- Continuing to support the Mission of the Church in all aspects of our activities.

CDF operates on a “not for profit” basis whereby annual surpluses are distributed to:

- Parishes through a rebate on their CWF fund contributions, meeting the costs of the Parish Support Team and providing other forms of assistance;
- The Archdiocese for its Charitable and Pastoral Works; and
- The Reserves of the CDF to ensure its ongoing financial stability

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.





Criteria 3: Identifying Risk

Modern slavery risks in operations and supply chains

CAS has been working to evaluate and identify risk of modern slavery in diocesan operations and supply chains since March 2017, when the [Sydney Archdiocesan Anti-Slavery Taskforce](#) was announced by the Archbishop of Sydney.

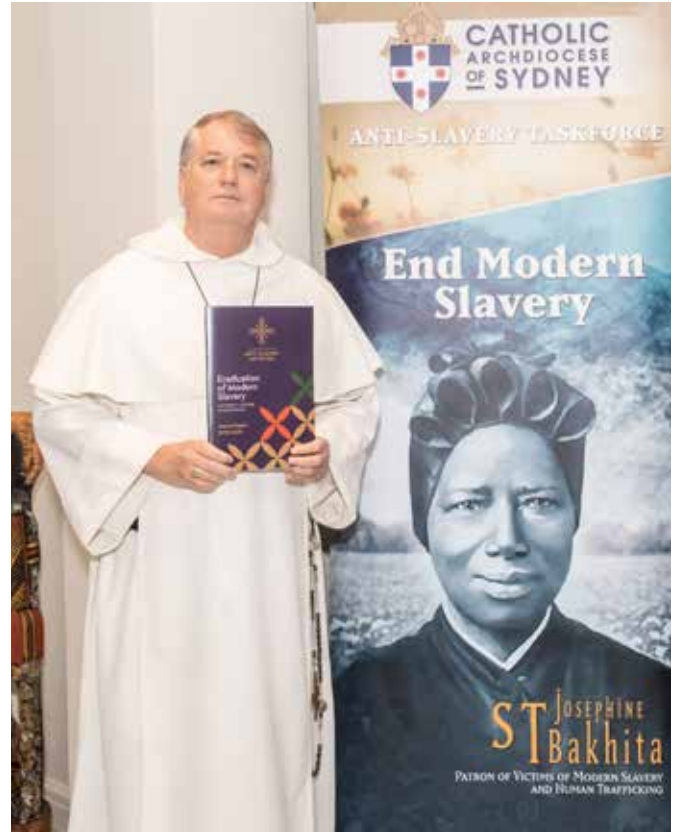
The Anti-Slavery Taskforce was established with two staff with expertise in modern slavery, working full time to progress anti-slavery initiatives across the Church.

The Taskforce gave its [first report](#) to Archbishop Fisher in February 2018, at an event and mass to mark the Feast Day of St Josephine Bakhita, the Patron Saint of Slavery Victims.

The Taskforce Report was received several months before anti-slavery legislation was first introduced into the Australian Parliament in June 2018.

The comprehensive 72-page report made ten recommendations on managing modern slavery risk in procurement and supply chains including recommendations on a national approach to collaboration, resource development and sharing, education and engagement.

Subsequently the Taskforce established the Australian Catholic Anti-slavery Network (ACAN) on 2 December



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

2019 - the United Nations International Day for the Abolition of Modern Slavery and the first anniversary of the passing of the Modern Slavery Act through the Australian Parliament.





Eradicating Slavery from Catholic Supply Chains Conference participants 29-30 July 2019

This CAS risk assessment has been based on tools, processes and templates developed as part of the ACAN Risk Management Program. These materials have been adapted for CAS internal purposes.

The steps CAS took to identify modern slavery risks included:

- conducting an operational gap analysis to identify internal capacity to implement a modern slavery risk management program across five key areas of diocesan operations

- understanding CAS operations and supply chains
- raising modern slavery awareness amongst CAS employees

Gap Analysis

The CAS Gap Analysis was undertaken in both 2019 and 2020.

Members of the CAS Modern Slavery Working Group met on 12 July 2019 in a joint activity to conduct the analysis.





The exercise produced a “heat map” on which red areas indicated work had not commenced; amber indicating some basic steps had been taken; yellow meaning progress was underway; and green meaning that appropriate practices were in place.

Up and down arrows indicate the improvement or slipping in progress.

Indicator	2019	2020	Development
Management Systems			
Governance	Red	Amber	⬆️
Commitment	Amber	Yellow	⬆️
Business Systems	Red	Amber	⬆️
Action	Amber	Amber	⬆️
Monitor / Report	Red	Amber	⬆️
Risk Management			
Risk Framework	Red	Yellow	⬆️⬆️
Operational Risk	Amber	Amber	⬆️
Identifying External Risks	Red	Amber	⬆️
Monitoring and Reporting Risk	Red	Amber	⬆️
Human Resources & Recruitment			
Awareness	Red	Green	⬆️⬆️⬆️
Policies & Systems	Red	Amber	⬆️
Training	Red	Amber	⬆️
Labour Hire / Outsourcing	Red	Red	⬇️
Procurement & Supply Chain			
Policies & Procedures	Red	Amber	⬆️
Contract Management	Red	Amber	⬆️
Screening & Traceability	Red	Amber	⬆️
Supplier Engagement	Amber	Amber	⬆️
Monitoring & Corrective Action	Red	Red	⬇️
Customers & Stakeholders			
Customer Attitude	Amber	Amber	⬆️
Information Provision	Red	Amber	⬆️
Feedback Mechanisms	Red	Yellow	⬆️⬆️
Worker Voice	Red	Amber	⬆️

Image 2: Heat Map from CAS MSWG Gap Analysis Exercises in 2019 and 2020



Overview of 2019/2020 CAS Gap Analysis

Management Systems

CAS has taken steps towards understanding modern slavery risks in operations and supply chains. CAS acknowledges that modern slavery occurs in its supply chains. CAS has moved to implement key components of the ACAN Modern Slavery Risk Management Program, as yet not all actions have been integrated into existing business systems.

Human Resources and Recruitment

CAS Modern Slavery Working Group has undertaken modern slavery awareness training and employees will be invited to undertake training in 2021. CAS hiring and onboarding processes do not reference modern slavery risk management. Current labour hire and outsourcing practices do not as yet identify modern slavery risk areas.

Procurement and Supply Chains

Modern slavery risks were not considered in CAS procurement policies or supplier management processes. Supply contracts did not refer to modern slavery risks and CAS had not mapped the supply chain to understand priority suppliers or risk categories. CAS did not monitor suppliers for modern slavery risks.

The CAS Guide for Business Practice now includes the Archdiocese's commitment to eradicating modern slavery in its supply chains. CAS now has a procurement policy and general contract clauses in relation to modern slavery risks and these clauses will be in all relevant contracts in the future. CAS has taken steps to map its supply chains and engage high risk suppliers, but more will need to be done to monitor supplier performance. CAS engagement and communication now focuses on high risk suppliers.

Risk Management

CAS has commenced assessing modern slavery risks. CAS has developed an understanding of the risks and vulnerabilities in its supply chains and intends to implement effective actions and reporting processes.

Customers and Stakeholders

CAS has a basic understanding of stakeholder expectations about modern slavery risk management and has established specific communications mechanisms for internal and external stakeholders to report modern slavery issues. CAS does not have feedback or communications in place for workers in supply chains. CAS has extensive information about modern slavery risks on its websites. Link: <https://www.sydneycatholic.org/solidarity-and-justice/anti-slavery/>

The initial results left CAS with a need to recognise that on

most relevant matters CAS had not commenced action, and only on a minority of issues had CAS taken internal steps to long term progress in abating operational risk of modern slavery.

The number of high-risk results recorded was expected, as the risk of modern slavery had not been a category considered in a structured manner previously.

There is evident improvement in some indicators in the Gap Analysis, first undertaken in 2019, and updated in 2020, with some of the biggest improvements in the areas of governance and risk management.

The major improvement is in CAS staff awareness as a result of CAS educating internal stakeholders. As teams and responsibilities change, and workforces experience turnover, the challenge is to ensure that CAS maintains consistent implementation of the ACAN Modern Slavery Risk Management Program. Other indicators demonstrating substantial improvement are the CAS Risk Framework, and the feedback mechanisms which will be aligned with Domus 8.7 options and capabilities. (See explanation of Domus 8.7 in Criteria 4).

There are only two areas which have not generated sufficient progress to measure a change - Labour Hire and Monitoring and Corrective Action. CAS will work to address both these issues during 2021. The fact that these two indicators are where CAS made the lowest improvement score, also highlights that they are external facing activities, which CAS has only just started to address, after laying the foundations through internal facing activities.





Understanding operations and supply chains

Covid-19

A major CAS responsibility during the pandemic has been to ensure the health and safety of CAS staff and everyone in the community who may be associated with CAS activities.

The COVID-19 pandemic has presented CAS with increased risk to worker safety and health.

Staff wellbeing was at the forefront of all decisions relating to working arrangements and office management.

Through these COVID-19 programs, CAS has maintained the pre-COVID level of procurement of goods and services, which has also supported CAS suppliers during this difficult period.

CAS put in place arrangements which allowed the reception of JobKeeper allowances for various categories of staff.

Work Environment

CAS maintains standards of conduct which express Catholic Social Teaching for all employees and volunteers, and provides a safe work environment for everyone visiting or working on CAS premises.

It is the current assessment that CAS exposure to modern slavery in its operations is low risk. However, CAS 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.

CAS Supply Chain risk

Analysis of the CAS supply chain is based on the following parameters:

- geographic location
- industry
- product category
- workforce profile

Based on this analysis, CAS has found the following supplier categories to be **high risk**:

- building and construction
- cleaning services
- events and entertainment
- facility management
- food and beverage
- furniture and office supplies
- labour hire
- security services

Other supplier risk categories are medium risk and low risk.

Medium Risk: Electricity, Gas, Waste, Office Consumables, Fire Services, Air conditioning and Ventilation, Pest Control, Locks & Access control, General Electrical, Plumbing, Small Values Equipment.

Low Risk: Municipal Rates, Intra-Church rent (residential and retail), Safety Equipment and Training, Staff Training, Memberships and Subscriptions, Admin Fees. Future efforts by CAS to combat modern slavery in supply chains will target suppliers where high spend correlates with high risk goods and services.





CAS Supplier Risk Analysis

Number of Suppliers	High Risk Suppliers	Spend Categories	High Risk Categories	Total Spend (\$)	High Risk Spend
50	23	14	8	\$14,699,738	\$7,126,640

Image 4: CAS Total Spend/Spend Categories Table



Image 5: Total Spend - Risk Profile Pie Charts

CAS Supplier Risk Analysis

Covid-19

CAS has 23 high risk suppliers across eight high risk categories in a total spend of \$14 million.

Engaging with these 23 high risk suppliers forms the basis for the CAS Action Plan to be implemented from 2021 to 2023.

CAS will implement the list of priorities in the Action Plan,

commencing with high risk suppliers, then moving to medium risk and then to low risk suppliers.

In the future, CAS intends to use data from the SEDEX platform to better understand CAS' risks and refine CAS risk reduction.

CAS considers the approach taken to be the best possible starting point to understand the risks and that this approach will allow CAS to achieve a substantial reduction in unmitigated risk in supply chains.



Criteria 4: Steps taken to mitigate Modern Slavery

Modern slavery risks in operations and supply chains

Archbishop Fisher established the Sydney Archdiocesan Anti-Slavery Taskforce in May 2017, prior to any modern slavery legislation, to pave the way for CAS to eliminate modern slavery and forced labour from its operations and supply chains.

By the end of the Taskforce's first year, it became evident that a coordinated effort within the Catholic Church in Australia, not just one diocese, would be necessary to eradicate modern slavery in Catholic supply chains. This realisation, widely shared across the Church in Australia, together with the passage of the Modern Slavery Act led to the formation of the **Australian Catholic Anti-slavery Network (ACAN)**.

ACAN's organisational and administrative requirements are carried out by CAS and the Anti-Slavery Taskforce. CAS is also a member of ACAN and a beneficiary of its resources.

In addressing Criteria 4, CAS is not describing all the steps and activities to address modern slavery risk, only the main directions undertaken in 2020.

CAS milestones and key events are listed in *Appendix B* to this Modern Slavery Statement.

Management Systems

In the area of management systems, CAS has focused on raising the level of governance through the development of a modern slavery policy. CAS also started the process of mapping and selecting systems and tools which may lead to a standardised approach to assess and address modern slavery risk in operations and supply chains.

Risk Management

CAS updated risk management frameworks, with the assistance of training, workshops and tools coordinated by the Anti-Slavery Taskforce as part of the ACAN Modern Slavery Risk Management Program. This work included updating risk taxonomy, risk identification and prioritisation, and anti-slavery objectives being integrated into CAS management processes.

Procurement and Supply Chains

Leveraging the resources of ACAN, CAS has made changes to its procedures and policies, and now includes anti-slavery contract clauses in all of its pro forma contracts for procurement and construction works. CAS has reinforced its

commitment to the eradication of slavery in its supply chains by updating the CAS Guide to Business Practice, a code of conduct for partners and suppliers to include provisions about modern slavery. (See *Appendix C*).

CAS also organised a half-day workshop "Ethical Sourcing Seminar and Expo" for CAS staff and suppliers in February 2019.

Archbishop Fisher delivered an [address](#) and launched an ethical purchasing program called '**Shop for Good**' encouraging parishes to purchase Fairtrade consumables such as tea and coffee.

Following the Shop for Good launch St Marys Cathedral and the Polding Centre catering took the decision to serve only Fairtrade tea and coffee.

Human Resources and Recruitment

CAS has made significant efforts in staff awareness raising, with 21 staff completing the first two ACAN eLearning modules "Modern Slavery 101" and "Modern Slavery and Business".

CAS also initiated a review process for outsourcing procurement categories, traditionally prone to exploitative labor practices, e.g. cleaning, security and maintenance. CAS is reviewing proposals to insource these functions, and thus eliminate this high-risk area of exposure to modern slavery.

Customers and Stakeholders

CAS developed a Stakeholder Engagement Plan. This Plan is being implemented and will be ongoing for the foreseeable future. CAS initiated the deployment of training modules for stakeholders as well as toolkits for parishes and suppliers.

Action Plan and Road Map

CAS is in a strong strategic position, as many baseline activities and actions have been implemented. The next steps in the CAS Action Plan are to continue implementation to further address modern slavery risks and to provide a remedy pathway for modern slavery victims.

The Action Plan is structured around the same five risk categories analysed, with the Action Plan proposing specific actions across the five risk categories, as well as annual recurring actions. For the year 2021, CAS has initiated the actions to start in that year. The actions initiated may vary slightly in commencement date, as CAS progresses through the Action Plan and Road Map.



ACTION		TIMEFRAME
Management Systems		
	CAS will continue to develop policies, principles and processes, and integrate these into management tools.	2021
	CAS will work to integrate anti-slavery into governance structure and define metrics to measure, manage, and report.	2022
Risk Management		
	CAS will continue working with partners to update risk management framework and define how to measure and understand risk in operations and supply chains.	2021
	To maintain relevance of the risk assessment CAS will develop a process to periodically review and update the risk management framework, as and when understanding of Modern Slavery Risk matures.	2022-2023
Procurement and Supply Chains		
	In the area of procurement and supply chains, CAS will inform suppliers of CAS anti-slavery measures, including updated contract clauses, supplier code of conduct and tender requirements.	2021
	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 the Sedex platform.	2023
	CAS will deploy Building Links awareness raising tools on larger construction projects.	2021
Human Resources and Recruitment		
	Release the ACAN eLearning modules "Modern Slavery 101" and "Business Relevance", and the next three eLearning training modules to CAS staff, boards and senior management.	2021
	CAS will update hiring policies to ensure continuity with modern slavery initiatives.	2021

Simplified Action Plan 2021

As the understanding of modern slavery risk and impact of the actions evolves, CAS intends to develop the Action Plan.



Modern Slavery Remediation

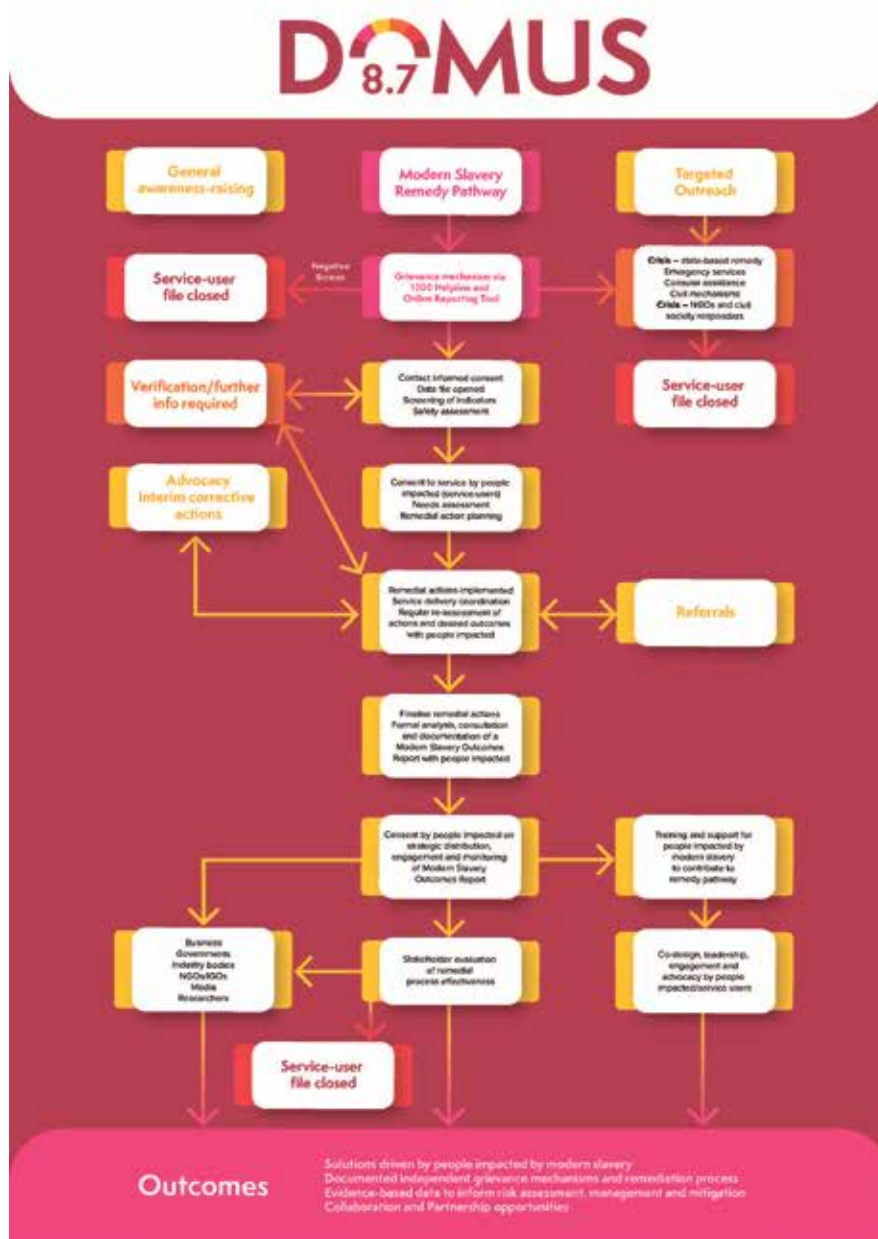
CAS intends to provide appropriate and timely remedy to people impacted by modern slavery in accordance with the United Nations Guiding Principles on Business and Human Rights, the *Australian Modern Slavery Act 2018 (Cth)* – *Guidance for Reporting Entities and other relevant Australian laws.*

The remedy includes providing for, or cooperating in, actions to address harms to people and to address future risks if CAS is found to have caused or contributed to modern slavery.

Due to the complexity of remediation, CAS will need to source specialist resources that ensure the best outcomes for people impacted by modern slavery,

To this end, Archbishop Fisher established a new agency of **CAS** called **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 Flowchart



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 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's intention is to have any future grievances in relation to modern slavery mediated through Domus 8.7. Where CAS is directly linked to modern slavery by a business relationship CAS is committed to working with the entity that caused the harm to ensure remediation and prevention of its recurrence.

Additional information about Domus 8.7 is available on the ACAN website acan.org.au/domus87



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.





Domus 8.7 Remedy Consultation Forum with business

The Anti-Slavery Taskforce coordinates the Building Links program, through a Department of Home Affairs Modern Slavery Grant targeting the construction sector. Building Links includes the deployment of an independent site-level operational grievance mechanism directly accessible to vulnerable construction workers.

When suspicions of modern slavery practices are notified 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.

A "Remedy Pathways" module in ACAN's Modern Slavery

eLearning course will be available to CAS staff and other stakeholders in 2021.

Remedy Consultation

During the reporting period the CAS conducted a remedy consultation workshop with 30 business representatives from Australian Modern Slavery Act reporting entities. The workshop increased CAS understanding of the business perspective on modern slavery remediation processes, gaps in internal capacity and practical responses and ways that Catholic services such as Domus 8.7 can partner with business to address remedy.



Domus 8.7 Advisory Committee member Shannon Finch Partner Jones Day hosts a modern slavery remedy forum March 2020



Case Studies

A practical response to people impacted by modern slavery is an important part of providing remedy and of CAS anti-slavery activity. Specialists in the Anti-Slavery Taskforce have triaged a number of cases for people presenting as victims.

- Four hospitality workers exploited in hotels were provided with welfare support and assisted to access employment and migration advice and rights information to prevent future exploitation.
- Three cleaners working in a health care, hotel and educational facilities were assisted to access legal services

to address exploitative working conditions and offered welfare support.

- The family of a temporary visa holder who died while working in horticulture was assisted to access legal advice and support.

The Anti-Slavery Taskforce was instrumental in developing a unique partnership between the Sisters of Charity Foundation and The Salvation Army to ensure people impacted by modern slavery can access housing via an **Anti-Slavery Housing Program** that was launched in 2020.



L - R John McCarthy QC, Jenny Stanger, His Excellency General the Honourable David John Hurley AC DSC (Retd), Hon Reba Maher, Her Excellency Mrs Linda Hurley, Richard Haddock



Enabling Survivors to Become Agents of Change

MOE TURAGA

For some survivors of modern slavery, support to actively participate in anti-slavery work provides a form of remedy. CAS is committed to enabling 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 support for these survivor advocates includes coordination of participation logistics, providing relevant event documentation, travel costs and speaker fees/compensation.

CAS supported the participation of survivor Moe Turaga to present at its 2019 Ethical Sourcing Seminar in front of 150 participants that included: suppliers to Catholic entities; The Most Rev Archbishop Anthony Fisher OP; Jennifer Westacott, CEO of the Business Council of Australia; The Hon Alex Hawke, MP; and The Hon Tanya Plibersek, MP. The seminar and **Mr Turaga's story were featured in the Sydney Morning Herald.**

Mr Turaga was also supported by the CAS to participate in the 2019 University of New South Wales (UNSW) Innovate Rights Conference and to have his story published in its



most complete form in the UNSW Human Right Defender Magazine. This support included coordination of participation logistics, providing relevant event documentation and ensuring travel costs and speaker fees/compensation were provided.



VANNAK ANAN PRUM

Also in 2019, the CAS sponsored slavery survivor Vannak Anan Prum to launch his graphic novel of slavery in Australia. *The Dead Eye and the Deep Blue Sea* is Mr Prum's first-hand account of the three years he was enslaved on a Thai fishing boat and a Malaysian palm oil plantation.

The CAS provided support to help Mr Prum share his story and book with media including interviews with the ABC's Late Night Live podcast and SBS including in English and the Khmer language for radio and other media/events. CAS support included coordination of participation logistics including an interpreter, event documentation, travel costs for Mr Prum and a support person and speaker fees/compensation. A public event in Sydney was co-sponsored by Konica Minolta Australia.

CAS will continue to provide a platform for survivors to be ethically engaged to make contributions to modern slavery responses.



Criteria 5: Effectiveness

Measurement is highly challenging because of the distinction which needs to be made on whether an entity is *directly linked to, has contributed to or caused* modern slavery.

CAS did not find any cases of modern slavery in its operations and supply chains in the 2020 reporting period.

The absence of any cases was despite the CAS risk assessment process, which otherwise found that there were categories of high risk of modern slavery amongst some CAS suppliers.

In order to deliver tangible results as part of the ACAN Risk Management Program, CAS has worked on creating measures and metrics, which will prove beneficial in years to

come when CAS progresses with the next iterations of the

ACAN risk management program, collaborating with ACAN and other entities across Australia.

Future measures of effectiveness

In the future, CAS will use its SEDEX membership to improve visibility and reporting into its supply chains.

CAS expects that SEDEX membership, as well as additional efforts to build anti-slavery capacity with CAS suppliers and staff will eliminate any risk that CAS is directly linked to modern slavery, dramatically lower the risk of CAS directly causing modern slavery, and significantly diminish the risk that CAS is indirectly causing modern slavery.



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

The Catholic Archdiocese of Sydney ABN 72 823 907 843

The CAS Modern Slavery Working Group met three times in 2020 (documented in Appendix B) and representatives include the Finance Director, **senior staff from** CatholicCare and the Catholic Development Fund Sydney, the CAS General Counsel and Legal Counsel, Director of People & Culture, Property Services personnel, General Manager, St Mary's Cathedral and Director of Communications and the ASTF executive team.

Leadership and staff of entities owned and controlled by CAS were invited to participate in modern slavery events organised by the Anti-Slavery Taskforce including:

- St Josephine Bakhita Feast Day commemorations,
- UN International Day for the Abolition of Slavery
- Ethical Sourcing Seminar and Expo
- Catholic Mission Conference
- Clergy Conference
- Webinars

CAS agencies

- CatholicCare Sydney ABN 38841427747

- Catholic Development Fund Sydney ABN 73866037848
- Sydney Catholic Early Childhood Education ABN 12493270655
- The Catholic Weekly ABN 60 471 267 587
- Catholic Institute of Sydney ABN 52853557085
- St Mary's Cathedral ABN 13120232163
- Charitable Works Fund ABN 60471267587
- The Mustard Seed Bookshop ABN 60 471 267 587
- St Bakhita Community Services Ltd ABN 31609675603
- Archbishop's Council of Priests
- Justice and Peace Office
- Catholic Immigration Office
- Commission for Ecumenical & Inter-religious Relations
- Vocation Centre
- University Chaplaincy
- Safeguarding and Ministerial Integrity Office
- Sydney Centre For Evangelisation
- Sydney Catholic Youth
- Chaplaincy services

Related entities:

- Catholic Mission ABN 52945927066
- Caritas Australia ABN 90970605069



Reporting Criteria 7: Other

Kevin Hyland: Catholic Church 'an incredible team for good' against modern slavery

By David Ryan - March 5, 2020

Reading Time: 3 minutes



Kevin Hyland with Anti Slavery Taskforce members John McCarthy QC and Alison Rahill

Catholic Weekly news story March 2020 featuring Kevin Hyland UK's first Anti-Slavery Commissioner, John McCarthy QC and Alison Rahill, Anti-Slavery Taskforce

The CAS Anti-Slavery Taskforce established and coordinates the ACAN which is comprised of more than 40 Catholic entities and continues to grow. ACAN was an outcome of a **2019 conference** on Catholic actions to eradicate modern slavery and raise awareness of Australia's Modern Slavery Act 2018.

The Anti-Slavery Taskforce provides subject matter expertise to participants and facilitates delivery of a modern slavery risk management program through the following:

- induction of participating entity Modern Slavery Liaison Officers (MSLO)
- monthly MSLO teleconference
- monthly newsletter to Catholic entities
- graphic design, digital/social media and communications resources
- resources development
- management of external suppliers and consultants

- technical assistance in relation to modern slavery issues and general questions to support MSLOs
- participation in entity events, board meetings, working group or team meetings
- government relations
- review, compilation and submission of Compendium of Catholic Modern Slavery Statements to Modern Slavery Register

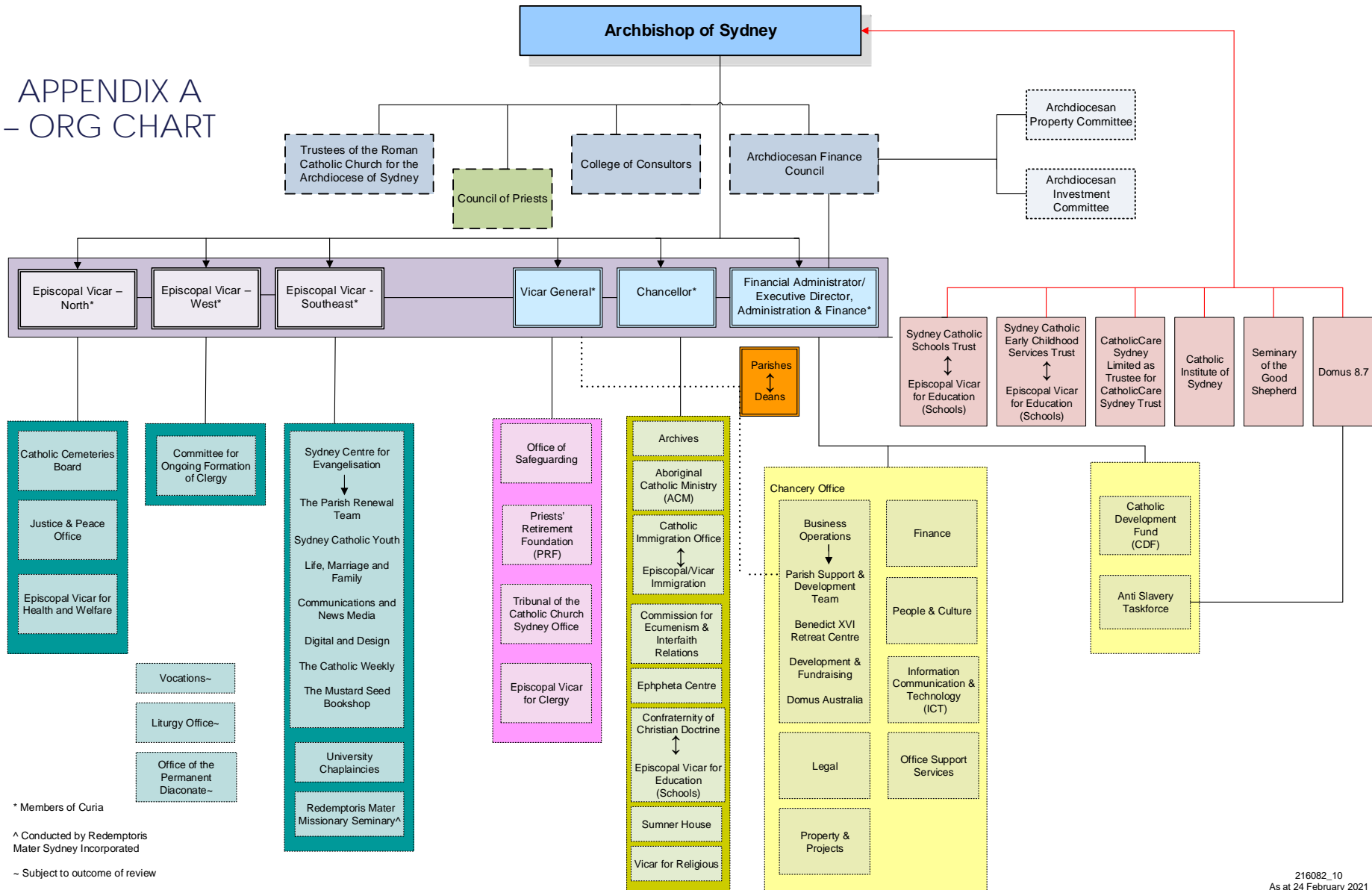
Anti-Slavery Taskforce staff have been appointed to the Australian Government's Modern Slavery Expert Advisory Group (EAG) which brings together key experts with practical knowledge and expertise in combating modern slavery.

The Anti-Slavery Taskforce is a participant in the National Roundtable on Human Trafficking and Modern Slavery and its staff participated in consultation on the National Action Plan to Combat Modern Slavery 2020-2025 with the Australian Institute of Criminology.



Catholic Archdiocese of Sydney – Organisational Chart

APPENDIX A – ORG CHART



* Members of Curia

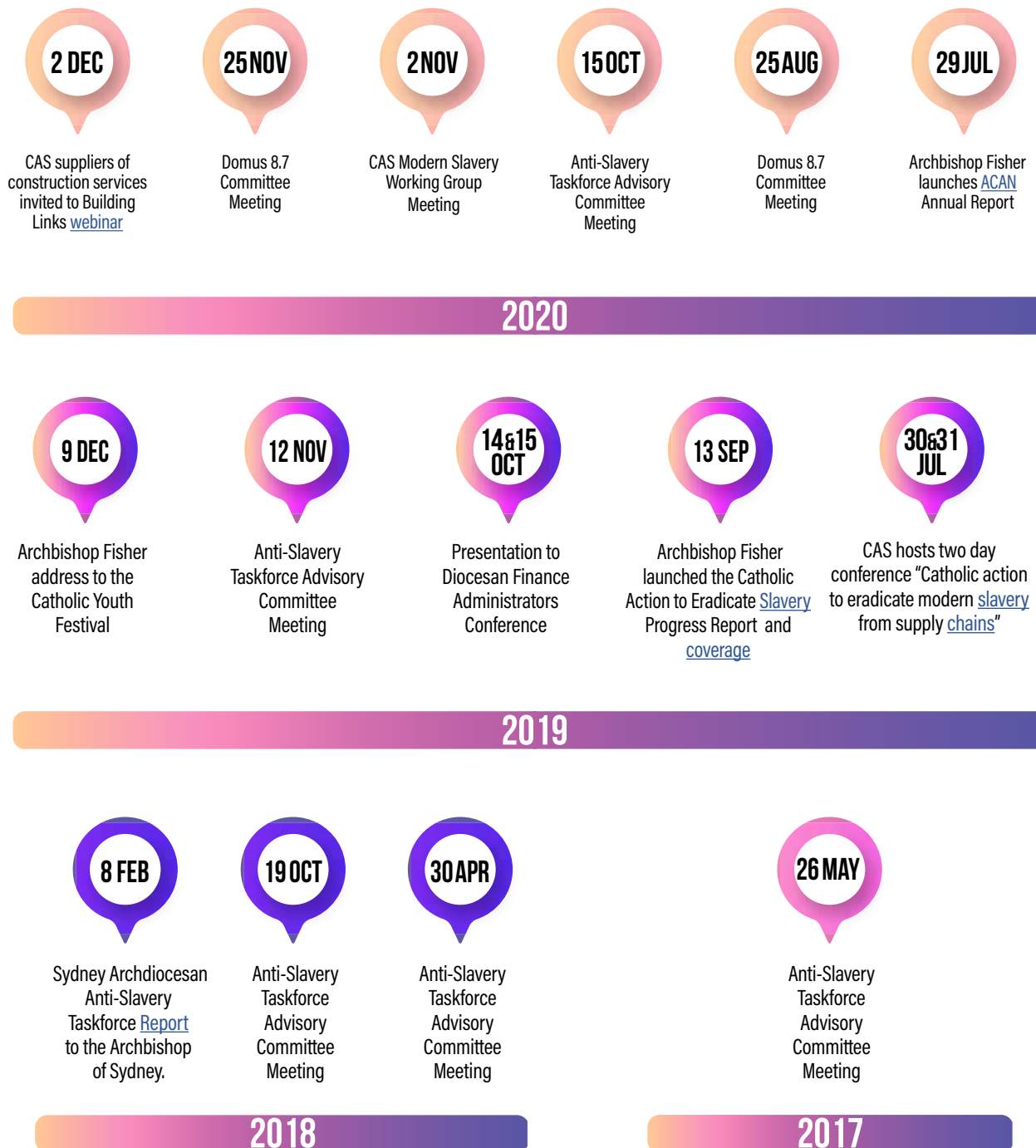
^ Conducted by Redemptoris Mater Sydney Incorporated

- Subject to outcome of review

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As at 24 February 2021



APPENDIX B – TIMELINE OF ANTI-SL



Other actions: Policies implemented, MSWG meetings, Templates rolled out, Training Rolled out, 8 MSLO meetings in 2020, CAS Working group meetings



EVERY ACTIONS AND MILESTONES



2020



2019



APPENDIX C – CAS Guide to Business Practice

Catholic Archdiocese of Sydney Guide for Business Practice

Working with the Catholic Archdiocese of Sydney

A business partner or supplier of the Catholic Archdiocese of Sydney (the Archdiocese) is one of a limited number of organisations identified for their unique contribution of products and services, and for their support of the many community based programs conducted by the Archdiocese and its agencies.

The Archdiocese welcomes the involvement of business organisations and individuals whose commercial activities are consistent with the teaching of the Catholic Church and who share our commitment to good ethical standards and social responsibility.

The Archdiocese is committed to transparent operating systems to ensure it is conducting business in an ethical manner. Business partners and suppliers of the Archdiocese are asked to confirm their agreement with the Archdiocese's Guide for Business Practice and their commitment to work within it.

Guide for Business Practice

The Archdiocese supports the following principles for ethical business practice.

Partnership

As a business partner or supplier of the Archdiocese you will be associated with a local community network of 138 parishes, serving almost 600,000 Catholics. It is not expected that partners and suppliers will share Catholic beliefs and teachings on every occasion, but it is important that they appreciate the values of the Catholic community and do not conduct business in a way which:

- is clearly inconsistent with the moral or social teaching of the Catholic Church;

- seeks to promote or benefit from products or practices which are harmful or destructive; and
- is unethical or socially irresponsible in the light of the social teaching of the Catholic Church teaching or best business ethics practice.

This requirement extends to the conduct of other businesses associated with partners and suppliers. It may also apply to past business practice where a partner or supplier continues to endorse historic practices or conduct which contradict these principles.

Openness

The Archdiocese values its business partners and suppliers, and will publicly acknowledge their involvement in the work of the Church and in service to the wider community. In turn, partners and suppliers should be comfortable with the association of their name and brand with the Catholic Church and the Archdiocese.

Ethical Investment Policy

The Archdiocese has in place an Ethical Investment Policy which identifies specific organisations and limits with whom funds can be invested. This Policy is followed to ensure that the Archdiocese will not knowingly invest in any organisation which would be considered "unethical".

The Catholic Archdiocese of Sydney Guide for Business Practice

It is important that the conduct of business by a partner or supplier does nothing which may damage the reputation of the Catholic Church or the Archdiocese. If this issue arises, the Archdiocese may need to publicly disassociate itself from the partner or supplier concerned. The Archdiocese will discuss matters going to the reputation of the Church or the Archdiocese with the partner or supplier concerned before making any such decision.

Business partners and suppliers agree to inform the Archdiocese at the earliest opportunity of any issue



or development which might adversely affect their reputation or image, attract negative media or public attention, or have serious legal implications.

Modern Slavery

The Archdiocese is committed to working with its business partners, suppliers, government and civil society to eradicate modern slavery in all its forms. All workers within our operations and extended supply chains should be treated with dignity, respect, fairness, and should not be subject to harassment, discrimination, wage theft, debt bondage, deceptive recruitment, coercion, forced labour, exploitation, human trafficking, slavery, slavery-like conditions or any inhumane treatment. To best understand and mitigate risks of modern slavery through our operations and supply chains, the Archdiocese will use its best endeavours to strengthen its business partnership and supplier due diligence, implement more robust oversight mechanisms and expectations of our business partners and suppliers and conduct review processes on a regular basis.

Disclosure

Business partners and suppliers of the Archdiocese should use their best endeavours to disclose any business or professional activities or involvements which may be considered unethical, socially irresponsible, or contrary to Catholic social teaching.

In particular, business partners and suppliers should disclose any business activities or involvements which are contrary to the fundamental commitments shared by Catholics to:

- protect the dignity of every individual
- avoid activities which are harmful to people or socially or environmentally destructive;
- defend human rights, including the right to life and the rights to freedom of religion and conscience;
- respect the law and promote justice and fairness, particularly in the workplace and in business dealings;
- strengthen and protect marriage, families and communities; and
- foster responsible and life-giving values, especially among young people.

Application

The Executive Director, Administration & Finance, is responsible for business partnerships and the application of the Guide for Business Practice, which may be amended from time to time.

For any questions concerning business partnerships and the Guide for Business Practice, please contact:

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Catholic Archdiocese
of Sydney